

Leeds City Region Growth Deal

Independent Assessment of Impacts
Growth Deal Rounds 1-3

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Context

Study Brief and approach

Arcadis was commissioned by the West Yorkshire Combined Authority to conduct an independent impact evaluation of the Leeds City Region (LCR) Growth Deal - Rounds 1 to 3. The evaluation seeks to determine the overall effectiveness, impact and value for money achieved of the economic development and regeneration projects within the Growth Deal.

The evaluation team completed desk-based research, interviews with Combined Authority staff and delivered a stakeholder survey primarily aimed at partner Local Authorities.

The impact modelling was completed to HM Treasury Green Book principles and additional Departmental Guidance issued by Government. The Impact Assessment work adopts a sub-national approach and considers the returns to the Leeds City Region economy, assessed in both gross and net terms, based on PIMS tracking evidence and business case expectations.

Leeds City Region

Established in 2005, Leeds City Region (LCR) is the functional economic area made up of the local authority districts of Barnsley, Bradford, Calderdale, Craven, Harrogate, Kirklees, Leeds, Selby, Wakefield, and York. The Combined Authority was established on 1 April 2014 as a strategic authority with devolved powers for transport, economic development, and regeneration. The Leeds City Region Local Enterprise Partnership (the LEP) and the Combined Authority work in partnership together. The Combined Authority is the accountable body for the LEP and is responsible for carrying out the finance functions of the LEP and has oversight of its financial and governance, transparency and accountability arrangements.

Policy Context

- Following the 2008/09 recession the Government had a major focus on stimulating private sector employment.
- When the first Growth Deal submission was made Leeds City Region was the largest economy in England outside London worth £62.5 billion.

- However, Gross Value Added (GVA) per head was 18% lower than the national average and output productivity (£ per hour worked) was 12% lower than the national average.
- The 2014 and 2016 Strategic Economic Plans (SEP) highlight the LEP and Combined Authority's commitment to address Government's policy ambition through four strategic Priorities which will deliver the overall transformative vision to '*be a globally recognised economy where good growth delivers high levels of prosperity, jobs and quality of life for everyone.*'
- Growth Deal delivery has occurred during the Macro-economic climate which includes Brexit, Covid 19 public health emergency & the national climate emergency.



Growth Deal

Leeds City Region LEP and the Combined Authority secured £516 million across three Growth Deal submissions:

- **Submission 1:** completed in December 2013 and formally approved by Government in July 2014, with delivery commencing from 1st April 2015. This submission was based on the original SEP.
- **Submission 2:** completed in November 2014 in response to Government's invitation to LEPs to submit a further, limited set of proposals for projects and programmes that commence in 2016-17.
- **Submission 3:** In September 2016, the Combined Authority submitted the Growth Deal 3 submission. The submission was based on the updated SEP.

Of the total allocation of £516 million, £235.45 million was for economic development schemes with the remaining £280.55 million for transport projects.

Priority	Growth Deal 1	Growth Deal 2	Growth Deal 3	Total
Priority 1	£18,000,000	£21,600,000	£22,450,000	£62,505,000
Priority 2	£74,000,000	£5,000,000	-	£79,000,000
Priority 3	£4,800,000	£8,000,000	-	£12,800,000
Priority 4a	£16,600,000	£20,000,000	£5,000,000	£41,500,000
Priority 4c	-	-	£20,000,000	£20,000,000
Priority 4d	-	-	£20,000,000	£20,000,000
Total	£113,400,000	£54,600,000	£67,450,000	£235,450,000

The Growth Deal investment was directed at the four strategic priorities articulated in the Strategic Economic Plan (SEP):

- Priority 1: Supporting growing businesses;
- Priority 2: Developing a skilled and flexible workforce;
- Priority 3: Building a resource-smart city Region; and,
- Priority 4: Delivering the infrastructure for growth.

The Growth Deal would be crucial to the delivery of the SEP. The deal agreed with Government contained several specific targets to be achieved by March 2025. All these targets are gross and do not require allowance to be made for deadweight, leakage, displacement and substitution:

- 19,595 new jobs created.
- 2,300 new homes; and,
- £1,031 million of additional investment levered from local partners and the private sector.

