

HS2

High Speed Rail – Phase 2b

(Crewe to Manchester and West Midlands to Leeds)

Design Refinement Consultation

Response of Manchester City Council

September 2019



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Appendix 1: WDES Response of Manchester City Council 2018

Appendix 2: WDES Response of Greater Manchester Combined Authority (GMCA) 2018

NB DUE TO SIZE THE APPENDICES WILL BE AVAILABLE TO MEMBERS ON REQUEST



1.0 Introduction

- 1.1 This paper sets out the response of Manchester City Council (MCC) to HS2 Ltd.'s High Speed Two: Phase 2b: Design Refinement Consultation (DRC). This response fully supports, and is aligned with, the response made by the Greater Manchester Combined Authority (GMCA).
- 1.2 The response also re-provides HS2 Ltd. with a summary of the main issues to which the City continues to seek resolution, as set out in previous consultation responses, and which MCC expect further engagement on.
- 1.3 Issues relating to the relocation of the two Manchester vent shafts are outlined in this document, along with the need for appropriate mitigation by HS2 Ltd. The response also provides support to GMCA's response on issues regarding High Legh also included in the DRC, and covers comments relating to the safeguarding area, which HS2 Ltd. are consulting on alongside the DRC.
- 1.4 In response to HS2 Ltd.'s Design Refinement Consultation, Manchester City Council (MCC) welcome the opportunity to comment on the relocation of the two ventilation shafts and associated infrastructure situated at Palatine Road and Lytham Road, following MCC's response to HS2 Ltd.'s Working Draft Environmental Statement (WDES). The proposals to relocate these two vent shafts are welcomed. However, there are issues associated with the proposed locations, which HS2 need to address. MCC also expect appropriate mitigation measures related to this infrastructure to be developed by HS2 Ltd., in collaboration with stakeholders.
- 1.5 Although the opportunity to comment on the Design Refinement Consultation (DRC) is welcomed, MCC is disappointed in the limited scope of this consultation, and expect future consultations that include more detailed information for the line of route and the design of stations. It would be useful for HS2 Ltd. to share the timescale and content for future consultations in relation to the hybrid Bill process.
- 1.6 We are also disappointed that the information to be included in the full Environmental Statement (ES), which will be part of the hybrid Bill, and will provide detail on the likely significant environmental effects of HS2 in different areas along the Phase 2b route, will not be made available to the Council prior to its publication.

2.0 The Opportunity from HS2 & Northern Powerhouse Rail (NPR)

2.1 HS2 and NPR offer considerable opportunities for economic growth in Greater Manchester (GM) and the North. The schemes have significant potential to benefit the wider agenda for rebalancing the economy in the UK. It is essential that the growth opportunities and benefits afforded by HS2 and NPR are maximised.



- 2.2 MCC welcomes and fully supports the Government's intention to progress with the proposed HS2 Phase 2b extension from Crewe to Manchester and the West Midlands to Leeds. MCC also welcome the Government's consideration of the case for Northern Powerhouse Rail (NPR) to improve capacity, reliability and frequency of services.
- 2.3 MCC endorses the identified station locations at Manchester Piccadilly and Manchester Airport, and welcomes the opportunity to work with HS2 Ltd. and partners to develop these plans to ensure they are integrated with our aspirations for the City and to capitalise on the economic stimulus of the airport and its growth.

3.0 Response Context

- 3.1 This response should be considered in the context of other MCC and GM strategies, in particular the GM HS2 Growth Strategy; 'The stops are just the start' (2018). MCC, along with the GMCA and Trafford Council with input from Manchester Airport Group (MAG), published this comprehensive Growth Strategy for the stations at Manchester Airport and Manchester Piccadilly. The Growth Strategy sets out how HS2 can have maximum impact through station planning; wider connectivity; full support for committed and new economic and residential growth and regeneration; and local skills and supply chain benefits.
- 3.2 MCC has previously responded to the two HS2 Phase 2b line of route consultations, submitted in 2014 and 2017; and Working Draft Environmental Statement in 2018 (Appendix 1 NB Due to size, appendices are available to Members on request); and to ongoing design work, which has raised a number of issues that HS2 has yet to address. These points are set out in Section 4.
- 3.3 This response to the Design Refinement Consultation builds on and should take account of, MCC's and GMCA's responses to HS2 Ltd.'s Working Draft Environmental Statement (WDES) (Appendices 1 and 2).
- 3.4 The MCC response to the Design Refinement Consultation also fully supports, and should be read alongside, the GMCA consultation response. The issues outlined in this response align with Manchester City Council's views, including comments on the relocation and realignment of the vent shafts and on the revised safeguarding boundaries, new scope and new infrastructure.

