

Stephanie Tobyn
Director, Strategy, Policy & Reform



07 March 2024

Ian Yeowart
Managing Director
Grand Union Trains Limited
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York
YO19 4RB

Lawrence Bowman
Interim Group Director, System Operator
Network Rail Infrastructure Limited
1 Eversholt Street
London
NW1 2DN

Dear Mr Yeowart and Mr Bowman,

Application for a new track access contract for services between London Euston and Stirling

1. We have carefully considered Grand Union Trains Limited's (Grand Union's) 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 October 2023.
2. We have decided to approve access rights from June 2025 to June 2030 for Grand Union to operate four daily return services between London Euston and Stirling, calling at Milton Keynes Central, Nuneaton, Crewe (contingent rights only), Preston, Carlisle, Lockerbie, Motherwell, Whifflet, Greenfaulds and Larbert, with an additional positioning move service each day each way between London Euston and Preston.
3. In taking this decision we placed particular weight on the beneficial aspects of this application arising from the introduction of the first open access competition on the West Coast Main Line (WCML) and new, better rail journey opportunities for passengers, particularly between central and southern Scotland and London.
4. We will now draw up the detailed access contract to direct Network Rail and Grand Union to enter into. We will discuss the drafting of these terms separately with you.
5. This letter explains the reasons for our decision.

Background

6. Grand Union originally submitted an application in 2019 to run services between London Euston and Stirling using new build bi-mode trains, and revised its application and resubmitted it in October 2022. In September 2023, Grand Union withdrew its application and submitted this new application to ORR in November 2023 to run the same services but using existing off-lease rolling stock. This application was submitted as a disputed



application under section 17 of the Railways Act 1993, as Network Rail had not been willing to support the sale of access rights. In its latest response to ORR (25 January 2024), Network Rail is now willing to support the application.

7. The application was for:

- 4 return services per day between London Euston and Stirling, calling at Milton Keynes Central, Nuneaton, Crewe (contingent rights only), Preston, Carlisle, Lockerbie, Motherwell, Whifflet, Greenfaulds and Larbert, with an additional positioning move service each day each way between London Euston and Preston.
- Using existing off-lease diesel trains – likely Class 221 *Super Voyagers* or Class 222 *Meridians*.
- Access rights from June 2025, for a period of 5 years.

8. Grand Union services will mainly compete with public service operator Avanti West Coast (AWC). Some of its services will compete to a smaller extent with services offered by other public service operators Caledonian Sleeper, London Northwestern Railway, TransPennine Express and ScotRail.

9. Grand Union proposes to offer significantly increased direct journey opportunities between London and central and southern Scotland, particularly from areas which currently require interchange at Edinburgh or Glasgow, and a significant uplift in direct services from Stirling. Larbert, Greenfaulds and Whifflet will receive their first direct services to London. Grand Union has also included in its business plan that it intends to offer a broader range of seating options for passengers.

ORR's role and approach

10. 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.

11. 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.

12. 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
- For this particular application, we also consider that the duty to have regard to guidance from Scottish Ministers is relevant.

13. 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.

14. 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.

15. 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).

16. 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

17. 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 September and October 2023. Several train operators and other stakeholders responded:

- AWC and West Midlands Trains (WMT) opposed the application on the basis that it would abstract unacceptable levels of revenue from existing operators. They also raised capacity and performance concerns.
- AWC additionally raised concerns over the perpetuation of diesel operation on the route. Transport for Greater Manchester supported Grand Union's previous proposals for new services on the condition they would not negatively impact connectivity, performance or reliability of existing services, and in relation to this specific application noted that while diesel operation is a prudent decision to ensure earliest entry into service, it is "regrettable from a carbon neutrality and air quality perspective".
- Transport Focus supported the application, noting the additional choice and benefits for passengers the proposed services would offer. London TravelWatch supported additional services in Scotland but questioned Network Rail's assessment of station capacity at Euston. CrossCountry supported the proposal.

18. Transport Scotland responded to us outside the industry consultation, advising that it had no objection to new services which offer improved connectivity and journey opportunities for the people of Scotland but that it would be keen to discuss performance impacts with Network Rail. Transport Scotland noted that there would not be significant revenue abstraction for ScotRail or Caledonian Sleeper from the proposed services. Transport Scotland did note a preference for electric traction on electrified routes, but recognised the environmental benefits of electric and diesel rail travel over other transport options.

