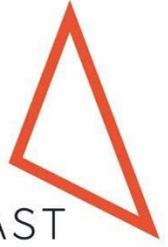


## Grand Union Trains London-Stirling October 2023 Industry Consultation Responses

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Gianmaria Cutrupi  
Customer Manager (Aspirant Open Access Operators)  
Freight & National Passenger Operators (FNPO)  
System Operator Network Rail  
11th October 2023

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 new application for the Grand Union Trains (GUT) proposed open access service between Stirling and London Euston, dated 8th September 2023 and commencing from June 2025, on behalf of First Trenitalia West Coast Rail Limited (FTWCRL).

The application reflects developments since the previous application by Grand Union on the route, submitted on 17th October 2022 and consulted with the industry.

As previously, FTWCRL has assessed the GUT proposal. 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 continued focus on market recovery and growth, and strategic development of the WCML timetable to target emerging demand.

**Capacity and Performance:**

FTWCRL has continued to work collaboratively with GUT alongside Network Rail, other Operators and wider stakeholders as part of the development and successful delivery of the December 2022 timetable structure. This includes through the Events Steering Group (ESG) forum. Reflecting the Declaration of the WCML South Fast Lines as 'Congested Infrastructure' on 11th May 2020, the 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 included the design of the timetable structure allowing for the phased introduction of additional FTWCRL Liverpool services from June 2024 onwards. FTWCRL's application for the associated access rights is currently being reviewed by ORR, following industry consultation. 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 Class 807 and 805 Hitachi rolling stock now being delivered.

During the December 2022 ESG, ourselves and GUT highlighted the need to protect strategic capacity found through the ESG, that would be required when new rolling stock becomes available. It was our concern that even if a small part of a path is eroded and utilised by another service, the end to end path becomes unworkable. This is particularly pertinent north of Preston which is predominantly a two-track railway with lots of flat junctions and limited opportunities to overtake slower freight services. Despite a paper produced by Network Rail on 23<sup>rd</sup> February 2022 (called “December 22 NW&C ESG Strategic Capacity Proposal Paper”) the recommendations have not been enacted.

As a result, service aspirations not part of the ESG process have been accommodated to the detriment of the strategic ESG paths. We believe that a similar piece of work is now required to the West Coast Main Line Capacity Assessment 2020, with a cross-industry group undertaking an appraisal of the WCML capacity north of Preston in the December 2023 timetable.

## **Rolling Stock**

We note GUT now propose to use available Class 22x diesel trains and seek a contract of up to 10 years on the grounds of the investment to be made in the 22x fleet including further enhancements during the contract term. This replaces the previous intention to procure new Bi-mode trains and is attributed to concern about power supply upgrades, a concern that we share and on which we are working collaboratively with Network Rail to ensure that we maximise the use of the available electrical capacity.

AWC would raise three issues with the GUT application in respect of rolling stock;

- Rolling Stock - It is not clear whether GUT are referring to tilting Class 221 trains, non-tilting Class 222 trains, or some cascade offering Class 220 trains. A Class 221 fleet might enable GUT to utilise tilt EPS speeds but a Class 220 or Class 222 fleet would be restricted to MU or PS speeds. We would need more information on the capabilities of the specified rolling stock to assess the performance impact, including contingency plans for rescue and recovery.
- Traction – FTWCRL will, through our fleet strategy, eliminate diesel traction on services running on WCML North and into Scotland. Whilst we identify this in the short term helps to alleviate concerns around electric traction power supply, the GUT proposal appears to perpetuate LDHS diesel operation over this route for up to 10 years. Suggesting further enhancements during the contract term would imply no plans to migrate to cleaner and more sustainable electric traction during the contract term.
- Power Supply - In obtaining access independent of power supply concerns, were GUT to set out to procure as an incumbent Open Access operator during the contract term a fleet of new or cascaded EMU or Bi-mode trains, then the power supply capacity issue would once again become a concern as to whether they could be permitted to operate electric traction over key parts of the WCML and a new commercial and technical process of Vehicle Change and compatibility would ensue.

