

Grand Union Trains London-Stirling November 2022 Industry Consultation Responses

Respondent	Page
Avanti	2
GUT response to Avanti	4
Liverpool City Region	7
GUT Response to Liverpool City Region	8
Northern	9
GUT response to Northern	11
TPE	12
GUT response to TPE	15
Transport Focus	19
WMT	20
GUT response to WMT	22
CrossCountry	26



Gianmaria Cutrupi
Customer Manager (Aspirant Open Access Operators)
Freight & National Passenger Operators (FNPO)
System Operator
Network Rail

21 November 2022

Dear Gianmaria,

First Trenitalia West Coast Rail Limited response to Industry Consultation - Grand Union Trains, Section 17 Application, London Euston-Stirling

Context:

Thank you for the opportunity to respond to this application for the Grand Union Trains (GUT) proposed open access service between Stirling and London Euston, commencing from May 2025, on behalf of First Trenitalia West Coast Rail Limited (FTWCRL).

The GUT application reflects developments and industry engagement that has taken place since the initial consultation by Grand Union on proposed services on this route, from 27 August 2019. This includes through the West Coast Main Line (WCML) Industry Planning Group (IPG) and Events Steering Group (ESG) workstream to finalise the December 2022 Concept Train Plan.

FTWCRL has assessed the GUT proposal and whilst recognising the importance of healthy competition on the network for the benefit of the passenger, we cannot, at this time, offer our support to this application. This is on the basis that the proposal is primarily abstractive and therefore delivers poor taxpayer value for money in the context of Covid-19 recovery; and strategic development of the WCML timetable to target emerging demand.

Capacity and Performance:

FTWCRL has worked collaboratively with GUT alongside Network Rail, other Operators and wider stakeholders as part of the development of the December 2022 timetable structure. Reflecting this, further to Declaration of the WCML South Fast Lines as 'Congested Infrastructure' on 11 May 2020, Network Rail's WCML Feasibility Analysis Overarching Report issued 12 February 2021 stated that the Fast Lines could facilitate paths for 15 tph. In line with this, the West Coast December 2022 ESG has restructured the timetable to accommodate the increased quantum of service, changes to rolling stock, improvements to connectivity, HS2 enabling works at Euston and improvements to performance.

This includes the design of the timetable structure allowing for the phased introduction of additional FTWCRL Liverpool services from December 2023. FTWCRL's application for the associated access

rights is currently out for consultation, reflecting collaborative work undertaken through the ESG process. There is considerable socio-economic and revenue benefit arising from the introduction of these services.

This encompasses not only growth to and from Liverpool but the improvements to intermediate connectivity, including through building new markets for regular inter-city train services from Trent Valley stations and enhanced regional interchange opportunities. This is key to deliver on the aspirations of the Department, and will enable FTWCRL to introduce the capacity and customer connectivity benefits and return on investment, including in new rolling stock Class 807 and 805 Hitachi rolling stock.

We note GUT will be using new build bi-mode rolling stock, and that discussions with manufacturers and suppliers are on-going. We would need more information on the nature and capabilities of the specified rolling stock to make an assessment on associated performance impact, including contingency plans for rescue and recovery. Noting that if approved, crew and route training is planned to begin in time for a service start in 2025, we would question current assumptions on timescales and pricing for new train order and production.

Demand and Revenue:

To address some of the specific comments in section 4.1 of GUT's application; regarding award of the West Coast Partnership, we note that at the point of Franchise award, the Competition and Markets Authority (CMA) undertook an in-depth review of the impact on affected routes and flows, and decided that undertakings given by FirstGroup plc and Trenitalia SpA on behalf of FTWCRL and other subsidiaries were sufficient to mitigate or prevent any competition concerns. With regards to the comment in the Form P on Motherwell, note that from December 2020, FTWCRL introduced additional calls at Motherwell in the majority of its services to and from Scotland to improve regional and cross-border interchange opportunities across the Central Belt.

As well as impacting customer behaviour, the Covid-19 Pandemic has fundamentally changed the nature of FTWRCL's operating model – with an Emergency Recovery Management Agreement (ERMA) currently in place until 31 March 2023, ahead of transition to a National Rail Contract. This sees the Department take full revenue and cost risk.

