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Cc Paul Harris, Network Rail

19th March 2025

Dear John,

**Network Rail Representations for Applications Affecting the West Coast Main Line (South) dated 7<sup>th</sup> February 2025**

We are writing in response to the above letter but would like to start by thanking Network Rail (“NR”) for the considerable effort it has undertaken to assess all applications submitted under the “competing and/or complex track access applications for December 2024, May 2025 and December 2025 timetable changes” process.

We will address below the full range of topics contained in NR’s letter (capacity, performance, Euston station passenger flows and HS2). We would also note that in the “Background and Context” section of the letter there are comments regarding a phased introduction of the additional Liverpool services, and we would like to note that subsequent to this letter being issued we have raised a Regulation 32 appeal regarding those services to ORR on 26<sup>th</sup> February 2025.

**Timetable Capacity**

Virgin agrees with NR’s assessment that there is unused capacity on the West Coast Mainline, notably 1) nine unused paths in each direction between London Euston and Rugby; and 2) the second hourly Liverpool services (that are the subject of our Regulation 32 appeal) - both informed by the December 2022 Event Steering Group (ESG) for timetable planning.

Virgin’s December 2025 timetable bids have sought to make use of both those capacity opportunities. Our timetable planning has shown that these are viable paths that can operate seven days a week and we are ready to work with NR planners to refine these services.



We note that NR's letter also references power supply issues, the main focus of which we understand is at Bushey feeder station, and that the capacity assessment may change once this is undertaken. From the NW&C Regional Investment Review Group (RIRG) notes sent to us on 25<sup>th</sup> January 2025, a heat map presented shows that Euston to North Wembley and Crewe to Weaver Junction are considered "red" – with red identified as **"There are safety concerns, the asset is unable to accommodate more traffic without endangering people or reducing asset life considerably. There is a high likelihood of service affecting issues, and/or non-compliance against connection agreements under normal traffic conditions"**. We also note from the minutes that despite this, there is a **"desire from Avanti and electric freight to introduce electric fleet before the works are complete"** which we understand will be at the end of CP7 at the earliest. Given obvious concerns and potential safety implications, we would be surprised if there were any increases in electric rolling stock over and above today's timetable, and this is the main reason we have proposed using diesel rolling stock until these concerns are addressed towards the end of CP7.

Also, in Appendix C, there is reference to Platform 16 at Euston remaining out of commission given the pause in HS2 works but that reinstating it would allow much greater flexibility. As Platform 16 was only meant to be temporarily out of use and seems to be fully funded (page 10), we would imagine that NR should now reinstate the platform to the benefit of capacity and operational performance.

With the extensive work completed as part of the December 2022 ESG and the fact that we are planning to use only already identified paths, we believe sufficient and quality timetable capacity exists for our proposed services.

### **Timetable Performance**

We note that the December 2022 ESG timetable restructure aimed to release additional capacity and to address the performance challenges on the routes identified following the May 2018 timetable introduction.

It appears from NR's letter that the actual performance of the route might not be meeting expectations, quoting examples such as a c. 25% deterioration in right time arrivals Moving Annual Average (MAA) at Euston (graph p.7) between 2021/22 P.1 and 2024/25 P.10 following the Dec 22 ESG timetable. These are of a much more significant scale than the c. 3% loss of improvement in Time-to-3 that Network Rail notes with additional services such as Euston-Liverpool and Euston-Stirling (paragraph 1 and Table 3; p6). It is unclear as to the root cause that NR is attributing this ongoing poor performance to, but we would expect that the time and effort put into the Dec 22 ESG by NR as a professional and skilled infrastructure manager would suggest that the timetable is not the main cause, especially given the focus on timetable assurance following recent failures (May 2018 quoted in NR's letter).



Current operational performance on the route is significantly below expectations as shown in the table below, compared against NR's PR18 funded targets (under the Consistent Region Measure – Performance (MAA)):

Year	PR18 Target (#1)	PR18 Floor (#1)	Delivered (#2)	Delta to Target
2019/20	1.7	2.02	2.05	(0.34) - 20% adv
2020/21	1.62	1.94	1.13	0.49
2021/22	1.58	1.9	1.38	0.2
2022/23	1.56	1.88	1.82	(0.26) - 17% adv
2023/24	1.53	1.85	1.93	(0.4) - 26% adv

#1: <https://www.orr.gov.uk/sites/default/files/om/pr18-final-determination-lnw-route-settlement-document.pdf>

#2: <https://dataportal.orr.gov.uk/statistics/performance/passenger-rail-performance/table-3174-consistent-region-measure-passenger-performance-by-region-periodic/>

As can be seen, apart from the two pandemic years, it appears NR metrics have fallen short of target 100% of the time and below the regulatory floor 67% of the time. Delivering short of performance expectations has been typical of recent control periods despite being funded to deliver at these levels. We therefore do not believe that current poor levels of performance should be a rationale for Network Rail to oppose the introduction of new rail capacity and connectivity - it is important that the industry as a whole is able to demonstrate that it is capable of delivering robust and high-performing timetables for customers while providing for growth of the network.