In the revised GUT application, there is no detailed information on the depot and stabling strategy. This is pertinent to the timetable, particularly first and last trains and Engineering Access. Please could GUT provide more information on the following:

- Fuelling – There is currently no fuelling system installed at Wembley Inter City Depot to facilitate the fuelling of Voyagers. Where are GUT planning fuel the trains at the south end of the WCML?
- Stabling at Preston – When FTWCRL looked at options to stable an additional unit at Preston it could not be accommodated by Network Rail with the existing infrastructure maintenance strategy. Can GUT clarify where they intend to stable their unit in the Preston area?
- Maintenance – The Form P it states that the trains will be maintained under a full train service agreement (TSA). Can GUT confirm where will the trains be maintained?

#### **Demand and Revenue:**

Currently there is no material change to the timetable proposition from GUT and as such the previous analysis undertaken still stands. With regards to Section 4.1 of the Form P, 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, Covid-19 fundamentally changed the nature of FTWCRL's operating model – with an Emergency Recovery Management Agreement (ERMA) ahead of transition to a National Rail Contract from 15<sup>th</sup> October 2023. This sees the Department for Transport take full revenue and cost risk.

Government continues to provide significant financial support to the rail industry at a level that is unprecedented. In reflection of this, our plans seek to prioritise and balance efficiency alongside demand growth, Levelling Up, Union Connectivity and the drive towards Net Zero. From December 2022 we 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 new 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 continued focus on market recovery and growth, 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,

[Georgia Ehrmann]

Head of Network Development & Planning  
Avanti West Coast

# *Grand Union*

Georgia Ehrmann,

Head of Network Development & Planning

Avanti West Coast

Email:

30 October 2023

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 capabilities of the route. New build rolling stock is currently extremely difficult to procure due to the many other uncertainties in the market, and unlike franchise/concession operators, open access operators do not have the comfort of asking the taxpayer to pay for its fleet of trains.

While the current 22x fleet is indeed diesel, there are significant advances in fuel technology that we would look to utilise over time if the application is approved. Alongside this, with technology advancing at such a pace, there may be other options for traction that are developed. Using a reliable off-lease fleet would enable Grand Union not only to evaluate emerging technologies, but also enable it to work alongside Network Rail while it seeks to address the power supply challenge it faces not only on the WCML but elsewhere.

**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](http://www.granduniontrains.com)

# ***Grand Union***

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 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.

It is therefore 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. The MD of LNER has been very clear that the existence of competition on the route has focused its mind 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 elsewhere.

As is clearly evidenced on the ECML, the introduction of competition has achieved a number of things. It has increased ridership significantly, increased overall industry revenue, increased choice and made travel more affordable. At the same time also seeing an improvement in passenger satisfaction.

While the industry continues to model 'abstraction impact' the actual evidence [of what is happening on the ECML] points clearly to the presence of competition 'in the market' having a positive financial impact for all operators, noted by LNER. It is therefore not reasonable from either a taxpayer or passenger perspective to believe that the monopoly supplier can only rely on the taxpayer to drive its recovery when all the evidence states otherwise.

You raised points around fuelling, stabling and maintenance. While the actual maintenance provider and location still has to be determined, the planned service is not expecting to stable a unit in London. Grand Union will continue discussions with Network Rail and others on suitable locations should the application be successful.

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

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# ***Grand Union***

should as a way of stimulating the entire market, improving not only its own position, but also helping alleviate the burden on the taxpayer.

Regards

Ian Yeowart

**GRAND UNION TRAINS LIMITED**

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

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[www.granduniontrains.com](http://www.granduniontrains.com)

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**From:** crosscountrytrains.co.uk  
**Sent:** 04 October 2023 08:32  
**To:** Gianmaria Cutrupi  
**Cc:** \$UK XC -Track Access  
**Subject:** RE: Industry Consultation - Grand Union Trains, Section 17 Application, Stirling-London Euston

OFFICIAL

Hi Gianmaria,

Please be advised that due to no issues being raised internally at CrossCountry during the consultation period, we are happy accept as it has no perceived impact to us on the network.

[Kind Regards](#)

**Martin Haffner**, Track Access Manager, CrossCountry

**Mobile:**

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



**From:**

**To:**

**Subject:**

**Date:**

Re: Industry Consultation - Grand Union Trains, Section 17 Application, Stirling-London Euston  
11 October 2023 11:22:05

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OFFICIAL

Hello Gian,

Many thanks for this.