Government continues to provide significant financial support to the rail industry post-pandemic at a level that is unprecedented. In reflection of this, our plans seek to prioritise and balance efficiency alongside Levelling Up, Union Connectivity and the drive towards Net Zero. From December 2022 FTWCRL will have restored the majority of our Pre-Covid service level north of Preston, with a small number of services to be reinstated later. As we re-build our timetable to encourage customers to return, the impact on the industry farebox and therefore taxpayer of the proposed GUT services is likely to be exacerbated. On this basis the application will further constrain the long-term revenue recovery of the WCML.

FTWCRL undertook a high-level assessment of the forecast revenue impact of the proposed GUT services to inform ORR's Economic Equilibrium Test for the original application launched in August 2019. This was shared with ORR in January 2020. Here, the GUT proposal was assessed to be primarily abstractive, as set out in our response to ORR.

This exercise has been repeated with the updated timetable position of both Operators. FTWCRL has compared the proposed timetable from May 2023 with the latest GUT timetable proposal. While

FTWCRL supports the ambition of Open-Access operation in growing rail travel as a whole, unfortunately, the result of this latest analysis confirms the previous position, whereby, the introduction of GUT services is primarily abstractive, not just from FTWCRL, but the industry more widely.

The results, using the FTWCRL version of MOIRA 1, show that almost 90% of the revenue attributable to GUT is abstracted from existing operators with only 10% estimated to be new revenue for rail.

Of the revenue abstracted from the existing operators, the MOIRA analysis estimates that around 75% is from FTWCRL with 25% from other National Rail TOCs with the majority of abstraction coming from established markets such as Milton Keynes to London and Preston to London with minimal generation being achieved through the introduction of these new services.

Conclusion:

Following our assessment of the revised GUT application, whilst recognising the importance of healthy competition on the network for the benefit of the passenger, FTWCRL is unable to support the application. This is the case as the application is primarily abstractive. As such it represents poor taxpayer value for money in the context of Covid-19 recovery; and strategic development of the WCML timetable to target emerging demand. We would be prepared to share our cost and revenue conclusions with the ORR in due course, as part of its evaluation process.

Please get in touch with any questions in the meantime.

Yours sincerely,

Head of Network Development & Planning
Avanti West Coast

Grand Union

Georgia Ehrmann,

Head of Network Development & Planning

Avanti West Coast

Email:

25 November 2022

Dera Georgia,

First Trenitalia West Coast Rail Limited response to Industry Consultation - Grand Union Trains, Section 17 Application, London Euston-Stirling

Thank you for your consultation response and acknowledgment of the significant work that has been undertaken by the industry following the Network Rail Declaration of Congested Infrastructure. In particular my colleagues are grateful of the positive role played in the ESG work by Avanti's own timetable planners.

While you have no particular issues on capacity and performance, if approved our rolling stock plan will need to be in line with the requirements of the route.

You raised a number of issues in respect of demand and revenue and noted the CMA review when the franchise was awarded. While you correctly note it raised no competition concerns following undertakings given; that concern was aimed purely at First Group's dominance of the market and had no bearing on the potential of others to introduce competition.

While noting the impact that the pandemic has had on the railway, it is a clear fact that the only route with on track competition, the ECML, has fared much better than elsewhere. If the recovery seen on the ECML was replicated elsewhere then the amount of Government support required would also be significantly reduced.

With First Group operating two of the three ECML open access operators you will be aware of the significant changes in customer behaviour there as opposed to the WCML (and GWML) where no such competition exists.

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB

Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW

A Company registered in England & Wales No: 11408012

www.granduniontrains.com

Grand Union

It is clear that far from having a negative impact on industry and operator revenue, the provision of competition on the ECML has stimulated growth in direct contrast to that seen elsewhere. Recent figures are stark with LNER reporting loadings of 106% of pre-pandemic, while First Group operated Avanti is at 74% on the WCML. The MD of LNER has been very clear that the existence of competition on the route has focused their minds on its customers. The ECML was also the first route to be back to full timetable, again compare that to the situation currently on the WCML and across the Pennines.

The evidence is clear that the arrival of some limited competition stimulates the market and forces operators to raise their game, evidenced so clearly on the ECML.

While Grand Union would have been surprised if Avanti had welcomed this application, the evidence of what is happening on the ECML would suggest quite clearly that it should.

