

Manchester City Council Report for Resolution

Report to: Executive - 14 December 2016

Subject: High Speed 2 (HS2) Phase 2 Route Announcement

Report of: The Chief Executive

Purpose of Report

This report summarises the recent announcement of the High Speed 2 (HS2) Phase 2b line of route, from Crewe to Manchester, the West Midlands to Leeds, and the issues that this presents for Greater Manchester. It also informs Members of the work being carried out by Manchester City Council and TfGM to develop a HS2 Growth Strategy for Manchester Piccadilly and Manchester Airport, to ensure that Greater Manchester is best placed to maximise the benefits offered by HS2.

Recommendations:

The Executive is requested to:

1. Note the contents of the HS2 route announcement and the issues raised for the city and Greater Manchester.
 2. Welcome the Government's intention to progress with proposed HS2 Stations at Manchester Piccadilly and Manchester Airport.
 3. Note the work being done to develop a HS2 Growth Strategy for Manchester Piccadilly and Manchester Airport to maximise the benefits of HS2 to the city Greater Manchester.
 4. Agree that a response to the Government's consultation on the Phase 2b line of route be submitted in line with comments set out in Section 4 of the report: and Work with Greater Manchester Combined Authority (GMCA) and partners to ensure that there is a coordinated response to the consultation.
-

Ward Affected:

Ardwick
Baguley
City Centre
Didsbury East
Didsbury West
Fallowfield

Levenshulme
Longsight
Northenden
Rusholme
Withington
Woodhouse Park Ward

Manchester Strategy outcomes	Summary of the contribution to the strategy
<p>A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities</p>	<p>A high-speed line between Manchester, the West Midlands, Crewe and London will support business development in the region. The scheme has the potential to provide a catalyst which can attract further investment into Greater Manchester by creating a new gateway into the regional centre and boost investor confidence in the area. Specifically, the proposals for HS2 stations at Manchester Piccadilly and Manchester Airport provide major opportunities for stimulating economic growth and regeneration in the surrounding areas. This potential is significantly added to by the potential introduction of Northern Powerhouse Rail (NPR) at both these locations.</p>
<p>A highly skilled city: world class and home grown talent sustaining the city's economic success</p>	<p>Development of a high-speed rail network serving the city centre and the Airport, and the regeneration of the Piccadilly area, will provide much needed additional capacity and thus contribute towards the continuing economic growth of the city, providing additional job opportunities, at a range of skill levels, for local residents. As part of the HS2 Growth Strategy, a Greater Manchester High Speed Rail Skills Strategy is being developed, to best enable local residents to access the opportunities created by both the construction of the High Speed rail infrastructure and from the additional investment and regeneration arising from it.</p>
<p>A progressive and equitable city: making a positive contribution by unlocking the potential of our communities</p>	<p>The economic growth brought about by High Speed Rail and the regeneration of the Piccadilly area could help provide additional job opportunities for residents, as well as improved connections to jobs in the city centre and beyond.</p>
<p>A liveable and low carbon city: a destination of choice to live, visit, work</p>	<p>The Manchester Piccadilly HS2 Strategic Regeneration Framework (SRF) provides a vision and framework for the regeneration of the Piccadilly area as a key gateway to the city, with a unique sense of place. This could include the creation of new residential neighbourhoods and significant new public spaces. A masterplan will also be developed for the area around the Airport as part of the HS2 Growth Strategy.</p> <p>HS2 will enable the provision of improved public transport, through the capacity released on the classic rail network and, if aligned with Greater Manchester's plans, integration with other transport</p>

	<p>modes at Manchester Piccadilly and Manchester Airport. This can encourage more public transport journeys and less reliance on cars.</p>
<p>A connected city: world class infrastructure and connectivity to drive growth</p>	<p>HS2, together with NPR and the Northern Hub rail schemes, will bring a step change in rail connectivity both across GM and to the rest of the UK. HS2 and NPR will radically enhance north-south and east-west connectivity between the country's major cities, which will increase labour market accessibility, open up new markets for trade and stimulate economic growth, as well as better connecting people to job opportunities.</p> <p>The city's plans for Manchester Piccadilly and Manchester Airport Station are to provide world-class transport interchanges that can act as gateways to the city and city region.</p>

Full details are in the body of the report, along with any implications for:

Equal Opportunities Policy
Risk Management
Legal Considerations

Financial Consequences – Revenue

This report sets out the arrangements to develop HS2 Growth Strategies for Manchester Piccadilly and Manchester Airport stations. These will underpin the transformational redevelopment of these stations as strategic interchange facilities. Department for Transport has provided a grant of £2.5m (£1.25m per station) via the Greater Manchester LEP (with GMCA as Accountable Body) to cover this work. This will build on the work already carried out from within existing Manchester City Council and TfGM resources to begin development of a HS2 Growth Strategy.

