# Responses to ORR's 31 March 2025 consultation on Available Capacity at Temple Mills depot.

Capacity at Temple Mills International Depot | Office of Rail and Road

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28 April 2025

Dear Martin,

**The ORR's consultation on the initial findings on available capacity at Temple Mills International Depot**

The Department for Transport welcomes IPEX's report into available capacity at Temple Mills International Depot (TMI) and the opportunity to respond to these findings. Firstly, I would like to thank ORR officials for their thorough work on the Section 17 access applications for TMI. This is a highly complex situation that has many interested parties with competing aims.

As you are aware, the government is fully supportive of a thriving and competitive international rail passenger service market and welcomes the prospect of new entrants in future, which offers the potential for greater choice and lower fares for passengers, stimulating further shift to rail for international journeys.

As the report correctly highlighted, there are major capacity constraints at TMI with limited space available to support the growth ambitions of the international rail market, both from current and prospective operators. Within the report, 1.6 maintenance shed roads were identified as being available overall. Whilst some capacity has been identified, this appears insufficient to support the demands of the market and would likely not

meet the full needs of any single operator. It is also not clear what the impact would be if there was a reduction in overnight stabling at St Pancras if there were a second operator. This would presumably reduce the available maintenance shed roads further.

The Department recognises that there are significant capacity constraints that currently exist in terms of maintenance facilities for international rail services. As you are aware we are therefore engaging with a range of industry stakeholders to explore options to potentially address this capacity challenge for the sustained long term future growth of International Rail. Officials will continue to engage with ORR colleagues and report on emerging conclusions as this work progresses.

Yours Sincerely,

[redacted]

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Sent by email: operations.team@orr.gov.uk

28 April 2025

Dear Operations Team,

**Eurostar's response to the ORR's initial findings on available capacity at Temple Mills International Depot (TMI)**

Thank you for the opportunity to respond to the ORR's initial findings on the availability of capacity at the Temple Mills International Depot (TMI) and the evidence set out in the independent report by the ORR's appointed consultants, IPEX, ("the Report") on which these findings are based.[1]

## Executive summary: options for growth.

The ORR published its initial finding in relation to Temple Mills Depot on 31st March. This said that there was "some" capacity available at Temple Mills Depot. This, in itself, was a departure from the final draft of the report which Eurostar had been asked to check for factual accuracy (version 0.21) which had concluded that "*as the depot is currently utilised, without any changes, there is no Latent Capacity within the maintenance shed.*"

The ORR's initial findings were in turn presented by several potential operators to suggest that it had been concluded by ORR that sufficient capacity existed to meet their needs. Eurostar does not believe that the findings of the report support such a view. The Report was clear that the opportunity to create meaningful capacity was dependent on a number of options provisionally identified by IPEX but that these had not been further assessed or costed. Eurostar agrees and believes that, even at this early stage, there are a range of factors that would call into question the deliverability of the IPEX options. These include (without limitation):

- The spare capacity is presented (at least diagrammatically) as being available as single contiguous roads. In practice any available capacity is likely to be distributed as white space across several roads of varying maintenance capabilities and, therefore, to be less operationally accessible.
- Most options are predicated on being able to move servicing activities outside the shed and on doing so delivering material capacity gains. In practice, it is already the case that no train enters the shed without a maintenance need; no train is delayed in leaving the shed for servicing (as opposed to maintenance) reasons; and previous trials of this approach proved inefficient and took up more capacity than was gained.
- The options to convert LDA and reception roads underestimate the scale and feasibility of remodelling necessary to make such changes and could result in the loss of one or more reception roads.

[1] Source: The ORR's consultation announcements, available here: https://www.orr.gov.uk/search-consultations/capacity-temple-mills-international-depot (accessed 22 April 2025).

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- It is not possible to mix Heavy and Light maintenance on Road 1 without risking the major fleet overhaul programme (to which Eurostar has committed considerable prior investment) and further restricting Heavy Maintenance capacity.
- The report takes no account of the current overnight stabling and rectification of sets at St Pancras International station (SPI). In the event of additional operators accessing SPI some of this overflow may need to be transferred back to TMI, further reducing capacity at TMI.

Eurostar notes that we are now 8 months into the section 17 process. To date the applicants have had the (entirely proper) opportunity to set out their future maintenance needs, albeit details of all applications remain scant given their early stages of development. However, the process so far has not given Eurostar a similar opportunity to set out its own future needs and legitimate plans for the depot. Nor is it clear when it will do so. This is important because Eurostar has its own plans to intensify the use of the current fleet to provide additional services and benefits to customers and to help support future investment such as the expansion and development of SPI. In addition, Eurostar has its own publicly stated intention to purchase up to 50 new trains, for which it is in an advanced state of discussion. These growth ambitions have every bit the same legitimacy as those put forward by alternative operators – and arguably more so in the case of the use of the e320 fleet which will deliver immediate passenger benefits and is not dependent on as yet unconfirmed train orders or further, as yet uncommitted, investments.

Eurostar will continue fully to co-operate with and support the ORR's (multiple) section 17 processes but believes the time has come to take a step back and assess whether the current processes, or those processes alone, are efficient, manageable and capable of delivering positive outcomes. Even if all the options provisionally identified by IPEX prove in due course to be feasible, beneficial and non-disruptive, they would still only deliver 1.6 equivalent roads of capacity. An amount which is patently – and significantly – inadequate to meet the needs of maintaining up to 100 new trains (adding together the ambitions of all concerned). In fact, it is likely inadequate to meet the proper future needs of even one operator – Eurostar included. And that is before any consideration has been given as to whether the depot – which was built for 400m TMST and then adapted for e320 trains of the same length - is even technically capable of accommodating the various 200m from different manufacturers which the applicants have indicated that they might purchase.

Eurostar's concern is that an increasingly prolonged and costly section17 process can, at best, drive towards outcomes that are more about rationing failure and thwarting the investment ambitions of those who are not successful, than finding solutions to unlock the full measure of potential investment (over £2bn) and growth ambitions from the sector as a whole.

To be clear, Eurostar wants to see growth in the market and expects to compete for that growth with other rail operators, just as we do with short-haul aviation and cross-Channel journeys today. Eurostar anticipates fair on-rail competition and ORR will know that Eurostar approached the recent Periodic Review of HS1 for Control Period 4 with the possibility of new entrants firmly in mind. However, Eurostar does not believe that whatever space may be freed up within the existing maintenance shed at TMI is sufficient to meet Eurostar's future new fleet needs – or those of the applicant parties. Eurostar expects to invest in increased and enhanced depot facilities and wants alternative operators to have the same fundamental opportunity.

Eurostar is committed to helping find solutions. It believes that options exist for expansion at alternative locations in Kent and East London and that these should be examined. Whilst this is not wholly a matter for the ORR, we believe that ORR has a vital role in helping to assess the system needs in relation to growth and capacity as a whole, and in helping to set the rules around future use and access to new build capacity which will support the necessary private investment.

We encourage the ORR now to broaden its consideration beyond the narrow (and inevitably limited) section 17 processes and the current light maintenance facilities at TMI, and to help lead this wider vision for growth and investment. Eurostar will lend its full assistance.

## Structure of our response

Below, Eurostar sets out its response to the ORR's consultation on its initial findings regarding available capacity at TMI and the underlying Report by IPEX.

- In Section 1, Eurostar comments on the Report's findings regarding the current use of TMI;
- In Section 2, Eurostar provides its headline views on the capacity options presented in the report. Further details relating to these views can be found in the annex to this letter.
- In Section 3, Eurostar sets out more information on its future additional maintenance needs supporting its long-standing growth agenda
- In Section 4, Eurostar takes stock on the section 17 application process today and what steps could and should follow
- In Section 5, Eurostar provides options for finding solutions that can satisfactorily accommodate the overall growth of the sector for the best interest of consumers.

## The current use of the depot

### While heavy maintenance is part of the capacity study, it is outside of the regulated scope and the section 17 process

The scope of the ORR's s.17 consideration is the current light maintenance facilities, principally the main shed at TMI, approach roads and sidings. The Report also reflects on the use of the Heavy Maintenance facilities (bogie drop and wheel lathe), but to avoid confusion, these fall outside the scope of section 17.

This also includes Road 1 in the maintenance shed that is equipped to carry out heavy maintenance activities and dedicated in its current use to heavy maintenance activities. Eurostar invested in equipping and using Road 1 in this way in order to increase efficiency of its heavy maintenance activities and make most efficient use of its heavy maintenance equipment.

The Report suggested that the road could also be used for some light maintenance activities (with some restrictions). While this may free up a limited amount of incremental light maintenance capacity in the main shed, it would likely have an adverse impact for the efficient use the heavy maintenance facilities, further restricting these. Using Road 1 for any alternative uses which would undermine the considerable investments already made in the efficient delivery of the necessary "R Exam" works cannot be objectively justified. No reliance should therefore be placed on options to deliver latent shed capacity which are predicated on returning Road 1 to mixed use.

### The key finding regarding currently available maintenance shed capacity changed shortly before publication, but the facts didn't.

The ORR's initial findings included that there was

*"some available capacity at TMI depot for more trains to be stabled, serviced and maintained"*, and that *"some of this capacity can be accessed without any changes to current operational practices at the depot"*.[2]

Those findings are consistent with the content of the Report, which also states that the currently available capacity includes some latent maintenance shed capacity.[3]

However, Eurostar was asked to comment, for accuracy only, in the days leading up to the report's publication by the ORR , at which stage it understood the version it was reviewing was complete in terms of the report, analysis and data supplied for the study.[4] The final, published Report's contents and conclusions shifted significantly in relation to the current use and capacity in those final days. It is not clear why this happened.

In particular, the statements:

[2] https://www.orr.gov.uk/search-consultations/capacity-temple-mills-international-depot, accessed on 21 April 2025.
[3] IPEX Report, Conclusions section on page 4, and para 15.2.3 : "some latent shed capacity exists now".
[4] Eurostar received two near-final draft versions to review for accuracy and confidentiality on 12 and 21 March. In addition Eurostar received the final Report version for a final confidentiality review on the morning of 28 March in which the findings regarding the current shed use had changed.

*"the maintenance shed is currently fully utilised based on EIL's current use of the shed"* and "*as the depot is currently utilised, without any changes, there is no Latent Capacity within the maintenance shed."*

appeared in the draft reviewed by Eurostar on 21st March but had been replaced in the published version.