4.0 Overarching Comments on Key Issues

4.1 Manchester City Council, alongside the Greater Manchester Partners, continue to facilitate ongoing dialogue with HS2 Ltd. on the issues raised through previous consultations and ongoing design discussions. We welcome opportunities to work collaboratively with HS2 Ltd. on key issues and progress is being made in some areas. However, a range of aspects of the HS2 Phase 2b scheme remain a cause of significant concern for the City and GM partners, as outlined below.



- 4.2 It is essential that HS2 Ltd. take into account the growth context and principles contained within the range of local and regional strategies and policies in the final design and delivery proposals for Manchester Piccadilly and Manchester Airport Stations, and the line of route within Manchester. Previous responses have requested HS2 Ltd. develop schemes in line with Manchester and GM strategies and policies, to realise regeneration opportunities, and providing the right scheme for users and the future. These strategies include, but are not limited to:
 - Greater Manchester Strategy (GMS)
 - Greater Manchester Transport Strategy 2040
 - Manchester Piccadilly Strategic Regeneration Framework (SRF)
 - GM HS2 and Northern Powerhouse Rail Growth Strategy: the stops are just the start
 - Manchester Airport and the Airport City Masterplans
- 4.3 MCC has raised a number of specific issues in our previous responses, which need to be fully addressed in the final scheme designs and within the formal Environmental Statement (ES). The WDES does not provide sufficient information to fully understand or comment on the impacts of the scheme and the proposed mitigation. There are a number of areas where it is crucial HS2 Ltd. fully engages with MCC to inform the design, minimise impacts and inform the formal Environmental Statement, ahead of hybrid Bill submission. We are disappointed that HS2 Ltd. have not provided a formal response to our WDES submission and are not proposing to formally consult on the content of the final Environmental Statement until the submission of the hybrid Bill.

Station Design & Urban Integration

- 4.4 It is imperative to create a station at Manchester Piccadilly that is a world class, fully integrated transport hub, which is connected to the city centre, which can actively maximise the economic growth and regeneration benefits to the city, in line with the Piccadilly Strategic Regeneration Framework 2018 (SRF) and GM HS2 Growth Strategy.
- 4.5 A strategic approach to transport investment at Piccadilly is needed, which supports the transformation of Piccadilly Station at the earliest opportunity to maximise regeneration benefits; avoid significant and long term disruption and blight; and promote investor confidence. In other words, a 'Build it Once, Build it Right' approach.
- 4.6 The fully integrated station included in the Piccadilly SRF and Growth Strategy requires the removal of Gateway House, in order to provide an appropriate station entrance, which allows the station to properly connect into the city centre, and accommodate the significant anticipated increase in passengers and users. HS2 Ltd. should consider this solution as part of an optimum station design. MCC wish to seek agreement with HS2 Ltd. that Gateway House will be removed as part of the station delivery.



- 4.7 The proposed inclusion of two multi-storey car parks at Piccadilly, next to a major transport interchange is refuted. The size, location and access of the proposed multi-storey car parks are not in accordance with the approved Piccadilly SRF and are not commensurate with the approach taken with other key city centre transport hubs, for example at London Euston, or within local transport policy in the City Centre Transport Strategy (which is currently being refreshed) and the GM Transport Strategy 2040 which seeks to encourage modal shift and minimise car trips into the city centre.
- 4.8 It is also imperative the Manchester Airport station is a fully integrated station solution and that the impact on surrounding communities and environment is minimised and fully mitigated. HS2 Ltd. need to be fair and consistent in their funding strategy for the Airport Station, so that it is in line with other HS2 airport stations. A local funding contribution can only be considered in the context of a fair and consistent approach.
- 4.9 The design of both station schemes, including public realm, should ensure that they are of the highest exemplary architectural design quality, to create a world class facility; respond positively to their context; and be in line with existing regeneration frameworks. The designs should be fully integrated into the existing environment and create destinations of distinction.

