

Stuart Freer  
Station and Depots & Network Code Executive  
Office of Rail Regulation  
London  
WC2B 4AN

22<sup>nd</sup> April 2013

Dear Stuart,

## **Review of the General Approval (Stations) 2010 & General Approval (Depots) 2010**

In reference to the above mentioned consultation dated February 2013 East Coast Main Line Company Limited (ECMLCo) would like to highlight the following points with the proposals set out and the questions asked;

### **Annex B: General Approval (Stations) 2010 – proposed changes**

ECMLCo has no objections to any changes proposed in items 1 to 5 of Annex B and has no specific comments to make on the changes as proposed with the exception of item 4.

ECMLCo would like to raise the query on the ability to make generally approved changes to the names of the parties of the various contracts and would like consideration made to when this could be possible. There would appear to be numerous situations where this could be a useful General Approval, such as;

- Simple refranchising where there are no changes to any conditions or clauses as shown within an existing access agreement,
- Transfer to 'public' ownership as was the case for the East Coast Franchise,
- Transfer to a 'management agreement' for times of ad-hoc extensions for a TOC to run services for the DfT,
- Renaming of the company that holds the station/track access agreement,
- Buying out of the company that holds the station/track access agreement by another party, and
- The transfer of obligations from Railtrack plc to Network Rail Infrastructure Ltd.

### **Annex C: General Approval (Depots) 2010 – proposed changes**

ECMLCo has no objections to any changes proposed in Annex C.

### **Annex D: proposed amendments to the template access agreements**

ECMLCo has no objections to any changes proposed in Annex D.

ECMLCO would request that copies of the agreed National Station Conditions 2011 (FRI Leases) are made available as template documents on the ORR website.

ECMLCo gives consent for this response to be shown in full on the ORR website.

Yours sincerely



Niall Melvin  
Commercial Access Manager  
East Coast Main Line Company Limited.