This is important because the revised wording increases the likelihood of an inaccurate understanding of the Report's conclusions, but it is unclear how such changes to the report were supported, since there was nothing that changed in either fact or evidence between these two versions of the report.

## IPEX's proposed options

The Report identified a maximum of 1.6 roads of latent shed capacity, which broadly break down into: a) capacity equivalent to two roads during the day; and b) capacity equivalent with one road during the night. Despite the diagrammatic presentation of the maintenance plan in the Report[5] showing the available capacity as contiguously available capacity (i.e. one road completely available at all times during the night and two roads completely available at all times during the day), this is not necessarily the case. In practice, the capacity which exists is more likely to be available in packages of white space distributed across several roads (each of which have different maintenance capabilities). This can be less efficiently utilised and the diagram therefore risks giving a misleading impression.

However, even this modest level of latent capacity is dependent on hypothetical options that the Report itself acknowledges have not been fully assessed, costed or verified. As a general statement the Report asserted that some latent shed capacity was available "*now*"[6], before presenting six options which it says have the potential to free up latent maintenance shed capacity by permitting moving some non-maintenance activities currently carried out inside the shed always to outside roads.[7] As indicated above, IPEX did not conduct any material appraisal of these options and Eurostar's comments likewise present our own view informed by the experience of managing the depot for over 25 years, but without more detailed appraisal.

Eurostar provides a summary of its views below. Further detail in relation to each option is provided in the Annex to this letter.

### No evidence supporting how, and how much, latent shed capacity can be accessed "now"

The Report presents no further evidence or explanation for its claim that some latent shed capacity was available "now". This is all the more unclear because the previous near final draft versions had stated clearly that as the depot was currently being used, there was no latent available capacity.

It also leaves entirely unclear how much of the latent capacity, including the latent shed capacity, can be accessed without any operational changes supported by additional investments in the depot infrastructure as set out in the Report's options regarding the enhancement of external roads.

Absent further clarifications there is therefore no reliable basis on which to find that material, useable capacity in the maintenance shed exists without operational changes.

As Eurostar explains in more detail below and in the Annex to this letter, we do not agree that moving non-maintenance activities currently being carried out in the shed onto external roads (suitably enhanced, which is, in itself, subject to such enhancements being feasible) is likely free up the level of additional shed capacity suggested.

[5] IPEX Report, paragraph 12.6.6.
[6] IPEX Report, Conclusions section, page 5: "*Although some latent shed capacity exists now*".
[7] IPEX Report, paragraph 4.3.2: "*The full extent of the identified Latent Maintenance Shed Capacity could be realised if tasks such as interior cleaning, interior repairs, and driver preparation which are occasionally performed in the shed, were always completed elsewhere."*

## Moving non-maintenance outside the Shed

The main tenor of the options identified by IPEX is to enhance the external roads so that non-maintenance activities, including cleaning, driver preparation, sanding, washer fluid top up and pre departure testing can be carried out on these roads. These enhancements, so the Report claims, will enable a moving of all non-maintenance activities currently carried out inside the shed to external roads, which appears to be the key lever to freeing up latent capacity in the shed.

That assessment is not robust for several reasons:

- It is already the current operational practice that trains only enter the maintenance shed if they require a maintenance visit. Any trains not requiring this are already serviced, cleaned and prepared on the external Stabling Roads.
- Wherever possible, non-maintenance activities are carried out concurrently to maintenance activities (i.e. where a maintenance service is required regardless of non-maintenance requirements) to increase overall efficiency.
- Eurostar previously carried out pre-departure tests outside of the shed, but this led to service delays because train sets needed to be returned to the shed for faults detected during the pre-departure checks.
- The additional set moves between the shed and external roads would consume a significant amount of the time claimed to be freed up through the moving of non-maintenance activities to external roads.
- There are significant caveats and concerns regarding the feasibility of many of the enhancement options, which we explain in more detail in the Annex.

IPEX itself caveated its findings by stating *"It was not possible in this study to quantify the amount of additional time that Sets currently occupy the shed (that is, the time Sets are occupying the shed with maintenance finished and waiting for departure and or having tasks such as driver preparation, which may be completed elsewhere…),"*[8]

The assertion that carrying out non-maintenance tasks exclusively on external roads can free up a meaningful amount of shed capacity is, therefore, conjectural, rather than evidenced and carries a low level of confidence.

## Storage of decommissioned e300 sets currently stabled at TMI

Eurostar agrees that this is currently done as a matter of convenience (and de-prioritisation of re-cycling due to depot pressures). It should be borne in mind that one of these trains (the one formed as two half sets) occupies the Cripple Roads which are not electrified and only 200m in length, so their usefulness is limited compared to other external roads.

This disassembling and moving of these sets to offsite storage facilities is entirely feasible but not trivial. The value derived from this undertaking needs to be clearly quantified so it can be weighed against the significant cost, time and resources that such an undertaking would likely require. Due to their age and condition, they would need to be disassembled on site carriage by carriage and moved by road to offsite storage locations.

## Physical constraints around the LDA and reception roads may limit the feasibility of some enhancement proposals

Eurostar has safety-related and practical concerns about improvement options discussed in the Report.

The Report proposed that all external roads could be equipped with sanding facilities. For sanding activities, trains must be accessible from both sides. Without major reconfigurations, there is not sufficient space on both the LDA and the reception roads to access trains for sanding from both sides.

[8] IPEX published report, paragraph 15.3.3.

To enable cleaning and other servicing activities to be carried out on the reception roads, significant wholesale reconfigurations would become necessary, which may even come at the loss of one reception road in order to create sufficient space for the necessary walkways, access platforms, sanding facilities, equipment storage and welfare facilities. At a minimum, the layout of the reception roads in the depot would likely need to be altered, requiring a moving of the rails and the OLE, which in turn would have knock on effects on the rest of the depot.

### Stabling at SPI

A further important consideration when assessing available capacity at the depot is the use of SPI for stabling and low-level rectification tasks. This has been a long standing, well-established practice and takes place currently with the permission of the station facility owner. This approach was adopted to alleviate existing pressures which are felt in the depot.

Currently, Eurostar stables sets at SPI overnight and has a small team based there to conduct some low-level rectification tasks at the station. If other operators start to access SPI, this level of stabling may no longer be available to Eurostar, and if that is the case then the requirement will transfer back to TMI. This will inevitably utilise some of the areas identified by the IPEX report as potential available capacity.

## Eurostar's Own Future requirements

The IPEX study was a point in time study looking at use in early 2025. Access is sought for years which are in the future and the use of the depot will have evolved.

Eurostar notes that the s.17 process has now been under consideration by the ORR for 8 months. To date four separate operators have now submitted to the ORR their requests for access, however Eurostar itself has not yet been asked about its own future use by the ORR, and it is not clear at what point in the process this will happen. Such an approach risks distorting the narrative around available capacity since Eurostar has its own future legitimate needs which any potential determination should take into account. There are two general topics (in addition to the SPI stabling issue raised above): Eurostar's planned increased use of its current e320 fleet; and its intended purchase of up to 50 new trains.

### Increased use of current e320 fleet

Eurostar has a stated public ambition to grow to 30m passengers in the 2030s[9]. The new fleet is a key component in these ambitions, but it is not the sole component. An essential element of the strategy is to increase the usage of the existing fleets (including e320) until the new fleet becomes available. This is already in evidence: rolling stock utilisation across the business increased by 26% in 2023 and 10% in 2024. E320s are already being exclusively deployed for regular services on the Amsterdam – Paris route and Eurostar has stated its intention to introduce a fifth Amsterdam – London service in 2026 which will necessitate a further increase of the e320 utilisation rate.

Eurostar's broader future plans are also, directly and indirectly, predicated on this increased fleet utilisation: a successful increase in fleet density is expected to drive increased frequencies, benefitting passengers through increased choice and more choice of fares and providing Eurostar a more robust basis on which to undertake investments in future capacity to further serve passenger interests, including not only its new planned fleet but also station capacity enhancements already planned at SPI. Passengers would start to benefit almost immediately from increased service density, and well before the introduction of any new fleets.

[9] Eurostar's ambition to grow to 30 million passengers by 2030, has been an objective of the merger between Eurostar and Thalys, since 2019: https://mediacentre.eurostar.com/mc_view?language=&article_Id=ka43z000000kM6fAAE.

Finally, it is objectively justified for priority to be given to the capacity use of facilities by the enhanced use of the e320 fleet because it represents the most efficient use of the TMI depot capacity with the greatest and most certain passenger benefits:

- These benefits are available progressively from the current date – it would be unreasonable and damaging to consumer benefit to cancel certain passenger benefits today against the prospect of very uncertain potential benefits in five years' time.
- They require no further major investment of modification of the depot and so are most efficient to achieve.
- There is a high degree of certainty that the services and therefore passenger benefits will be delivered in a timely manner since the trains exist and all necessary licences, safety certificates and access contracts are already place.

In contrast none of the current four section 17 applicants has yet to place an order for a single train.

### New Fleet

Eurostar also has its own legitimate needs for its depot to house and maintain its own future fleet. Eurostar is close to finalising an order for up to 50 new trains and has committed to the necessary investment in new facilities to service them[10].

Eurostar has concluded in respect of its own fleet exactly what it has consistently communicated to the alternative applicants and ORR: that new trains with very different technical characteristics running a significant density of services cannot realistically be accommodated within the existing light maintenance shed at TMI.

The area available at TMI to develop the necessary new facilities significantly overlaps with the areas identified by IPEX as offering the potential for increased capacity. Planning assessments are already underway, and work here is likely to start in the next two to three years. As such, they will not be available to provide alternative space for the existing e320 fleet.

## Limitations of the s.17 process

It is now eight months since the ORR received the first section 17 application and began its process of consideration. In the meantime, there have been three further applications for the same capacity at the same depot. In addition, and as indicated above, Eurostar has its own growth plans, and its own legitimate future needs and investment intentions for the depot.

The IPEX depot capacity study has now concluded. It was a necessary step (and one offered by Eurostar under its own application process as set out in its Service Facility Description for TMI) and Eurostar welcomes it. However, the study has found that, even if every option proposed by IPEX was validated and implemented (irrespective of feasibility, cost, disruption, the distribution of capacity, future pressures from SPI or other constraints), then the capacity realised would be insufficient to satisfy the needs of any one operator let alone five operators all of whom have plans and intentions to invest.

