

**Stephanie Tobyn**  
Director, Strategy, Policy & Reform



01 December 2022

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Jake Kelly  
Group Director, System Operator  
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Dear Mr Yeowart and Mr Kelly,

**Application for a new track access contract for services between London Paddington and Carmarthen**

1. We have carefully considered Grand Union Trains Limited's (Grand Union) application for a track access contract with Network Rail Infrastructure Limited (Network Rail). This was submitted to us under section 17 of the Railways Act 1993 (the Act) in June 2022. We have decided to approve access rights from December 2024 to December 2034 for Grand Union to operate five daily return services between London Paddington and Carmarthen, calling at Llanelli, Gowerton, Cardiff Central, Newport, Severn Tunnel Junction and Bristol Parkway.
2. We will now draw up the detailed access contract to direct Network Rail and Grand Union to enter into. This will be similar to the draft contract submitted with the application, except for a contract length with ten years of access rights rather than the twenty years applied for, and without rights to stop at the as-yet unbuilt Cardiff Parkway and Felindre stations, as explained below. We will also include additional requirements relating to the investments Grand Union will make (that justify a contract duration with ten years of access rights) and rolling stock commitments, including the time by which the rolling stock must be secured and the services introduced. We will discuss the drafting of these terms separately with you.
3. This letter explains the reasons for our decision.

**Background**

4. Grand Union submitted its application on 21 June 2022 to run services between London Paddington and Carmarthen. This application was submitted as a disputed application under section 17 of the Act, as Network Rail was not willing to support the sale of access rights.
5. The application was for:

- From December 2024, five return services a day between Carmarthen and London Paddington, calling at Llanelli, Gowerton, Cardiff Central, Newport, Severn Tunnel Junction and Bristol Parkway using new-build bi-mode trains;
- Access rights for services to call additionally at Cardiff Parkway, and Felindre (instead of Gowerton), stations once these stations are built; and
- An access contract for twenty years of access rights between December 2024 and December 2044, based upon investment in new rolling stock and significant station investment at Felindre and improvements at Severn Tunnel Junction.

6. Following discussions between the ORR case team and Grand Union regarding the additional evidence requirements for approval for rights to serve as-yet unbuilt stations, and the evidence needed to support a significant twenty-year contract length, Grand Union advised us it was willing to accept a decision with ten years of access rights, between December 2024 and December 2034, based on investment in new rolling stock only, and without rights to stop at the as-yet unbuilt Felindre and Cardiff Parkway stations or firm commitment to investments at Felindre or Severn Tunnel Junction.

7. Grand Union has advised that it intends to apply to ORR separately for additions to its access contract for calls at Felindre and Cardiff Parkway stations, if it receives approval for this initial proposal. This supplemental application would have to go through the standard legislative and ORR access application process, once submitted.

8. This application from Grand Union follows a previous application for seven daily return services between London Paddington and Carmarthen made in 2020 (the “2020 application”), which we rejected in February 2021. Our reasons for that decision can be found in that [decision letter](#).

### **ORR’s role and approach**

9. Under the Act we must approve track access contracts between Network Rail and train operators and any amendments to them. If Network Rail and a train operator reach agreement, they jointly submit the proposed contract for our approval, under section 18 of the Act. If they cannot reach agreement, the train operator can apply under section 17 of the Act and ask us to direct Network Rail to enter into the contract. This application was made under section 17.

10. We determine all track access applications in the manner we consider best calculated to achieve our statutory duties, which are set out mainly in section 4 of the Act. The weight we place on each duty is a matter for us depending on the circumstances of each case. Where the duties point in different directions, we weigh them against each other to help us reach a decision.

11. Although our duties are wide ranging, our experience generally is that a subset tends to be especially relevant to access decisions with the others not pointing strongly one way or the other. In this case we considered all our duties and these were the most relevant:

- promote improvements in railway service performance (which is defined as including in particular, performance in securing (a) reliability (including

punctuality), (b) avoidance or mitigation of passenger overcrowding, and (c) that journey times are as short as possible);

- otherwise protect the interests of users of railway services;
- promote the use and development of the network for passengers and goods to the greatest extent that we consider economically practicable;
- promote competition in the provision of railway services for the benefit of rail users;
- enable persons providing railway services to plan the future of their businesses with reasonable assurance;
- have regard to the funds available to the Secretary of State and [their guidance](#); and
- have regard to notified strategies and policies of the Welsh Ministers.