As highlighted earlier, this evaluation is focused exclusively on the £235.45 million of economic development projects. It is worth noting that the £280.55 invested in transport schemes will deliver Growth Deal outputs, and individual transport schemes have helped unlocked housing and commercial sites that were supported within the allocation of £235.45 million for economic development schemes.

The Impact of the Programme and Priorities

The impact from the Growth Deal has been presented at the Growth Deal programme level (across the 3 rounds of the LCR Growth Deal) as a whole and for the individual priorities. However, it is impossible to wholly isolate the impacts and effectiveness of individual priorities as the range of activity undertaken by the LEP, both within and outside of the Growth Deal, is inherently interdependent.

For instance, the investment within further education facilities provides improved and additional education and training space within colleges. This supports an increase in the level of skills and qualifications delivered which is relevant to employer needs, particularly in technical disciplines. In doing so it provides a resource for businesses to grow, improve productivity and drive economic growth.

Similarly capital programmes providing support to businesses have been complemented by interventions providing training and skills development.

Taking account of the holistic nature of the Growth Deal in addressing the four strategic priorities, their interconnectivity and the different methodological approaches employed to evaluate them direct comparison can be misleading. Instead, the findings of this report should be regarded, like the interventions themselves, as inextricably interconnected across the priorities of the Growth Deal.

Interpreting the Findings of the Report

The anticipated economic returns of the Growth Deal as a whole and for each of the priorities within it are detailed within the pages that follow. These detail the anticipated impact at the LCR level providing an estimate of the Gross Value Added and employment impact alongside a measure of the Return on Investment.

The Return on Investment reflects the ratio between the value of the anticipated total benefits and the total public-sector costs incurred. Whilst this measure is strong across the Growth Deal as a whole and each of the priorities, there is a significant difference between some of the priorities.

Whilst the return on investment is key, it is not, and should not be, the sole determinant of the value or success of a project nor whether it should proceed. The key aims of the LEP have been to develop and support a successful, balanced, inclusive and green economy – these aims cannot simply be reflected within a measure of the financial return generated.

Indeed, the recent updates to the HM Treasury's Green Book (which guides elements of appraisal and evaluation) stressed that whilst value for money is important, other elements such as the strategic case underpinning projects and addressing local priorities are also crucial in terms of decision making.

Determining the Scale of Impact

There are several factors that influence the ability to identify, quantify and monetise the benefits delivered by different types of projects and that subsequently impact on the return-on-investment figure. These include:

- The period over which benefits are anticipated to accrue – these are set out within the Green Book and will vary between different types of projects. For infrastructure projects and it can be 100 years, whilst new job creation is anticipated to last 10-years and business assists 3-years.
- The evidence base for monetising benefits is more comprehensive in some policy areas than others – allowing more benefits to be included whilst reducing uncertainty. For example, the Flood Hazard Research Centre has developed a manual for economic appraisal that details a range of eligible benefits that can be included within an assessment of economic impacts.
- Some projects will have the potential to lever higher levels of private-sector leverage enabling public funding to go further and potentially generate greater levels of outputs.
- The scale and timing of costs associated with a project will also have an impact. Larger costs that are incurred earlier in a project will have a relatively greater negative impact on the overall return on investment figure.

Impact Approach

Approach and Impacts Assessed

Gross and net LCR impacts, assessed over and above counterfactual position, following HM Treasury Green Book approach and supporting recognised guidance (MHCLG-AG, EA-FCERM etc.). Whole programme approach to Value for Money assessment, considering all impacts against all Growth Deal and leveraged costs to determine a likely long-term view on economic returns. Most impacts claimed are delivered by 2040/41.

Those impacts assessed are outlined in the table below. Other potential impacts not assessed include Amenity, Health, wider 'indirect' Land Value Uplift and the potential for catalytic, reputational and place-making effects.

