

## Grand Union Trains London-Carmarthen Further Industry Responses

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**From:**

**Sent:** 22 July 2022 10:36

**To:**

**Cc:**

**Subject:** RE: Grand Union Trains Ltd S17 London-Carmarthen - opportunity for comment

Good Morning,

Having internally discussed the altered application CrossCountry is now in a position to support Grand Union Trains Ltd's application for London – Carmarthen services based upon the current altered proposal.

Kind regards,

Track Access Manager  
CrossCountry



# ***Grand Union***

Track Access Manager  
Cross Country Trains

Copy:  
Network Rail

9 August 2022

Dear

**Industry Consultation - Grand Union Trains, Section 17 Application, London  
Paddington-Carmarthen**

Thank you for your further response regarding the introduction of the proposed services to improve rail links between southwest Wales and London and for your support of the application.

Should the ORR grant the application we look forward to working closely with you.

Yours sincerely



Managing Director



21 July 2022

Senior Executive, Access and Licensing by email

**Grand Union Trains Wales Track Access Application for services between London and Carmarthen (revised application)**

Thank you for sharing the updated Grand Union Trains' (GUT) track access application on 23 June 2022 and for allowing the opportunity for the Department to respond accordingly. We would, however, like to stress that where applications are substantively changed after their original submission, the Department will require sufficient time to fully reassess the application in order to provide fully assured representations and this must be factored into future consultation processes.

As set out in the Department's previous response to the ORR and highlighted in the Williams-Shapps Plan for Rail, we do see a role for open access operators into the future. We want to continue to explore the scope for open access where spare capacity exists to make best use of the network and grow new markets for rail. However, we do not consider this to be the case for this application from GUT given the significant overlap with existing services between London and Wales, which already play an important role in connecting communities within our Union and provide essential services to passengers.

The main points contained within this letter are summarised below:

- As was the case with previous applications from GUT, our analysis shows that this track application does not meet the 0.3 'not primarily abstractive' (NPA) test, as set out in the ORR's guidance. GUT would need to either generate significantly more revenue themselves or abstract significantly less revenue from other operators on the network in order for the Department to be confident that taxpayer interests were sufficiently protected.
- The Department continues to operate within a significantly more constrained budget position than before given the continuing and considerable financial impacts following Covid-19 and the pattern of rail demand. Given the current financial pressures, the loss of revenue at the significant scale discussed in this letter will impact the funds available to improve and support the railway in what are already particularly financially strained circumstances for rail finances.
- Additional services proposed by GUT will have a negative impact on capacity and performance on the Great Western Main Line (GWML), and consequently an impact on passengers.

We also note that given the affordability challenges posed by this application – particularly in the current challenging financial context, given that these routes are already well served by current

operators, we do not consider this application to be consistent with the types of application that the Secretary of State indicated that he could support in his strategy guidance to the ORR.

The Department has undertaken proportionate analysis to understand the impact of the proposed services on passenger demand.

Indicative MOIRA runs suggest an abstraction ratio of 0.19 looking at revenue only. This is consistent with the services being highly abstractive. The majority of this abstraction is from GWR. After factoring in an estimate of the Infrastructure Cost Charge GUT would pay, the abstraction ratio rises to 0.22.

Although this analysis does not include fare competition scenarios, when these have previously been calculated the NPA reduced even further and would therefore expect the impact of GUT services to be even more detrimental to the network.

There are a number of key uncertainties with this analysis that should be flagged. We have primarily used the information available from the GUT's application letter to the ORR and initial indications of the number of services. There are a number of areas where clarity on exact plans would provide a more robust analysis. We consider that it is important for the ORR to have such clarity and fully reflect it in its analysis of the application. We also cannot capture the impact of planned services to new stations in MOIRA.

We note that this analysis is also consistent with previous assessments the Department has made of similar bids by GUT.