19. The Department for Transport (DfT) did not comment on this application.

Statutory Consultation

20. As Network Rail was initially unable to support the November 2023 Grand Union application, it was submitted under Section 17 and we conducted a statutory consultation with Network Rail to elicit the capacity and performance analysis we required to determine the application. In January 2024, Network Rail provided its final representations, concluding that it could support the application. Network Rail concluded that:

- Capacity exists for the rights to be accommodated;



- There are no material performance concerns with the application; and
- It could only support rights up to December 2030 due to potential interactions with HS2.

21. Network Rail asked for ORR to seek assurances from Grand Union that it could be operational by mid-2025 and raised various points of detail on the proposed track access contract.

22. We set out further detail on Network Rail's views in the sections on capacity and performance below.

Engagement with the parties

23. 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.

24. 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.

25. 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; sustainability; interactions with HS2; and conclusions.

Potential passenger benefits

26. We consider that the proposed Grand Union service could bring a number of potential benefits to passengers on the route.

27. 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.

28. 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.

29. 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. This service would represent the introduction of the first open access competition on the WCML and we recognised the benefits this could bring. 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

30. 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

31. 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.

32. Grand Union applied for access rights from June 2025 and plans to begin operations in that timetable period (i.e. before December 2025), which would likely start with a few services before building up to the full offering. We view that starting within this timeframe is stretching but potentially achievable for a new operation using existing off-lease rolling stock.

33. We will include conditions within the track access contract requiring appropriate rolling stock to be secured and the services to be introduced by specified dates. If these are not met, the access rights would lapse.

Capacity

34. Network Rail went through a process of assessing available capacity and performance impacts for additional services on the WCML which resulted in the outputs of the WCML Event Steering Group (ESG) in March 2022.

35. A key output of the ESG was a WCML Concept Train Plan, which included existing services on the WCML, additional services proposed by AWC, as well as additional services included in the Grand Union 2019 application. The Concept Train Plan demonstrated that all additional services could be accommodated.

36. Our consultants, WSP, examined the Concept Train Plan and discussed it with Network Rail, AWC and Grand Union. WSP concluded that it “is a very good base on which to plan the timetable and that a fully compliant timetable will be able to be finalised accommodating all operators’ applications”.

37. The work undertaken by WSP assumed that upcoming WCML power supply upgrades and Euston platforming works would be completed in advance of the start of Grand Union services. Network Rail advised us last year that there was uncertainty over the delivery dates of these schemes. Network Rail’s recent support of the proposal has been provided considering this ongoing uncertainty. Grand Union’s proposal does not rely on completion of the schemes, but the work itself could interact with Grand Union services. If Grand Union services do interact with these works, Network Rail will be able to use



standard industry processes to mitigate any negative impacts, as it will have to do with all other operators on the route.

38. Based on our assessment, we are satisfied that there is sufficient capacity to accommodate the Grand Union proposals.

Performance

39. Network Rail modelled the performance impacts of Grand Union's previous application alongside a much larger application for additional hourly London-Liverpool services from AWC, which have been introduced. Network Rail's Concept Train Plan, when compared to the December 2019 timetable, showed a performance improvement when all the additional services are included (albeit a lower 'time to three minutes' performance improvement of 1.2% compared to an improvement of 2.4% without the additional services).

40. Our consultants WSP reviewed the performance modelling carried out by Network Rail. WSP concluded that Network Rail's work was "extensive and detailed", and that the improvements made to the WCML timetable since 2019 provide the opportunity to add additional services on the route.

41. We do not consider the uncertainty surrounding power supply upgrades creates a performance concern for the Grand Union application because they now propose to use diesel trains. The application also entails only a small quantum of new services.

42. Network Rail has reviewed the performance impacts of the current application. It concluded that "there are no material performance concerns following a review of the performance intelligence available within the timescales available that would lead us to raise objections against the introduction of Grand Union Trains".

43. The introduction of new services into the timetable can negatively affect performance, which must be considered carefully against the benefits to customers of introducing those services. The industry is currently being challenged to maintain and improve punctuality and performance, and also to remove barriers to new open access. Equally, based on the absolute potential performance impact of Grand Union's proposed service, as modelled by Network Rail alongside wider changes to the WCML timetable and additional services by AWC, it concluded that it had 'no material performance concerns'. As such we consider that the performance impacts of Grand Union's services are acceptable given the wider benefits their introduction will bring for customers.