GWR intends to reach an alternative London Main Line Terminal whenever London Paddington is blocked due to Restrictions of Use for the building of the layout and station at Old Oak Common GWML. This happens on selected dates between 2024 and 2030. In addition diversions are again likely to be required after this to facilitate a number of items including renewal of the Paddington throat.

GWR's preference for customer and operations reasons is London Euston, although London Waterloo is also under consideration.

Paths into Euston will therefore on these dates (which are not yet firm and will not be given the need potentially for late notice items) be at a premium and I should be very grateful if this were borne in mind please in considering any caveat to Schedule 5 of any contract involving GUT's aspiration on the Euston - Stirling route.

Many thanks.

Rob

**Robert Holder** | Network Access Manager | Great Western Railway  
1 Milford Street | Swindon | SN1 1HL

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First Greater Western Limited | Registered in England and Wales number 05113733  
Registered office: Milford House, 1 Milford Street, Swindon SN1 1HL.

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**From:** Gianmaria Cutrupi  
**Sent:** 15 September 2023 12:11  
**To:** Consultations  
**Cc:** GUT - Ian Yeowart  
**Subject:** RE: Industry Consultation - Grand Union Trains, Section 17 Application, Stirling-London Euston

Hi Susan,

Thank you for your queries.

We completed a comprehensive range of analyses to evaluate the previous version of this application, including:

- Grand Union Trains Euston Stirling Autumn 2021 Path Analysis
- Grand Union Class 93 Analysis
- Simulation Modelling for Dec 22 WCML ESG, Performance Subgroup of Dec 22 WCML ESG
- Simulation Modelling for Dec 22 WCML Timetable Re-write – Carlisle to Stirling
- Bushey PSU Neutral Section – Traction Power Modelling Report
- Rolling Programme of Decarbonisation – Scotland, West & South 2022 Memorandum

We also produced a detailed performance analysis of perturbation scenarios for Euston station, together with some further power modelling analysis. Our work demonstrated the GUT services can be accommodated at London Euston (with the inclusion of additional paths requested by Avanti) during the HS2 enabling works, which reduce the platform availability to 15 or 14 platforms.

Inevitably, available capacity and performance on the network would decline with the introduction of more trains. The services proposed by GUT did not show any major clash with current and aspiring services in the WCML timetable.

I'm cc'ing Ian Yeowart, should he wish to respond on behalf of GUT.

Hope the above helps.

Kind regards,  
Gian

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

---

**From:** Londontravelwatch.org.uk  
**Sent:** 14 September 2023 09:12  
**To:** Gianmaria Cutrupi  
**Subject:** RE: Industry Consultation - Grand Union Trains, Section 17 Application, Stirling-London Euston

Hi Gianmaria

Thank you for sending through these papers.

While London TravelWatch welcomes additional services to run between under represented station in Scotland, we do have some concerns relating to capacity.

London Euston is already served by three different operators and one of the reasons HS2 is (currently) not being brought into Euston was due, in part, to capacity at the station throat where there is only three lines in each direction. Could you provide more information of models that Network Rail have carried out to ensure that this additional service will not impact on the current provision in/out of Euston? I'd also be interested to know whether a new operator would limit the capacity of the current TOC's to be able to increase their timetable should demand increase bearing in mind that three London TOC's are reporting passenger numbers have increased to 80% (or more) when compared to pre-covid levels.

Thanks

Susan

**Susan James (she/her)**  
**Head of Casework**



*Transport Focus and London Travelwatch work in partnership to support passengers with complaints and as a result both organisations have a responsibility for the information you share with us, and access to it for the purpose of pursuing your complaint. If you have any questions about this arrangement, please don't hesitate to ask.*



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[www.transportfocus.org](http://www.transportfocus.org)

Follow us on [Twitter](#). Our chief executive tweets [@anthonymsmithTF](#).