12. ORR is supportive in principle of open access, by which we mean passenger services provided outside of a public service contract. This reflects our duty to promote competition for the benefit of rail users and our recognition that competition can make a significant contribution to innovation in terms of the routes served, ticketing practices and service quality improvements, by both the new operator and through the competitive response of existing operators.

13. But we must also consider our other duties when making access decisions. These include duties to have regard to the funds available to the Secretary of State in relation to railways and to protect the interests of users of railway services, both passengers and freight customers. These require us to consider the impact of new open access services not just on the passengers benefitting directly from those services but all users of railway services.

14. With those issues in mind, our approach is to test whether new services such as these would be “not primarily abstractive” (NPA) as explained in our published guidance. In essence, the NPA test aims to help us balance our duties, in particular those to promote competition for the benefit of users and to have regard to the funds available to the Secretary of State. The extent to which we value the potential benefits competition can bring is reflected in the threshold for the test that we expect new services to reach – we would not expect to approve applications that did not generate at least 30p of new revenue for every £1 abstracted from existing operators (i.e. achieve a ratio of 0.3:1).

15. In addition to the NPA test, our guidance explains the range of other issues we expect to look at, including capacity and performance. We also consider the absolute impact on the funds available to the Secretary of State. In the circumstances of each application, we can decide what particular weight to place on each of these factors. We discuss these later.

## Industry consultation and stakeholder views

16. In advance of submitting the application to ORR, and in line with our published guidance, Network Rail carried out an industry consultation on behalf of Grand Union in May and June 2022. Several train operators and other stakeholders responded:

- CrossCountry supported the proposal, and Transport for Wales responded to the industry consultation noting it was keen to work with Grand Union on its proposals as they develop, to mitigate any potential impacts on its operations. MTR Elizabeth Line noted it had no significant objections to the proposal but had concerns about how capacity will be allocated to operators during engineering works to facilitate the construction of Old Oak Common station. Freightliner raised some concerns regarding future freight capacity and performance impacts.
- Great Western Railway (GWR) strongly opposed the application on economic, operations and market-need grounds. GWR viewed the application as having “no material dissimilarity from the application already made by the same applicant declined by the ORR”, and raised wider operational concerns (see GWR’s responses listed in annex).
- Transport Focus supported the application, noting it is a “strong case and clearly highlights the potential benefits to passengers that choice can bring, as demonstrated on the ECML”.

17. Separately to the industry consultation:

- Swansea City Council wrote to us supporting the application, noting that it “is vital that the South West Wales Region is supported by faster, more frequent services to support its economic ambitions”.
- Carmarthenshire County Council wrote to us noting that it is fully supportive of the proposal and the “additional private sector investment will complement our aspiration to improve rail journey times to and from Carmarthenshire and help stimulate modal shift to achieve key policy objectives of the Wales Transport Strategy”.
- The Welsh Conservative Members of the Welsh Parliament wrote to us on 17 November 2022 expressing full support for the application.
- The Department for Transport wrote to us on 21 July 2022 raising a number of capacity and performance concerns, and concerns relating to the impact on the Secretary of State’s funds. In particular, the DfT noted that it “continues to operate within a significantly more constrained budget position than before given the continuing and considerable financial impacts following Covid-19 and the pattern of rail demand. Given the current financial pressures, the loss of revenue at the significant scale discussed in this letter will impact the funds available to improve and support the railway in what are already particularly financially strained circumstances for rail finances.”

- The Welsh Government supported the application. On 16 June 2022 the Welsh Minister for Climate Change (responsible for transport) wrote supporting the application and the benefits it would bring to passengers in Wales.

## **Statutory Consultation**

18. As it did not support the proposal, we also consulted Network Rail, as required by the Act, in July 2022. We set out further detail on Network Rail's views in the sections on capacity and performance below.

## **Engagement with the parties**

19. In addition to the industry and statutory consultations, when reviewing an application we may hold discussions with the parties, seeking and clarifying the information we need to make our final decision. In this case we have engaged fully with Grand Union and Network Rail, throughout the course of this application.

20. Grand Union also took the opportunity to provide further detailed submissions to us. In reaching our decision, we considered all the material provided by Grand Union and other stakeholders. A list of these materials is included in Annex A.

21. The remainder of this decision letter is structured in four sections: potential passenger benefits; our analysis of the application (including operational viability, capacity and performance); the NPA test and absolute abstraction; and conclusions.

## **Potential passenger benefits**

22. We have considered that the proposed Grand Union service could bring a number of potential benefits to passengers on the route.