Growth Deal Impacts Assessed by Priority						
	P1 Growing Business	P2 Skilled People and Better Jobs	P3 Energy and Economic Resilience	P4a Housing and Regeneration	P4c Economic Resilience	P4d Enterprise Zones
Number of Projects in LCR (54 Projects)	5	11	5	18	8	7
Construction employment	●	●	●	●	●	●
Generated Long Term FTE Jobs	●	●	●	●	●	●
Safeguarded Long Term FTE Jobs		●		●	●	
Employment-related GVA	●	●	●	●	●	●
Residential Land Value Uplift (LVU)				●	●	
Flood Defence Impacts (FCERM)					●	
Labour Supply Impacts (LSI)		●				
Move to More Productive Jobs (MMPJ)		●				
Carbon Impacts (Traded values)			●			
Fuel Bill savings			●			
Welfare Impacts (NHS savings)			●			

Overall Growth Deal Impact

Context

The 2014 and 2016 Strategic Economic Plans (SEP) highlight the Leeds City Region's commitment to address Government's policy priorities through four strategic Priorities which will deliver the overall transformative vision to 'be a globally recognised economy where good growth delivers high levels of prosperity, jobs and quality of life for everyone.'

Primary objectives

Priority 1

Support businesses to expand and create jobs

Priority 2

Assist FE colleges to improve and update learning infrastructure

Priority 3

Reduce commercial and domestic energy consumption

Priority 4

Unlock stalled housing and commercial developments
 Unlock Enterprise Zones
 Increase resilience to major flood events

Inputs

£60.1 million Growth Deal

£78.2 million Growth Deal

£11.4 million Growth Deal

£67.4 million Growth Deal

Main outputs

Businesses supported to expand
 Jobs created & safeguarded

Learning floorspace built or refurbished

Businesses and households supported to reduce energy use

Sites unlocked for development
 Homes built
 Commercial floorspace
 Flood protection

Outcomes

Increased business confidence and investment

Skilled workforce with increased earning potential

Businesses with increased profitability and resilience

Unlocked housing and commercial schemes
 Regeneration of communities

LCR Impact

45,485 gross FTEs
 (13,245 generated & 32,250 safeguarded)

16,110 net FTE jobs

£7.35bn GVA (NPV)

£2.23bn Other Impacts (NPV)

Total Long-Term Impact:
 £9.68bn (NPV)

Economic Return on Investment

£5.25 of Leveraged Private and Public Investment per £1 Growth Deal

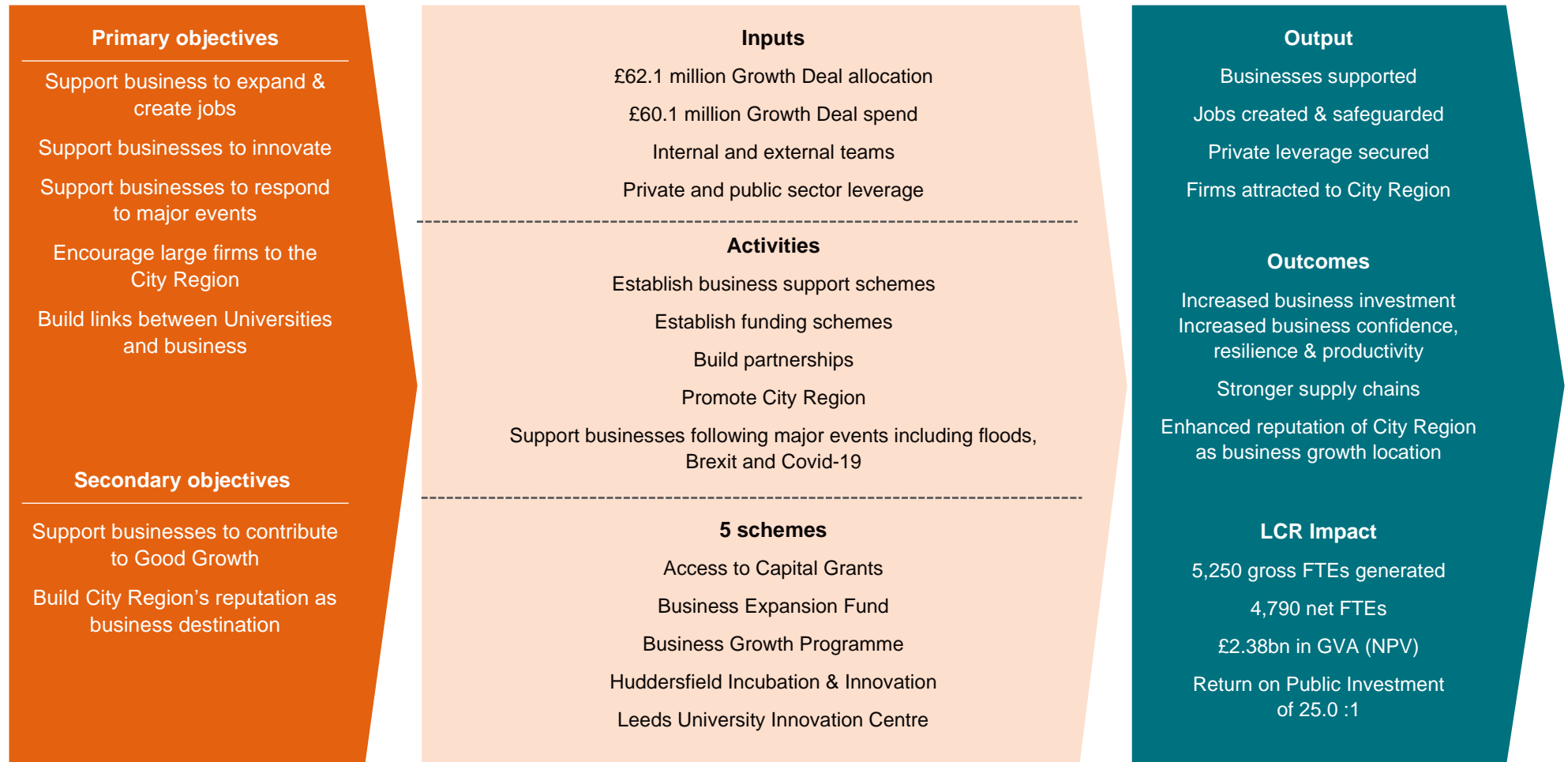
Total Return on Public Investment of 12.1 :1