This is without even considering the next critical step in the published depot access application process which would likely be to undertake technical assessments of compatibility of the depot facilities with for the various types of future rolling stock to identify if it is even technically possible (without significant, disruptive re-purposing) to maintain these new trains in a depot designed for an entirely different class, generation, and length of train. Especially bearing in mind that re-purposing for one class of new train is likely to exclude future access by operators who buy a different train.

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[10] The fleet procurement plans were first publicly reported on 16 May 2024: https://mediacentre.eurostar.com/mc_view?language=&article_Id=ka4Rz000007RgGrIAK.

Eurostar is concerned that the focus, energy and expectations of all participants are being channelled into a section 17 process that:

- was never designed for international services;
- was never designed to support five different competing applications/usages; and
- is increasingly costly, resource-intensive and disproportionately burdensome on all involved whilst (as is clear from this study) offering no realistic prospect of a beneficial outcome.

The latter point is one of the most important. If ORR drives through to a determination of access, then, based on the findings in this report, the most that can be offered is a partial award of access for one operator out of five. This cannot be expected to deliver a successful service for that operator and, at the same time, may well prejudice the financing prospects for other applicants seeking access. In other words, pursuing a section 17 solution within the limitations of that process will be insufficient to enable a full new service to be introduced (by Eurostar or anybody else), but it could serve to undermine significant sums (by our reckoning over £2 billion) in proposed alternative investments by disappointed applicants that might otherwise benefit passengers wishing to travel by international passenger rail.

To put it starkly, Eurostar is ordering up to 50 new trains, Evolyn previously stated up to 16, Virgin have recently announced an intention to buy 12 trains, and it can reasonably be expected that Trenitalia and Gemini needs will be of a similar order of magnitude. Up to 100 new trains of different models and characteristics are not all going to fit onto a theoretical 1.6 roads of potential capacity in a depot designed for an entirely different class of trains altogether.

The current ORR process does not, therefore, appear to be capable of delivering the outcomes sought by any party (including the ORR's objectives to promote growth and passenger choice), but at best can only ration what is already inadequate capacity, undermine much broader investment opportunities, and consume time and money in getting there.

This is not to diminish the process, in which Eurostar has played a full and proper part, but it is to argue that there is a need to look beyond.

## Future growth, Future Solutions

Eurostar wants to see market growth to the maximum extent, and within that market, we expect and intend to continue to compete for customers.

Eurostar is investing in a new fleet, and the associated maintenance that will come with a new fleet. We want other international passenger rail services to have the same chance, if they decide that they are prepared to take it.

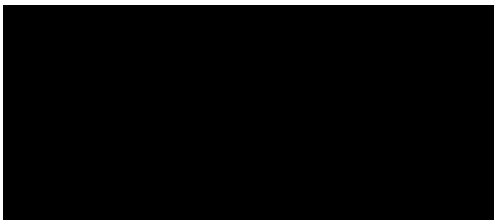
Eurostar believes that the time has come for the ORR, working with the UK government, to take a broader system view. It is in any case necessary that the ORR to consider other economic alternatives for capacity in order to support this growth. Eurostar suggests these alternatives may include the following:

- the Southeastern Trains Limited/Hitachi high-speed passenger rail depot at Ashford (Importantly we note that there is currently no service facility description published for this depot, despite notes in successive HS1 Network Statements that suggest this is in preparation, and we ask why ORR has not to date required this be completed and published);
- the current freight facilities owned by Getlink at Dolland's Moor and/or alternative Getlink facilities.
- Singlewell Depot;
- the previous depot site at Ripple Lane in East London;
- the HS1 chord and Fawkham Junction; and
- other alternative land and sites in East London.

Eurostar would support the ORR to undertake this broader review in order to assess the total growth needs for the high-speed passenger rail system and its passengers, as well as the options available for development to facilitate these. Eurostar would commit itself to engaging constructively with such a review.

Once again, thank you for the opportunity to provide these comments. Eurostar remains available to discuss any element of this letter or its comments to assist with the process further.

Yours sincerely



Gareth Williams

**General Secretary**
**Eurostar**

# Annex to Eurostar's response to the ORR's initial findings on available capacity at Temple Mills International Depot (TMI)

This annex contains further detail comments relating to Eurostar's responsive submissions and the content of the Report. The annex is structured as follows:

- Section A contains further submissions on the Report's findings regarding maintenance shed road availability.
- Section B contains further submissions on the Report's proposals relating to enhancing external roads and moving conduct of some non-maintenance activities out of the maintenance shed.
- Section C contains specific submissions on each of the 6 "*improvement options*" discussed in the Report.

## Section A – maintenance shed road availability

The Report identifies that latent available capacity exists for 1.6 roads of additional maintenance shed capacity, which breaks down broadly into one road at nighttime and two roads during daytime. Specifically, the analysis appears to suggest that one maintenance shed road is permanently and contiguously available day and night, and a second road is always available during dayshifts.[11]

Without having had access to the underlying modelling it is not possible for Eurostar to comment directly on the analysis. However, even to the extent that latent shed capacity exists, it is unlikely to exist in the sufficiently large contiguous and regular time windows that would provide meaningful capacity for additional trains.

In particular, it would be misleading to assume that one road could be permanently vacated in order to make it exclusively and permanently available for another operator (Eurostar notes that potential operators seeking section 17 directions from ORR seek exclusive use of at least one maintenance shed road within their access requests[12]).

It is not unusual that all eight roads are used simultaneously, particularly during the night, even within the parameters of the capacity needs recognised in the analysis. This is for several reasons:

a) Frequently more than one shed road is simultaneously occupied for reactive repairs. This is expected to increase over time as both fleets are aging. This does not appear to be reflected in the Report.
b) The analysis appears to assume that Eurostar can consistently and reliably sequence preventative exam works during the night with campaign work (modification programmes) during the day shifts on the same train. While this is indeed a correct reflection of how Eurostar *seeks* to sequence work to enhance efficiency, this is not always possible, particularly as a campaign nears its end. As a result a road may be occupied by one train for a campaign activity lasting several days while nighttime preventative exam works need to be carried out on other trains in the night shifts that then need to occupy an additional road.
c) There is some fluctuation across the year in the depot's usage intensity that varies with seasonality. The Report shows in section 12.5 that over a sample week in January 2025, the maintenance shed was fully occupied during the night shift on some days (notably between 10pm and 11pm and between 1am and 5am). As the trainplan intensifies later in the year, the shed occupation also tends to increase. So even if some shed capacity could be available in January, this capacity may be unavailable during other months, particularly in the summer.
d) Overall, it is not obvious to Eurostar whether the maintenance capacity analysis is based on an average need or on a peak need. The two examples above might suggest that it does not reflect peak capacity need. If so, this would mean that the identified latent capacity in the report may be overstated for, at least, some of the time.

[11] Ipex published report, section 12.6.6.
[12] Evolyn requested two "workshop tracks for daily maintenance", Virgin asked for capacity for two trains "to be inside the shed for up to 16 hours" "every day", and Gemini specified "one dedicated track in workshop shed". Source: applications published on https://www.orr.gov.uk/rail-guidance-compliance/network-access/station-depot/depot-applications-decisions, accessed on 24 April 2025.

Finally, the Report's capacity availability assessments are based on the assumption that the depot is maintaining trains with the same technical characteristics as the present fleets maintained at TMI, i.e. that there are no compatibility or other limitations that would operate to alter this assessment. There is no guarantee that the latent capacity as identified in the Report would be the same for trains with different technical characteristics.

## Section B - moving non-maintenance activities from the shed to external roads is extremely unlikely to increase maintenance shed capacity availability to a meaningful extent

The Report states that unlocking the full latent shed capacity is contingent on enabling all external roads for non-maintenance activities such as servicing, cleaning, sanding, pre-departure tests[13] and driver preparation: "*The full extent of the identified Latent Maintenance Shed Capacity could be realised if tasks such as interior cleaning, interior repairs, and driver preparation which are occasionally performed in the shed, were always completed elsewhere. This would be subject to suitable adjustments to process and facilities such as utilising and enabling reception roads to support relevant activities.*"[14]

To the points already set out in the body of Eurostar's letter, the proposals for enhancing external roads and moving all non-maintenance activities cannot be anticipated to increase maintenance shed capacity availability to a meaningful extent because:

a) It is the current operational practice that trains only enter the maintenance shed if they require a maintenance visit. Any trains not requiring this are serviced, cleaned and prepared on the external Stabling Roads, or berthed overnight at SPI where low level rectification tasks as well as other non-maintenance activities can be performed. Therefore, moving non-maintenance activities for trains coming into the maintenance shed to external roads would always introduce additional intra-depot train moves which due to the layout of the depot can require considerable amounts of time. They would abstract from the capacity in the maintenance shed.

b) Wherever possible, non-maintenance activities such as interior cleaning, sanding and washer fluid refill are carried out concurrently to maintenance activities inside the shed to increase overall efficiency. Moving such concurrent non-maintenance activities to external roads would therefore reduce, not enhance, efficient use of the depot capacity and extend the time a train must remain at the depot.

c) It is current practice for sanding only to be conducted during maintenance visits. Since sanding can be carried out concurrently to maintenance activities, installing sanding facilities on outside roads would provide no time saving inside the shed;

d) External road pre departure tests were practiced by Eurostar in 2015-2017. These were discontinued as they were found to reduce overall efficiency of use of the depot, and impact detrimentally upon timely return of sets to service. It was identified that the additional intra-depot moves (each taking up to an hour) were abstractive of capacity and that this also required additional driver resource to complete. In addition, where pre-departure tests identified faults, which happens, it proved to cause a reliability issue as sets needed to be taken back into the shed, necessitating further time-consuming moves and delaying return to service (by more than would have been the case had the pre-departure test been carried out inside the shed where the fault in question could have been addressed more quickly and without requiring additional train moves). Were pre-departure tests moved outside to allow other sets to move into the shed immediately, delays would quickly compound since the train now on an outside road could not necessarily be returned to an empty shed road but would have to await another free road. The likely adverse impact on efficiency and reliability would be unacceptable.

[13] The IPEX Report references interchangeably "train prep" and "service prep" which we reference as pre-departure checks that must be carried out following a maintenance intervention before releasing a train set for service and takes c. 60-90 minutes.
[14] IPEX Report, paragraph 4.3.2.

A conclusion that carrying out non-maintenance tasks exclusively on external roads would free up a meaningful amount of shed capacity is therefore, at this stage, hypothetical and unproven.