23. Additional services on the route would offer more choice to passengers and potentially differing journey opportunities. Further, the proposal offers new direct journey opportunities and potentially faster journey times.

24. In its application, Grand Union argued that its service would bring benefits including price competition to the route, passenger choice and innovation in terms of fares, comfort and customer service. Grand Union also committed to significant investment in new rolling stock.

25. We recognise that competition can make a significant contribution to innovation in terms of the routes served, ticketing practices and service quality improvements, by both the new operator and through the competitive response of existing operators. However, these benefits need to be offset against any potential negative impact on other passengers and users of introducing a new service.

## **Our analysis of the application**

26. As part of our assessment, we considered the operational viability of the proposed services, any concerns relating to the fair and efficient use of capacity and any impacts on operational performance. We also considered the level of revenue the proposals will

generate against what they will abstract from public funds, and the absolute level of that abstraction.

### *Operational viability*

27. We require applicants to show they are committed to, and capable of, using the access rights in their application. We consider whether proposals are operationally viable and supported by a plausible delivery plan. Having considered the business plan and the proposed operational strategy, we consider this application meets these requirements.

28. In particular, we note that Grand Union has advised us of its plans to enter a strategic partnership with Spanish national rail operator Renfe to operate the services, with financial backing from a Spanish private equity firm, Serena Industrial Partners.

### *Capacity*

29. Network Rail acknowledged that there is sufficient capacity to accommodate the five paths in each direction that have been applied for. This included a platforming exercise for the principal stations. This verified capacity at these points, along with supporting operational train movements to deliver the train service.

30. In response to this application, Network Rail also raised new operational considerations in addition to those raised in its objections to Grand Union's 2020 application. This included driver training, financial backing, level crossing risk and mitigations, and rolling stock strategy. We reviewed these objections and considered that they were either a) matters for Grand Union to deliver, and not relevant for Network Rail's consideration of the sale of access rights, or b) operational considerations which would need to be evaluated nearer an entry into service date, which should not preclude the award of access rights to a start-up operator.

31. Some consultees raised concerns over adding services during the construction of the new Old Oak Common station in west London because of the restricted capacity. During construction, it is probable that there will be periods of "two-track railway" operation, rather than a four-track route, because of engineering possessions. Old Oak Common is due to be completed during the lifetime of the contract Grand Union have applied for and the likely periods of "two-track railway" will continue throughout the construction period. We consider that temporary capacity restrictions can be mitigated by fairly allocating capacity between operators, as per existing standard industry processes. Therefore, the restriction is not a sufficient operational cause for concern to preclude approval of this application.

32. Based on our assessment, we were satisfied that there would be sufficient capacity to accommodate the five daily return services applied for.

### *Performance*

33. Network Rail submitted performance analysis to us, building on the analysis it completed for the 2020 Grand Union application. It forecasts the additional services would lead to a 0.38% drop in T-10 (arrival at destination within 10 minutes) punctuality for GWR Main Line services, a 0.69% drop in T-5 (arrival at destination within 5 minutes) punctuality

for Heathrow Express services, and minimal impacts on other GWR routes and on other operators.

34. Network Rail's performance analysis is more detailed than we have received for similar applications in the past and is based on standard and accepted industry methodology. However, we consider it is a cautious representation of the likely performance impact, and mitigations could reduce the level of negative impact.

35. The introduction of new services into the timetable (be they open access or otherwise) can negatively affect performance, which must be considered carefully against the benefits to customers of introducing those services. We have recently challenged Network Rail to do more to deliver better train performance, which has declined from the higher levels seen through the coronavirus pandemic. In its representations, Network Rail stressed its commitment to improving performance. Equally, the absolute potential performance impact of Grand Union's proposed service as modelled by Network Rail is less than we, and Network Rail, have accepted for other recent timetable changes on the route which have included greater numbers of additional services. As such, we do not consider that the forecast negative performance impacts should preclude approval of this application.

### **The Not Primarily Abstractive (NPA) test and absolute abstraction**

36. New open access services can offer new travel opportunities for users and create competition on existing flows. However, greater competition can also mean a loss of revenue for the services operated by existing operators, in particular GWR in this case. In situations where existing operators bear revenue risk, this revenue loss is expected eventually to lead to lower premium payments by operators to the Department for Transport (DfT), or higher subsidy payments from DfT to operators. Where the public service's contracting arrangements mean revenue risk sits with the DfT, the loss of revenue bears more directly on the funds available to the Secretary of State. This may also affect funding available for future investment.