Regards

Ian Yeowart

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB -

Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW -

A Company registered in England & Wales No: 11408012 -

www.granduniontrains.com

From: Jones, David - Integrated Transport
Sent: 25 October 2022 08:57
To: Gianmaria Cutrupi
Subject: RE: Industry Consultation - Grand Union Trains, Section 17 Application, London Euston-Stirling

Gian

Thank you for sending this through to the Liverpool City Region(LCR) for comment.

The LCR is fully supportive of the development of rail services. However in this case we note that there is an issue of congestion on the West Coast Main Line and that there are a number of operators wanting to operate additional services on this line.

The LCR is concerned that the provision of the Grand Union trains could impact on the delivery of the additional Avanti services between Liverpool and London (an additional 1tph) which is a franchise commitment. These services were expected to commence in December 22 but there introduction is delayed.

The LCR cannot support this proposal if the additional GU trains has any impact on the expected delivery of the additional Avanti services.

If it can be confirmed that there would be no impact on the delivery of the Avanti services this objection could be withdrawn.

Dave

[David Jones](#)

Rail Development Manager | 1 Mann Island, Liverpool, L3 1BP



From: Ian Yeowart
Sent: 26 October 2022 11:21
To: David Jones
Cc: Gianmaria Cutrupi
Subject: RE: Industry Consultation - Grand Union Trains, Section 17 Application, London Euston-Stirling

David,

Thank you for your recent consultation response.

The newly developed timetable for the WCML following the ESG has all the proposed services timetabled with a subsequent improvement of modelled performance of 15%. The services modelled include Avanti additional Liverpool's alongside Grand Union's 4 services to Stirling.

The reason why Avanti and Grand Union are having to submit applications via the ORR is that Network Rail is, at this stage, refusing to sell the capacity. Grand Union's proposed services have no impact on whether or not the extra Liverpool services are introduced, it is not a capacity issue.

As noted in our Form P: Grand Union actively participated in the West Coast Main Line (South) Industry Planning Group and subsequent Event Steering Group. Collaborative working on timetables with all operators and Network Rail planners resulted in a timetable that provided for all the requested access (Avanti, Grand Union and freight operators) and offered improved performance within an HS2 constrained temporary platform reduction at Euston. In a recent edition of Modern Railways - which carried a large article about the WCML - David Golding, who headed both the IPG and ESG stated "*.... and we came up with a timetable structure which can accommodate both the second Avanti service to Liverpool and Grand Union's Stirling services. In effect we have done what was postulated in that 2013 report.*"

I hope therefore you are now in a position to support the Grand Union application which does not impact on the capacity sought for Avanti.

Regards

Ian

Ian Yeowart MCILT
Managing Director

Grand Union Trains Ltd
Riverside Lodge
Naburn Lane
Fulford
York
YO19 4RB

www.granduniontrains.com



Gianmaria Cutrupi
Network Rail
Customer Manager (Aspirant Open Access Operators)
Freight & National Passenger Operators
System Operator

Northern Trains Limited
6th Floor
Northern House
9 Rougier Street
York
YO1 6HZ

(By email only)

21st November 2022

Dear Gianmaria,

Northern Trains Limited (NTL) formal response to the Section 17 Track Access Application by Grand Union Trains concerning proposed services between London Euston and Stirling.

Thank you for giving Northern Trains Limited (NTL) the opportunity to respond to the consultation regarding the Section 17 Application by Grand Union Trains, which was issued on 21st October 2022. I am responding on behalf of NTL.

Despite assurances given throughout this, and previous consultation periods regarding the proposed Track Access for Grand Union Trains, NTL are still concerned regarding power draw from the OLE on the West Coast Mainline. Network Rail (NWR) confirmed that modelling has been conducted for the December 2023 timetable, and responded with the key messages summarised below:

- There are multiple risks of Low Voltages (e.g., poor acceleration and potential unit trips) in classic feeding areas (Weaver-Crewe, Catterall to Euxton and Harker-Penrith).
- The existing marginal non-compliance at Catterall will be worsened, with increased risk of action from Electricity North West (Supplier).

NTL note in NWR's response that exceeding the asset capacity limits should be avoided. NTL are concerned that despite exceeding NWR's contractual limits at Catterall feeder station with the current traffic levels requiring access to the OLE, Grand Union Trains plan to operate further electric powered rolling stock which would place additional pressure on an asset that is already working at, and at times, over capacity.