Priority 1 – Growing Business



Context

Following the recession in 2008/09 the Government was focussed on increasing private sector employment, boosting innovation and increasing Foreign Direct Investment (FDI). Priority 1 addressed these policy drivers and was aimed at closing a gap in Gross Value Added (GVA) of £3,300 per head. The Combined Authority has had to respond to major events including Brexit, flooding and the Covid 19 outbreak. The policy drivers evolved over the delivery period to include a focus on inclusive growth.



Priority 2 – Skilled People. Better Jobs



Context

Colleges play a crucial role within the regional economy providing vocational training, skills development and apprenticeships. All the Priority 2 projects focused on the provision of new and improved buildings and facilities to replace failing infrastructure. The projects required a significant up-front investment and will deliver real and lasting benefits long into the future. A skilled workforce is critical to a successful economy and the impacts from this priority will be evident across the whole of the Growth Deal. The methodological challenges of the monetisation of all benefits is likely to underestimate the total impact.

Primary objectives

- Enable improved and up to date teaching environments
- Assist colleges to rationale their estate and reduce liabilities
- Enhance students' learning experience

Secondary objectives

- Encourage colleges to address a skills gap in value-added sectors
- Encourage colleges to increase apprenticeship provision
- Assist colleges to reduce their environmental impact
- Catalyse regeneration of towns and cities

Inputs

- £79 million Growth Deal allocation
- £79 million Growth Deal spend
- Private and public sector leverage
- Staff resource from Combined Authority and partners

Activities

- Appraise & approve prioritised projects
- 11 FE facilities improved/refurbished
- Improved digital infrastructure and learning space

11 schemes

- | | |
|-----------------------------------------------|----------------------------------|
| Bradford College | Leeds City College – Quarry Hill |
| Calderdale College | Leeds College of Building |
| Kirklees College – Dewsbury Learning Quarter | Selby College |
| Kirklees College Process Manufacturing Centre | ShIPLEY College – Mill |
| Leeds City College – Printworks | ShIPLEY College – Salt Building |
| | Wakefield College |

Output

- Learning floorspace built or refurbished
- Improved learning environment and student experience

Outcomes

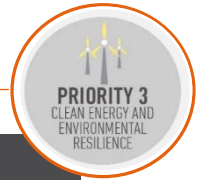
- Skilled workforce with increased earning potential
- Improved learning experience at viable colleges
- Stimulation of regeneration in towns and cities

LCR Impact

- 480 gross FTE jobs (374 generated & 106 safeguarded)
- 425 net LCR FTEs
- £574m in Economic Returns (NPV)
- Return on Public Investment of 4.6 :1

NB This RoI is constrained due to large initial costs, the long-term & varied nature of benefits and the challenges in monetising all of these.