Highways

- 4.10 A credible highways design at Pin Mill Brow is needed, with full technical evidence of demand modelling, and this must take account of the impact on the wider highway network. This should be aligned with the City's transport policies and approach to journeys in and around the city centre. The scheme needs to ensure connectivity to sites of major development including Mayfield; allow for future growth; and meet MCC's and GMCA's aspirations for reducing traffic in the city centre, which is also essential in order to respond to the current climate state of emergency.
- 4.11 Highways proposals must also avoid adverse impacts on the M56, its junctions and the local highway network surrounding Manchester Airport. Inadequate solutions have been provided on: how the proposed Manchester Airport station can be accessed from the M56; what the implications are for Junction 5 and 6 of the M56 (during construction and operation) and other strategic routes; and the impact on airport operations and accessibility. The M56 junction capacity should take account of HS2 and NPR demand, as well as further economic growth, to avoid a significant impact on the strategic road network due to a lack of proper planning for forecast future demand.
- 4.12 Dialogue is ongoing between Manchester City Council, TfGM, Highways England and HS2 Ltd. to agree a credible and appropriate highways solution for Pin Mill Brow; a commensurate parking solutions at Piccadilly; and solutions for the M56 and the surrounding road network.



4.13 HS2 Ltd. states that the assessment of significant effects in relation to traffic and transport during construction of the proposed scheme will be reported in the formal ES. Appropriate mitigation measures should be agreed with the City Council in advance of the final ES and hybrid Bill submission.

Construction, Traffic and Transport

- 4.14 More information on the construction programme and phasing is needed, to understand the relevant construction dates for each section of works and the likely duration of construction impacts. This needs to be developed in conjunction with MCC and GM partners and in consideration of other development, highways works and infrastructure projects within Manchester and Trafford, to allow timescales of work to be properly sequenced; to avoid extended blight; and to make efficient use of resources.
- 4.15 Proposals must protect the operation and future growth of Manchester Airport in relation to traffic and access during both the construction and operational phases. It is also essential the City centre continues to function through construction works and that any blight is minimised.
- 5.0 Overarching Technical Comments on the Relocation of Ventilation Shafts (Community area: MA07 | Davenport Green to Ardwick)
- 5.1 There are likely to be considerable vehicular movements arising from the transporting of materials to and from the ventilation shaft sites, associated with the construction process. HS2 Ltd. needs to provide detailed information on the logistics and removal process; the anticipated effects of construction on the local highway network and residential areas; the proposed temporary and permanent access to the vent shafts/head house; and construction compounds. Full details, impact assessments, and appropriate mitigation measures should be agreed with MCC, and other appropriate statutory bodies, in advance of the hybrid Bill submission.
- 5.2 The final design of the head house and auto transformer station at the proposed sites is a key issue. It is important that MCC is engaged in early and detailed discussions over the designs of these new structures to minimise their impact on local communities, ensuring they are in keeping with the local context and surroundings. The vent shafts need to be of the highest quality, and sufficient planting and landscaping should be used in the area surrounding the vent shaft and associated infrastructure for mitigation of any visual impact. The final design of the head house will need to be agreed by MCC, as the local planning authority. The City Council will need to be involved the detailed design of the vent shafts.
- 5.3 MCC have previously raised concerns in our response to the WDES about the lack of clarity on the impact of the vent shafts, including on air pollution. The documents and plans provided in this consultation do not contain enough information to ascertain environmental health impacts. These issues are of major concern to the Council, and it is extremely disappointing that it is not possible for us to properly consider the issues around contaminated land, air quality,



pollution, noise and vibration issues at this stage, due to the level of detail available. MCC demand that information on the impact of the vent shafts is provided in advance of the ES, so that we can make a proper assessment and respond appropriately.

6.0 Relocation of the Lytham Road vent shaft to Birchfield's Road, Fallowfield, Manchester

- 6.1 MCC were opposed to the original location of the vent shaft in the WDES at Lytham Road, situated on the site of the Manchester Enterprise Academy; (MEA) Central. HS2 Ltd. are subsequently proposing an alternative location at Fallowfield Retail Park.
- 6.2 We welcome the fact that the vent shaft is now situated away from the site of the newly built MEA Central, reducing its impact on the school. The point of access to the site is no longer using Lytham Road and has changed to Birchfield's Road, resulting in traffic accessing the site further away from the school. The change of access to the site also reduces the impact on Lytham Road residents. However, the Council are opposed to HS2 Ltd. locating the vent shaft on Fallowfield Retail Park for the following reasons.