Based on Eurostar's experience, it is unlikely that any more than limited maintenance shed capacity could be freed up. Any capacity gain could be largely (or wholly) abstracted by the additional time required for internal moves. Further it is a material possibility that any capacity gain after accounting for internal moves at the start or end of a night shift would not be within a sufficient time window for an additional train to be maintained in the maintenance shed before it needs to be returned to service in the morning.

## Section C: comments on the feasibility of IPEX recommended options for potential depot enhancements

IPEX's "*improvement options*" are all caveated in that they are contingent on feasibility studies confirming that they would a) be physically feasible, b) increase efficiency if implemented and c) could safely be incorporated into operational procedures. IPEX has also not considered cost and return on investment as part of its optioneering.

### Option 1 – Upgraded CET capability on LDA1 and LDA2

Currently only one set can be CET at any given time. This is due to the available water pressure from the supply and drainage capacity that are insufficient to use both LDAs concurrently. A feasibility study would be required to assess if and how both could be upgraded. In addition, it should be noted that the existing LDA hard and software systems may require significant upgrades or entire replacement in order to accommodate the doubling of current LDA capacity. This has not been required either at the depot design stage or at any time afterwards since the absolute emergency maximum arrival frequency for the depot has been one train every 20 minutes, and with CET taking 45 minutes being only able to CET one train at a time has never represented a bottleneck.

Since the arrival rate of train sets has not been identified as a bottleneck the Report, it is not clear how this enhancement in and of itself would aid the freeing up of theoretical identified latent capacity that is currently unavailable, for stabling and/or maintenance.

### Option 2 – Reception Roads 1-4 Upgrade

IPEX suggests that the roads could be used for cleaning, driver preparation and light vehicle maintenance without upgrades. This is not feasible as:

a) There is currently no level walkway from the depot to the reception roads, only a drivers' walkway. The roads are currently on ballast. This means that carrying any equipment required for cleaning and other non-maintenance activities from the main shed, which currently cannot be stored closer to the reception roads, would be hazardous, particularly at night and in poor weather conditions and would only be permissible subject to passing relevant health and safety checks. Further down in this annex are comments on IPEX's proposals to enhance these roads including building walkways and other necessary infrastructure.
b) Absent access platforms alongside the reception roads, cleaning crews would be unable to take any essential cleaning equipment, such as vacuum cleaning machines, onto the trains. Due to the length of the trains, at 400m long, it is not suitable to provide access only at the front and/or end of the sets.
c) Teams working on reception roads would need additional time to move between the maintenance shed and the reception roads, including with equipment. Without relevant welfare facilities closer to the reception roads, additional welfare trips would need to be scheduled for staff working on the reception roads. This would Involve a significant efficiency loss for crews working on reception roads.
d) Responding to the above considerations, this would require the recruitment of additional staff and making available additional equipment, which would also require additional staff facilities (eg changing rooms and lockers) and equipment storage at the main shed. That has not been considered in the Report.
e) As previously explained, moving pre departure testing to reception roads creates additional service reliability risks since any return to the maintenance shed required by faults detected during driver preparation would significantly delay the return to service.

Further, the report suggests that adding welfare facilities, sanding and wash fluid top up stations could enhance the use of these rods for further servicing activities, allowing trains to be moved from the maintenance shed to these roads following the completion of a maintenance activity for sanding, washer fluid top-up, cleaning, light vehicle maintenance (which is not further defined) and train preparation.

Eurostar comments as follows:

a) Upgrading the reception roads 1-4 as proposed At a minimum, upgrading the reception roads 1-4 as proposed would likely require moving the rails and OLE because there is currently insufficient space between and alongside the roads to accommodate walkways, access infrastructure and welfare and storage facilities. It may necessitate access through third party land, due to the tight boundary. It is not at all clear that this is achievable within the current footprint. This would incur significant additional costs, as well as potentially reduce reception roads from four to three in order to create space for the proposal (if it were physically feasible at all).
b) For sanding, there needs to be access to both sides of the train. There is insufficient space to access trains on both sides for sanding, and to create the necessary space would require additional disruptive infrastructure works. We also note that there is limited space available to transport the sand to and store it at the reception roads.
c) As mentioned above, additional access platforms would have to be built alongside each reception road to permit access to the train with equipment, for example for cleaning. This again would likely require extensive reconfiguration of the reception roads layout.
d) Undertaking such significant infrastructure work on these roads carries risk for the operations of the rest of the depot and would significantly disrupt the overall depot flow for a considerable amount of time. Any reconfigurations of the OLE in particular would likely significantly compromise other areas of the depot, which is operational 24 hours a day 7 days a week. While within the time available to comment in this response Eurostar has been unable to develop a detailed estimate, it expects any such major enhancements to take around 2 years to complete, with the associated disruptions to the overall depot operations and with no project or other delays during the works.
   More generally, as explained above, enhancing the servicing facilities available on these roads outside of the maintenance shed is unlikely to free up a meaningful amount of capacity in the maintenance shed.

### Option 3 - LDA Road 1 and LDA Road 2 Upgrade

a) Using LDA roads for anything else but toilet discharge on arrival to the depot may reduce the flow of sets into the depot, which may limit the additional capacity being sought to be unlocked through this option.
b) It could only be used for additional activities and stabling after the last arrival so that it would not limit the flow of sets into the depot.
c) Similar to the reception roads, there is no access to both sides of the trains which is necessary particularly for sanding.[15]
d) As explained elsewhere, it is far from clear that additional sanding stations would unlock capacity in the main shed where these activities are currently being carried out concurrently to maintenance activities and have been found not to be necessary in between maintenance visits.

### Option 4 – Improved walking routes and facilities

The report correctly identifies that any enhancement of the outside roads as outlined under options 1-3 above would require the availability of walkways, lighting, steps and stages and welfare facilities between the main shed and the outside roads to accommodate the additional use of the outside roads.

a) Eurostar agrees that this is an essential part of considering any options that would seek to enhance use of the outside roads as outlined in options 1-3. Any options also must be considered carefully against staff relationship aspects, staff welfare and health and safety requirements.
b) Eurostar has commented above on the significance of such enhancement projects and the significant disruption it would bring to the operation of the depot during the construction phase. Eurostar reiterates those points with regard to IPEX's improvement option 4.

[15] IPEX Report, paragraph 16.4, Caveats.

c) As highlighted above, any increase in utilisation of the external roads would require an increase in the workforce, for which additional welfare facilities need to be made available such as changing rooms and lockers, as well as additional storage for additional equipment that would be utilised on these roads. These do not appear to have been factored into the options presented in the report.

### Option 5 – Stabling Roads 1-3, provision of sanding capability

Ipex itself caveated that *"providing sanding capacity on all external roads therefore may not directly add to the usefulness of the roads"*[16], because currently sanding is only carried out with a maintenance visit and that has been proven to be sufficient. As for the other external roads, it is therefore unlikely this would help unlock the theoretical capacity identified by the report.

### Option 6 – Removal of Decommissioned Sets (Cl 373) from TMI

The report suggests that the four decommissioned half sets currently stabled, if removed, could free up a reception road and two half-length roads (Cripple Roads) that currently are not electrified.

This should be be feasible allowing for a suitable time period to carry this out, but the benefit of this option has to be properly quantified to be weighed against the costs incurred by removing the sets. At this stage we have the following additional considerations relating to this option:

a) Dismantling and moving to an offsite storage facility of the decommissioned set would likely be very time consuming. They would have to be dismantled carriage by carriage on site as they can no longer be moved by rail, and be moved to an offsite storage facility by road transport. Such a project would likely take at least 18 months.
b) Two of the roads that are currently occupied by decommissioned sets are the Cripple Roads which are only 200m long and not currently electrified. It is noted that the benefits of freeing up these two non-electrified half-length roads appear limited.

[16] Ipex published report, paragraph 16.6.

**ORR consultation on Temple Mills International depot Capacity Analysis**
**Eurotunnel response 28.04.2025**

Eurotunnel welcomes the publication on 31.03.2025 of ORR's initial findings together with the Ipex report, and we are grateful for this opportunity to contribute to ORR's public consultation.

This analysis takes place as a result of strong growth in demand for UK international high speed rail travel, requiring both increased supply of seat capacity on existing routes (London to Paris, Belgium and the Netherlands), and creation of direct services to new destinations (including Germany, Switzerland, Southern France and beyond). This strong market development potential has been duly recognised both by prospective new operators wishing to enter the cross-Channel high speed rail market and by Eurostar studying new direct routes, both requiring investment in new fleet capacity. The cross-Channel rail system was indeed dimensioned from the outset to accommodate more than double the current level of traffic, and Eurotunnel is keen to ensure that these growth ambitions are allowed to materialise, in order to realise the full potential of the Channel Tunnel Fixed Link.

ORR's report and initial findings appear particularly positive and constructive, as they pave the way for a final decision catering for all actors and projects seeking to develop the market, at several levels and timescales:

1) ORR's identification of immediately available shed capacity for maintenance of additional fleet at the international depot provides a green light for investment in new international fleet, allowing for the 1st phase of growth by one operator (with adequacy confirmed by several actors' reactions to publication of the report).

2) The report's identification of further capacity that may be delivered through medium-term improvements in current operational practices (displacement of idle vehicles, more efficient use of roads for productive tasks, subject to modest investment) provides confirmation of further sources of depot capacity, allowing for an initial phase of growth by the facility's operator (best able to release space to cater for its own future requirements).

3) While ORR's initial findings open the way in the medium term for first phases of growth by one operator and by the facility's operator, there is now clear evidence of market demand for new international services beyond those initial phases (thus both for 2nd phases of growth by one operator and by the existing operator, or for a 3rd operator). Since congestion has been declared on public record at this essential facility for international services, there is now a formal requirement to initiate a capacity development process for international depot capacity, in order

to satisfy forecast demand by all operators, in line with global system capacity commitments (as supported both by existing and new operators). A major capacity development project around Temple Mills International depot will naturally involve greater investment and longer timescales, to be delivered in time to meet the growth ambitions of all operators, including both Eurostar and new entrants.