The Not Primarily Abstractive (NPA) test and absolute abstraction

44. 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, for example holders of DfT National Rail Contracts or "operators of last resort" run directly by the UK or Scottish Governments. In situations where public service operators bear revenue risk, this revenue loss is expected eventually to lead to lower premium payments by franchised operators to



the franchising authority (DfT or Transport Scotland, for example), or higher subsidy payments from the authorities to operators. Where the public service’s contracting arrangements mean revenue risk sits with Governments, as is the case for all passenger operators on the WCML today, the loss of revenue bears more directly on the funds available to the Secretary of State or the Scottish Ministers. This may also affect funding available for future investment.

45. The ‘**Not Primarily Abstractive**’ (**NPA**) **test**, defined in ORR guidance, is the key criterion we use to evaluate this trade-off¹. It informs whether new revenue expected to be generated 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. 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 not sufficient criterion for approval on its own, as we must consider all factors and ORR duties together.

46. 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 abstraction** to be too great². 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

47. Our central generation:abstraction ratio forecast, summarised in Table 1 below, is 0.38:1. We forecast Grand Union’s services will abstract revenue of £24.4m per annum, predominantly from AWC. The reference year for our central case forecast is financial year 2027/28; this is the year in which we expect earnings from Grand Union’s new services to be fully established.

Table 1: ORR’s central generation:abstraction ratio forecast (2021/22 prices).

	Generation (£m)	Gross Abstraction (£m)	NPA test ratio
ORR’s central generation: abstraction ratio forecast	£9.3m	£24.4m	0.38

¹ 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”.

² 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.



48. Grand Union’s own central generation:abstraction ratio forecast, summarised in Table 2 below, is 0.49:1³. It forecasts abstraction of £23.1m per annum.

Table 2: Grand Union's demand and revenue forecast. Based on May 2020 timetable (2021/22 prices).

	Generation (£m)	Gross Abstraction (£m)	NPA test ratio
Grand Union's central generation:abstraction ratio forecast	£11.4m	£23.1m	0.49

49. AWC also submitted an economic assessment; it forecast a generation:abstraction ratio of circa 0.14:1. However, its analysis did not take account of the impact on generation of large journey time savings from Grand Union’s services or the impact of passengers switching to rail from air, and therefore its forecast significantly underestimates the level of revenue generation due to Grand Union.

50. We forecast a lower level of revenue generation and higher abstraction than Grand Union, principally because we take a more conservative approach to forecasting the impact of large journey time changes and passengers switching from air to rail. However, our forecast is sufficiently above the threshold to consider that – on the basis of the available evidence and our assessment – the application passes the NPA test.

Absolute level of abstraction

51. 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](#).

52. We forecast Grand Union services will abstract £24.4m of revenue per annum, predominantly from AWC. AWC is on a National Rail Contract for the West Coast Partnership, with Government currently taking full revenue and cost risk, with a core term to October 2026 (and further extensions available to 2032 at the DfT’s discretion).

53. 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 £24.4m for this application is within the range of previous applications we have approved.

Sustainability

54. Some consultees raised issue with the continued use of diesel rolling stock on the WCML. Grand Union has opted to use diesel rolling stock in response to known power supply constraints on the route, and the lack of availability of new electric trains.

55. If we were comparing two options, one for diesel traction and the other for electric traction, then the relative sustainability impacts of the traction types may be a relevant

³ Grand Union also submitted sensitivity forecasts taking account of rolling stock quality, however, as its central estimate is well above the NPA test threshold we did not consider this estimate further.



consideration. However, we do not view it would be appropriate to turn down new passenger services on the basis of diesel traction, especially on a route which has known electricity power supply constraints. Additionally, the proposal provides opportunities for travellers switching from air to rail travel, which would provide sustainability benefits.

Interactions with HS2

56. Network Rail advised that it was only content to agree to the proposed Grand Union services until December 2030 because of anticipated interactions with HS2 services.

57. Our consultants WSP reviewed interactions with HS2. WSP advised that “While the points raised [by Network Rail] about the interaction with HS2 services are important, we do not see the granting of access rights for [Grand Union] as an impediment to delivering maximum benefits from HS2 from December 2030”. WSP advised that Grand Union’s services could be approved to December 2034, when the full HS2 service operating on to the WCML was due to commence. Since the WSP report, various HS2 works have been delayed, pushing back the likely start date of full HS2 services on the WCML.

