



WEST COAST
PARTNERSHIP

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22nd July 2024

Dear Mr Harris,

Context:

Thank you for taking the time to respond to First Trenitalia West Coast Rail Limited (FTWCRL) 3rd, 11th, 14th, 17th and 18th Supplemental Agreement consultations.

Please find below FTWCRL's response to the comments contained in your response to these consultations.

3rd Supplemental Agreement:

Note: The 3rd Supplemental Agreement seeks to convert existing trains which serve Blackpool North to serve Glasgow Central instead and introduce a new Blackpool North Service from the start of the May 2025 Timetable.

- *Network Capacity*

FTWCRL notes that in their response, Network Rail (NR) have stated that they "have not yet had an opportunity to fully consider its position on this application and whether it can eventually support the proposed access rights". Furthermore, NR also states that it "*will not be able to in this representation provide all the necessary information for ORR to make an informed decision at this point in time*".

FTWCRL notes that NR has received 83 new applications, of which 55 are seeking capacity on North West & Central (NW&C) Region. Therefore, the analysis which NR will be required to undertake "*involves a level of complexity not previously experienced*".

Services which FTWCRL included within this application were developed as part of the Industry Planning Group (IPG) and Event Steering Group (ESG) workstreams which culminated in the existing timetable structure.

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First Trenitalia West Coast Rail Limited,
a FirstGroup and Trenitalia FS Group company.
Registered Office: 8th Floor, The Point, 37 North Wharf Road, London, W2 1AF.
Registered in England No. 10349442



FTWCRL notes that NR references large enhancements taking place around NW&C Region, such as (inter alia), TransPennine Route Upgrade, HS2, Midlands Rail Hub. FTWCRL continues to work with NR and other industry partners via established meeting structures to progress the pipeline of industry enhancement schemes and ensure that outputs are aligned to future performance and capacity aspirations.

FTWCRL notes that NR references “*interacting applications and capacity constraints*” at several locations across NW&C Region. FTWCRL continues to work with NR and other partners via established industry forums to develop operational and timetable solutions to such constraints where possible.

FTWCRL remain confident that the services within this application are deliverable with the network capacity available and will work collaboratively with industry partners to restore the last gaps in the hourly service between Birmingham and Scotland via the West Coast Main Line (WCML).

- Stations

FTWCRL notes NR’s statement that “*passenger flow at London Euston is currently a concern*”. FTWCRL is collaborating closely with NR at the station on initiatives to address these concerns and improve the experience of passengers.

- Infrastructure

FTWCRL notes that NR has stated that “*NW&C has several areas of concern with regards to power supply*” and that it will be necessary to carry out further modelling work to determine available capacity.

FTWCRL is keen to work closely with NR and other industry partners to assist with the development of Overhead Line Equipment (OLE) traction power supply modelling and looks forward to reviewing the outputs once this activity is complete. FTWCRL also believes that operational and technological mitigations to deficiencies in power supply may present an opportunity to address some of these concerns.

FTWCRL notes reference to NR/L1/ELP/27000 “Policy Requirements for Electrical Power Assets; it would be helpful to understand whether the ORR intends to use this as the benchmark where the timetable is restricted by a N-1 approach, as opposed to dealing with outages as and when they occur.

NR have asserted five locations where power supply constraints exist. FTWCRL notes that two of these (Catterall & Harker feeding areas) were not the subject of the “early warning of congested infrastructure” letters. The latest statement from NR “NW&C Traction Power Capacity and Capability Overview” published in May 2024 shows Catterall as having “no significant concerns”. FTWCRL would like to understand what has changed in the interim regarding this feeder station.

FTWCRL recognises that within the same assessment, Harker feeder station is shown as amber, having concerns under present conditions, although not raised as a concern prior to this letter. Again, FTWCRL would like to understand what has changed since the “Early Warning of Congested Infrastructure” letter and assessment within this process.

FTWCRL note that the 3rd Supplemental only proposes to increase traffic through the area by an additional 1 train per day in each direction, and thus we consider the impact from this application on the infrastructure to be minimal.