Priority 3 – Clean Energy and Environmental Resilience



Context

A report in 2012 found that ‘10% of city-scale GDP leaves the local economy every year through payment of the energy bill.’ The 2014 Strategic Economic Plan (SEP) outlined the commitment to catalyse a stalled pipeline of low carbon energy schemes; help businesses reduce energy consumption; and, increase resource efficiency. The 2016 SEP committed to reducing fuel poverty.

Primary objectives

Reduce the consumption of energy, water and waste in the commercial and domestic sectors

Reduce fuel poverty in deprived communities

Support the development of low carbon energy schemes

Secondary objectives

Increase businesses’ resilience to rises in energy costs

Support the clean energy supply chain

Increase the number of jobs in low carbon goods and services

Inputs

£12.8 million Growth Deal allocation

£11.4 million Growth Deal spend

Internal and external teams

Private and public sector leverage

Activities

Secure external funding for schemes

Procure external suppliers

Offer free energy audits to businesses

Issue funding to businesses

Build public and private sector partnerships

Provide funding for domestic work

Support clean energy schemes

5 schemes

Energy Accelerator

Leeds District Heat Network

Resource Efficiency Fund

Resource Efficiency Fund 2

Tackling Fuel Poverty

Output

Businesses supported

Fuel poor households supported

Low carbon energy schemes supported

Outcomes

Businesses with increased profitability and resilience

Individuals in better health

Savings for the NHS

Cleaner environment

LCR Impact

286 gross FTE jobs generated

201 net FTEs

£694m in Economic Returns (NPV)

Return on Public Investment of 14.5 :1

Priority 4a – Housing and Regeneration



Context

Leeds City Region and West Yorkshire needed to accommodate higher levels of housing growth to support strong economic growth. Barriers to development included abnormal costs on brownfield sites, accessibility and connectivity and finance. A number of communities had witnessed long-term decline with a need for regeneration including commercial space for businesses.

Primary objectives

Underpin City Region’s growth through provision of additional housing

Unlock stalled housing and commercial developments

Invest in towns and cities that have suffered long-term decline

Catalytic stimulation of regeneration of city and town centres

Secondary objectives

Increase the supply of affordable homes to address a widening gap between income and house prices

Invest in infrastructure that delivers environmental improvements and supports social inclusion

Inputs

£41.7 million Growth Deal allocation

£34.7 million Growth Deal spend

Internal and external teams

Private and public sector leverage

Activities

Funding to address constraints on housing and commercial sites

17 schemes

Barnsley Town Centre
 Bradford One City Park
 Bradford Conditioning House
 Bradford High Point
 Bradford Odeon
 Leeds Brownfield Sites
 Leeds Red Hall
 Halifax Beech Hill

Halifax Northgate House
 Kirklees Housing Sites
 Leeds Bath Road
 New Bolton Woods
 Wakefield Civic
 Wakefield Kirkgate
 Wakefield Rutland Mill
 York Central
 York Guildhall

Output

Sites remediated / enabled for development

Number of homes enabled and number completed

Outcomes

City Region’s growth potential supported by new homes

Regeneration of communities

Increased opportunities for businesses

LCR Impact

2,950 gross FTE jobs
 (1,890 generated & 1,060 safeguarded)

2,610 net FTEs

£2.46bn in Economic Returns (NPV)

Return on Public Investment of 11.8 :1

Priority 4c – Economic Resilience



Context

Leeds City Region experienced major flooding in 2015 and this galvanised action to protect communities and businesses. A 2016 Committee for Climate Change report highlighted that flooding causes annual damage totalling £1 billion. The Combined Authority sought to increase resilience to flooding, unlock housing and commercial developments and trial new approaches.