37. The '**Not Primarily Abstractive**' (**NPA**) **test**, defined in ORR guidance, is the key criterion we use to evaluate this trade-off<sup>1</sup>. It informs whether new revenue expected to be generated (a proxy for consumer benefits) is sufficient to compensate for the impact on the Secretary of State's funds. The latter is approximated by using the revenue abstracted from existing operators minus any Infrastructure Cost Charge (ICC) payments to Network Rail from the open access operator. Our policy is to reject applications that generate less than £0.3 of new revenue for each £1 of net revenue loss to taxpayers. Conversely, passing this test at a level above £0.3 is a necessary but not sufficient criterion for approval, as we must consider all factors and ORR duties together.

38. In addition to the NPA test, ORR guidance also sets out that we may decide to decline a track access application should we deem the **absolute level of revenue**

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<sup>1</sup> Our [NPA test guidance](#) notes, however, that "there will necessarily be a large degree of judgment involved in this decision" and that "we will need to strike a balance between a number of our statutory duties, in particular to promote: the use of the railway network; competition for the benefit of rail users; whilst enabling persons providing railway services to plan with a reasonable degree of assurance and having regard to our duties in relation to funders".

**abstraction** to be too great<sup>2</sup>. This gives ORR the ability to give greater weight to the impact on Secretary of State’s funds than is implicit in the NPA test. We consider these issues in the round, alongside other factors such as potential passenger benefits and the impact on performance.

*Our central NPA test ratio forecast*

39. Our central generation:abstraction ratio forecast, summarised in Table 1 below, is 0.44:1. We forecast Grand Union’s services will abstract revenue of £20.4m per annum predominantly from GWR. The reference year for our central case forecast is financial year 2029/30. This is the year we expect earnings from Grand Union’s new services to be fully established and Grand Union to be paying full rate ICC<sup>3</sup>. It takes account of the full rate ICC payments of £2.8m per annum, resulting in net abstraction of £17.6m per annum. The ratio is based on the net level of abstraction.

*Table 1: ORR's central generation:abstraction ratio forecast (2018/19 prices).*

	Generation (£m)	Gross Abstraction (£m)	Abstraction net of ICC (£m)	NPA test ratio
ORR’s central generation: abstraction ratio forecast	£7.7m	£20.4m	£17.6m	0.44

40. Our forecast uses a gravity model for three stations (Severn Tunnel Junction, Llanelli and Carmarthen) in line with our previous decisions.<sup>4</sup> This adjusts the modelled demand to take account of MOIRA’s<sup>5</sup> tendency to underestimate the generative impact of large changes in journey time, as delivered by Grand Union’s new services on certain flows. Applying the gravity model is therefore important to the application passing the NPA test.

41. We have undertaken significant analysis of Grand Union’s revenue forecast model as part of our analysis of its previous application. This included the use of consultants to review Grand Union’s model, including an in-depth analysis of the gravity model, and we have engaged with Grand Union and its consultants. We are therefore confident that the modelling follows industry guidance, and the results are robust.

42. Our forecast is sufficiently above the threshold for us to conclude that - on the basis of the available evidence and our assessment - the application passes the NPA test.

*Absolute level of abstraction*

43. In addition to the assessment of the relative benefits and costs of the new services under the NPA test, the absolute level of abstraction is relevant in weighing our Section 4 duty to have regard to the funds available to the Secretary of State and [their guidance](#).

<sup>2</sup> This was originally set out in Office of the Rail Regulator (2004), *Moderation of Competition: Final Conclusions*, 3.18(c), available [here](#). More recently, this was given as one of the reasons for rejecting GNER’s application to run services between Cleethorpes/West Yorkshire and London in May 2016, and the 2020 Grand Union application.

<sup>3</sup> ICC payments for new open access services are phased in over the first five years of operation, starting at zero rate for the first two years and then increasing over the next three years to 25%, 50% and 100% of the full payment rate.

<sup>4</sup> A gravity model uses socio-economic factors (income, population and wages) alongside changes in Generalised Journey Time (GJT) to estimate the demand impact of new services where there has been a large change in journey time.

<sup>5</sup> MOIRA (Model of Industry Revenue Analysis) is the industry standard modelling software to estimate the demand and revenue impacts of service changes.



44. We forecast Grand Union services will abstract £20.4 of revenue per annum, predominantly from GWR. Net of annual ICC payments of £2.8m per annum, this will impact on government funds by £17.6m per annum.