- *Performance*

FTWCRL notes that NR has stated in its review of Form P and associated documents that NR's Performance Team will need to reassess TOC performance measurement data. FTWCRL stands ready to collaborate with NR and assist with this assessment and looks forward to reviewing the outputs once this activity is complete.

FTWCRL notes that it is stated in the review of Form P and associated documents that NR's support for this application assumed the completion of the Bushey power supply upgrade. Except for the rights sought for two trains on the London Euston – Blackpool North route (via the Trent Valley) the trains in this application are already operating on the network via Bushey and do not therefore represent an additional quantum in the timetable or uplift in traction power supply demand at this location.

11th Supplemental Agreement:

Note: The 11th Supplemental Agreement seeks to introduce two passenger services in place of an Empty Coaching Stock (ECS) move from the December 2024 timetable; a 07:00 Manchester Piccadilly to London Euston on a weekday & a 09:43 Liverpool Lime Street to Wolverhampton (continuing to London Euston) on a Sunday.

- *Rights Requested*

FTWCRL notes that NR has stated that it does not support this application because of the presumption of continuity into the next timetable period for firm rights.

FTWCRL notes that NR has stated that it would support the granting of contingent rights for this application with no presumption of continuity. FTWCRL accepts contingent rights for the 11th supplemental, acknowledging that it has made a separate application for the same rights from May 2025.

Whilst the 09:43 Liverpool Lime Street – Birmingham New Street (Su) rights sought in this application do constitute a 'new' train, the 07:00 Manchester Piccadilly – London Euston (Sx) is an application to restore a headline peak hour train from the pre-COVID timetable.

FTWCRL remain confident that the services within this application are deliverable with the network capacity available and will work collaboratively with industry partners to introduce these services.

- *Operational Practicalities*

FTWCRL confirms that the trains in the 11th Supplemental Agreement would need to operate as ECS movements in a similar path if it does not obtain the rights sought. This is to ensure that rolling stock and maintenance requirements are aligned to the continued operation of other passenger trains in the timetable.

14th Supplemental Agreement:

Note: The 14th Supplemental Agreement seeks to bring back rights into the December 2024 timetable that had been temporarily relinquished, in addition to an additional right on the Birmingham Route. The trains are: 13:32 Chester to London Euston (weekdays), 17:32 Chester to Crewe (Saturdays) and an 18:16 Euston to Birmingham New Street (Sundays).

- *Performance*

FTWCRL notes that in their response, NR have stated that they are “unable to in this representation provide all the necessary information for ORR to make an informed decision at this point in time due to awaiting completion of performance assessment”. FTWCRL stands ready to collaborate with NR and assist with this assessment and looks forward to reviewing the outputs once this activity is complete.

Following the introduction of CI.805 into passenger service from 02/06/2024, FTWCRL and NR are collaborating to conduct a data-led evaluation of these trains’ performance. This study is expected to deliver preliminary results by the end of July 2024, at which point it will be possible to better understand the impact (if any) of their operation since introduction.

It is noted that the expected completion of this activity is due to report back to the joint Avanti West Coast (AWC) and NR Alliance Board on the 12th August 2024. We would request that input from NR regarding the 14th Supplemental is based on a data led approach from this work.

It should be noted that if rights are not supported on performance grounds, the 13:32 Chester to London Euston (SX) would need to operate as an Empty Coaching Stock movement for rolling stock balancing purposes.

- *Network Capacity*

FTWCRL notes that NR references large enhancements taking place around NW&C Region and Wales and Western Region, such as (inter alia), TransPennine Route Upgrade, HS2, Midlands Rail Hub. FTWCRL continues to work with NR and other industry partners to progress the pipeline of industry enhancement schemes and ensure that outputs are aligned to future performance and capacity aspirations.

FTWCRL notes that NR references “*interacting applications and capacity constraints*” at several locations across NW&C Region. FTWCRL continues to work with NR and other partners via established industry forums to develop operational and timetable solutions to such constraints where possible.