Financial Consequences – Capital

There are no capital implications arising directly from this report.

Contact Officers:

Name: Howard Bernstein
Position: Chief Executive
Telephone: 234 3006
E-mail: h.bernstein@manchester.gov.uk

Name: Pat Bartoli
Position: Head of City Centre Growth & Regeneration
Telephone: 234 3329
Email: p.bartoli@manchester.gov.uk

Background Papers:

High Speed Two: From Crewe to Manchester, the West Midlands to Leeds and Beyond, Command Paper, DfT, November 2016
High Speed Rail: Investing in Britain's Future (Consultation on the route from the West Midlands to Manchester, Leeds and beyond), DfT, July 2013
Report to Executive 15 January 2014 - HS2 Consultation – A City Council Response
Report to Executive 11 September 2013 - High Speed 2 (HS2) Consultation and HS2 Manchester Piccadilly Strategic Regeneration Framework (SRF)
Report to Executive 18 December 2013 - High Speed 2 (HS2) Manchester Piccadilly and Mayfield Strategic Regeneration Framework (SRF) Consultations

1. Introduction

- 1.1 In July 2013, Government launched a public consultation process on the proposed route for Phase 2 of the High Speed 2 (HS2) rail line, which closed on 31 January 2014. The proposed route included proposals for HS2 stations at Manchester Piccadilly and Manchester Airport. Manchester City Council and the Greater Manchester Combined Authority (GMCA) both provided a response to the consultation, following a report to the Executive on 15 January 2014.
- 1.2 As reported in the January 2014 report, our response to the consultation set out the benefits of HS2 to the UK, Manchester and the city region. It outlined the economic opportunity at Manchester Piccadilly and Manchester Airport, and emphasised what needed to be done in order to achieve that opportunity. The key points made in our response included:
- The need to create a station at Manchester Piccadilly that is a fully integrated transport hub, which can actively support the regeneration of the eastern side of the city centre.
 - A strategic approach to transport investment at Piccadilly which leads to the earliest transformation of Piccadilly Station; avoids significant and long term disruption and blight; and promotes investor confidence.
 - Consideration of a revised Station layout at Manchester Airport which would move the HS2 station concourse north, enabling an interchange with an extended Metrolink service (the proposed “Western Loop”) to properly connect the station to the Airport and surrounding communities.
 - Consideration of new highway proposals by Manchester Airport Group and TfGM to avoid adverse impacts on the M56 and local highway network.
 - An approach to funding for the Airport Station that is in line with those for other HS2 airport stations.
 - A request for close working with HS2 Ltd and other stakeholders on a number of technical issues around the construction of the tunnel, tunnel portal and ventilation shafts.
- 1.3 DfT are now moving into preparations for HS2 Phase 2b, covering the route from Crewe to Manchester (Western Leg) and the West Midlands to Leeds (Eastern Leg). On 15 November 2016, DfT published information setting out the Government’s preferred route for Phase 2b of HS2, and launched a consultation on a number of areas where the proposed 2013 route has changed. This report summarises the HS2 preferred route for the Western Leg and the key issues arising from it for the city and Greater Manchester.

2. Background

- 2.1 The January 2014 Executive report set out the transport and economic case for HS2 and the benefits anticipated to arise from it.
- 2.2 Since the consultation on the proposed route, the northern city regions have come together to set out proposals for Northern Powerhouse Rail to provide

transformed rail connectivity across the north of England. This work is being taken forward by Transport for the North (TfN).