Key issues

- 6.3 Fallowfield Retail Park is 48,300 sq ft and currently has a 5,979 sq ft unit to let. The retail park provides a supermarket, shops and a medical practice to the local community. The area surrounding the retail park is characterised by residential development, two schools and University of Manchester sports fields.
- 6.4 There would be a loss of car parking spaces used by Birchfield's Primary School (situated on Fallowfield Retail Park) to access the back entrance of the site for drop off/pick up and spaces that may be used by MEA Central as part of a 'Park and Stride' agreement.
- 6.5 Birchfield's Primary School currently has 245 pupils with capacity for 262 pupils. Manchester Enterprise Academy opened in 2017 and currently has 245 pupils, with capacity for 1,050 when all year groups are enrolled. Both schools will attract vehicle trips for pupil drop off and pick-ups. Without use of the retail park spaces, an increased number of vehicles could use local residential streets to park, including Lytham Road. The pressure on the flow of traffic and parking spaces may increase at peak times as MEA Central becomes fully occupied in future. Another concern is the potential for increased air pollution outside the school. Therefore the permanent loss of these parking spaces on Fallowfield Retail Park would have a negative impact on the area.
- 6.6 MCC are concerned about the loss of local retail facilities for residents and school parking, and the resulting impact on the local community. The proposed location would see demolition of three retail units at the northern end of the retail park, subject to detailed design development, and a loss of approximately 100 car parking spaces. The impact on the retail park, and the businesses located, there



will be significant, both temporarily during construction, and permanently from the loss of retail space and parking, leading to a loss in jobs. A reduction in businesses trading on the retail park would impact the local community using them, especially people who rely on these facilities, including those needing to access shops within walking distance.

- 6.7 We are also concerned about the potential impact on the local health facility, which is proposed for relocation to one of the units on the retail park, requiring investment by Manchester Health and Care Commissioning (MHCC). HS2 Ltd. needs to engage with MHCC to clarify if there will be an impact on this medical practice, and if so, how this will be managed, in terms of timescale, decision making, and financial reimbursements of costs incurred in relocation.
- 6.8 The Council have requested, and continue to request, further information on the other locations considered and rejected, and the reasons why the retail park was selected as the preferred location.
- 6.9 As well as nearby schools, some residential properties on Birchfield's Road may be impacted and experience potential noise and vibration issues given their proximity to the site. The proposed alternative location has moved closer to residential properties on Birchfield's Road. There is not enough detail provided by HS2 Ltd. in the WDES or Design Refinement Consultation to comment further on this impact.
- 6.10 There will be a temporary impact on residents in close proximity to the site during the construction works associated with traffic, vehicle movement and machinery. The loss of car parking spaces, along with increased traffic during construction, could result in increased pressure on local residential streets, including Lytham Road.
- 6.11 Residential properties on the western side of Birchfield's Road will also experience a permanent visual impact when the head house is placed.
- 6.12 We are requesting that HS2 Ltd. work with the Council to identify alternative sites for locating the vent shaft. HS2 Ltd. need to undertake further investigations on alternative sites, including the garage opposite the retail park, and car repair site by the Birchfield's Road roundabout, and explore whether there are other options in the vicinity.
- 6.13 A residents association and the three local Ward Councillors have also raised significant concerns on the proposed relocation of the Lytham Road vent shaft. This is the first opportunity that local residents and Councillors have had to comment on these proposals. Their concerns reflect the issues raised above, including the impact on the local retail facilities; loss of local jobs; the loss of the school parking spaces and the resulting impact on pupil safety and traffic congestion; short-term and long term environmental impacts; and the timing of the consultation event. HS2 Ltd. have indicated to us that they are meeting with



the residents association, local Councillors and the local MP to discuss their issues.

- 6.14 HS2 Ltd. are requested to consult appropriately with the local schools, businesses, residents and Councillors; take on board their views; and respond to them appropriately.
- 6.15 The ES will need to detail the potential air quality, noise and vibration issues associated with construction works and the operational phase. HS2 Ltd. must minimise potential noise impacts and any other environmental impacts of the intervention points at vent shafts, particularly in residential areas, and consult fully with local residents on these.
- 6.16 Birchfield's Road is a main arterial route to the City centre so the traffic issues during construction need to be fully understood and mitigated for in the ES, especially at peak times.