[Sign up](#) to our email list to keep up to date with London TravelWatch work.  
London TravelWatch is the operating name for the London Transport Users Committee

\*\*\*\*\*  
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**From:** northernrailway.co.uk  
**Sent:** 06 October 2023 11:23  
**To:** Ian Yeowart; Gianmaria Cutrupi  
**Cc:** SMB - Track AccessConsultations  
**Subject:** RE: Industry Consultation - Grand Union Trains, Section 17 Application, Stirling-London Euston

OFFICIAL

Morning Ian, Gian

Thank you for coming back to me to answer NTL's queries.

We have no further comments with respect to this application.

Kind regards,

Kate

**Kate Oldroyd**  
Track Access Manager

Mobile:

YORK  
YO1 6HZ

[northernrailway.co.uk](http://northernrailway.co.uk)



---

**From:** Ian Yeowart  
**Sent:** Monday, October 2, 2023 3:47 PM  
**To:** northernrailway.co.uk  
**Subject:** Re: Industry Consultation - Grand Union Trains, Section 17 Application, Stirling-London Euston

**CAUTION:** This email originated from outside the Northern email system. **DO NOT** click links or open attachments unless you recognise the sender and know the content is safe.

Hi Kate,

Depending on the fleet there might be a requirement for one set overnight in the Preston area with the overall maintenance undertaken under a TSA. That would mean the maintainer would have some input into stabling. It certainly should make it a little easier to find a home!

Regards

Ian

Ian Yeowart MCILT

Managing Director

**Grand Union Trains Ltd**

Riverside Lodge

Naburn Lane

Fulford

York

YO19 4RB

[www.granduniontrains.com](http://www.granduniontrains.com)

---

**From:** [northernrailway.co.uk](http://northernrailway.co.uk)

**Sent:** Monday, October 2, 2023 3:20 PM

**To:** Ian Yeowart ; [northernrailway.co.uk](http://northernrailway.co.uk); Gianmaria Cutrupi **Subject:** RE: Industry Consultation - Grand Union Trains, Section 17 Application, Stirling-London Euston

Hi Ian,

Thanks for coming back to me.

Are you able to also share any stabling expectations for this new service? I know from a previous application GUT were looking at something in the Preston area?

Kind regards,

Kate

---

**From:** Ian Yeowart

**Sent:** Monday, October 2, 2023 2:32 PM

**To:** [northernrailway.co.uk](mailto:northernrailway.co.uk); Gianmaria Cutrupi

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

**CAUTION:** This email originated from outside the Northern email system. **DO NOT** click links or open attachments unless you recognise the sender and know the content is safe.

Hi Kate

Our rolling stock may be either 221 or 222 and we are in discussions with both ROSCO's. If the AT300 replacements for both MML and WCML are delayed significantly then it could potentially delay a June 2025 start but that would be dependent on the actual release dates.

Regards

Ian

Ian Yeowart MCILT

Managing Director

**Grand Union Trains Ltd**

Riverside Lodge

Naburn Lane

Fulford

York

YO19 4RB

---

[www.granduniontrains.com](http://www.granduniontrains.com)

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**From:** [northernrailway.co.uk](http://northernrailway.co.uk)

**Sent:** Monday, October 2, 2023 2:27 PM

**To:** Gianmaria Cutrupi ; [northernrailway.co.uk](http://northernrailway.co.uk)

**Cc:** Ian Yeowart

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

Hi Gian,

Thank you for addressing the Network Rail queries. I haven't seen anything come through from Ian though? I am on leave when the consultation closes so I need to respond this week.

Thanks,

Kate

---

**From:** Gianmaria Cutrupi

**Sent:** Thursday, September 21, 2023 12:00 PM

**To:** [northernrailway.co.uk](http://northernrailway.co.uk)

**Cc:** GUT - Ian Yeowart

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

**CAUTION:** This email originated from outside the Northern email system. **DO NOT** click links or open attachments unless you recognise the sender and know the content is safe.

OFFICIAL

Hi Kate,

Thank you for your comments on this industry consultation, I'm cc'ing Ian Yeowart from GUT who could assist with the GUT-related queries.

From a Network Rail perspective, I can confirm this application is not dependent on the delivery of infrastructural enhancements. Should the ORR approve the application, we will treat GUT like existing operators according to current rules and procedures for the delivery of wider projects and initiatives (e.g. HS2 works).