- 2.3 The aim of NPR is to link city regions closer together in order to significantly improve productivity across the North to enable it to be a real economic counter-balance to London and the South of England. It is the combination of the major capacity benefits brought about by HS2, and the local connectivity brought about by NPR, which will deliver maximum benefits and, crucially, the opportunity to rebalance the UK economy.
- 2.4 To achieve these transformational benefits, it is fundamental that both HS2 and NPR are planned and sequenced in an integrated way, and this requirement is particularly important at Piccadilly Station, which is expected to be a major hub for NPR, and where a number of different transport investments are planned over the coming years. This was one of the main conclusions of the National Infrastructure Committee (NIC) in their March 2016 report on High Speed Rail in the North, and it is important that work is driven forward on this basis. As a result, Manchester City Council, TfGM and TfN are working with DfT, Network Rail and HS2 Ltd to prepare, by the end of 2017, a single integrated strategy that supports NPR. Further details on this issue are set out below.
- 2.5 The NIC recommended that proposals for the redevelopment of Manchester Piccadilly should be prepared jointly by TfN, TfGM, Manchester City Council, Network Rail, DfT and HS2 Ltd. The report also supports our view that Piccadilly Station for a long term transformation of the station, effectively integrating HS2, NPR and other transport investment, in order to operate effectively as a focal point in the NPR network and unlock significant regeneration and commercial development.
- 2.6 As reported to the Executive in September and December 2013, an initial Strategic Regeneration Framework (SRF) has been developed for the area surrounding Piccadilly station (the HS2 Manchester Piccadilly SRF), in order to fully capture the opportunities and benefits presented by HS2 and other proposed transport investment. This proposes significant improvements in the vicinity of the station and also sets out our preferred options for the design and functionality of the station itself. The ambition for Piccadilly Station, set out within the SRF, is for a fully integrated, multi-modal transport hub at Piccadilly, explicitly designed to maximise productivity and growth.
- 2.7 The SRF will be revised as Part of the HS2 Growth Strategy work to reflect current HS2 and NPR developments (please see Section 5). A revised Framework will be brought back to a future meeting of the Executive.

3. The HS2 Phase 2b Preferred Route

- 3.1 The Secretary of State for Transport's announcement on 15 November confirmed the majority of the Government's preferred route for Phase 2b of HS2, to complete the full network. Following the 2013 public consultation, HS2 Ltd has recommended a number of refinements to the route, in order to

respond to issues raised through the consultation, as well as other factors. Government have launched a consultation on seven areas where the proposed refinements are considered to be substantial. The consultation runs until 9 March 2017, with a decision expected later in 2017.

The Western Leg – Crewe – Manchester

- 3.2 The Western Leg will provide new stations at Manchester Piccadilly and Manchester Airport and a connection to the West Coast Main Line at Golborne (close to Crewe). The preferred route and stations are confirmed, except for three proposals which the Government is consulting on, two of which impact on Greater Manchester:
- Moving the proposed rolling stock depot at Golborne to a site north of Crewe.
 - Changing the alignment on the approach to Manchester Piccadilly station so that it runs to the east of West Gorton.

Manchester Piccadilly

- 3.3 HS2 Ltd have currently only carried out limited design work on the Phase 2b stations, with further design development to be carried out in preparation for the hybrid Bill (please see Section 8). The current proposal is for the HS2 station at Manchester Piccadilly to be constructed alongside the existing main line station, not integrated within it as set out in our consultation response. The HS2 platforms will be parallel with, and alongside, platform 1. The platforms will be elevated with HS2 concourse facilities located at ground level. Further, more detailed, work is needed to consider how development of the plans for Piccadilly can work with Northern Powerhouse Rail.

Manchester Airport

- 3.4 The station at Manchester Airport will have two platforms and two tracks for non-stopping trains. The proposed location for the station is west of, and parallel, to the M56. The report accompanying the route announcement states that development of the station remains subject to agreeing an “appropriate local funding contribution” and commits to working with GMCA and other partners to determine this.
- 3.5 The Western Leg will also enable onward connections to Liverpool, the North West and Scotland via the West Coast Main Line.

Other Issues

- 3.6 As part of the route announcement, the DfT have issued safeguarding directions for the preferred Phase 2b route, which protects the preferred route from conflicting development. This means that the Department must be informed of planning applications within a zone around the route. They are also consulting on property compensation and assistance schemes for owner-occupiers within the safeguarding area, which could affect property owners in

Manchester. If confirmed, the schemes will be in place until one year after the railway is fully operational.