FTWCRL remain confident that the services within this application are deliverable with the network capacity available and will work collaboratively with industry partners to introduce these services; The firm rights for two of the three proposed trains return to FTWCRL regardless of the 14th Supplemental in May 2025 following temporary relinquishment.

- *Stations*

FTWCRL notes NR’s statement that “*passenger flow at London Euston is currently a concern*”. FTWCRL is collaborating closely with NR at the station on initiatives to address these concerns and improve the experience of passengers.

- *Infrastructure*

FTWCRL notes that NR has stated that “*NW&C has several areas of concern with regards to power supply*” and that it will be necessary to carry out further modelling work to determine available capacity.

FTWCRL is keen to work closely with NR and other industry partners to assist with the development of these models (inclusive of ECS moves) and looks forward to reviewing the outputs once this activity is complete. FTWCRL also believes that operational and technological mitigations to deficiencies in power supply may present an opportunity to address some of these concerns.

- *Rights Requested*

FTWCRL notes that NR has stated in its review of Form P and associated documents that the expiry date for the SX and SO rights is May 2025, as firm rights will be reinstated from then. FTWCRL’s application sought rights through until December 2030.

FTWCRL acknowledges the change to the end date of the rights included in this application as previously agreed with NR.

FTWCRL notes that NR has stated in its review of Form P and associated documents that AWC’s application referred to Sunday (SU) Peak trains, when there is no peak definition for weekend trains.

17th Supplemental Agreement:

Note: The 17th Supplemental Agreement applies to continue the rights requested in the 11th Supplemental from the May 2025 timetable, in addition to a new weekday 19:32 Chester to London Euston and extending an existing train on Sundays to form the 17:35 Holyhead to Crewe.

- *Network Capacity*

FTWCRL notes that in their response, NR have stated that they “have not yet had an opportunity to fully consider its position on this application and whether it can eventually support the proposed access rights”. Furthermore, NR also states that it “*will not be able to in this representation provide all the necessary information for ORR to make an informed decision at this point in time*”.

FTWCRL notes that NR has received 83 new applications, of which 55 are seeking capacity on NW&C Region. Therefore, the analysis which NR will be required to undertake “*involves a level of complexity not previously experienced*”.

FTWCRL notes that NR references large enhancements taking place around NW&C Region, such as (inter alia), TransPennine Route Upgrade, HS2, Midlands Rail Hub. FTWCRL continues to work with NR and other industry partners to progress the pipeline of industry enhancement schemes and ensure that outputs are aligned to future performance and capacity aspirations.

FTWCRL notes that NR references “*interacting applications and capacity constraints*” at several locations across NW&C Region. FTWCRL continues to work with NR and other partners via established industry forums to develop operational and timetable solutions to such constraints where possible.

Both the 19:32 Chester to London Euston (SX) and 19:55 Crewe – London Euston (SU) were developed as part of the Industry Planning Group (IPG) and Event Steering Group (ESG) workstreams which culminated in the existing timetable structure. FTWCRL remain confident that the services within this application are deliverable with the network capacity available and will work collaboratively with industry partners to restore these services.

FTWCRL remain confident that capacity also exists for the 07:00 Manchester Piccadilly to London Euston (SX) and 09:43 Liverpool Lime Street – Birmingham New Street (continues to London Euston) (SU); if rights are not granted, both services will be required to operate as an ECS movement regardless. FTWCRL will work collaboratively with NR and the industry to maintain these services beyond the May 2025 timetable.

- *Stations*

FTWCRL notes NR’s statement that “*passenger flow at London Euston is currently a concern*”. FTWCRL is collaborating closely with NR at the station on initiatives to address these concerns and improve the experience of passengers.

- *Infrastructure*

FTWCRL notes that NR has stated that “*NW&C has several areas of concern with regards to power supply*” and that it will be necessary to carry out further modelling work to determine available capacity. FTWCRL is working closely with NR and other industry partners to assist with the development of these models and looks forward to reviewing the outputs once this activity is complete. FTWCRL also believes that operational and technological mitigations to deficiencies in power supply may present an opportunity to address some of these concerns.