NTL hold current track access rights where we are unable to operate electric traction between Preston and Carnforth and this is a constraint that NTL must consider when appraising our

www.northernrailway.co.uk

NORTHERN TRAINS LIMITED

GEORGE STEPHENSON HOUSE, TOFT GREEN, YORK, ENGLAND YO1 6JT

Company No. 03076444

future rolling stock strategy. It therefore does not seem right that new services that require electric provision are allowed to operate where operators such as NTL that hold current access rights are already restricted in its operations due to the power draw issues.

Further, NTL have raised concerns informally during this consultation period regarding the performance modelling report. The report suggested that incorporating aspirant services without existing rights would result in only a very small performance improvement over Dec '19 on the WCML. The Dec '19 timetable was not considered to be very robust, nor well performing. We thank Grand Union Trains for their response to the concern raised, however NTL still do not have certainty regarding the performance of the WCML with the introduction of further services on already congested infrastructure. We would suggest that a further performance review from Network Rail is required that considers the performance impact of these new services, noting the upcoming Dec'22 timetable structure that is soon to be implemented and which will see multiple structural timetable changes in the west.

Finally, NTL have raised concerns regarding the stabling of additional sets in the Preston area. Stabling capacity is at a premium in the North West, particularly for electric stock. NTL is not aware of any suitable stabling locations around Preston, with Croft Street siding being one of the only suitable locations. Croft Street is already used to capacity by NTL and Transpennine Express. NTL note in the response from Grand Union Trains that bi-mode sets form the basis of the rolling stock strategy for the aspirant operator. NTL needs visibility of the proposed stabling plan to understand the impact on NTL of the stabling requirements of GUT in order to support introduction of the proposed new service.

Given NTL's outstanding concerns, we are unable to support the application at the current time. I look forward to hearing back from you, please do not hesitate to contact me if you require any further information in the meantime.

Yours Sincerely,

Alex Bateman
Track Access Manager

www.northernrailway.co.uk

NORTHERN TRAINS LIMITED
GEORGE STEPHENSON HOUSE, TOFT GREEN, YORK, ENGLAND YO1 6JT
Company No. 03076444

Grand Union

Alex Bateman
Northern Trains Limited

25 November 2022

Dear Alex,

**Industry Consultation - Grand Union Trains, Section 17 Application, London
Euston-Stirling**

Thank you for Northern's formal response to our application for rights to operate new services between London Euston and Stirling.

In its earlier response on 19 December 2019 at the beginning of the project Northern stated it was supportive of the project and looked forward to working with Grand Union.

It is therefore extremely disappointing that Northern has moved away from that position, not least as a compliant timetable has been developed, bi-mode rolling stock is proposed and a significant improvement in performance has been modelled which all address the issues of power supply, performance and stabling raised in your response.

Regards

Ian Yeowart -

GRAND UNION TRAINS LIMITED
Riverside Lodge, Fulford, YORK, YO19 4RB -
Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW -
A Company registered in England & Wales No: 11408012 -
www.granduniontrains.com



TransPennine Express
7th Floor
Bridgewater House
60 Whitworth Street
Manchester

Gianmaria Cutrupi
Customer Manager (Aspirant Open Access)
Network Rail System Operator

By Email only

Network Rail reference:

21/11/22

Dear Gianmaria,

With reference to the Industry Consultation issued by Network Rail on 21/10/22 relating to the Section 17 Track Access proposal for Grand Union Trains to run services between London Euston-Stirling, please find attached the response in behalf of TransPennine Express (TPE).

Unfortunately, TPE is not in a position to support this application. We noted that:

“Grand Union is proposing a new open access service linking towns which have no, or limited, long distance services into the wider rail network as far as London. It provides greatly improved connectivity as well as competitive services for some station pairs on the West Coast Main Line

Four trains per day each way are planned to operate between Stirling and London Euston via the Scottish Central route which avoids both Edinburgh and Glasgow with intermediate calls at Larbert, Greenfaulds, Whifflet, Motherwell, Lockerbie in Scotland and Carlisle, Preston, Nuneaton and Milton Keynes in England”.