Primary objectives

Increase the resilience of targeted towns and cities to major flood events

Support the development of housing and commercial sites by reducing flood risk constraints

Protect businesses from the cost of repeated floods

Secondary objectives

Increase the resilience of infrastructure to flooding including roads and rail

Develop knowledge on natural flood management schemes

Increase the viability of communities prone to flood

Inputs

£20 million Growth Deal allocation

£19.8 million Growth Deal spend

Internal and external teams

Private and public sector leverage

Activities

Approve funding for flood alleviation schemes

Support schemes to reduce surface water run-off

Support improvements to upland land management

9 schemes

Flood Alleviation - Brighouse and Clifton

Flood Alleviation - Hebden Bridge

Flood Alleviation 1 - Leeds

Flood Alleviation 2 - Leeds

Flood Alleviation - Mytholmroyd

Flood Alleviation - Skipton

Flood Alleviation - Wyke Beck

Colne and Calder - Natural Flood Management

Upper Aire - Natural Flood Management

Output

Housing and commercial land with enhanced protection

Outcomes

Businesses and jobs safeguarded

Housing and commercial schemes unlocked

Communities with increased confidence and viability

Carbon sequestered

Improved mental health

LCR Impact

33,810 gross FTE jobs
(2,725 generated & 31,085 safeguarded)

6,775 net FTEs

£2.90bn in Economic Returns
(NPV)

Return on Public Investment
of 12.6 :1

Priority 4d – Enterprise Zones



Context

The Combined Authority secured Enterprise Zone status for thirteen sites over two phases, and conducted early work to identify the funding needed to unlock development. The Zones represent a new product for the City Region with the potential for very large units to attract national and internally significant firms, supporting the aim to increase foreign direct investment.

Primary objectives

Identify viability gaps on Enterprise Zones and provide funding to unlock development

Promote opportunities available on the Zones and work with partners to attract inward investment

Secondary objectives

Provide space that enables businesses to expand and create employment

Increase business rates retained by the Combined Authority by accelerating development on the Zones

Enable existing industrial estates to upgrade stock

Activities

Complete surveys to identify viability gaps and funding to address them

Purchase sites if needed to unlock Promote Enterprise Zones nationally and internationally

Inputs

£20 million Growth Deal allocation

£19.6 Growth Deal spend

Internal and external teams

Private and public sector leverage

7 schemes

Aire Valley

Bradford Gain Lane

Bradford Parry Lane

Bradford Staithgate Lane

Clifton Business Park

Langthwaite Business Park

South Kirkby Business Park

Output

Sites with abnormal costs addressed

Commercial floorspace constructed and occupied

Construction jobs created

Outcomes

Commercial floorspace constructed and occupied

Construction jobs created

Jobs created as businesses expand

LCR Impact

2,720 gross FTE jobs generated

1,310 net LCR FTEs

£682m in GVA (NPV)

Return on Public Investment of 9.0 :1

Conclusions

10.1 – Impact:

- It is forecast that when fully delivered, and over the subsequent period that benefits will accrue, the Growth Deal projects will deliver £19.0bn in cumulative net economic returns (£9.7bn NPV) to the Leeds City Region economy. These impacts comprise a mix of net cumulative GVA and Land Value Uplift returns, alongside the economic returns from flood protection measures, upskilling and efforts for carbon reduction.
- Each £1 of the £242.3m of Growth Deal investment will leverage around £5.20 of private and other public investment and when factoring in all costs, every £1 of public investment is expected to deliver around £12.10 of economic returns to the LCR economy over the longer term.
- By this estimate it is forecast that the Growth Deal will deliver exceptional economic returns.

10.2.1 – Programme delivery:

- The Combined Authority is currently forecasting to spend £242,251,402 against a target of £235,550,000, which equates to an over-spend of £6,901,402. However, this is related to the provision of loans to projects which have since been repaid.
- There is under-spend on each Priority against the original allocation with the exception of Priority 2 enabling the Combined Authority to spend £10,132,429 on legitimate Growth Deal delivery costs.
- The Combined Authority's performance against expenditure targets was highly effective, particularly as the allocation from Government was challenging and had major expenditure profiled in years 1 and 2.
- The Priorities which achieved strong early delivery have some common factors including the completion of as much development work on the pipeline prior to the submission of Growth Deal bids as possible; the presence of proactive staff who drove the process; the formation of teams around existing members of staff to increase delivery capacity rapidly; and positive, collaborative partnerships with project sponsors.