FTWCRL notes NR’s statement that to assess power supply it must understand any ECS moves by operators. FTWCRL is keen to work closely with NR and other industry partners to assist with the development of power supply models and looks forward to reviewing the outputs once this activity is complete.

FTWCRL notes reference to NR/L1/ELP/27000 “Policy Requirements for Electrical Power Assets; it would be helpful to understand whether the ORR intends to use this as the benchmark where the timetable is restricted by a N-1 approach, as opposed to dealing with outages as and when they occur.

NR have asserted five locations where power supply constraints exist. FTWCRL notes that two of these (Catterall & Harker feeding areas) were not the subject of the “early warning of congested infrastructure” letters. The latest statement from NR “NW&C Traction Power Capacity and Capability Overview” published in May 2024 shows Catterall as having “no significant concerns”. FTWCRL would like to understand what has changed in the interim regarding this feeder station.

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- *Performance*

FTWCRL notes that NR has stated in its review of Form P and associated documents that NR's Performance Team will need to reassess TOC performance measurement data. FTWCRL stands ready to collaborate with NR and assist with this assessment and looks forward to reviewing the outputs once this activity is complete.

Following the introduction of Cl.805 into passenger service from 02/06/2024, FTWCRL and NR are collaborating to conduct a data-led evaluation of these trains' performance. This study is expected to deliver preliminary results by the end of July 2024, at which point it will be possible to better understand the impact (if any) of their operation since introduction.

The rights sought to operate a 07:00 Manchester Piccadilly – London Euston (SX) is an application to restore a headline peak hour train which operated in the pre-COVID timetable.

18th Supplemental Agreement:

Note: The 18th Supplemental Agreement is focused on the December 2025 timetable and introduces an additional round trip on the Liverpool Route on a Sunday; a 16:13 Liverpool Lime Street to London Euston and a 20:06 London Euston to Liverpool Lime Street.

- *Network Capacity*

FTWCRL notes that in their response, NR have stated that they “have not yet had an opportunity to fully consider its position on this application and whether it can eventually support the proposed access rights”. Furthermore, NR also states that it “*will not be able to in this representation provide all the necessary information for ORR to make an informed decision at this point in time*”.

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FTWCRL notes that NR references large enhancements taking place around NW&C Region, such as (inter alia), TransPennine Route Upgrade, HS2, Midlands Rail Hub. FTWCRL continues to work with NR and other industry partners to progress the pipeline of industry enhancement schemes and ensure that outputs are aligned to future performance and capacity aspirations.

FTWCRL notes that NR references “*interacting applications and capacity constraints*” at several locations across NW&C Region. FTWCRL continues to work with NR and other partners via established industry forums to develop operational and timetable solutions to such constraints where possible.

FTWCRL remain confident that the services within this application are deliverable with the network capacity available and will work collaboratively with industry partners to restore these services.

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- *Infrastructure*

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FTWCRL recognises that within the same assessment, Harker feeder station is shown as amber, having concerns under present conditions, although not raised as a concern prior to this letter. Again, FTWCRL would like to understand what has changed since the "Early Warning of Congested Infrastructure" letter and assessment within this process.

- *Performance*

FTWCRL notes that NR has stated in its review of Form P and associated documents that "*the performance of similarly related trains is poor, and NR's Performance Team will need to reassess*". FTWCRL requests clarification from NR on what is meant by 'similarly related trains' or how this assessment of 'poor performance' has been made.

Conclusion:

FTWCRL thanks NR for taking the time to review our applications and provide comment. We hope that our response provides some additional context on our application.

We remain confident that there is sufficient network capacity to deliver the services as set out in each of our supplementals

We remain committed to working collaboratively with NR and the industry to deliver the services we have applied for as part of the 20th May 2024 process, and are available to discuss any of the above at your request as modelling develops surrounding capacity, performance and power supply.

Yours sincerely,

[REDACTED]

Andy Doyle

**Head of Operational Readiness
Avanti West Coast**