The information contained above demonstrates that under the modelling carried out by DfT, the GUT track access application fails the NPA test with ratios being below the 0.3 set out by the ORR. As previously set out in our responses to Network Rail and the ORR, any level of abstraction will be felt more severely by the Department given the overall industry revenues and stretched funds available. Again, we think it is crucial to reiterate here that the Department is currently operating within a more constrained budget position than before, and this needs to be taken into account when considering the GUT application and the impact it will have across the network, as was the case in the ORR's consideration of the previous application from GUT. Given the unprecedented effect Covid-19 has had on the rail sector and the UK economy, it is imperative that funds available to the Secretary of State are given particular consideration and weight.

As almost all revenue and costs risks associated with GWR now sit within the Department, the loss of any revenue will therefore directly impact the funds available to the Secretary of State. The uncertainty over future rail demand is imperative to take into account for this application and in consideration of any level of abstraction. Now, more than ever, rail funds are important and stretched due to the uncertainty in the market and demand.

The level of abstraction and consequent harm to the Department's finances will likely be made even worse if future demand is more heavily focused on off-peak services where the GUT proposal is focused. At this stage the likelihood of this is unknown but it should be highlighted as a key further consideration.

In addition to the above information, the Department would like to take this opportunity once again to highlight the potential disbenefits to passengers we believe the proposed GUT services between Paddington and South Wales could have on CrossCountry (XC) long distance services linking the North of England and Birmingham with Bristol, the South-west, Oxford, the Thames Valley, Southampton and Bournemouth.

The proposed GUT service between Paddington and South Wales will, in our assessment, further impact on performance given how busy the GWML already is. Although reduced in April 2020, the XC Train Service Requirement requires 2 trains per hour between Westerleigh Junction and Temple Meads and between Didcot and Reading to provide for the significant levels of passenger

demand on the principal routes linking Birmingham with Bristol, Oxford and Reading. This includes peak services to and from Cardiff using the busy route between Severn Tunnel Junction and Cardiff Central. An hourly service between Nottingham, Birmingham, Gloucester and Cardiff is also already provided by XC.

Further, XC have recently reinstated a number of Manchester-Bristol services, with more expected to be reinstated in due course, returning to an hourly service in future and bringing XC services back to 2 trains per hour each way through Bristol Parkway as contracted in their train service requirement. XC also plan on using Firm Rights to reinstate further Newcastle-Birmingham-Reading services from May 2023 as passenger numbers continue to rise. The proposed GUT service would therefore have a direct impact on such services.

The timetable we have been provided in relation to the proposed services also suggests that some GUT trains may have relatively short turnaround times of under 30 minutes, resulting in performance risk across the GWML and other interacting routes through to the Midlands and North in the event of even minor perturbation. This issue may be exacerbated if shunt moves are required for services terminating at Cardiff Central to create platform space.

We consider that fitting additional trains between London and South Wales risks train service performance and passenger impacts across the wider North of England/Midlands – Thames Valley – South Coast routes that already have numerous passenger and freight trains. Given the paramount importance of performance to passengers, we consider this to be an important consideration in evaluating this application.

It therefore remains the Department's view that the extra services set out by GUT cannot be effectively accommodated on the GWML without significant risk of negative impact on the performance of the network and would have a detrimental impact for passengers. Moreover, these services are on routes already well served by existing services, reducing the scope to which they offer benefits from developing new markets. We are also aware that GWR have separately proposed to introduce new two hourly services between Cardiff and Carmarthen from May 2023 which would deliver some of the same benefits that GUT's application claims to accomplish.

