



David Reed  
Senior Executive, Access and Licensing  
Office of Rail and Road  
25 Cabot Square  
London  
E14 4QZ

24<sup>th</sup> December 2024

## **Grand Central Section 17 application – 11-year Track Access Agreement: Response to Network Rail representations**

Dear David

Thank you for email dated 11<sup>th</sup> December 2024. We have reviewed Network Rail's (NR) representations and have the following comments.

Throughout 2024, Grand Central (GC) has engaged with NR on its proposal to extend its current service levels to 2038. The proposal would see GC commit to a new build fleet of trains (subject to final internal approval), resulting in significant investment in the industry by an open access operator, underpinning the requested 11-year contract.

### **Workstream 1: Capacity modelling and Performance assessment**

We note NR's comments in relation to service timings and we will work with NR to establish correct sectional running times once we have identified our preferred supplier. As stated by NR, GC has committed that any new stock will at least meet the timings currently utilised by our Class 180 units in order to avoid any detrimental impact on the timetable. We of course expect some level of improvement, especially when operating under electric traction.

In relation to maintenance and servicing locations, this will in part be driven by our selection of preferred manufacturer. However, I can confirm that GC will retain the requirement to stable units in the North East, West Yorkshire and London as per our current operation. We will obviously inform NR as soon as we have identified our preferred solution in order to support the development of any changes to empty coaching stock moves required.

### **Workstream 2: Route clearance for new build Bi-Mode trains**

GC is aware of the requirements under RIS-9270-RST in relation to rolling stock compatibility. We welcome the approach from NR to work together on the remit in order to support GC in demonstrating compatibility.

GC will advise NR of train length, as soon as it has selected its preferred supplier, but can confirm it will be a 5-car unit with similar size to 5-car units currently operating on the East Coast Mainline (ECML).

Grand Central Railway Company Limited  
Suite 2A, 20 George Hudson Street,  
York, YO1 6WR

### **Workstream 3: Power modelling**

As identified by NR, GC is proposing to introduce new (at least) Bi-Mode units, which would draw electric power when operating on the ECML under the wires. Following initial power supply modelling work to support the introduction of the ECML Event Steering Group (ESG) timetable, NR has identified that further power supply modelling is required to consider GC operating its existing service levels with electric traction as well as some additional services proposed by other operators as part of the ORR's interacting access rights process.

GC met with NR and contributed to the original remit development, and initial power supply modelling outputs were shared with GC on 21<sup>st</sup> November 2024 in a call held with NR. Our understanding of the initial results is that when considered in isolation, GC services could be accommodated within the existing power supply capacity.

Whilst, a copy of these initial outputs has not been shared with GC, we would request NR to share these initial outputs with the Office of Rail and Road (ORR) and also set out a clear timeline as to how the power supply modelling will be concluded in January as well as how these initial outputs will contribute to the final analysis.

We anticipate that full modelling outputs will include various scenarios for GC and other operators, some of which do not currently hold access rights for the specific services being considered. GC is an existing operator who has been providing services to the North East and West Yorkshire since 2007 and 2010 respectively. The ORR in its own guidance suggests a strong presumption of the continuation of access rights for existing services and therefore it is GC's view that the initial outputs suggesting GC services can be accommodated should be sufficient to allow the application to be supported.

We also note NR's comment in relation to the potential for a specific footnote in Schedule 5 which would require GC to operate under diesel traction for part of the service. GC is currently operating a 25-year-old fleet of diesel trains which has suffered from reliability issues. These trains are operated on routes which have significant proportions electrified, supporting a key intent of our proposal to move away from the use of diesel wherever possible significantly reducing our emissions and improving our service from an environment and sustainability perspective. A request to continue operating sections of electrified route with diesel traction would be extremely disappointing especially when these units will take c. 3 years to be built, providing a significant time window for additional measures to be considered.

### **Workstream 4: Sale of Access Rights**

Noting NR's remaining concerns, whilst not necessarily agreeing, we appreciate the support for the continuation of GC's access rights and also the collaborative nature that NR has taken to supporting GC in development of its current application. We are happy to amend the drafting in the contract as required to reflect the current footnotes in Table 2.1 and Table 4.1 of schedule 5. However as set out in our 24<sup>th</sup> Supplemental Agreement we would urge NR and ORR to reach decisions on the conversion and continuation of contingent rights as soon as possible in order to provide as much certainty as possible in future timetables for timetable participants.

We also recognise the drafting errors in Table 2.1 in relation to the quantum of Bradford services and the wording of 3.8.2, both of which we will be happy to update accordingly.

Grand Central Railway Company Limited  
Suite 2A, 20 George Hudson Street,  
York, YO1 6WR

## **Workstream 5: Operational readiness and European train control system (ETCS) fitment**

GC has specified in its request to manufacturers that the units offered must be fitted with ETCS and compatible with the infrastructure on which it will operate. GC has played a significant role in the East Coast Digital Programme (ECDP) and will continue to participate fully especially in anticipation of the introduction of a new fleet of trains once a preferred manufacturer has been selected.

As identified by NR, and set out in our Form P, GC had requested that access rights be granted by 31<sup>st</sup> December 2024 in order to be able to commit to an order on new rolling stock in the early part of 2025. Whilst we appreciate this will not be possible based on current timescales, we would urge NR to work towards resolution of any outstanding issues as soon as possible, and we are happy to provide any further information or hold further discussions as required in order to support this. The timescales for new rolling stock remain challenging, with the build likely to take c. 3 years and therefore continued delay to the award of access rights lengthens the period that GC will continue to operate an ageing diesel fleet, which has provided a significant reliability challenge over the last 2 years.

GC has provided significant passenger benefits over the last 17 years offering a valued services to communities in the North East and West Yorkshire. It would therefore be extremely disappointing if NR felt it was unable to reach a position of support for the extension of these services on the basis of them requiring to operate under electric traction.

We look forward to continuing to discussions with NR with a view to a quick resolution as early as possible in January 2025.

Yours sincerely,



Chris Brandon  
Interim Director



Grand Central Railway Company Limited  
Suite 2A, 20 George Hudson Street,  
York, YO1 6WR