In the context of this, we are unable to support this application on merits of concern we have in the following areas:

Timetable

1. Since TPE responded to GUTs original proposal in July 2021, we are aware that GUT has worked with Network Rail and Operators as part of the development of the forthcoming December 2022 timetable structure. We are conscious of capacity issues that have been identified by Network Rail on the WCML South section of the railway and whilst we do not directly operate on this section, we are concerned that GUTs application would take any capacity beyond the identified maximum number of trains of 15tph once timetable changes of Avanti and other Operators are taken into consideration. Historically, services running in corridors where trains per hour exceeds the identified maximum capacity results in congestion and as such delays from this could easily be experienced further north on the WCML were TPE operates our Anglo Scottish Trains to Glasgow and Edinburgh.
2. TPE further notes that West Coast Partnership intends to call at Motherwell from December 2022 and therefore begins to serve the market “gap” identified by GUT. We also note that Motherwell – Glasgow corridor is a heavily congested piece of infrastructure with several passenger and freight operators using the corridor as part of long-distance journeys. Additional services risks potentially carrying over any disruption to other regions even further.
3. Finally on any proposed future timetable, TPE remains particularly concerned that many services may require flexing and the impact that this may have on TPE services at Glasgow Central but also within the Manchester area and access to Manchester Airport. We require confirmation that our previous July 2021 concerns as below can be fully resolved:
 - *Implementing the Grand Union paths has required flexing of timetabled services in all cases, and further analysis would be required for the paths to be fully Timetable Planning Rule (TPR) compliant. Has this been resolved?*
 - *Grand Union services departing early or arriving late at Stirling conflict with Engineering Access Statement (EAS) Section 4 possessions. This applies to the first up path and last down path. Has this been resolved?*

Rolling Stock

4. TPE notes that in GUTs Form P, “New build bi-mode rolling stock is planned. Discussions with potential suppliers and manufacturers are ongoing”. TPE needs to understand the capabilities of any specified rolling stock to make an assessment on performance impact, timetable Sectional Running Times and also contingency plans for rescue and recovery. Once the need for Traction Compatibility and Traincrew training is factored in, December 2025 also feels ambitious.

Demand and Revenue

5. TPE would continue to question the overall forecast revenue impact of the introduction of the proposed GUT services. Whilst the direct impact on TPE is relatively small, the overall impact in terms of GUTs proposal being primarily abstractive on the industry as a whole and needs to be carefully considered. We would further highlight that since the Covid-19 Pandemic our operating model has changed considerably – with a National Rail Contract now in place. This sees Rail North take full revenue and cost risk. TPE continues to re-build our timetable to encourage WCML customers to return and the impact on the industry farebox and therefore taxpayer of the proposed GUT services is likely to be exacerbated.

These findings emphasise our concerns with this proposal and underpin why TPE cannot support this proposal until all issues can be fully resolved.

We look forward to your and Grand Union Trains response on these issues.

Yours sincerely,

**Chris Hassall,
Head of Commercial Contracts,
TransPennine Express**

Grand Union

Chris Hassall,
Head of Commercial Contracts,
TransPennine Express

25 November 2022

Dear Chris,

Industry Consultation - Grand Union Trains, Section 17 Application, London Euston-Stirling

You raised a number of issues in your response which are addressed below.

It does, however, remain disappointing that First Group owned TPE would raise the issue of impact on 'industry revenue' while its two sister companies operate open access on the ECML in direct competition with LNER and a number of TPE's own services - 'competition' that pass without comment.

Timetable

1. Since TPE responded to GUTs original proposal in July 2021, we are aware that GUT has worked with Network Rail and Operators as part of the development of the forthcoming December 2022 timetable structure. We are conscious of capacity issues that have been identified by Network Rail on the WCML South section of the railway and whilst we do not directly operate on this section, we are concerned that GUTs application would take any capacity beyond the identified maximum number of trains of 15tph once timetable changes of Avanti and other Operators are taken into consideration. Historically, services running in corridors where trains per hour exceeds the identified maximum capacity results in congestion and as such delays from this could easily be experienced further north on the WCML were TPE operates our Anglo Scottish Trains to Glasgow and Edinburgh.

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB -
Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW -
A Company registered in England & Wales No: 11408012 -
www.granduniontrains.com

Grand Union

Grand Union's timetable, along with that of Avanti, is compliant and forms part of the Concept Train Plan developed from the ESG, which itself came about following Network Rail's declaration of congested infrastructure. Your response would indicate that you also do not support the introduction of the additional Avanti Liverpool services – I trust TPE will be consistent in this respect.