4. Key Issues for Greater Manchester

- 4.1 The City Council and GMCA are generally supportive of HS2 and the provision of stations at Manchester Piccadilly and Manchester Airport, due to the significant economic, transport and regeneration benefits that can be delivered. However, there are a number of issues within the Phase 2b route announcement on which we have major concerns and which we strongly feel do not reflect our response to the 2013 consultation. As a result it is proposed that both the City Council and GMCA respond to the consultation on the preferred Phase 2b line of route. These issues are set out below.

Stations Refinements

- 4.2 **Manchester Airport Station** has been relocated and redesigned to optimise the use of land between the railway and M56, specifically relocating the multistorey car park here. MCC and TfGM have been disappointed that our response to the 2013 consultation was not fully incorporated in terms of location and design, and further urgent work is underway to ensure the concourse arrangements are properly integrated with highways and future Metrolink extensions, and properly connected to the Airport.
- 4.3 DfT and HS2 Ltd continue to press GMCA for a commitment to fund a proportion of the airport stations costs. Senior level discussions have agreed that urgent partnership working on the airport station design is required to agree a suitable design and appropriate local contributions.
- 4.4 The design of **Manchester Piccadilly Station** has seen little change since 2013, and, again the GMCA and MCC request at consultation for a fully integrated station has not been adopted: currently the proposed HS2 station is a separate station located alongside the existing Piccadilly Station. The Station is also not in the optimal location to allow connectivity to the city centre. We have been assured by HS2 Ltd that as hybrid Bill design progresses (and Northern Powerhouse Rail progresses) the detailed work to move the station forward to properly integrate the design with existing station / other transport modes will be reconsidered.
- 4.5 We need to ensure that the NIC recommendation is fully taken on board, and a single strategy is developed for Piccadilly Station, which addresses the inter-dependencies between the different investments planned at Piccadilly and avoids a silo based approach. This is essential to avoid the delivery of two separate HS2 and NPR/classic rail stations at Piccadilly, delivered over a period of years, which would not provide the scale of benefits required, whilst also blighting the area for a prolonged period. Only a fully integrated approach can deliver not just a single multi-modal transport interchange, but a facility which can become the core of a major regeneration strategy that transforms the Piccadilly area, bringing significant job creation and economic activity.

- 4.6 The suggestion that at least 50% of the costs of a single Piccadilly Station should be met from local contributions, made in the Government's response to the NIC report, also needs to be further challenged. This has not been possible to achieve even in London at Euston Station. The funding options for the Station need to be developed as part of an integrated approach to design and delivery.
- 4.7 There now appears to be agreement with Government that an integrated strategy should be pursued at Piccadilly and intensive work will now be undertaken by TfGM and Council officers, working with HS2 Ltd, DfT, TfN and Network Rail, to review options and develop the most cost efficient way in delivering this strategy. This work (overseen by the Piccadilly Station Joint Board, made up of senior representatives from Network Rail, Manchester City Council, TfGM, HS2 Ltd, DfT and TfN) will also consider the costs of, and benefits from, the project, and, crucially, the value capture options that can arise from the increased land and tax values brought about by it. This will be the basis of the Manchester Piccadilly Growth Strategy and can help address the issue of the appropriate level of local contributions to the cost of the station.

Northern Powerhouse Rail (NPR)

- 4.8 As indicated above, it is important that at points where NPR interacts with HS2, including the potential shared use of the HS2 network at and between Manchester Piccadilly and Manchester Airport, that suitable provisions are made within the HS2 Phase 2b hybrid Bill to accommodate these, particularly at Manchester Piccadilly.
- 4.9 The **Manchester tunnel (from the Airport to Piccadilly) and Piccadilly station approach** has moved approximately 300m east since the consultation design. This new design sees the tunnel portal located in the Ardwick rolling stock depot taking a direct line to the station location rather than hugging the existing railway. This amendment reduces the impact on the West Gorton area, and reduces flood risk and engineering issues. It also significantly impacts on the land available for regeneration around Piccadilly as set out within the HS2 Piccadilly Strategic Regeneration Framework (SRF). It further isolates a triangle of land between the HS2 line and the classic rail land that is compromised for development.
- 4.10 Further work is underway to understand the implications of this, but initial work suggests that it has a detrimental impact on the existing SRF, with a loss of floorspace of around 13% on that envisaged; loss of part of the proposed boulevard and park; and a reduced townscape. These impacts need to be further examined, along with what actions may be available to minimise them.
- 4.11 The implications for construction of the tunnel, and the location and design of the four ventilation shafts proposed also need to be considered. The method of tunnel construction has yet to be determined and it is likely that additional land will be required at both the northern and southern ends to facilitate construction, which could sterilize the land for a number of years. The

proposed location of the ventilation shafts are marked on the route maps which accompany the route announcement. The amenity impact of the ventilation shafts will need to be addressed.