Kind regards,

Gian

**Gianmaria Cutrupi**

**Aspirant Open Access Operators Manager**

Freight & National Passenger Operators (FNPO)

System Operator

---

**From:** [northernrailway.co.uk](http://northernrailway.co.uk)

**Sent:** 21 September 2023 11:00

**To:** Gianmaria Cutrupi

**Cc:** [northernrailway.co.uk](http://northernrailway.co.uk)

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

OFFICIAL

Hi Gian,

I've had some initial comments come back to me on this one. We believe this application is dependant on EMR releasing class 222s is this correct? Could we therefore potentially see an extension to the initial 10 years that GUT are seeking if there are any delays to this cascade? Also, does this application link in with Network Rail's project Alpha on the WCML which is looking at station rebuilds and track redesign?

Kind regards,

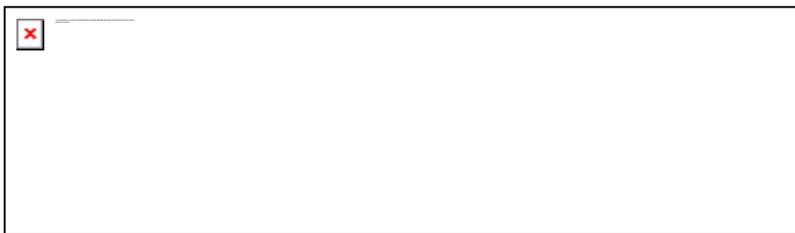
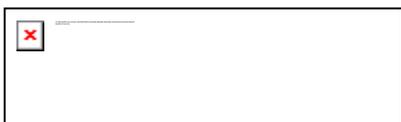
Kate

**Kate Oldroyd**

Track Access Manager

George Stephenson House, Toft Green  
YORK  
YO1 6JT

[northernrailway.co.uk](http://northernrailway.co.uk)



---

**From:** transportfocus.org.uk>  
**Sent:** 15 September 2023 11:25  
**To:** Gianmaria Cutrupi  
**Subject:** Re: Industry Consultation - Grand Union Trains, Section 17 Application, Stirling-London Euston

OFFICIAL

Hi Gianmaria

Thanks for this proposed application. We'd support it, in light of the additional choice and benefits for passengers the proposed services would offer.

Best regards

Martin

---

**Reed, David**

---

**From:** tfgm.com>  
**Sent:** 10 October 2023 09:58  
**To:** Gianmaria Cutrupi  
**Subject:** RE: [EXTERNAL] Industry Consultation - Grand Union Trains, Section 17 Application, Stirling-London Euston

OFFICIAL

Dear Gianmaria,

Many thanks for the opportunity to comment on the revised application by GUT to operate Stirling-London trains.

Given TfGM has already responded in detail to the original application during 2021, our comments are limited to the proposed use of 22x units as opposed to new build EMUs. Whilst we appreciate that this is a prudent decision to ensure earliest entry into service, it is regrettable from a carbon neutrality and air quality perspective. This is especially true given the Avanti 221 fleet is itself being replaced with bimodes at this current time.

With best regards,  
Joe Hodgkinson

---



West  
Midlands  
Trains

11/10/2023

Gianmaria Cutrupi  
Network Rail  
By email only

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. Unfortunately, the application lacks supporting evidence and clarity to allow us to support it. We require the following points to be addressed by GUT before further discussion and consideration can be carried out regarding the proposal.

**1)** Capacity on the West Coast Mainline has been a concern, and the subject of considerable scrutiny for some time. Following the Covid-19 pandemic, WMT and other operators have revised timetables to respond to changes in demand, and to address systemic performance risks.

We are concerned that additional services will present further challenges (in terms of capacity and performance) to the West Coast Mainline. The fast line between Camden South Junction and Ledburn Junction remains formally “Congested Infrastructure”; it was concluded in 2020 that there was no available capacity without significantly impacting performance and causing a reduction in timetable resilience. Whilst the December 2022 timetable change has since been implemented (following the work of the ISG/ESG) the declaration has not been revoked by Network Rail.

