

Louise Beilby  
Senior Access Executive  
Office of Rail and Road

Paul Harris  
Head of Franchise Management  
Network Rail

28<sup>th</sup> February 2025

Dear Louise & Paul,

**FTWCRL Response to NR's letter on West Coast South Track Access Applications**

**1. Introduction**

With reference to the above issued by Network Rail on 7<sup>th</sup> February 2025 please, this letter acts as First Trenitalia West Coast Rail Ltd (FTWCRL)'s response.

FTWCRL welcome Network Rail's intervention, acknowledging it has taken considerable effort to assess all applications submitted as part of this process. FTWCRL endorse Network Rail's view that it is important to have a timetable that is resilient and that delivers effectively for customers.

Acknowledging that the December 2022 ESG timetable structure has brought significant benefits for journey opportunities across the West Coast, FTWCRL remain committed to working closely and collaboratively with Network Rail to reintroduce the remaining trains within the timetable structure, with a view to improving resilience and punctuality.

**2. Competing Access Applications – Response to the ORR's letter of 24<sup>th</sup> April 2024.**

Referring to the ORR's letter issued on the 24<sup>th</sup> April 2024, which focused on competing access rights, this resulted in a significant number of applications from prospective and existing operators submitted on the 20<sup>th</sup> May 2024. On the West Coast Mainline, this included applications from Virgin Management Limited (Virgin Trains), East Coast Trains Limited (Lumo), in addition to pre-existing requests from the Wrexham, Shropshire & Midlands Railway (WSMR) and Grand Union Trains (GUT) – now First Rail Stirling. This was in addition to newly proposed parcels operations and other freight uses.

At the time, FTWCRL provided opinion on the two new open access applications; namely both the Virgin and Lumo applications. At the time, FTWCRL was consistent and opposed both applications for access, with similar grounds surrounding capacity and future HS2 operations on the WCML. An additional layer of opposition was provided to the Virgin application on the basis it sought to take-over operations which FTWCRL is contracted to operate on behalf of the Secretary of State. FTWCRL also opposed applications from parcels operators – conditional on their response for areas of clarification.

### **3. Avanti West Coast's Timetable Step Up Strategy.**

AWC is part of the West Coast Partnership, the trading name of FTWCRL; we have a mission to be the transport of choice, connecting customers and communities along the West Coast Mainline. This is with the vision of delivering a service that sets new standards for customer experience and operational excellence.

Delivery of additional services within the next two upcoming timetable change dates is an essential part of this mission and is a key part of what FTWCRL has worked towards over the course of the past two and a half years. FTWCRL welcome Network Rail's reassertion that these services were included within the December 2022 ESG timetable. Noting that our additional access applications made in advance of the ORR's 20<sup>th</sup> May 2025 deadline are all aligned with this timetable specification and are part of the originally intended operation within the December 2022 ESG.

FTWCRL has applied an effective readiness process which has enabled a more reliable delivery of our timetable, increasing provision at each change date in line with available traincrew resource. Recognising the importance for customers of a train service they can rely on, and which provides effective and reliable journey opportunities, which is recognised by customers, as is evidenced in the latest net advocacy scores regarding our service.

What is more, FTWCRL is a net contributor to the public purse, as one of only two DfT operators not requiring a subsidy for its operation. This is a clear result of the actions taken to stabilise operations and move forward with our mission and vision.

FTWCRL has been clear that our current position regarding relinquishment of access rights is temporary, and as more drivers become productive in line with our long-term five-year driver strategy, all residual unused rights on the Birmingham, North Wales and Anglo-Scot routes will be reinstated, with an operation comparable to the timetable frequency prior to the pandemic. Completion if this should take place during the May 2025 timetable.

During the December 2025 timetable, FTWCRL plans to introduce all remaining additional services on the Liverpool route, operating a total of 319 trains per weekday across the network. All of these services were included within the December 2022 ESG agreed by the industry, and as such FTWCRL believe that there is sufficient capacity for the small number of services

which have additional rights applied for – some of which have already been operating on a contingent basis since December 2024.

FTWCRL notes that operation of the increased AWC services operated since December 2022 will be put at risk in the event of a significant resource abstraction to an Open Access operation, which itself would likely have further damaging performance affects for the West Coast Mainline.