Golborne and Rolling Stock Depot

- 4.12 The Rolling Stock Depot proposed at Golborne during consultation has been relocated to the north of Crewe. Relocating the depot has also led to the removal of the 'northern chord', which HS2 Ltd originally designed to allow empty rolling stock to run from Manchester Piccadilly to and from the depot. MCC and TfGM would like to see the infrastructure retained to future proof for potential services from Manchester to Scotland. In addition, the Northern Powerhouse options indicate a strong preference to use the chord.
- 4.13 HS2 Ltd have confirmed that it could be possible to develop an alternative route option including the northern chord, alongside the preferred route, and that the final decision will need to be taken in advance of the hybrid bill submission in Autumn 2017.

5. Greater Manchester High Speed Rail Growth Strategy

- 5.1 At Budget 2016, Government announced it would allocate £2.5m of funding to take forward work on the HS2 Growth Strategies for Manchester Piccadilly and Manchester Airport stations (£1.25m per station). The development of growth strategies for both Piccadilly and Manchester Airport will underpin the transformational redevelopment of these stations, as strategic interchange facilities between HS2, Northern Powerhouse Rail, local transport and intercontinental air connections, and will be fundamental components in achieving shared objectives for the delivery of a Northern Powerhouse. The final Growth Strategy is due to be submitted to Government in September 2017.
- 5.2 The HS2 Growth Strategy for each station will comprise:
- 1) A public-facing document which sets out the local vision, the strategic case for intervention, the programme of investment required and in broad terms the benefits/outcomes that investment will deliver.
 - 2) A supporting business case to Government.
 - 3) A Regeneration and Connectivity Plan, which will include:
 - Evidence-based assessment of the development and regeneration potential of the area; and
 - The required local infrastructure to achieve this potential.
 - 4) An Implementation Plan, which will include:
 - How the HS2 Growth Strategy will be delivered in the short-medium (up to 5 years) and longer (5 years plus) term; and

- A prioritised programme of projects and their milestones; indicators for tracking delivery; and the role and remit of local governance and delivery structures.

6. Timescale and Next Steps

- 6.1 The Government is due to make a decision on the areas of Phase 2b where they are consulting during 2017 as follows and deposit a hybrid Bill for Phase 2b by the end of 2019. They are also planning to produce a single integrated strategy for HS2, NPR and local transport improvement by the end of 2017.
- 6.2 It is proposed that Manchester City Council and GMCA responds to the consultation on the changes to the Phase 2b route, with TfGM and MCC leading on the draft GMCA response, as was done with the previous 2014 consultation response to HS2 Phase 2b. A briefing note on the Phase 2b route announcement is due to be presented to the GMCA in December 2016, and the draft consultation response will be reported in February, prior to submission of the response for the deadline of 9 March 2017.
- 6.3 The City Council and TfGM will continue to work with other partners to develop and finalise the Growth Strategy for Manchester Piccadilly and Manchester Airport in line with the timetable set out in section 5.2. We will also continue to work with Government on the designs of stations, and other route issues, as the hybrid Bill process and the plans for NPR progress, in order to ensure the optimal solution at each station.

7. Contributing to the Manchester Strategy

(a) A thriving and sustainable city

- 7.1 A high-speed line between Manchester, the West Midlands, Crewe and London will support business development in the region. The scheme has the potential to provide a catalyst which can attract further investment into Greater Manchester by creating a new gateway into the regional centre and boost investor confidence in the area. HS2 and NPR can greatly improve business connectivity and productivity, allowing businesses in the city region better access to markets, labour, skills and customers
- 7.2 Specifically, the proposals for HS2 stations at Manchester Piccadilly and Manchester Airport provide major opportunities for stimulating economic growth and regeneration in the surrounding areas. This potential is significantly added to by the potential introduction of Northern Powerhouse Rail (NPR) at both these locations.
- 7.3 A Strategic Regeneration Framework (SRF) has been developed for Manchester Piccadilly, and HS2 Growth Strategies are also being developed for Piccadilly and Manchester Airport, in order to ensure that the city region can maximise the benefits from investment in High Speed Rail. As outlined in Section 5.6, the SRF will be revised to reflect current HS2 and NPR developments.