At detailed level, the Ipex report provides a useful technical analysis combining three distinct angles of analysis (statistical approach on historical occupancy of resources, bottom-up approach reconstructing global resource requirements, modelling of operational flows & processes between individual depot resources) to arrive at prudent, reasoned conclusions. In support of Ipex's technical analysis, some additional observations may be helpful:

A) To complement bottom-up approaches, a top-bottom approach of high-level benchmarking against high-speed train fleets would indicate a typical ratio of fleet in shed for maintenance at ca.15%, within a maximum range between 10% (extremely low) to 20% (extremely high) – in other terms, 17% represents one shed road for 6 fleet units (high maintenance), while 11% reflects one shed road for 9 fleet units (efficient maintenance). Ratios would be expected to vary between recent fleets with efficient maintenance regimes (data capture & diagnosis tools) and ageing fleets with higher maintenance needs and lower-efficiency fixed regimes (until retirement from operations), also depending on fleet sizes (small fleets imply higher fluctuations) and exceptional events (brand new fleet, winter or wildlife damage, retrofitting). Top-bottom benchmarking would return a shed requirement of 4 shed roads for a 16% ratio (25 units x 16%) or 5 shed roads for an extreme 20% ratio (25 units x 20%) of fleet in maintenance [NB: in both cases, consistent with Ipex's recommendation for dedicated use of shed capacity for maintenance tasks, excluding servicing (eg. sand replenishment) and stabling (eg. spare units or under testing)]

B) Ipex's analysis on stabling capacity requirements correctly highlights the critical importance of adequacy of spare stabling road capacity as a key factor for operational efficiency & performance of depot resources. Once initial fleet growth is accommodated for maintenance & servicing at the depot in the medium term (all the more so after improvements in operational practices), lack of spare stabling capacity would inevitably result in loss of efficiency of optimised resources, therefore counteracting prior efficiency gains. In that context, the mobilisation of ring-fenced stabling capacity for international services would play an instrumental role in enabling efficient depot operations & capacity utilisation.

Confidential

The Office of Rail and Road

By email: [redacted]

cc:

25 April 2025

**Re: Temple Mills Depot – Independent Capacity Assessment 2025 (IPEX)**

Dear Ms O'Brien and Mr Chowdhury

Firstly, Evolyn thanks you and other involved parties for your work with IPEX which has culminated in this thorough assessment on the available capacity at Temple Mills International Depot (TMI).

This letter sets out Evolyn's written response to the ORR regarding the IPEX document published on 31st March 2025 "Temple Mills Depot – Independent Capacity Assessment 2025".

- Evolyn is pleased to acknowledge and confirm that there is **some capacity available** at Temple Mills Depot.

- We strongly believe that at the point at which a second international operator maintains its rolling stock at these facilities, Temple Mills Depot will become a multi-operator depot and so the manager of the depot should be a neutral third party who, in order to be fully independent, must not be any of the operators maintaining its rolling stock at Temple Mills Depot. From that point onwards, each operator should manage the movements and activities of their trains within the depot independently, and pay the corresponding access charges per train according to clause 4.11 of Temple Mills International Depot - Service Facility Description, but the coordination and procedures should be overseen fairly and transparently by a **neutral depot manager**.

- In a multi-operator context within the Temple Mills Depot, it would be advantageous to analyse the possibility of amending the working shifts of the **personnel working at the depot** in order to adapt the future resources to the actual maintenance activities, particularly in the observed "bottlenecks". This analysis about the personnel would also help to increase the overall capacity of the facilities from another point of view.
  In addition, according to Temple Mills International Depot - Service Facility Description, the clause 4.26 refers to some services delivered by TMI personnel (currently employed and managed by Eurostar). Evolyn understands that those services which require Eurostar equipment to perform such activities will also require TMI personnel, however, that TMI personnel should be neutral and not managed by Eurostar, especially if those services are carried out on different rolling stock than the current one maintained at Temple Mills Depot. In summary, there will be general activities that are common to any operator at TMI that should be carried out by a neutral third party.

- If the objective of the UK railway sector is to uphold the principles of open access and fair competition within a multi-operator framework, the **allocation of the latent Depot Capacity** would be advisable to be designated for new entrants rather than the existing operator, even in the event of any future expansion of its fleet. It is noteworthy that, although Eurostar's primary maintenance facility is TMI, it currently utilises other depots across mainland Europe to diversify its maintenance operations. Consequently, this current latent Depot Capacity should be available solely and exclusively to new international operators.

- According to 'Temple Mills International Depot Service Facility Description' written by Eurostar International Limited, the basic services offered at TMI include '*2.2 (e) Maintenance, with the exception of "heavy" maintenance*'. However, this assessment confirms on several occasions that Eurostar does indeed use **at least one shed road for "heavy" maintenance** activities as described for example in the following pages:
    - Page 21. '*Shed Road 1: Overhaul (Some limitations on activities that can be undertaken due to road setup for overhauls)*'.
    - Page 22. '*Maintenance Shed: Light + Heavy maintenance*'.
    - Page 32. '*Latent Maintenance Shed Capacity – the Latent Capacity for more Sets to be maintained at the depot, requiring access to the maintenance shed and including the capacity for heavy maintenance as well as routine light maintenance*'.
    - Page 48. Heavy Maintenance - Fleet downtime requirement: 1.01 roads.
    - Page 51. '*12.6.2 The maintenance plan assumptions are: ... The equivalent of a full road dedicated to heavy maintenance (days and nights), predominantly for R exam work*'.

  Therefore, if Eurostar is currently using this road to perform some overhaul activities within the maintenance shed, Evolyn assumes that this procedure results from the operator's decision, as it is the sole user of these facilities. In this case, these "heavy" maintenance services should be effectively excluded from the services offered at Temple Mills Depot under clause 2.2 (e) above, and hence, this road should be considered as another "normal" road for light maintenance, significantly increasing the latent Depot Capacity value compared to the one outlined in the assessment.

- The **maintenance shed**, as the name suggests, must be used for maintenance only, not for parking, cleaning or any other activity that is not maintenance. However, the assessment concludes that the latent Depot Capacity in the maintenance shed is 1.6 roads, including these activities that are not strictly "maintenance", as mentioned in the following cases among others:
    - Page 54. '*... Sets may continue to occupy the shed following completion of maintenance until their departure. This is because it is not always necessary to move the Set (following maintenance completion) as it would be a wasted move if the Set is departing from the shed*'.
    - Page 55. '*... more maintenance shed capacity could be realised if tasks such as interior cleaning, interior repairs, and driver preparation which are occasionally performed in the shed, were always completed elsewhere... It was not possible in this study to quantify the amount of additional time that Sets currently occupy the shed unnecessarily..., however it is evident that using the reception roads would unlock more shed capacity*'.

  Some activities are currently performed within the maintenance shed because Eurostar is the only operator maintaining trains at Temple Mills, and there is adequate space within the shed, making it

unnecessary for Eurostar to move its trains elsewhere at this time. Therefore, this practice is clearly inefficient in terms of capacity, as it leads to occupation of vital shed roads for non-maintenance activities that can and should be done outside the maintenance shed.
In addition, the assessment states the following: '*Separately, it was observed that the average shed occupancy over the observation period (based on EIL data and IPEX observations) was 5.9 roads*'. This observation together with the above explanation about the use of the maintenance shed would suggest that the latent Depot Capacity in the maintenance shed is significantly higher than 1.6 roads.

- Regarding the **Wheel Lathe facility**, the assessment mentions that the Wheel Lathe Capacity has on average 35% latent capacity (2,357 hours). Will a new international operation have access to perform some activities at this facility of the depot?

- Regarding the **Bogie Drop facility** and values, the assessment only indicates that 0.88 out of the 2 Bogie Drop roads are required. Therefore, Evolyn understands that there is some latent capacity available at this facility, specifically 1.12 road. Will a new international operation have access to perform some activities at this facility of the depot?

- Finally, all the **improvement options** included in the assessment offer varying benefits in terms of optimisation and capacity increase at TMI, particularly those relating to the upgrade capability on LDA1 and LDA2 due to the significant increase in sets per hour, and also the removal of the decommissioned Class 373 sets from the cripple roads and their possible electrification in the future.

I hope that this response has been clear and helpful to you, and we look forward to the conclusion of the consultation period and moving forward together to the next phase of the project.

Yours sincerely,

[redacted]

Antonio Urda
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Via e mail to: operations.team@orr.gov.uk

28 April 2025

**Capacity at Temple Mills International Depot – ORR consultation**

Thank you for the opportunity to respond to the above consultation. Gemini Trains welcomes the publication of the independent assessment on the availability of capacity at Temple Mills International Depot (TMI), which was commissioned by the ORR.

Gemini Trains also welcomes the ORR's initial findings, which we fully support. The conclusions of the independent report and the ORR's initial findings concur with our analysis and assessment of the capacity at TMI.

In response to the specific initial findings, Gemini Trains makes the following observations.

***There is some available capacity at Temple Mills international (TMI) depot for more trains to be stabled, serviced and maintained.***

Gemini Trains agrees with this finding. We have undertaken our own assessment of the available capacity at TMI, including a visit to the facility hosted by Eurostar International Limited (Eurostar), and believe there is available capacity that can be made available.

***Some of this capacity can be accessed without any changes to current operational practices at the depot.***

Gemini Trains agrees with this finding. We highlight that the capacity that we require, as set out in our Section 17 application dated 24 February 2025, can be met within the currently available capacity for operations, stabling, and maintenance at TMI.

***The rest of this capacity may be delivered through investment in changes to current operational practices. This does not include any adaptations required to ensure compatibility with different types of trains.***

Gemini Trains agrees with this finding, but notes that the capacity we seek can be accommodated without investment in changes to current operational practices.

About Gemini Trains

Gemini TOC Ltd (Gemini Trains) is a new business that for the last two years has been developing plans to operate passenger rail services between London and mainland Europe. It comprises a team of senior industry leaders on both sides of the Channel and we have a substantive business plan that has been independently verified.

Gemini Trains looks forward to introducing services in competition to Eurostar to the core destinations of Paris and Brussels, as well as serving other destinations not currently served by Eurostar. We believe there are substantial benefits to passengers from the introduction of competition, as well as supporting wider objectives of passenger growth and modal shift to rail.

Our services will be operated by a fleet of purpose-built new high-speed train sets that will be certified to operate on the high-speed rail infrastructure on both sides of the channel and meet the specific requirements of operation through the Channel Tunnel.

We propose to maintain our trains at the purpose-built service facility of Temple Mills International Depot (TMI). TMI is a regulated service facility and is the only UK service facility capable of maintaining trains for operation through the Channel Tunnel.