NR in its letter has suggested that firebreaks are needed and that the open access paths (xx58 arrival at Euston and xx36 departure) provide for this, and has included Tables 1 and 2, showing the performance of the service prior to those paths at Watford (up direction) and Rugby (down direction). While we have no reason to doubt the accuracy of the tables, we do feel they could be clearer in how they represent the position. We have reviewed the past six weekdays (10/3 – 14/3 & 17/3) in Real Time Trains and have seen the following:

- Table 1 (2143 path excluded as not obvious service arriving in the prior 5 minutes) - of the six days and six remaining services noted in NR's letter (36 services in total in the Up direction), six were recorded as on time (16.7%) and 30 as late (83%). However, if you were to look at performance between entry onto the WC South section (at Rugby), and Watford, 18 services gained time (50%), five services performed on time (14%) and 13 services lost further time (36%). Given 64% of the time the path operated better or as expected, this would not point to the WC South section being the area of the performance issues which appear instead to be due to the xx54 arrival coming from or via Birmingham.
- Table 2 - of the six days and eight services noted in NR's letter (48 services in total in the down direction), 36 services left on time (75%) and 12 left late (25%) although only seven (15%) left more than one minute late. Of these 48 services, 12 (25%) gained time by Rugby, 16 (33%) ran as expected and 20 lost further time (42%). Given 58% of the time the path operated better or as expected, this would not point necessarily to the WC South section being the



area of the performance issues when it could relate instead to management of and access to the station.

It would seem therefore that the preceding paths are able to operate satisfactorily. We feel that it is important that the industry as a whole is able to demonstrate that it is capable of improving performance rather than looking to restrict important capacity on the network. We note paragraph 29 of WSMR's published response to NR's letter includes some important "other factors" that may be contributing to degraded performance.

### **Passenger Flows at Euston Station**

We note NR's comments around the challenges of passenger flow at Euston station. The station concourse has not materially changed for several years so NR's summary seems somewhat at odds with being able to accommodate 46.1m (<https://dataportal.orr.gov.uk/media/1668/estimates-of-station-usage-2018-19-factsheet.pdf>) passengers in 2018/19 compared to the current 36.2m (<https://dataportal.orr.gov.uk/statistics/usage/estimates-of-station-usage>). It is unclear why the modelled scenario in the letter differs from what we understand is clearly capable of being delivered, and we must ask ORR to carefully verify NR's approach; as the figures cited arguably give a distorted view of station capacity to the detriment of Virgin and other aspirant Open Access operators.

We would also offer the following:

1. Our proposed rolling stock for operation of the second Liverpool paths would add less capacity than is currently modelled and therefore offer a passenger flow improvement at stations.
2. Network Rail suggests Open Access Stirling services will exacerbate Euston passenger volume challenges in two evening peaks between 16.45-17.00 and 17.30-17.45 (Figure 2 p.8). These are, however, not at times when Stirling services are due to leave Euston, understood to be at 16.20 and 19:20 (the latter as far as Preston only).
3. Network Rail predicts that these peaks will grow significantly by 2042, yet neither the Stirling nor proposed WSMR services would initially receive approval to operate beyond the early 2030s. Presumably in considering overall passenger footfall growth (both GBR and Open Access generated) at Euston in the next 20 years, Network Rail will be able to consider plans to accommodate this growth, whilst also taking account of future volume transfer to High Speed 2.
4. We understood that the booking office area and floor above were to be vacated as part of HS2 plans, with the traincrew to be relocated to the previous management offices on Platform 1. Presumably the anticipated relocations of staff accommodation and booking offices could still progress and the space vacated be repurposed pending clarity being received on HS2's impact on Euston.
5. Platform 16 (unlike Platforms 17 & 18) appears to be fully funded to reinstate. Presumably NR could now perform that work and free up vital capacity while HS2's plans are further evaluated.



We feel that utilising important capacity on the network would deliver important economic growth and regional connectivity, especially as it seems difficult to justify that one Open Access service an hour would be materially detrimental to passenger management at Euston Station.

## **HS2**

We note NR's comments contained in their letter and specifically that the only current firm plans are that a service between Old Oak Common and Curzon Street are planned, with only an expectation that services will then begin afterwards to Manchester, Glasgow and Liverpool. Until these expected plans become more certain we would imagine that more capacity would be welcome to support growth and regional connectivity, as HS2 trains may offer less capacity than is currently being delivered. It is also likely that these planned services would be introduced beyond the duration of our proposed track access contract and should not therefore be considered a reason to reduce current capacity.

## **Summary**

Following the May 2018 timetable introduction, enhanced planning and assurance was introduced by NR and its December 2022 ESG concluded that a robust timetable was capable of being delivered on the south end of the West Coast Mainline, inclusive of the paths Virgin has bid for.

While performance concerns remain, it is important that the industry as a whole is able to demonstrate that it is capable of delivering robust and high-performing timetables for customers while providing for growth of the network. Constraining the developed timetable due to poor performance would deliver poor value for customers and taxpayers. Failing to deliver the full outputs of the timetable would likely further bring into question the industry's ability to deliver timetable changes which would be a shame given the robust timetable planning work that was undertaken as part of the December 2022 ESG.

Vital capacity on the network should be utilised efficiently and we are confident that our bid will contribute significantly to economic growth and regional connectivity.

Yours sincerely,



**Phil Whittingham**  
**Rail Consultant**  
**Virgin Group**