FTWCRL strongly believes in the plans developed for the future; that they will deliver the most optimal outcome for customers, with more trains and better journey opportunities to be realised within the next 12 months. This cannot be matched by any Open-Access operation based on current timescales for both resource and rolling stock availability.

#### **4. Network Rail's Capacity Analysis**

FTWCRL notes that Network Rail has identified challenges with network capacity which would be caused by the increased operation of services in the event of access requests being granted.

FTWCRL note that its applications were made in line with services intended to operate within the December 2022 ESG. In many cases, these services have been operating under contingent rights arrangements granted for 6 months in the December 2024 timetable. They are also intended to operate in the May 2025 timetable under the same arrangements. As such, we do not agree that these can be considered new given that passengers already enjoy the use of these train services.

It is therefore strongly believed that there is sufficient capacity to continue operation of these services alongside our additional applications – as these services are consistent with the timetable structure envisaged by the ESG process.

FTWCRL share Network Rail's concerns regarding the utilisation of the remaining spare capacity within the paths for the remaining XX:36 departures from London Euston, and XX:58 arrivals. FTWCRL agree that operation of additional, open-access services within these paths (and therefore the complete removal of these performance and timetable firebreaks) will likely have a detrimental impact on operational performance, specifically punctuality measures. This path is an important contingency, providing space for existing WCML operators to flex services for greater operational resilience.

Concern is also held regarding power supply at Bushey Feeder Station noting the increased proposal for both passenger and freight services using this section, which prior to the December 2022 ESG had not been considered as part of Network Rail's analysis. Given an early indication of congested infrastructure has been received, FTWCRL would equally be concerned with any increased electric traffic through the area over and above that which is already planned within the ESG structure.

Furthermore, station concourse capacity analysis is a useful insight; FTWCRL agrees with Network Rail's analysis that additional departures (likely Open Access) in key peak hours would likely drive an adverse impact on customer flows throughout the station. FTWCRL has worked hard to support Network Rail with its five-point-plan for improving issues at Euston and remain committed to supporting a cross-organisational response to known challenges.

Looking further to the future, we welcome Network Rail's acknowledgement of the strategic importance of HS2, and the future service specification which would be impacted by additional access to the network.

As you will be aware, West Coast Partnership Development, the other part of the FTWCRL business, is the Shadow Operator of High-Speed Services and is responsible for the development and recommendation of Train Service Specifications (TSSs) for all relevant services, including on the Conventional Rail Network, following the opening of the HS2 infrastructure. This work, on behalf of the Secretary of State, is being undertaken in collaboration with Network Rail and is intended to optimise the economic benefits of the investment in the new HS2 network.

It is noted that the ORR has made clear the importance of HS2, issuing a letter stating this and acknowledging that High Speed Services are a priority. FTWCRL remains clear that the applications being sought by other operators are not consistent with the planned TSSs for High Speed and residual Intercity West Coast services therefore impacting the intended outcomes of the substantial investment in the rail network by the Secretary of State.

## **5. Improving Operational Resilience**

Whilst FTWCRL continues with the timetable step-up strategy while remaining actively committed to working collaboratively with Network Rail to improve operational delivery within the timetable.

FTWCRL recognises that there are areas highlighted within the analysis which will require our support. FTWCRL is fully engaged with improving operational delivery and commit to working with Network Rail and the other train operators to investigate issues highlighted, with a view to resolving these where feasibly possible.

## **6. Concluding Remarks**

FTWCRL is supportive of Network Rail's intervention on access rights proposals, given the response is inclusive of the trains which were put forward as part of the December 2022 ESG.

FTWCRL is clear in our belief that our own proposals, over and above those where existing rights exist, fit neatly within the existing ESG structure as originally intended, and therefore should not have an adverse impact on network performance – noting that some services are indeed already operating with temporary contingent rights.

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FTWCRL remain committed to working closely with Network Rail and other train operators to improve the resilience of the timetable and its delivery, especially with the increase in service offering to customers over the coming timetable changes in 2025.

Yours sincerely,

Andy Doyle  
**Head of Operational Readiness**  
**Avanti West Coast**

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