We also note GUT's updated intention to use new build bi-mode trains from the outset, with proposed service commencement in December 2024. While the Department is glad to see that comments regarding potential performance and compatibility issues of using displaced IC225 rolling stock have been taken on board by GUT, we do have concerns that there will not be sufficient time for GUT to order and be supplied with the necessary new rolling stock to meet a December 2024 commencement date; this is emphasised by GUT's own assumption of a 24-36 month lead time from date of order, and the delayed delivery of bi-mode trains for other train operators suggests that delivery is likely to be later rather than earlier than expected. We would also like to reemphasise that, should the proposed new build bi-mode trains be Class 802s, we believe that further analysis will be important to confirm that the addition of further sets will not exacerbate the problem of previous electromagnetic compatibility issues experienced with the 80x fleet (accepting that the current Class 80x fleet will be fitted with passive filters and ACPTU cards to reduce train emissions).

More generally, we do not regard this application as consistent with the proposed future approach to open access as set out in the Williams-Shapps Plan.<sup>1</sup> Should the ORR decide, notwithstanding our representations above, to grant the application, we would request that the ORR considers access terms that provide flexibility to ensure space for future reform to improve our railways, particularly by constraining the length of time that access is granted for, consistent with current rules regarding access. While the application references investment, most notably in relation to Felindre station and other unspecified "significant investment", we note the omission of any detail

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<sup>1</sup> Williams-Shapps Plan for Rail (May 2021), pp. 58-59

relating to timescales and outputs and can see no justification for a 20-year access contract in any event. Moreover, we would expect any terms with respect to investment and rolling stock to be clearly set out and for GUT to be held accountable for meeting them in order for any access contract to continue in place.

In summary, the Department considers that this application is primarily abstractive in nature, impacting on taxpayer funding of the railway at a time when rail revenue nationally is significantly constrained. It would have a substantial and overall negative effect for passengers on the already-crowded GWML network in relation to capacity and performance, on an area of the network which is already well served by passenger services that support the connectivity of our Union. We consider that these impacts must be examined in detail as the application is considered.

Please contact me if you wish to discuss this matter further in the meantime.

Yours sincerely,

A handwritten signature in blue ink, consisting of a small circle followed by a horizontal line that tapers to the right.

**Deputy Director**

cc. Director, Rail Strategy and Analysis

# ***Grand Union***

Senior Executive, Access and Licensing

Office of Rail and Road

Via email

3 August 2022

## **Grand Union Trains Wales Track Access Application for services between London and Carmarthen (revised application)**

Thank you for sight of the Department of Transport's (DfT) response to our revised track access application.

The DfT provides a summary at the end of its letter which sets out its key objections to this track access application, which are that:

- it is primarily abstractive in nature, impacting on taxpayer funding of the railway at a time when rail revenue nationally is significantly constrained.
- would have a substantial and overall negative effect for passengers on the already- crowded GWML network in relation to capacity and performance,
- is on an area of the network which is already well served by passenger services that support the connectivity of our Union.

and consider that these impacts must be examined in detail as the application is considered.

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# Grand Union

ORR has previously undertaken an extremely rigorous assessment of our application, so this response provides summary answers which completely refute their arguments against our application:

- We have demonstrated our application is not primarily abstractive and it significantly exceeds the 0.3 threshold that is used as the benchmark by ORR. This application is much lower abstraction than either our previous application and some previously approved open access operations. The initial application for 7 services passed the ORR not primarily abstractive threshold but was rejected due to the absolute level of abstraction being at the higher end of previously approved applications with the Covid impact at the time taken into consideration. To get to our current position we have had a number of meetings with the ORR economists to validate the process.

It should also be noted that a recent Industry document produced by Rail Partners – *“Harnessing the commercial expertise of the private sector”* evidenced, post pandemic, that operators on revenue risk, which includes open access operators, achieved revenues 9% higher than DfT contracted long distance operators. This equates to ‘lost’ industry revenue of £300m per annum. Taken at a route level, the amount lost through lack of commercial freedom is significantly greater than the forecast abstraction suggested by the introduction of Grand Union’s services.

It also highlighted how LNER, the only operator to face competition, has fared better than other contracted long-distance operators and was allowed greater latitude by the DfT, no doubt due to the existence of open access competition. It provides a number of case studies to demonstrate how operators on revenue risk have been agile to attract passengers back to the railways and grow back revenues strongly.