**2)** The proposed GUT services will be within the top 5 longest distance journeys operated in the U.K., and with that distance comes considerable performance and reliability risk concerns. This does not automatically mean every service will be late, but there is a greater risk of lateness, and with greater connectivity comes greater interaction with other operators and thus higher performance risks, both direct and reactionary.

We are concerned that services coming from Stirling have a higher risk of presenting late on the core West Coast Line south of Crewe, which creates a performance risk to other Operators (a good example of this currently, being our interaction with longer distance services through the West Midlands and West Coast Main Line south of Weaver Junction). We need to understand GUT’s plans to mitigate and improve performance, given this increased risk to existing services.



**West  
Midlands  
Trains**

**3)** With Preston being cited as GUT's "central operating base" WMT needs to understand how GUT are looking to support services through ECS plans and diagrams. Whilst at this time we appreciate that details are still being worked out we feel our best assessment would come from a starting point of a fully developed train plan including diagrams and ancillary moves, which we appreciate will evolve as plans develop.

**4)** In this latest proposal, WMT notes the change of traction type to that of the 22x family of multiple units. How does this compare with the timings used to inform the paths in the plans developed by the ISG/ESG? Also, has GUT to this end identified whether the sets it will obtain will be able to use tilt technology or will they be restricted to permissible speeds?

**5)** Could GUT confirm that the Economic Equilibrium Test and Not-Primarily Abstractive Tests have been conducted, and can GUT provide details of the results of that analysis?

**6)** WMT has concerns that calls at Nuneaton and Milton Keynes Central are primarily abstractive. We question the commercial validity of proposed calls at both stations, which (when previously modelled) would suggest a significantly increased level of abstracted revenue from other Operators, whilst generating proportionately little new revenue and duplicating service patterns that are already well-served by several 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 both existing and future access parties, via a holistic and managed approach.

To this end we would expect northbound services to pick up only at Milton Keynes Central and Nuneaton, and southbound services set down only at Milton Keynes Central and Nuneaton, to achieve GUT's ultimate objective of unlocking journeys for both locations to the Northwest and Scotland but at the same time not replicating available journeys between the Midlands and London Euston.

In conclusion, WMT must object to the GUT application until these concerns have been adequately resolved noting a number have been discussed previously with GUT through our response to a previous application, WMT looks forward to further detailed discussions to satisfy the concerns it has rightfully raised.

Yours faithfully

**Scott Turner**  
Network Access Manager

# Grand Union

Scott Turner  
Network Access Manager  
West Midlands Railway  
Email:

30 October 2023

Dear Scott,

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

You will be aware that the southern part of the route had initially been declared congested and this led to a formal 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%. Network Rail has therefore addressed the reasons for declaring the infrastructure congested and as a result has previously supported Grand Union's application for access to the network from 2025.

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.

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It is too early to have developed plans and diagrams, but Preston area is our preferred location for a 'central' base. Operating diesel traction offers more options, and we will continue to work with Network Rail and others to ensure we can robustly deliver the timetable if approved.

The initial timings were based upon the use of a Class 91. Our expectation is that with the same top speed but with improved acceleration characteristics, the 22x fleet would enable timings to be maintained or improved, but again we will continue to work collaboratively with colleagues to ensure a robust timetable is delivered. At present 221s can use tilt, but 222s cannot, and it will depend on the outcome of further work in this area around the introduction of AT300 for Avanti whether non-tilt MU stock may be able to operate at higher line speeds.

The ORR undertakes a thorough review of all open access applications. I note you 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.

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 be significantly reduced.

It is therefore 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. The MD of LNER has been very clear that the existence of competition on the route has focused its mind on its customers and its business.

As is clearly evidenced on the ECML, the introduction of competition has achieved a number of things. It has increased ridership significantly, increased overall industry revenue, increased choice and made travel more affordable. At the same time also seeing an improvement in passenger satisfaction. The whole industry benefits from the introduction of even limited competition as clearly evidenced on the ECML. The

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use of outdated modelling on the impact of abstraction has now been overtaken by what is actually happening in the markets where competition exists.

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 direct Intercity flows has proven to be of significant benefit to passengers, and as the ECML has shown, also to operators.

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

Regards

Ian Yeowart

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