45. ORR has no pre-set limit on an acceptable level of absolute abstraction. Past decisions have been made on a case-by-case basis, taking account of the circumstances surrounding each application. The forecast abstraction of £17.6m (net of ICC) for this application is well within the range of previous applications we have approved.

### **Contract duration**

46. Track access contracts longer than five years must be justified by the existence of commercial contracts, specialised investments or risks<sup>6</sup>. Grand Union justified a 10-year contract on the basis of its level of investment in a fleet of new bi-mode rolling stock. We have reviewed the business case and believe that a contract with ten years of access rights, from December 2024 to December 2034, is justified based on the proposed level of investment in new rolling stock only. We will link the contract duration to this investment being made.

### **Conclusion**

47. We determined this application in light of (a) ORR's policies and (b) ORR's statutory duties. None of the duties have higher priority than the others in the legislation. It is for the ORR to decide, first, which duties are relevant to this application, and secondly, where the relevant duties point in different directions, it is for ORR to give each of them the weight it considers most appropriate. We have identified below, those duties we consider are relevant to this application.

#### *Summary of our assessment against our policy:*

48. **Operational viability:** Having considered the business plan and the proposed operational workings we consider this application meets our requirements for operational viability.

49. **Capacity:** There are no major capacity concerns outstanding. Based on our assessment, we are satisfied that there is sufficient capacity to accommodate five daily return services.

50. **Performance:** Network Rail and some stakeholders have highlighted concerns over the performance impacts of this application. Network Rail's modelling shows the introduction of five daily return Grand Union services could lead to a 0.38% drop in T-10 punctuality for GWR Main Line services and a 0.69% drop in T-5 punctuality for Heathrow Express services. However, we believe these modelled impacts may be cautious, and mitigations could reduce the negative impacts. Further, the absolute potential performance impact of Grand Union's proposed services modelled by Network Rail is significantly less than we, and Network Rail, have accepted for other, albeit larger, recent timetable

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<sup>6</sup> Regulation 21(8) of The Railways (Access, Management and Licensing of Railway Undertakings) Regulations 2016.

changes on the route. We do not consider that the forecast negative performance impacts should preclude approval of this application.

51. **NPA test:** Our published approach emphasises the role of the NPA test as a necessary (but not sufficient) condition to approving an open access application and as our main analytical tool for helping us weigh some of the duties we have found especially relevant in open access decisions.

52. Our assessment is that the generation:abstraction ratio of the application for five daily return paths is 0.44:1, which is well above the 0.3 threshold. We therefore conclude it passes our NPA test.

53. **Absolute abstraction:** We forecast Grand Union services will abstract £20.4m of revenue per annum, predominantly from GWR. Net of annual ICC payments of £2.8m, this will impact on government funds by £17.6m per annum. This is within the range of open access applications we have previously approved.

*Weighing ORR's duties:*

54. The NPA test informs the overall assessment of the application in respect of the weighing of potentially competing duties, in particular (i) to promote the use of the railway network; (ii) to promote competition for the benefit of rail users; (iii) to enable persons providing railway services to plan with a reasonable degree of assurance; and (iv) to have regard to the funds available to the Secretary of State.

55. We must also have regard to any notified strategies and policies of the Welsh Ministers, so far as they relate to Welsh services or to any other matter in or as regards Wales that concerns railways or railway services.

56. **Promote improvements in railway service performance:** (which is defined as including in particular, performance in securing (a) reliability (including punctuality), (b) avoidance or mitigation of passenger overcrowding, and (c) that journey times are as short as possible). We note that this proposal is forecast to cause some negative performance impacts in terms of punctuality, but we do not consider that these impacts should preclude approval of this application. The absolute potential performance impact of Grand Union's proposed services modelled by Network Rail is significantly less than we and Network Rail have accepted for other, albeit larger, recent timetable changes on the route. We also note the potential for improved journey times for passengers at some stations that Grand Union proposes to serve.

57. **Otherwise protect the interests of users of railway services:** We consider this duty does not point clearly in any one direction. For example, while it may be in passengers' and/or other users' interests that there are more services on offer, it may also not be in passengers' or users' interests if more services lead to a negative impact on performance (no matter the size of that impact).