This points clearly to the DfT stranglehold on the private sector having the biggest negative impact on taxpayer funding of the railway, not the introduction of further private investment and limited competition – ably demonstrated by the performance of LNER.

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- The planned calls at Seven Tunnel Junction, Carmarthen, Llanelli and our new station Felindre, together with calls at the planned Cardiff Parkway station open up areas that are poorly served by DfT specified GWR services and significantly improve Union connectivity for these areas

In short, the DfT has failed to provide any evidenced reasons why our application should not be approved. We believe the rigorous assessment by the ORR has examined these impacts, and many others in detail, and we are happy to continue dialogue if there are further points to be considered.

The attachment to this letter contains a detailed response to the points that are randomly scattered through the DfT's letter.

Yours sincerely

A handwritten signature in black ink, appearing to be 'M. Jones', written in a cursive style.

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## Detailed Response to Points raise in DfT letter of 21 July 2022

The DfT letter is somewhat disjointed, so our response focusses on the issues raised, rather than answering the comments point by point as they arise in the letter, which would result in a lot of duplication.

### Timescale

It is not clear if the DfT is asking for more time to consider this application. Our application is scaled down from the previous application and focused on the key issue that resulted in the ORR declining that first application. There is little new here that requires more time to assess, other than Felindre<sup>1</sup> station instead of running via Swansea. However, as Felindre was originally proposed by the UK Government we would expect that they are fully aware of its benefits, which fit well with the new Union Connectivity agenda. If DfT make any further submissions we would naturally expect to have the right to respond.

### Role of open access operators

The DfT clearly and regularly states that it supports open access operation, although the evidence shows that it has vigorously opposed all previous open access applications. It is perhaps time for the DfT to give up its pretence of supporting 'open access' when it so obviously does not. The issue is not about revenue, it is about control. The very fact that the DfT has 'an idea' (so far undefined and quantified) of what open access might be acceptable to it, points directly to the fact that it also wants to micromanage open access applications in the same way that it seeks to micromanage the rest of the railway.

Our plans are the same broad model as seen elsewhere, providing communities with high quality rail links that the DfT has not seen fit to provide alongside some limited

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<sup>1</sup> Felindre station is a DfT supported project which was originally proposed in July 2019 by Welsh Secretary Alun Cairns.

<https://www.gov.uk/government/news/welsh-secretary-provides-platform-to-discuss-west-wales-parkway>

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competition. We consider that this is exactly what open access operators were expected to do when the concept was created at rail privatisation.

## **DfT Revenue Analysis**

It is not for us to comment on the degree and quality of analysis that the DfT has undertaken to inform its response. The DfT admit that it has only partly assessed the revenue impacts of our proposal. We believe that the analysis that we have shared and discussed with the ORR and your consultants fully represents the impact of our proposed new services on demand.

## **Abstraction (NPA test)**

The evidence which we have provided to the ORR has demonstrated that our services pass the 'not primarily abstractive' (NPA) test by a very considerable margin.

## **Abstraction (absolute)**

We took note of ORR's reasons for rejecting our previous application and have been at great pains to minimise the abstractive element of this application whilst serving and growing new markets. There is an inevitable overlap with existing services because the travel demand of the communities to which we are going to provide much better rail services is to major cities such as Cardiff and London. Every effort has been made to focus on these new markets.

In practise the modelled abstraction is a worst-case scenario and competition on key flows develops the market and leads to considerable growth for the DfT contracted operators as well – York to London being a good example. We also note that despite numerous requests the DfT has been unable to provide any evidence of actual abstraction despite open access being present on the ECML since 1999. Recent work by industry body Rail Partners demonstrates that competition is, in fact, important in driving up revenues and passengers, a situation noted by the ORR in a number of previous approvals.