58. On the basis of the agreement from Network Rail and the work undertaken by WSP, we are confident to recommend that Grand Union services can be approved for the 5 years requested by Grand Union, until June 2030. In the event that Grand Union services do interact with HS2 works or HS2 services, Network Rail will be able to use standard industry processes to mitigate any negative impacts, as it will have to do in a fair and non-discriminatory manner with all other operators on the route.

Conclusion

59. 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:

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

61. **Capacity:** There are no major capacity concerns outstanding. Based on our assessment, we are satisfied that there is sufficient capacity to accommodate the Grand Union proposal.

62. **Performance:** Some stakeholders have highlighted concerns over the performance impacts of this application. Network Rail has modelled the performance impacts and concluded that it has no material concerns. We considered here the potential trade-off between the benefits to customers associated with the proposed additional services



(including new journey opportunities) and the protection of user interests in good performance. We do not consider that performance impacts should preclude approval of this application.

63. **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.

64. Our assessment is that the generation:abstraction ratio of the application is 0.38:1. We therefore consider the application passes our NPA test.

65. **Absolute abstraction:** We forecast Grand Union services will abstract £24.4m of revenue per annum, predominantly from AWC. This is within the range of open access applications we have previously approved.

Weighing ORR's duties:

66. 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.

67. We must also have regard to any general guidance given by the Scottish Ministers about railway services wholly or partly in Scotland or about other matters in or as regards Scotland that relate to railways. The Scottish Government has been invited to make representations on this application and has not raised any objections.

68. **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 do not consider that performance impacts should preclude approval of this application. Equally, the addition of more trains generally assists with the management of overcrowding and this application does involve some improved journey times.

69. **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 the contract is consistent with our duty to promote use and development of the network, through new direct trains and some faster journey times.

70. **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 real passenger benefits even on the competing franchised services. Further, we considered that this application would represent the first competitive pressure from an open access operator on the WCML and the user benefits that could bring to the route.



71. **Enable persons providing railway services to plan the future of their businesses with reasonable 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 certainty in order to plan their businesses with reasonable assurance. A timely decision is important for this application given the short duration of the rights and the tight timescales for mobilisation.

72. **Having regard to funds available to the Secretary of State:** we considered the current state of rail finances in deciding the weight to be given to this duty. Our published approach emphasises the role of the NPA test; 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 considered what particular weight to place on the modelled £24.4m pa 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 within the range of open access applications we have previously approved.

73. **Having regard to any general guidance given by the Scottish Ministers:** Transport Scotland advised that it has no objection to new services being introduced on the WCML that would offer improved passenger connectivity and journey opportunities for the people of Scotland.

Decision

74. We have considered carefully our duty to promote improvements in railway service performance and to have regard to the funds available to the Secretary of State. However, we consider that greater weight should be given to the beneficial aspects of this application arising from the advent of competition and the introduction of new, better journey opportunities for passengers. **We have therefore decided to approve a five-year access contract for Grand Union to run services between London Euston and Stirling.** 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.

I am copying this letter to Rob McIntosh at Network Rail, Elisabeth Cuthbertson and Lucy Ryan at DfT, Shona Partridge at Transport Scotland, Scott Turner at WMT and Sue Rhymes at AWC. We will also place a copy on our website.

Yours sincerely

A handwritten signature in black ink that reads 'Stephanie Tobyn'.

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](#) – 3 November 2023
- Business Case and supporting material provided by Grand Union
- 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](#) (September and October 2023):

- AWC
- CrossCountry
- Great Western Railway
- London TravelWatch
- Northern
- Transport Focus
- Transport for Greater Manchester
- West Midlands Trains

Statutory Consultation with Network Rail:

- [Network Rail Initial Representations](#) – 1 December 2023
- [Network Rail Further Representations](#) – 25 January 2024

Other correspondence and studies:

- *West Coast Main Line Capacity Assessment*, Network Rail – 4 March 2020
- *Assessment of Applications for Track Access on the West Coast Main Line*, WSP – 8 February 2023
- *Grand Union Trains Impact Assessment*, AWC – 21 November 2023
- Response from Transport Scotland – 16 January 2024