In developing its business plan Gemini Trains has met senior representatives at Eurostar to discuss our requirements, access application process and their view of available capacity. Eurostar have also hosted a visit to TMI for the Gemini Trains team, enabling us to observe first-hand the design and operation of the facility.

While Eurostar have been cordial and professional in our meetings, they have taken the position that insufficient capacity exists to accommodate our requirements. This is a position we disagree with and is supported by the IPEX report and the ORR's initial findings. Recognising Eurostar's position, the submission of Section 17 applications by other potential operators and the ORR review of available capacity, Gemini Trains submitted a Section 17 application for access to TMI on 24 February 2025.

Our Section 17 application sets out the capacity that Gemini Trains is seeking, which can be accommodated within the available operations, stabling and maintenance capacity identified in the IPEX study.

In the remainder of our response, we firstly make some brief observations on the detail within the IPEX report. These comments are brief as we broadly agree with its analysis and conclusions. Secondly, we highlight the necessary steps we believe the ORR should adopt to progress access applications to TMI.

Gemini Trains' comments on the IPEX report

We welcome the IPEX report and substantially agree with its analysis and conclusions. These concur with our own assessment of the available capacity.

IPEX have assessed the available spare maintenance shed capacity as either '1.6 shed roads' (based on a calculation of the requirements needed to maintain the current Eurostar fleet), or spare available capacity of '2.1 shed roads' based on the observed utilisation during the period of the report. Using either approach clearly evidences that there is available spare capacity.

We would make the following observations regarding the assessment of available capacity:

The report assumes operation of 400m train sets throughout. Eurostar currently operate 400m train sets and therefore only this length of train is reflected in the report's operational analysis.

Apart from the current situation on the Channel Tunnel route, the European high-speed sector is increasingly focused on 200m train sets, which also have the capability to operate in double set formation to create a 400m train. Each of the major OEMs who offer a high-speed train product provides this in a 200m formation.

Any train that operates on the high-speed infrastructure between the UK and mainland Europe via the Channel Tunnel must comply both with all the relevant Technical Specifications for Interoperability (TSIs) relating to operation of high-speed train sets and additionally the specific requirements relating to operation through the Channel Tunnel. Currently no OEM offers a fully certified train that can operate through the Channel Tunnel, as TSIs have been updated since the current Eurostar trains were certified. All the major OEMs are engaged with Getlink and the other Infrastructure Managers regarding the requirements to ensure they can offer an approved product.

It is reasonable to assume and widely accepted that a 200m train (based on the standard European products) would be the basis for future operation. Therefore, the assessment of available capacity at TMI for operations, stabling and maintenance should also consider that 200m length trains may use the facility.

The maintenance building at TMI currently accommodates 400m sets, so a single road within the maintenance shed would be capable of maintaining two 200m train sets. The same goes for stabling elsewhere at TMI. While the tracks are not currently electrified, the cripple sidings used by Eurostar to store decommissioned train sets, could be utilised to provide stabling capacity for 200m train sets.

Therefore, we recommend the ORR considers the implications of the use of 200m train sets and the likelihood that this will further facilitate available capacity.

Our second substantive point on the IPEX report is that it does not address directly the impact on capacity that can be achieved through efficient train operations on the site. The IPEX report correctly addresses issues including arrival rates, CET processing time, wheel lathe hours and time for maintenance activities. The overall efficiency of a service facility is also determined by the effectiveness through which these activities are coordinated and movements around the service facility are managed.

This becomes increasingly important as spare capacity is used and the site must be operated efficiently to maximise the use of capacity. This is less of an issue currently when the facility is under-utilised and only used by a single operator.

The transition to a multi-user environment, plus increased utilisation of the facility, will need to be accompanied by effective and efficient planning of capacity and 'on the day' train movements. Without this there is a real risk that the identified available capacity could be frustrated.

This does not change the underlying assessment of available capacity, but we recommend the ORR also consider how the use of capacity is efficiently managed in a neutral manner when TMI moves into a multi-user environment.

We have previously highlighted to the ORR - in our response to Eurostar's initial representations on our Section 17 application- that it is essential that the facility operator (Eurostar) ensures that available spare capacity at TMI is made available to other operators. We also highlighted the importance that they engage positively with both the ORR and new operators to support this outcome, as opposed to seeking to frustrate the process as could be inferred from the tone and content of their letter to the ORR of 1 April 2025.

In summary, we agree with the conclusions of the IPEX report and the supporting initial findings of the ORR. We expect that the ORR will remain proactively engaged in relation to TMI in the coming years, to provide independent assurance that Eurostar's special obligations as the dominant incumbent - in providing fair and non-discriminatory access to its facility - are being met.

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Taking forward access applications

TMI is a regulated 'service facility' and it is essential that fair access is made available to new operators who wish to operate services on HS1 and through the Channel Tunnel. We are grateful to the ORR for commissioning the IPEX report that shows clearly that space exists at TMI, despite Eurostar claiming otherwise.

We remain concerned that Eurostar could seek to frustrate the process of making capacity available to applicants, including Gemini Trains.

Gemini Trains highlights that the volume of capacity it has requested in its Section 17 application can be accommodated at TMI. This level of capacity is within the identified level of available space without modifications set out in the IPEX report. Furthermore, and importantly, we draw your attention to the fact that currently Gemini Trains is the only Section 17 applicant whose request for space can be accommodated with no enabling work at TMI.

Following the conclusion of your consultation, we ask that the ORR sets out clearly and promptly the process it will follow to determine the three Section 17 applications for the available space at TMI. Furthermore, we request that the ORR provides an assurance that it will monitor Eurostar's engagement with other operators with the transparent objective of finding solutions and agreeing access to TMI rather than attempting to frustrate the process and in so doing, causing unnecessary delay.

We are keen to engage effectively with the ORR as you develop your understanding of our requirements and set out your process to opine on the respective applications. We ask that a meeting be set up shortly to discuss the timescales you will be working to.

We note the ORR will publish this response on its website and confirm that we are content that the contents of this letter to be published in full.

Yours sincerely

[redacted]

**Adrian Quine**
**Chief Executive Officer**
**Gemini TOC Limited**

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**From:** Sarah Parsons
**To:** Operations Team
**Subject:** Capacity at Temple Mills International Depot
**Date:** Thursday, May 8, 2025 12:45:57 PM
**Attachments:** image001.jpg

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Dear Operations Team

I am writing on behalf of the London Borough of Waltham Forest in response to the your report into Capacity at Temple Mills International Depot. Unfortunately by the time we were made aware of the report and associated consultation it was too late to submit a response before the deadline. We are hopeful however, that you will accept this late submission.

The Council is of the view that expansion could be very positive for the borough, particularly in driving inclusive economic growth through the creation of high quality jobs - both temporary opportunities during the construction phase and permanent employment once the expanded depot is in operation. We also welcome the opportunity to expand our role in increased international rail travel.

The Leyton Mills area of the borough, within which the depot can be found, is our largest growth area, where we have been working with landowners, infrastructure providers and other stakeholders to develop an ambitious vision for an inclusive neighbourhood that fully integrates with, and sees direct investment into the existing communities of Leyton. Our vision seeks to deliver over 5,000 new homes, including affordable homes for local people, 40,000 sqm of high quality workspace and industrial / logistics / distribution uses offering high quality new jobs, a new cultural destination, new community uses (including education and health facilities), and new shops, cafes and restaurants within a landscape-led network of generous, biodiverse and ecologically rich open spaces, served by a new rail station at Ruckholt Road and improved cycle and pedestrian connections from Leyton into the Queen Elizabeth Olympic Park. Our ambitious vision has the existing ecology of the area at its heart, an includes proposals to protect and enhance much loved assets such as Hackney Marshes and the Old River Lea.

Full details of our vision can be found in the Supplementary Planning Document (SPD) for the area, adopted last summer.

In addition to the SPD, we are also progressing Part 2 of our Local Plan, a site allocations document, through examination. Public hearings are scheduled for June and July. This includes the allocation of the New Spitalfields Market site, immediately adjacent to the depot. You can read the whole of Local Plan Part 2 here, or the extracted details of the New Spitalfields Market SPD here.

Whilst we anticipate that any expansion proposal would be treated as a Nationally Significant Infrastructure Project (NSIP), subject to a Development Consent Order (DCO) outside the

usual local planning process, we would welcome the opportunity to work together to ensure that it aligns with, and supports delivery of, the ambitions of the Leyton Mills SPD.

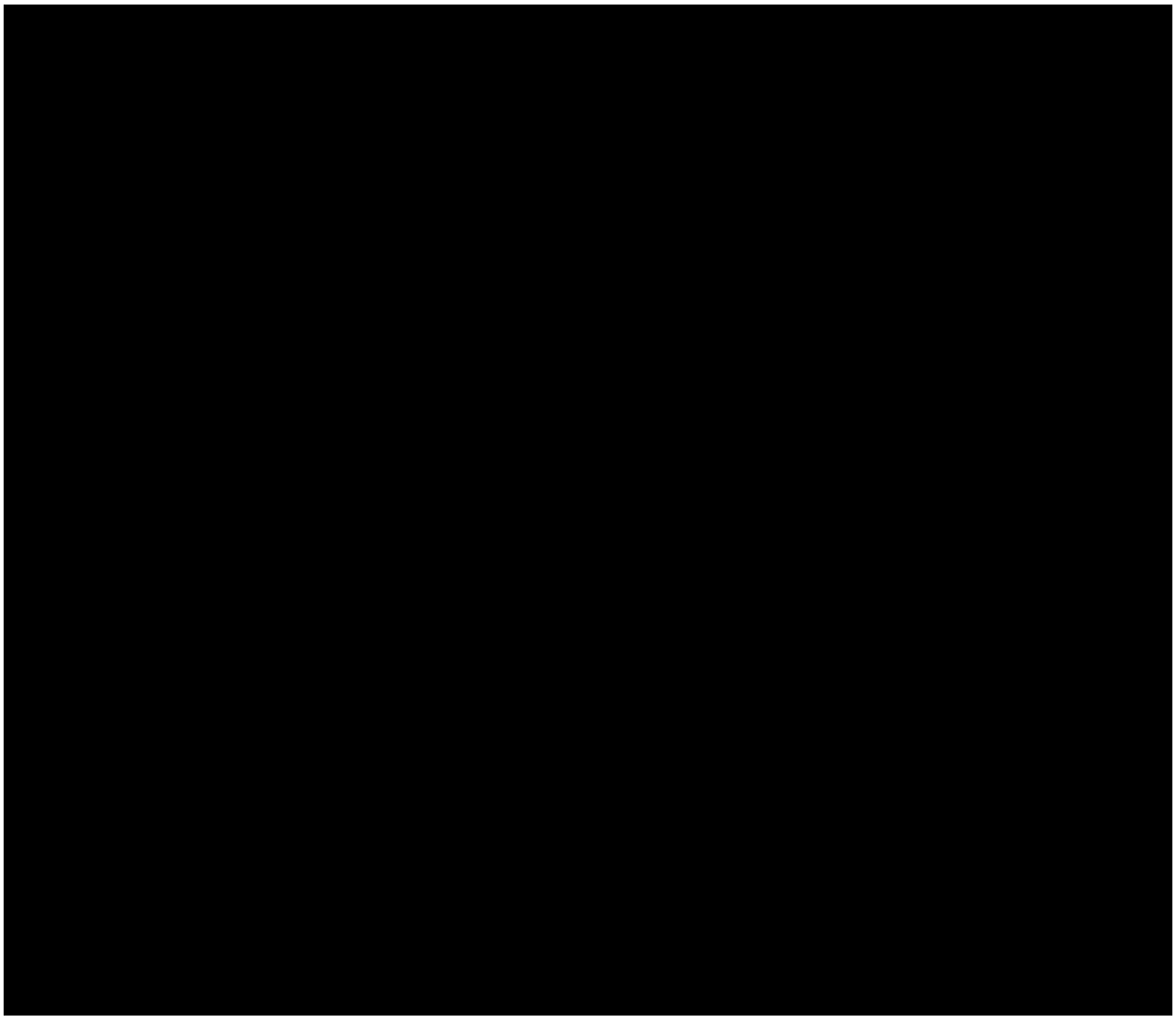
If you would like to meet to discuss this further, or have any questions or queries, please do not hesitate to contact me