We also note that coach services have quickly returned on the route and that Flixbus is currently expanding its Swansea – London operation, which clearly suggests that the rail offer is not sharp enough and abstraction to other non-rail operators is growing.

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We believe that there is a big opportunity to switch travel from coaches to trains (the majority of the journey on electric trains) on this route in line with the UK Government's Net Zero targets.

We note the DfT's observation about our services being focussed on off-peak travel and would be willing to discuss the detailed timings of our proposed services to provide the best spread of services to passengers just as we have interacted with other operators on the West Coast Main Line with our application for services to Stirling. It is, however, rather ironic that on previous applications the DfT had focused on the very limited peak services!

## **Capacity and Performance**

Our application clearly uses spare capacity on the network – capacity that was identified and performance modelled before the DfT cancelled a number of Bristol 'superfasts' which were to run via Bristol Parkway. The performance impact of our previous application was accepted by ORR and as there are fewer trains proposed in this application any modelled performance impact will be lower as noted by Network Rail.

DfT reference our planned turn round times at Paddington. Commercial operators have to strike a balance between the paths available, and the resources used so our turn round times are not excessive. It is also noted that excessive dwells lead to station congestion. We will have suitable contingency plans in place as part of our routine operation to mitigate the impacts of any late running into Paddington. We are not planning shunt moves at Cardiff Central as no trains are planned to terminate there.

## **CrossCountry Trains.**

It is quite concerning that the DfT would make significant play about potential impact on CrossCountry services. As is now known, CrossCountry Trains has written in support of our application. The DfT intervention is a worrying pointer towards its overarching involvement in the operational railway and the disconnect that exists. We are confident that the connectional opportunities between our planned services and CrossCountry services at Cardiff/Newport and Bristol Parkway will be attractive and

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benefit new users and CrossCountry opening up a range of new journey opportunities across the network.

## **New Trains**

It is disappointing that DfT feels the need to raise the issues with its new trains, the implication being that we will have the same problems. Grand Union Trains is a professional operator and will comply with all necessary requirements to introduce our new trains onto the network.

## **Additional GWR services to Swansea and Carmarthen**

This is the first intimation that GWR might run more services to Carmarthen. The Welsh Government certainly were not aware of this at our last meeting, neither has it been raised at the Wales Event Steering Group (ESG) which is planning the May 2023 timetable for the whole of Wales. TfW was also not aware. This failure to introduce it into the ESG is important as it could seriously disrupt the whole planning process for all the long-distance services across Wales. Grand Union has been actively participating in the ESG, including at a detailed train path level, and our services are included in the emerging train plan.

The DfT statement indicates that it is a GWR initiative, but GWR is now operating under a short (to 21 June 2025) National Rail Contract, which means it is operating train services that are specified by the DfT. The letter is either disingenuous in its phrasing or GWR is proposing this independently. It is instructive to note that GWR did not mention this in its own response to the ORR.

Following further investigation, we are advised that GWR may be raising the opportunity to extend one PM London service to Carmarthen, as opposed to a two hourly service (new or extended is not clear) as suggested by the DfT. The actual position remains unclear.

It is surprising that DfT considers it an important use of resources to go head-to-head with an open access operator and another operator when it is pressing for service cuts elsewhere to save money and there are other existing operations where demand remains high.

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Grand Union would also suggest that it is only the very possibility of its arrival on the network that has driven this behaviour, which underpins the real value of competition on the network. From Grand Union's perspective further services to poorly served destinations can only be a good thing in making rail more attractive and accessible and would drive the market for the benefit of all operators on the route.

However, with TfW also being unaware of this proposal, the DfT is obviously content to introduce competition and abstraction from TfW (with a 2 hourly service) when it suits.

We would point out that if we are unsuccessful in our application history suggests that there is no certainty that GWR will continue to operate additional services in the longer term – we understand that Avanti West Coast is planning the diversion of Euston – Blackpool trains to Glasgow now that Grand Central cannot operate.