7.0 Relocation of the Palatine Road vent shaft, West Didsbury, Manchester

7.1 MCC were opposed to the location in the WDES proposal for Palatine Road vent shaft, situated in the Didsbury Flood Storage Basin. MCC recognise the consultation proposes an alternative location for this vent shaft within Withington Golf Club land, closer to Palatine Road as suggested by the City council in its response to the WDES. Compared to the WDES option the alternative location reduces the impact of land take from the Didsbury Flood Storage Basin, which consequently reduces the land take required for replacement flood storage. The new location has also moved infrastructure further away from residents at Ashfield Lodge which MCC support.

Key issues

- 7.2 There are key issues with the proposed alternative location at Palatine Road. The new location results in the loss of the existing Clubhouse which will be demolished in the current plans, as well as the loss of most of the Clubhouse car park which services the Club, significantly impacting on Withington Golf Club as a business.
- 7.3 The proposed location remains within the flood storage area. In the proposed scheme, excavation will occur for replacement flood storage. Excavation incurs a loss of holes on the surrounding golf courses (permanent loss of part of one hole on Withington Golf Course and temporary loss of four holes at Didsbury Golf Course), impacting on both businesses.
- 7.4 There will be temporary construction and traffic impacts on Palatine Road which could impact surrounding residential areas. These impacts need to be fully understood, detailed in the ES, and mitigated for by HS2 Ltd.



Mitigation

- 7.5 As the proposed location is within the flood storage area, the Environment Agency will be responding to the consultation to advise on any appropriate flood mitigation, and MCC expect HS2 Ltd. to take account of any recommendation made by The Environment Agency.
- 7.6 HS2 Ltd. have informed us that they are meeting with Withington Golf Club to discuss relocation of the Club. HS2 Ltd. are also engaging with Didsbury Golf Club to agree mitigation for the impact on the Golf Course. For both clubs remodelling of the courses may be required to accommodate the construction and operational phase impacts. This should continue to be collaboratively agreed with the businesses impacted.

8.0 Safeguarding

8.1 HS2 Ltd. are also consulting on revised safeguarding maps from HS2 Ltd. MCC understand the safeguarding boundary will change at final hybrid Bill deposit. MCC therefore wish to provide further comment on the revised safeguarding boundary once it is available.

9.0 Summary of GMCA response

- 9.1 The response of Greater Manchester Combined Authority (GMCA) lists the key issues on the Design Refinement Consultation for Greater Manchester. MCC has provided input and is fully supportive of the response. MCC is in agreement with comments made on the realignment, new infrastructure and scope in this response.
- 9.2 The GMCA response notes that HS2 are proposing new infrastructure for a temporary railhead and permanent maintenance facility near Ashley, Cheshire.
- 9.3 At Manchester Airport, MCC and GMCA consider that insufficient emphasis has been placed on the use of rail to remove the spoil from both the cutting approaching the HS2 station, and construction of the tunnel to Manchester Piccadilly.
- 9.4 Further engagement with HS2 is requested to further consider the opportunity for a railhead in this area, in order to help reduce disruption during construction and provide potential long term legacy opportunities.
- 9.5 The GMCA response also notes the provision of the two junctions at High Legh, Cheshire (to provide 'passive provision' for future Northern Powerhouse Rail services between Manchester and Liverpool). MCC and GMCA fully support NPR and the intention to provide improved connectivity across the northern cities. However, from the consultation information provided, GMCA is concerned that the current proposals may preclude the ability to include the 'Northern Chord' as included in the original HS2 Business Case.
- 9.6 GMCA and MCC consider the Northern Chord connection to be vital to provide improved connectivity between the North West and Scotland with Manchester



and the Airport. There is the opportunity to provide faster and greater capacity links from Scotland, Cumbria and Lancashire to Manchester. The current alignment of the proposed HS2 tracks make the future provision of the Northern Chord more complex, increasing cost and necessitating disruptive work to the HS2 network.