Kind regards,

**Sarah Parsons** I S-AIR-RAH PAR-SONS
Assistant Director - Place and Design
Regeneration, Planning and Delivery

Place Directorate

London Borough of Waltham Forest



# Response to ORR Public Consultation on Capacity at Temple Mills International (TMI) Depot

We welcome the opportunity to respond to the Office of Rail and Road's (ORR) consultation on the availability of capacity at Temple Mills International (TMI) Depot, and to comment on the findings of the independent study commissioned from Ipex.

We note and support the ORR's initial findings that:

- There is currently some available capacity at TMI Depot for the stabling, servicing, and maintenance of additional international rolling stock;
- A portion of this capacity can be made available without any changes to current operational practices;
- Further capacity could be unlocked through targeted investment in changes to current operations (excluding train type compatibility adaptations).

These conclusions represent a meaningful step forward in addressing one of the structural barriers limiting the growth of international open-access rail services via the Channel Tunnel.

The **Channel Tunnel has the potential to accommodate significantly more rail traffic - up to 50% more according to recent estimates -** yet this opportunity remains underexploited due to two key barriers:

1. Limited availability of Channel Tunnel-compatible rolling stock, which is costly and subject to long manufacturing lead times
2. Restricted access to suitable maintenance facilities, which are critical for both operational resilience and for securing the financing necessary to acquire and operate rolling stock.

We welcome the confirmation that capacity exists at TMI and that some of it is immediately accessible. Providing this capacity to new entrants in a fair and transparent manner will be vital to fostering competition and supporting new international operators, including those currently seeking to enter the market.

Depot access is not only an operational requirement but a key enabler of wider policy objectives. Improved access to international maintenance facilities will help:

- **Boost economic growth.** A recent report from the Campaign for Better Transport, has revealed that increasing cross-channel rail traffic could **boost the UK economy by £1 billion a year.**
- **Boost passenger services**: Greater competition typically leads to improved service equality, more travel options, and reduced fares. This will make international rail more attractive and accessible to a wider segment of passengers.

- **Cheaper rail:** as mentioned above, greater competition can decrease fares as this has been the case in France, Spain and Italy. A recent study has found that new competitors could slash Channel Tunnel rail fares by 30 per cent in the next 15 years.

- **Maximise existing infrastructure**: Both the Channel Tunnel and Saint-Pancras High-Speed have substantial unused capacity. Making better use of these strategic assets will increase their return on investment and contribute to more sustainable and efficient transport networks.

- **Deliver environmental benefits**: Encouraging modal shift from air to rail on short and medium-haul international journeys - such as London to Paris or Brussels even Milan as announced by Trenitalia - is critical to meeting decarbonisation targets and reducing aviation-related emissions.

While the current findings are encouraging, we believe it is important to acknowledge the likely limitations of TMI's capacity over the medium to long term. If, as expected, multiple new operators (e.g. Virgin, Heuro, Evolyn/Trenitalia, Gemini, etc.) enter the cross-channel market by 2030, TMI alone is unlikely to meet the resulting demand for maintenance capacity - even with operational improvements.

We therefore recommend that the UK government, takes a forward-looking approach by developing an ambitious and robust international rail strategy to unlock cross-channel rail travel including in the context of this consultation:

- Evaluating the feasibility of developing new international maintenance depots in the UK
- Ensuring that any future depot developments are designed with open-access principles, allowing fair and competitive use by multiple operators;

**In conclusion**, the identification of available capacity at Temple Mills Depot is a welcome and timely development. It has the potential to remove a significant operational and financial barrier to entry for new international operators, supporting a more competitive and dynamic cross-channel rail market, boosting the UK economy growth and delivering cheaper rail tickets

However, realising the full potential of this opportunity requires forward planning. Without additional depot capacity beyond TMI, the growth of international rail services - and the associated economic, environmental, and passenger benefits - may soon be constrained once again.

We urge the Government to consider both the short-term access solutions and the long-term infrastructure needs of a competitive international rail market.

Thank you for the opportunity to provide our views on this important consultation.

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We are the UK office of the European clean transport NGO T&E whose aim is to achieve a zero-emission mobility system that is affordable and has minimal impacts on our health, climate and environment and is accessible to all.

[redacted]

TRENITALIA FRANCE
GROUPE FERROVIE DELLO STATO ITALIANE

*President et Directeur General*

**Operation Team**

**ORR** Office of Rail and Road

**Email: operations.team@orr.gov.uk**

Paris, 20 April 2025

**Capacity at Temple Mills International Depot**

Dear ORR team,

This letter is intended to provide some comments in response to the consultation on the availability of capacity at Temple Mills International depot (TMI) you launched on 31 March 2025.

First of all, we would like to thank you for the hard work you are doing to support the expansion of rail services between St. Pancras and continental Europe.

We firmly believe that not only increasing services, but also fostering diversification and competition among different rail operators is essential to provide customers with the best possible travel experience.

FS Italiane Group, which owns 100% of Trenitalia France, has already announced plans to launch a new high-speed rail service connecting London and Paris by 2029. With an estimated investment of EUR 1 billion, this new route is a key component of the FS Group's 2025–2029 Strategic Plan, which identifies the expansion of high-speed connections across Europe as a top priority.

We confirm that access to the Temple Mills International depot is essential for operating the route from UK to other European countries. Therefore, as you are aware, we submitted our depot access application on 28 March 2025.

In this regard, we warmly welcome the findings of the independent report you commissioned by Ipex alongside the consultation mentioned above, regarding the

[redacted]

available capacity at the Temple Mills International (TMI) depot for additional trains.

The report results are highly valuable for our operational needs and provide strong support for advancing our business case, unlocking new opportunities to connect London with other European cities.

The assessed available capacity appears adequate for the initial phase of the plan currently under development. However, it will not be sufficient to accommodate any future increase in services. Therefore, we strongly recommend investing in the expansion of the depot's capacity to ensure long-term sustainability.

Moreover, after having carefully reviewed the study, we would like to share the following observations:

1) the quality of the study is very high and professional both for the analysis model and for the overall setup of the study;

2) based on our operational experience, the evidence presented in the study appears to be consistent with the needs of industrial management for a modern rolling stock fleet.

According to the evidence reported in the study, we agree with its overall conclusions. In general, we think that managing the use of an industrial warehouse is complex. Whenplenty of space is available, it becomes inevitable that operators adapt their practices to take advantage of the larger area, often to reduce operational costs and risks (e.g., by minimizing movements). The future of the Temple Mills depot, in our opinion, needs to be carefully planned in coordination with the current operator, in order to optimize the overall industrial activities necessary for the increase of railway services on the London hub.

If you need any clarification or want to schedule a specific meeting, please feel free to contact us.

Thank you for your attention and cooperation.

Kind regards

**Marco Caposciutti**
CEO of Trenitalia France
[redacted]

28 April 2025

BY EMAIL ONLY

**VTE HOLDINGS LIMITED'S SUBMISSION IN RESPONSE TO ORR'S REQUEST FOR STAKEHOLDER EVIDENCE ON AVAILABLE CAPACITY AT TEMPLE MILLS DEPOT**

VTE Holdings Ltd (VTE) refers to the Office of Rail and Road's (ORR) publication of its consultation on Capacity at Temple Mills Depot (the Depot) dated 31st March 2025.

VTE submitted a Section 17 Application for capacity at the Depot having been advised by the Facility Manager that space was restricted. We are pleased to see that VTE's assessment that there is space available at the Depot is confirmed by the ORR's initial findings, and that with some minor changes to operational practices to improve the Depot efficiency, more maintenance shed space could be made available.

VTE is keen to provide ORR with information to support and enhance the conclusions in the report, but we have concerns in our ability to provide relevant detailed comparisons, comments and information given that the report, as issued, is heavily redacted. VTE also notes that much of the redacted information would need to be provided by VTE to Eurostar, pursuant to the Eurostar Service Facility Description, under normal circumstances for depot access. It would therefore seem odd if Eurostar now considers such information as commercially sensitive to a potential competitor if it were to be disclosed by them. If Eurostar maintains this position, then VTE should not be required to provide this same information to secure a depot access agreement.

VTE would also like to comment on the scope of the IPEX work. All current Section 17 applicants are planning to use up to 202m rolling stock, and therefore the fact that the report provides no views on the impact that this change would have is a shortcoming of the report. It is also likely that Eurostar themselves will procure shorter trains in future now that 400m long trains are not required for tunnel operation. VTE would expect shorter trains to allow greater flexibility and therefore make more efficient use of capacity at the depot.