## **Williams – Shapps and Great British Railways**

We recognise that there has been and remains some uncertainty around the details of the future railway industry. However, we believe that our involvement and holistic approach to the West Coast Main Line (South) Events Steering Group shows that we are a responsible and mature operator which is willing and able to work with the whole rail industry and that our different approach is of wider benefit to all operators. Open access operators also offer a different route to both new players entering the rail industry and in developing railway managers and staff in different ways, which will benefit the whole industry.

## **Investment and Felindre station**

A 'start-up' business such as an aspirant open access operator does not have the luxury that public sector organisations have to spend large sums of money on developing details of its planned investments before being granted access rights. It is after that point that it is possible to develop all its plans in more detail.

In contrast to the lack of accountability and uncertainty that surround DfT investment and train service planning we would be pleased to be held accountable for meeting our investment plans.

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The 20-year access contract request is not unusual in seeking to bring private sector investment into the railway, which is said to be a DfT policy, but we are willing to discuss suitable terms to support our planned and very significant future investment in the railway.

## **Taxpayer funding**

The letter refers to taxpayer funding of the railways, which raises much wider issues. The DfT is suggesting that modelled revenue abstraction is the only measure of taxpayer interest that needs to be assessed and protected against. Open access applications have always been assessed against the very narrow measure of modelled revenue abstraction, now with the addition of the Infrastructure Cost Charge, where applicable.

No account is yet taken of wider payments into the railway industry such as retail commission, station and depot access charges and payment into numerous 'overheads' such as BTP, all of which reduce the costs paid by the wider industry and reduce 'abstraction'.

Beyond the railway industry we and the staff we will employ and suppliers we will engage will be paying considerable sums in terms of National Insurance, Income Tax, VAT, Fuel Duty, Corporation Tax, etc. all of which will feed back to the Government.

We point out that our contribution to public sector finances is much wider than just modelled revenue abstraction.

Furthermore, in most transport appraisals for service changes, wider socio-economic benefits, such as journey time reduction and road safety benefits are also taken into account which feed back into the wider economy all of which arise from making more use of the part publicly funded rail network.

Grand Union's services will make a material difference to the lives of the people we will employ, those we will serve and to the economy of south and southwest Wales and as Rail Partners has evidenced, will provide a catalyst to the incumbent operator to act with greater commercial freedom.

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**From:**  
**Sent:** 21 July 2022 17:17  
**To:**  
**Cc:**  
**Subject:** [EXTERNAL] Re: Grand Union Trains Ltd S17 London-Carmarthen - opportunity for comment

Thank you

Our previous response still stands. We see Network Rail still does not support the application.

In addition, although not shown in the application, any call at Old Oak Common will require retiming of notional paths east or west of Old Oak Common. It is known from work already undertaken that this is likely either to cause problems at Paddington regarding turnrounds or will significantly disturb many parts of the timetable including significantly the South Wales area. If GWR has to retime to the west it is likely GUT will have to too.

None of this response is confidential thank you.

Yours,

**Robert Holder | Network Access Manager | Great Western Railway**  
1 Milford Street | Swindon | SN1 1HL

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# ***Grand Union***

GWR

Copy:

Network Rail

9 August 2022

## **Industry Consultation - Grand Union Trains, Section 17 Application, London Paddington-Carmarthen**

Thank you for your further response regarding the introduction of the proposed services to improve rail links between southwest Wales and London.

I note your comments about Old Oak Common and as we have indicated in previous replies, we are happy to work collaboratively with the industry when more detailed work on the timetable and calling pattern for this station are being developed.

The collective work undertaken by industry members including Grand Union on the development of the concept train plan for the West Coast Main Line IPG/ESG, for which output delivered on access aspirations alongside a modelled 15% performance improvement, shows what can be achieved when the industry comes together.

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# *Grand Union*

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. J. ...', is positioned above the title 'Managing Director'.

Managing Director

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