- 9.7 It should be noted that the 2014 and 2017 GMCA consultation responses highlighted that Trafford Council raised concerns about the impact of the Northern Chord, and also identified the need for HS2 Ltd. to work closely with GM partners to consider options to mitigate local impacts.
- 9.8 Further engagement with HS2 Ltd. and DfT is requested regarding the potential for the Northern Chord in order to ensure that this can be appropriately considered within the development of the touchpoints for NPR, costs mitigated and the benefits of the potential connectivity provided can be realised.

10.0 Further engagement

- 10.1 MCC and GM partners have requested specific technical discussions with HS2 Ltd. to engage with, and respond to, issues under the WDES topics for specific community areas. Future information on wider topic areas, including route-wide construction, have also been requested. MCC will continue to request specific dialogue with HS2 Ltd. where more detailed information is required, and in advance of the hybrid Bill deposit.
- 10.2 HS2 Ltd. have published a high level report on the consultation responses on the WDES. It is noted the feedback paper summarises respondents' concerns. However, it does not provide any new information, despite comments on the overall lack of information in the WDES. As set out below, this detail needs to be provided to stakeholders in advance of the hybrid Bill submission, and detailed in the full ES. HS2 Ltd. have engaged with MCC and GM partners to provide general feedback on the GMCA WDES response. However, disappointingly, HS2 Ltd. do not provide formal feedback on individual responses, and it remains unclear how our comments will be reflected in the final ES.
- MCC would like to be informed as early as possible on the details of further consultations planned by HS2 Ltd., including consultation on the final design for the stations and any further refinements required to enable future NPR infrastructure. We welcome further engagement on HS2 Ltd.'s plans for future consultations and expect consultation to take place where the design may have an impact on the local environment and communities.
- 10.4 We are disappointed that HS2 Ltd. only plan to share the detailed information at the time when the hybrid Bill is submitted and the full Environmental Statement is published. MCC wishes to continue to work with HS2 Ltd. through the current design phase leading to the Bill deposit, with the aim of achieving the full vision set out in the GM Growth Strategy, and to ensure that all of the issues that we have raised are properly addressed before the hybrid Bill is submitted.



11.0 Conclusion

- 11.1 In all responses over the past six years, MCC and partners have reiterated their support for HS2, and the significant benefits that will arise from having HS2 stations at Manchester Airport and Manchester Piccadilly.
- 11.2 MCC's response to this consultation aligns with the GMCA response and the key issues summarised from previous consultation responses. We are very disappointed that HS2 are not proposing to consult with us on the detail included in the ES prior to the hybrid Bill deposit. The Council need to be able to have proper consultation with our local communities on the expected impact in advance of the publication of the material. MCC reserves the right to comment on the issues included in the ES, and other consultations in future, due to the lack of detail included at the WDES and Design Refinement stage of the project.
- 11.3 MCC supports the relocation of ventilation shafts on Palatine Road and Lytham Road in Manchester. However, there are a number of significant concerns with the proposed alternative location of the Lytham Road vent shaft at Fallowfield Retail Park on Birchfield's Road. In consideration of these concerns, MCC opposes the proposal to relocate the vent shaft at the retail park, and requests alternative sites are identified and assessed. MCC expects mitigation measures to be taken by HS2 Ltd. in relation to the construction and placement of these ventilation shafts in proposed alternative locations.
- 11.4 It is important that MCC are engaged in detailed discussions over the designs of the new stations and associated infrastructure (including vents shafts) to minimise their impact on local communities and ensure seamless integration with their surroundings.
- 11.5 Highway and transport solutions need to be appropriate at both the Airport and Piccadilly; consider the impact on the wider strategic road network; avoid compromising existing, planned or future development; and involve both local stakeholders and Highways England.
- 11.6 MCC ask for early and meaningful engagement with HS2 Ltd. on the final construction, operational and safeguarding boundaries before hybrid Bill submission, and for engagement on the programme for construction, including the impacts associated with traffic, and the mitigation measures to be taken.
- 11.7 In summary, MCC welcome the opportunity to comment on the consultation, but are disappointed that we have not received a response to our previous consultation submissions, and that HS2 are not proposing to consult fully with us prior to the publication of the full ES. We also welcome the opportunity to continue working with HS2 Ltd., DfT, TfN, Network Rail and other partners on the design development of the proposed scheme in advance of hybrid Bill submission. Through this, we hope to be able to achieve the ambition for world class, fully integrated stations with a build it once, build it right approach.