



Louise Beilby
Senior Access Executive
Office of Road and Rail

11th April 2025

Dear Ms. Beilby

**Liverpool and South Wales Railway (LSWR)
Response to Network Rail's representations March 25**

Thank you for the opportunity to comment on Network Rail's representations on our Liverpool Lime Street to Rhooose (Cardiff International Airport) Section 17 Open Access application.

The purpose of our application and early Network Rail-led industry consultation was to enable us to understand other industry members' strategic plans and perspectives and thence fully develop our overall proposition and full timetable options in a collaborative and complementary rather than competitive manner with DfT, TfW, Network Rail and other passenger and freight operators.

We very much want to work with rail industry partners to deliver a better, value-for-money railway for passengers, as you will also observe in our comments back to the DfT. For example, we'd like to share our innovative investment approaches to services, stations and infrastructure, our 'Third Party' new stations model creating 'new to rail' markets and modal shift such as Worcestershire Parkway (2020), as well as our own experience as investing train operators.

We appreciate the feedback we have received from Network Rail as well as other consultees and firmly believe that this will enable us to progress to a much more detailed operational plan, including comprehensive timetabling and performance analysis. And would expect to proceed going forward on a much more open basis with Network Rail.

The following notes pick up on Network Rail's specific and detailed comments:

Specified Equipment

We note and concur with Network Rail's approach to Sectional Running Times using Class 197 SRTs where none exist for Class 22X, and this matches our own approach. During the next detailed phase, we will undertake work to validate appropriate SRTs to enable the detailed timetabling to have further credibility.

We note Network Rail's comments relating to Route Clearance. We recognise the need to undertake a full route Compatibility Assessment for consideration by Network Rail. We will consider what work would be appropriate at this stage to confirm for ourselves and Network Rail that there are no issues that could add significant cost or time to our proposed start dates.

We note and understand Network Rail's comments about the numerous applications that have listed Class 22X units as the proposed rolling stock. We believe that at the current time, there is a realistic prospect of these units being available for this proposed service.



Capacity

The LSWR consultation timetable was developed based on the principle of identifying a path during the middle of the day and then extrapolating that path to other hours to create a full day's timetable. We acknowledge that the next stage of planning will be to seek to develop a full day timetable with detailed planning for each path. Nonetheless, we are encouraged by Network Rail's initial findings, acknowledging that there were only 3 paths out of 16 for which they could not find immediate solutions to conflicts. We commit to working further with Network Rail's planners on the next stages.

Complex and Competing Applications

We acknowledge the current situation and accept that our application will be dealt with in line with the terms of reference for the current NR and ORR process.

Performance

We welcome the opportunity to work with Network Rail to develop a remit for the proposed Performance Modelling.

North West & Central

We note the comments about signaller workload and platforming at Liverpool Lime Street station. We are aware of the stakeholder aspirations to operate an hourly service from Liverpool to Cardiff as expressed by TfW's longer term aspirations. We believe that the proposal offers an early opportunity to achieve many of the passenger outcomes sought by such a strategy. We believe that these concerns are capable of being overcome and would propose to address these directly in the next stage of planning.

We also recognise that despite some of the specific concerns, such as a clash with the 2FXX Liverpool Lime Street to Warrington Central, the NR statement that they believe that 13 of the 16 paths can be made viable demonstrates that solutions are at hand.

We note the comments about a lack of current servicing in the Liverpool area for Class 22X units. We can confirm that we are in discussion with Alstom (the OE manufacturer for these units) about the possibility of making use of their facility at Widnes.

Wales & Western

We acknowledge the extensive work being undertaken on several Indicative Train Service Specifications. We would value seeing the output of this work, noting that our proposal aligns with TfW's stated aspiration of an hourly service between Cardiff and Liverpool.

We note the concerns about level crossing mitigations and already have a reasonable understanding of these. However, we note that this should not be used as a reason to prevent new service opportunities, but may, by necessity of the need for change form part of any planning and mobilisation phase for such a service.

Rail Freight

We note and understand the need for a long term strategy on increasing both freight and passenger usage of rail. However, we note that any such proposal will only get time limited Access Rights and extension of those rights would need to continue to be weighed against the other competing needs for the capacity.



We believe LSWR's proposal can be one part of swift, early, cost-sharing delivery of new and real connectivity, economic and environmental benefits to north, mid and south Wales, Merseyside and the borders with England.

We look forward to working closely with Network Rail going forward to progress these plans to a point where they are able to support the application.

Yours sincerely

Ian Walters
Managing Director