- The Combined Authority strengthened the Assurance Framework considerably over the 5-year delivery period, and delivery for the final years benefitted from a robust and consistent approach to business cases, appraisal, contracting and monitoring. There is a sense from some partners that the Assurance Framework has become too rigid and onerous and would benefit from a greater focus on proportionality.
- The Combined Authority delivered the Growth Deal alongside a major organisational change programme which saw the establishment of new Directorates and a Programme Management Office. The organisational changes boosted delivery capacity and embedded consistent management and governance processes.
- In relation to performance on core outputs the Combined Authority is forecast to exceed the target for leverage, and significantly exceed the target for homes created by March 2025. Transport schemes within the Growth Deal have contributed towards the homes target by unlocking housing developments.
- At present the Combined Authority is forecast to achieve 75% of the target for jobs created by March 2025. The current forecast includes jobs enabled by transport schemes. The current forecast under-performance on jobs is partly due to several schemes that could have created a large number of jobs not proceeding. The evaluation note that the unit cost of jobs offered in the third Growth Deal submission was considerably lower than the earlier submissions and feel that this has also played a role.

10.3 – Programme design:

- The Combined Authority's Growth Deal submissions were all underpinned a clear understanding of the economic strengths, weaknesses, opportunities and challenges in Leeds City Region.
- The Strategic Economic Plan contained clear and appropriate strategic priorities, and the Growth Deal was clearly focussed on achieving them.
- The Combined Authority had very limited time available to develop the Growth Deal submissions. This restricted the amount of development work that could be completed on individual schemes, and this appears to have had a particular bearing in the Housing and Regeneration and Enterprise Zones programmes of activity.

Recommendations

11.1 – Programme design:

- Invest in the development of pipeline projects for each policy priority as an on-going process. This will build capacity to react quickly to funding opportunities within the Combined Authority and within Local Authorities.
- Continue the current focus on bringing together policy and delivery staff when devising bids to Government. The addition of staff from the new Evaluation Team alongside staff from the Programme Management Office will further strengthen the approach, ensuring that full consideration is given to deliverability alongside how individual schemes will be monitored and evaluated.
- Adopt a consistent approach to unit costs for future programme bids. The unit cost for jobs created varied considerably across the first, second and third Growth Deal submissions.
- Continue the current focus on developing logic models when preparing bids to Government. Seek to identify gaps in logic; surface and test underlying assumptions; and determine areas of tension between objectives and outputs.
- Devise a Monitoring and Evaluation Plan for each new major programme before they commence. This provides an opportunity to determine any wider outputs that should be collected alongside those mandated by Government. It should detail how overall impact will be measured, how the counterfactual will be determined and ensure that appropriate data is collected during the delivery process.
- Commence external evaluations earlier in the delivery phase for future programmes providing opportunity for processes to be explored and refined, and for impact data to be collected during delivery.

11.2– Programme delivery:

- Develop a clear baseline position for each programme and scheme when funding is announced detailing their expenditure and output targets. Ensure there is a clear link between the overall programme targets and

those set for each individual scheme. This is particularly important when there are significant differences between the financial ask and the ultimate settlement from Government. It is important to complete this work early as it can become increasingly difficult to disentangle over time.

- Appoint an overall lead for major programmes as early as possible (in this case an overall Growth Deal Programme Manager) and ensure that each delivery team is adequately resourced. Seek to appoint a core delivery team funded through devolution funds that can be moved onto major programmes rapidly to ensure early delivery progress.
- Release development funding as early as possible for schemes that require it and continue to work closely in partnership with project sponsors to understand and overcome obstacles to successful delivery.
- Continue to use funding from Government to trial innovative approaches to major challenges and successes. This has occurred through Growth Deal delivery with innovations including novel approaches to tackling the City Region’s productivity deficit.
- Consider adopting a more proportionate approach to business cases and appraisal, with lower value and less complex schemes benefitting from lighter touch business cases, fewer steps in the assurance process and more targeted appraisal.

11.3 – Programme impact and evaluation:

- Explore the inclusion of weighted formulas or BCR threshold definitions across intervention types/priorities to clearly demonstrate what constitutes ‘Value for Money’ for the Combined Authority.
- Adopt an emphasis on seeking clarity for a ‘no Growth Deal’ counterfactual position, as opposed to a ‘no investment’ one across the business cases.
- Consistent approaches should be adopted in terms of the measurement of different categories of outputs and impacts and how these should be monetised.
- Ensure that new projects and programmes implement relevant guidance contained within the newly adopted Evaluation Strategy.