VTE has set out below its key concerns about the adequacy of the EIL Maintenance Plan used in the IPEX analysis:

1. The report notes that the IPEX modelling is based on current plans and allocations of EIL maintenance provided by Eurostar themselves and from physical observations in late January 2025 (15th to 21st). Without any further details either being shared directly with us or being provided in the report (or as could be derived from information that is now redacted), it is impossible to ascertain whether these maintenance plans are comparable with modern fleets, or typical of the maintenance experienced throughout the year (or whether are they based on more seasonal/commercial fluctuations).
2. The planned 87 arrivals and departures over the observation period noted in section 4.6.2 were not completed and that over 24% fewer movements (66) were observed as per section 4.6.4. Upon further analysis of Realtime Trains, it would appear that both the planned and actual movements in the observation period were very high. For example, the Working Timetable for 1st April to 7th April 2025 (Appendix 1) showed 28 arrivals and 27 departures at the Depot, a total of 55 movements; and actual movements between 15th April and 21st April (Appendix 2) showed 47 movements on and off the Depot. This would mean respectively 37% and 46% fewer movements than planned during the IPEX observation period. We would recommend that ORR investigates signalling data at the depot to establish whether the observation period was a typical experience. It may be that after reconciling these planned and actual movements there might be significantly better available capacity.

3. VTE also notes that IPEX confirms, *"that the average shed occupancy over the observation period (based on EIL data and IPEX observations) was 5.9"* and that *"this figure is comparable with the bottom-up maintenance plan analysis performed by IPEX"*. We believe the report would benefit from some benchmarking of maintenance activity given IPEX's extensive experience in the sector (noted in section 2.2.3). For example, while we would like to understand (as noted earlier) whether this maintenance plan used is based on a typical week, it would appear on the face of it to VTE that the Eurostar fleet is very maintenance intensive (contractually or by custom/practice) and the efficiency/reality of this is not considered in the report. Based on the assumption that each of the 25 trains in the fleet covers approximately 350,000km on average per annum for the current 25 services each way a day (15 to Paris, 6 to Brussels and 4 to Amsterdam), the report suggests a need for 6.4 roads at the Depot on average every day to maintain the fleet with more maintenance capacity required at other depots (the % performed elsewhere is redacted). Our own Section 17 application, similar to others, seeks a maximum of 3 roads for all maintenance requirements in total despite each train operating over 60% more km on average. Therefore, based on the circa 8.75m km operated by Eurostar, we would predict that our own fleet could only need four shed roads for maintenance, including any heavy maintenance requirements.
4. Section 12.6.6 states that the Realistic Shed Requirement is 6.4 roads based on the maintenance plans shared by EIL. VTE has noted above its views on those plans given the difference in planned and observed movements, and without access to the redacted information VTE cannot comment on the proposed maintenance plan shown and whether this is realistic or not. It appears from the detail of the upgrade options in Section 16 that shed capacity could be utilised more effectively by performing some tasks currently undertaken in the shed on reception and LDA roads.

VTE's other comments of note:

1. VTE notes the assumption that the depot operates under strict 5 kph speed limits. VTE's Group experience is that 5 mph was used on depots on the West Coast Mainline. A safety review of the speed limit at the Depot could be undertaken to improve the efficiency of the depot movements.
2. VTE notes the observation that the Class 373 is considered more maintenance intensive than a Class 374 or comparable new fleet. Eurostar has indicated that these trains will be replaced as part of their new train order, but it is difficult to understand from the report what, if any, assumptions have been made on the future depot performance once these trains no longer operate.
3. VTE notes the improvement options contained in section 16. These all seem pragmatic and of relatively low capital expenditure and should be costed more formally to identify what the financial and commercial impact would be on aspirant operators.
4. VTE notes that there are several roads used for storing equipment. VTE trusts that in preparation for starting services in 2029, this old equipment will be removed
5. VTE notes that one shed road is dedicated to E300 ETCS recommissioning. This will occur for a finite period at which point this road would become available. While the date is redacted, VTE would expect that by 2029 this programme will be finished and the Realistic Shed Requirement reduced by one road to 5.4, which should be more than sufficient to meet VTE's proposals, especially once efficiency improvements have been made.
6. VTE has seen no comment in the report as to whether the staffing arrangements at the Depot are appropriate and consistent with the maintenance plans submitted as the base information. Understanding and reconciling this would enable more comfort to be taken in the base information.

VTE has sought to provide information to support the consultation report or to seek clarity where the report is unclear. VTE is concerned that some large discrepancies between

planned and actual activity exist and may cast doubt over the base information provided to IPEX as the starting point for their modelling. Without access to the detailed redacted information, the work content in maintenance exams and the allocation and extent of maintenance on the Eurostar fleet, VTE has been unable to respond as fully as it would have liked.

VTE is however delighted that the report demonstrates sufficient capacity is currently available to meet our needs and considers it likely that upon once some further investigations are undertaken even more capacity will be available, particularly once E300 commissioning and operational efficiencies have been completed.

Yours sincerely

[redacted]

Phil Whittingham
For and on behalf of VTE Holdings Limited

## Appendix 1

Eurostar Temple Mills Arrivals and Departures

April 2024.

Source Network Rail Working Timetable

| Day | St P depart | TMI Rec arrival | | TMI Rec depart | St P arrival | |
|---|---|---|---|---|---|---|
| Monday | 0005 hrs | 0016 | | | | |
| | | | | 0440 | 0452 | |
| | | | | 0515 | 0527 | |
| | | | | 0706 | 0718 | |
| | 2015 | 2026 | | | | |
| | 2115 | 2126 | | | | |
| | | | | 2253 | 2305 | |
| | 2315 | 2326 | 4 TMI arrivals | | | 4 TMI depart |
| Tuesday | | | | 0440 | 0452 | |
| | | | | 0515 | 0527 | |
| | 0544 | 0555 | | | | |
| | | | | 0706 | 0718 | |
| | 2015 | 2026 | | | | |
| | 2115 | 2126 | | | | |
| | | | | 2253 | 2305 | |
| | 2315 | 2326 | 4 TMI arrivals | | | 4 TMI depart |
| Wednesday | | | | 0440 | 0452 | |
| | | | | 0515 | 0527 | |
| | 0544 | 0555 | | | | |
| | | | | 0706 | 0718 | |
| | 2015 | 2026 | | | | |
| | 2115 | 2126 | | | | |
| | 2315 | 2326 | 4 TMI arrivals | | | 3 TMI depart |
| Thursday | | | | 0440 | 0452 | |
| | | | | 0515 | 0527 | |
| | 0544 | 0555 | | | | |
| | | | | 0706 | 0718 | |
| | 2015 | 2026 | | | | |
| | 2115 | 2126 | | | | |
| | | | | 2253 | 2305 | |
| | 2315 | 2326 | 4 TMI arrivals | | | 4 TMI depart |
| Friday | | | | 0440 | 0452 | |
| | | | | 0515 | 0527 | |
| | 0544 | 0555 | | | | |
| | | | | 0706 | 0718 | |
| | | | | 1403 | 1415 | |
| | 2015 | 2026 | | | | |
| | 2115 | 2126 | | | | |
| | 2230 | 2241 | | | | |
| | | | | 2253 | 2305 | |
| | 2330 | 2341 | 5 TMI arrivals | | | 5 TMI depart |
| Saturday | | | | 0440 | 0452 | |
| | 0544 | 0555 | | | | |
| | | | | 0559 | 0611 | |
| | | | | 0716 | 0727 | |
| | | | | 1204 | 1215 | |
| | 2015 | 2026 | | | | |
| | 2045 | 2256 | 3 TMI arrivals | | | 4 TMI depart |
| Sunday | | | | 0700 | 0711 | |
| | | | | 0903 | 0915 | |
| | | | | 1733 | 1745 | |
| | 1915 | 1926 | | | | |
| | 2115 | 2126 | | | | |
| | 2145 | 2156 | | | | |
| | 2315 | 2326 | 4 TMI arrivals | | | 3 TMI depart |

Summary - 28 TMI arrivals every 7 days and 27 TMI departures every 7 days

## Appendix 2

| **Realtime Train Times STP - Temple Mills** | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Filter | WTT/VAR/STP/CAN | | | | | | | | | |
| | Non Passenger | | | | | | | | | |
| | Planned | | | | | | | | | |
| | ES | | | | | | | | | |
| | STP | | | | | | | | **TOTAL** | |
| | | | | | | | | | | |
| ST P Depart | 15/04/2025 | | | 21:15 | | 20:15 | | | 2 | |
| ST P Arrivals | 15/04/2025 | | 05:27 | 07:18 | 04:52 | | | | 3 | |
| ST P Depart | 16/04/2025 | | 23:15 | 21:15 | | 20:15 | | | 3 | |
| ST P Arrivals | 16/04/2025 | | 05:27 | 06:41 | 04:52 | 07:18 | | | 4 | |
| ST P Depart | 17/04/2025 | | 23:15 | 21:15 | | 20:15 | | | 3 | |
| ST P Arrivals | 17/04/2025 | | 05:27 | 23:05 | 04:52 | 07:18 | | | 4 | |
| ST P Depart | 18/04/2025 | | | 21:15 | 22:30 | | 23:30 | | 10:45 | 4 |
| ST P Arrivals | 18/04/2025 | | 05:27 | 06:41 | 04:52 | 07:18 | 23:05 | 14:15 | 10:35 | 7 |
| ST P Depart | 19/04/2025 | | | | | 20:15 | 22:45 | | | 2 |
| ST P Arrivals | 19/04/2025 | | 06:11 | 07:27 | | | | | | 2 |
| ST P Depart | 20/04/2025 | | | | 16:15 | 21:15 | 21:45 | 23:15 | | 4 |
| ST P Arrivals | 20/04/2025 | | 07:11 | 09:15 | | | | | | 2 |
| ST P Depart | 21/04/2025 | | | | | 14:45 | 21:15 | 23:00 | | 3 |
| ST P Arrivals | 21/04/2025 | | 06:41 | 07:11 | 11:38 | 15:40 | | | | 4 |
| | | | | | | | | | | 47 |
| | | | | | | | | | | |
| | | | | | | | | | | Ave Daily |
| ST P Depart | | | | | | | | | 21 | 3.00 |
| ST P Arrivals | | | | | | | | | 26 | 3.71 |
| | | | | | | | | | 47 | 6.71 |