58. **Promote the use and development of the network to the greatest extent that we consider economically practicable:** 'Use' is about capacity, and we have identified that there is sufficient capacity on the relevant part of the network in relation to this application. Approving a 10-year contract for Grand Union to run five return services would be

consistent with our duty to promote use and development of the network, through new direct trains, some faster journey times, and use of new rolling stock.

**59. Promoting competition in the provision of railway services for the benefit of users of railway services:** ORR has a policy of supporting greater on-rail competition, through enhanced open access, and there is some evidence that competition can bring passenger benefits even on the competing existing services as well as bringing net positive economic benefits<sup>7</sup>. Further, it might also be relevant to consider that this application would represent the first competitive pressure from an open access operator on the Great Western Main Line and the user benefits that could bring to the route. Our analysis that these services will be significantly generative of new revenue (the application clearly passes the NPA test) indicates that the consumer benefits of competition here are likely to be significant.

**60. Enable persons providing railway services to plan the future of their businesses with a reasonable degree of assurance:** We consider that this duty does not point towards approval or rejection of the application, but rather points towards us making timely decisions for the benefit of both applicants and incumbents in order to provide them with certainty in order to plan their businesses with reasonable assurance.

**61. Having regard to funds available to the Secretary of State and their guidance:** We considered the current position of rail finances in deciding the weight to be given to these duties. Our published approach emphasises the role of the NPA test as a necessary (but not sufficient) condition to approving an open access application; the NPA analysis informs but does not determine how we weigh relevant duties in reaching a final decision. In the circumstances of this application, we have to decide what weight to place on the modelled £17.6m per annum (net of ICC payments) absolute level of abstraction impact on the Secretary of State's funds and our duty to have regard to the Secretary of State's funds. This level of abstraction is well within the range of open access applications we have previously approved. We also considered the Secretary of State's [guidance](#) to us, which notes he is "supportive of open access in particular circumstances where these do not significantly impact on affordability or the value for money from public investment".

**62. Having regard to notified strategies and policies of the Welsh Ministers:** Welsh Government supports the application and in particular the proposal to provide a significant increase in services between Carmarthen and London, including additional services at Llanelli, Gowerton and Cardiff. We also consider the new services foreseen by the application are consistent with the Welsh Government's current transport strategy, [Llwybr Newydd: the Wales transport strategy 2021](#).

## Decision

63. We considered carefully our duty to have regard to the funds available to the Secretary of State, but decided to place greater weight to the beneficial aspects of this application. **We have therefore decided to approve a ten-year access contract for Grand Union to run five return services a day between London Paddington and**

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<sup>7</sup> [Monitoring the impact of, and response to, open access - 2022 Update](#)

**Carmarthen.** This decision, and the contract we will subsequently direct, provides Grand Union, Network Rail and other interested parties with clear expectations and timescales to deliver the introduction of these new services.

64. I am copying this letter to Michelle Handforth at Network Rail, Dan Moore at DfT, James Arden at the Welsh Government, Colin Lea at Transport for Wales, and Robert Holder at GWR. We will also place a copy on our website.

Yours sincerely

A handwritten signature in black ink that reads "Stephanie Tobyn". The signature is written in a cursive style with a long, sweeping underline.

**Stephanie Tobyn**

## **Annex A: Submissions, Correspondence and Representations received**

In reaching our decision we considered all the material provided by Grand Union and other stakeholders. These included:

From the applicant:

- [Form P](#) (application form) and [Draft Contract](#) – 21 June 2022
- Business Case and supporting material – 3 August 2022
- AECOM report *London Paddington to Carmarthen Open Access : AECOM Demand and Revenue Analysis* – 12 May 2022
- Additional correspondence between ORR and Grand Union and its consultants, AECOM.
- All responses from the applicant to representations, including to industry consultation responses and Network Rail's submissions.

[Industry Consultation responses](#) (May and June 2022):

- Transport Focus
- Transport for Wales
- MTR Elizabeth Line
- CrossCountry
- Department for Transport
- Freightliner
- Great Western Railway

[Further Industry Consultations responses](#) (July 2022)

- CrossCountry
- Department for Transport
- Great Western Railway

Statutory Consultation with Network Rail:

- [Network Rail Representations](#) – 15 July 2022

Other correspondence:

- Lee Waters AS/MS, Deputy Minister for Climate Change, Welsh Government – 16 June 2022
- Councillor Rob Stewart, Swansea City Council – 13 September 2022
- Councillors Darren Price and Edward Thomas, Carmarthenshire County Council – 4 October 2022
- Welsh Conservatives in the Welsh Parliament – 17 November 2022