The work undertaken on performance shows a modelled improvement of 15% over the 2019 timetable, a significant improvement.

2. TPE further notes that West Coast Partnership intends to call at Motherwell from December 2022 and therefore begins to serve the market “gap” identified by GUT. We also note that Motherwell – Glasgow corridor is a heavily congested piece of infrastructure with several passenger and freight operators using the corridor as part of long-distance journeys. Additional services risks potentially carrying over any disruption to other regions even further.

The ‘West Coast Partnership’ – Avanti is of course a First Group company, and while stops at Motherwell will be welcomed by passengers the provision of direct services between Stirling and the Central Belt form the basis of the Grand Union submission - Grand Union will not be operating on the corridor between Motherwell and Glasgow, leaving the WCML there to travel towards Stirling.

It is also worth pointing out that colleagues at Network Rail Scotland have not raised any issues about the introduction of Grand Union services on either capacity or performance grounds.

3. Finally on any proposed future timetable, TPE remains particularly concerned that many services may require flexing and the impact that this may have on TPE services at Glasgow Central but also within the Manchester area and access to Manchester Airport. We require confirmation that our previous July 2021 concerns as below can be fully resolved:

*- Implementing the Grand Union paths has required flexing of timetabled services in all cases, and further analysis would be required for the paths to be fully Timetable Planning Rule (TPR) compliant. **Has this been resolved?***

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB -

Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW -

A Company registered in England & Wales No: 11408012 -

www.granduniontrains.com

Grand Union

- *Grand Union services departing early or arriving late at Stirling conflict with Engineering Access Statement (EAS) Section 4 possessions. This applies to the first up path and last down path. **Has this been resolved?***

Flexing is inherent in any timetable development and Grand Union's services have been fully developed as part of the recent Concept Train Plan. As TPE will be aware it is illegal to 'hardwire' paths within any timetable.

Any outstanding issues on engineering access will be resolved at the time of any ORR award prior to being in a position to agree a track access contract.

Rolling Stock

4. TPE notes that in GUTs Form P, "New build bi-mode rolling stock is planned. Discussions with potential suppliers and manufacturers are ongoing". TPE needs to understand the capabilities of any specified rolling stock to make an assessment on performance impact, timetable Sectional Running Times and also contingency plans for rescue and recovery. Once the need for Traction Compatibility and Traincrew training is factored in, December 2025 also feels ambitious.

This is a role for Network Rail not TPE. Currently timings are based upon 110mph Class 91 operation. New build bi-mode stock will be 125mph capable and have improved performance characteristics over the timings currently used as well as diversionary ability away from the wires

Any award from the ORR will identify the requirements of rolling stock performance.

Demand and Revenue

5. TPE would continue to question the overall forecast revenue impact of the introduction of the proposed GUT services. Whilst the direct impact on TPE is relatively small, the overall impact in terms of GUTs proposal being primarily abstractive on the industry as a whole and needs to be carefully considered. We would further highlight that since the Covid-19 Pandemic our operating model has changed considerably – with a National Rail Contract now in place.

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB -

Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW -

A Company registered in England & Wales No: 11408012 -

www.granduniontrains.com

Grand Union

This sees Rail North take full revenue and cost risk. TPE continues to re-build our timetable to encourage WCML customers to return and the impact on the industry farebox and therefore taxpayer of the proposed GUT services is likely to be exacerbated.

As is now clear, far from having a negative impact on industry and operator revenue, the provision of competition on the ECML has stimulated growth in direct contrast to that seen elsewhere. Recent figures are stark with LNER reporting loadings of 106% of pre-pandemic, while First Group operated Avanti is at 74% on the WCML. The MD of LNER has been very clear that the arrival of competition on the route has focused their minds on its customers. The ECML was also the first route to be back to full timetable, again compare that to the woeful situation currently on the WCML and across the Pennines.

The evidence is clear that the arrival of some limited competition stimulates the market and forces operators to raise their game, evidenced so clearly on the ECML.

As Grand Union has stated on a number of previous occasions when responding to various First Group owned responses, the issue of impact on the farebox and the taxpayer does not appear to be an issue where First Group operates the 'competing service', only where it faces competition.

The ORR will make its decision following a comprehensive review of the application.