(b) A highly skilled city

- 7.4 Development of a high-speed rail network serving the city centre and the Airport, and the regeneration of the Piccadilly area, will provide much needed additional capacity and thus contribute towards the continuing economic growth of the city, providing additional job opportunities, at a range of skill levels, for local residents.
- 7.5 As part of the HS2 Growth Strategy, a Greater Manchester High Speed Rail Skills Strategy is being developed, to best enable local residents to access the opportunities created by both the construction of the High Speed rail infrastructure and from the additional investment and regeneration arising from it.

(c) A progressive and equitable city

- 7.6 The economic growth brought about by High Speed Rail and the regeneration of the Piccadilly area could help provide additional job opportunities for residents, as well as improved connections to jobs in the city centre and beyond.

(d) A liveable and low carbon city

- 7.7 The Manchester Piccadilly HS2 Strategic Regeneration Framework (SRF) provides a vision and framework for the regeneration of the Piccadilly area as a key gateway to the city, with a unique sense of place. This could include the creation of new residential neighbourhoods and significant new public spaces. A masterplan will also be developed for the area around the Airport as part of the HS2 Growth Strategy for the airport.
- 7.8 HS2 will enable the provision of improved public transport, through the capacity released on the classic rail network and, if aligned with Greater Manchester's plans, integration with other transport modes at Manchester Piccadilly and Manchester Airport. This can encourage more public transport journeys and less reliance on cars.

(e) A connected city

- 7.9 HS2, together with NPR and the Northern Hub rail schemes, will bring a step change in rail connectivity both across GM and to the rest of the UK. HS2 and NPR will radically enhance north-south and east-west connectivity between the country's major cities, which will increase labour market accessibility, open up new markets for trade and stimulate economic growth, as well as better connecting people to job opportunities.
- 7.10 Greater Manchester's plans for Manchester Piccadilly and Manchester Airport Station are to provide world-class transport interchanges that can act as gateways to the city and city region.

- 7.11 Manchester Piccadilly is already well connected by public transport. The arrival of HS2, NPR and other planned investment will, if fully integrated, transform Piccadilly into the most intensive strategic transport interchange in the North, providing unrivalled connectivity to businesses and employment opportunities in the city centre, GM and across the North and the UK.
- 7.12 HS2 and NPR proposals will transform rail connectivity to Manchester Airport from across the North of England and the UK, unlocking new jobs and productivity growth. More frequent and faster rail services will help to increase the effective population catchment area of the Airport, supporting the case for introducing new inter-continental trade routes, and thereby boosting the economic potential of the North of England.

8. Key Policies and Considerations

(a) Equal Opportunities

- 8.1 HS2 and NPR are anticipated to provide additional job opportunities available to local residents and improved transport connections to those opportunities. A GM High Speed Rail Skills Strategy is being developed to ensure that residents are best placed to access the jobs created.

(b) Risk Management

- 8.2 MCC and TfGM will work closely with Government and TfGM to minimise risks arising from the design and delivery of HS2 and NPR.

(c) Legal Considerations

- 8.3 As part of the technical information gathering exercise for the Environmental Impact Assessment for the hybrid Bill, HS2 Ltd will be requesting that MCC enter into a Memorandum of Understanding. This will enable staff to be reimbursed for the time spent on data gathering requested by HS2.

9. Conclusions

- 9.1. HS2 has the potential to provide significant rail capacity and economic growth benefits to Manchester and the city region. Greater Manchester supports HS2 Phase 2 and the provision of stations at Manchester Piccadilly and Manchester Airport, and are preparing plans to maximise the benefits that can arise from the arrival HS2 and NPR. However, there are a number of issues with the recently announced preferred Phase 2b line of route, to which it is proposed that Manchester City Council and the GMCA provide a response as part of the current consultation process. The City Council and TfGM will also continue to work with Government and TfN on these issues.
- 9.2. Detailed recommendations appear at the front of this report.