It remains disappointing that Grand Union continues to face hostility and protectionism from parts, but not all, of the industry, particularly so in the case of First Group where the benefits of open access are so clearly known and ably delivered.

Regards

Ian Yeowart

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB -

Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW -

A Company registered in England & Wales No: 11408012 -

www.granduniontrains.com

Reed, David

From: Martin Clarke
Sent: 21 October 2022 16:50
To: Gianmaria Cutrupi
Subject: Re: Industry Consultation - Grand Union Trains, Section 17 Application, London Euston-Stirling

Hi Gian

Thanks for this proposal for Grand Union Trains to operate open access services between Stirling and Euston, via the WCML. Noting the successes with open access operators on the ECML on increasing passenger numbers and overall passenger experience across all operators on the route, we're happy to support this proposal.

Best regards

Martin

Martin Clarke
Rail technical advisor
Transport Focus



Gianmaria Cutrupi
Network Rail
By email only

18 November 2022

Dear Gianmaria,

Re: Industry Consultation - Grand Union Trains, Section 17 Application, London Euston-Stirling

Thank you for providing West Midlands Trains (hereafter “WMT”) with the opportunity to comment on the Section 17 application submitted by Grand Union Trains (hereafter “GUT”) to operate new services on the West Coast Mainline between London Euston and Stirling.

We have some points which we would be grateful if you would address:

- 1) Capacity on the West Coast Mainline has long been a concern. Following the Covid-19 pandemic, WMT and other operators have revised timetables to respond to changes in demand. We are concerned that these additional services will present further challenges to a stretch of constrained infrastructure where capacity management is already problematic.
- 2) We are concerned that trains coming from Stirling will likely present late on West Coast South region creating a performance risk to other Operators. This is particularly relevant given that the opening line of the Williams-Schapps Plan for Rail states: “We want our trains to run on time”. Also, performance measures for Operators have changed from PPM to T-3.
- 3) As part of the HS2 works at London Euston, several platforms are being removed permanently and some temporarily. Stabling at London Euston is challenging at present without additional stock requiring long layovers and stabling. Has stabling capacity been modelled to show that these additional trains can be accommodated?
- 4) Traction power is the topic of much discussion. Can you confirm that the proposed stock would run in non-OHLE mode on West Coast South region if necessary?
- 5) Have the Economic Equilibrium Test and Not-Primarily Abstractive Tests been conducted? WMT is concerned that calls at Nuneaton and Milton Keynes Central could be abstractive. We would suggest that northbound services pick up only at Milton Keynes Central and Nuneaton and southbound services set down only Milton Keynes Central and Nuneaton. On the subject of revenue abstraction and future franchises, we question the commercial validity of the proposed GUT calls at Nuneaton and Milton Keynes, which (when previously modelled using MOIRA) suggest a significantly increased level of abstracted revenue from other Operators, whilst generating proportionately very little new revenue and also duplicating service patterns that are already well-served by a number of existing Operators.

Any long-term application should be considered as part of a wider review into the best use of capacity on the WCML, considering the aspirations for existing and future franchises via a holistic and managed approach.



West
Midlands
Trains

In conclusion, WMT must object to the GUT application until these concerns have been adequately resolved.

Sincerely,

Navdeep Brahmhatt-Gold
Network Access Manager
West Midlands Trains

Grand Union

Navdeep Brahmhatt-Gold
Network Access Manager
West Midlands Railway
Email:

21 November 2022

Dear Navdeep

Industry Consultation - Grand Union Trains, Section 17 Application, London Euston-Stirling

You raised a number of questions about our application, and I have addressed them below. Please feel free to contact me should you require any further information.

1) Capacity on the West Coast Mainline has long been a concern. Following the Covid-19 pandemic, WMT and other operators have revised timetables to respond to changes in demand. We are concerned that these additional services will present further challenges to a stretch of constrained infrastructure where capacity management is already problematic.

You will be aware that the southern part of the route had previously been declared congested and this led to a declaration of congested infrastructure which was addressed by Network Rail in line with the Access and Management Regulations.

This culminated in an industry ESG and the collaborative development (by all operators) of a new Concept Train Timetable. This timetable included the services sought by Grand Union and also the additional Avanti Liverpool services. The new timetable also showed a modelled improvement in performance of 15%.

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB
Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW
A Company registered in England & Wales No: 11408012
www.granduniontrains.com

Grand Union

2) We are concerned that trains coming from Stirling will likely present late on West Coast South region creating a performance risk to other Operators. This is particularly relevant given that the opening line of the Williams-Schapps Plan for Rail states: "We want our trains to run on time". Also, performance measures for Operators have changed from PPM to T-3.

Colleagues on the northern part of the route and in Scotland did not raise any issues in relation to the introduction of these services nor any potential performance impact. I am not quite sure therefore why just because trains are coming from Stirling you suggest they will present late.

As mentioned previously the industry work at the ESG not only showed all services could be accommodated but also that there was a modelled improvement in performance.

3) As part of the HS2 works at London Euston, several platforms are being removed permanently and some temporarily. Stabling at London Euston is challenging at present without additional stock requiring long layovers and stabling. Has stabling capacity been modelled to show that these additional trains can be accommodated?

The ESG work developed the Concept Timetable with the reduced platforms and all services accommodated. Grand Union would not be accessing the network until 2025 when further platforms will be brought into use.

4) Traction power is the topic of much discussion. Can you confirm that the proposed stock would run in non-OHLE mode on West Coast South region if necessary?

Grand Union is proposing to use bi-mode new build rolling stock. This will enable it to operate in either mode and also give significant diversionary capability.

5) Have the Economic Equilibrium Test and Not-Primarily Abstractive Tests been conducted? WMT is concerned that calls at Nuneaton and Milton Keynes Central could be abstractive. We would suggest that northbound services pick up only at Milton

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB

Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW

A Company registered in England & Wales No: 11408012

www.granduniontrains.com

Grand Union

Keynes Central and Nuneaton and southbound services set down only Milton Keynes Central and Nuneaton. On the subject of revenue abstraction and future franchises, we question the commercial validity of the proposed GUT calls at Nuneaton and Milton Keynes, which (when previously modelled using MOIRA) suggest a significantly increased level of abstracted revenue from other Operators, whilst generating proportionately very little new revenue and also duplicating service patterns that are already well-served by a number of existing Operators.

The ORR undertakes a thorough review of all open access applications. I note your comment specifically about Nuneaton and Milton Keynes but the addition of a significant number of new direct journeys is an important part of the application alongside a limited amount of intercity competition. You will also be aware of the ridership position on the ECML as opposed to the WCML, where the ECML 'franchised' operator is now at 106% of pre-pandemic loadings while on the WCML Avanti is at only 74%.

The MD of LNER has made it quite clear that the existence of the open access operators has focused its mind on its passengers and is in direct contrast to other intercity routes where some limited competition is always seen as a threat.

It is hard to envisage that services coming from and going to Stirling are duplicating service patterns, but as mentioned earlier a limited amount of competition on the Intercity flows has proven to be of significant benefit to passengers, and as the ECML has shown, also to operators.

Any long-term application should be considered as part of a wider review into the best use of capacity on the WCML, considering the aspirations for existing and future franchises via a holistic and managed approach.

That work has just recently been completed with the IPG followed by the ESG. As open access has shown elsewhere the industry itself is not particularly good at identifying passenger needs and requirements, not least as it appears unable to move

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB -

Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW -

A Company registered in England & Wales No: 11408012 -

www.granduniontrains.com

Grand Union

at the moment without DfT guidance. The ORR is well placed to consider access applications.

I hope that the responses have addressed your concerns and you now feel able to support what is a very important new service in respect of Union Connectivity.

Regards

Ian Yeowart

GRAND UNION TRAINS LIMITED

Riverside Lodge, Fulford, YORK, YO19 4RB -

Registered Office: Fulford Lodge, 1 Heslington Lane, Fulford, YORK, YO10 4HW -

A Company registered in England & Wales No: 11408012 -

www.granduniontrains.com

From: Josh Watkins
Sent: 21 November 2022 09:40
To: Gianmaria Cutrupi
Cc: \$UK XC -Track Access
Subject: RE: Industry Consultation - Grand Union Trains, Section 17 Application, London Euston-Stirling

Hi Gianmaria,

Following no internal issues raised during consultation, I am pleased to advise that this application is accepted by XC Trains Ltd.

Thanks,

Kind regards,

Josh Watkins, Senior Timetable Programme & Development Manager, CrossCountry

Address: 5th Floor, Cannon House, 18 The Priory Queensway, Birmingham, B4 6BS

