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Office of Rail and Road
25 Cabot Square,
London,
E14 4QZ

Date: 9th July 2025

Dear Louise,

FTWCRL's Response to Network Rail's Representations on Outstanding Access Right Applications

1. Section One: Introduction

This letter serves as First Trenitalia West Coast Rail Limited's (FTWCRL) official response to Network Rail's representations on outstanding Track Access Rights applications for firm rights made since May 2024. FTWCRL trades as Avanti West Coast (AWC) for existing operations on the West Coast Main Line, alongside West Coast Partnership Development (WCPD) who are responsible for developing the proposition, which includes the train service specification, for High Speed Services that will run on the new HS2 infrastructure as well as the Conventional Rail Network; together, the two organisations form the West Coast Partnership.

Our applications made as part of the ORR's process on Multiple Competing Access Applications launched in 2024 focused predominantly on our AWC operation, whilst laying the groundwork and structure for future development within WCPD's accountability.

We welcome Network Rail's input into this process after a significant time of deliberation and remain willing to work collaboratively with the infrastructure manager to implement our proposed services at the earliest opportunity, noting that many are already operating under contingent rights.

We do however have some concerns with the representations made by Network Rail, and intend to not only demonstrate why these concerns are not applicable to our applications (the majority of which

were originally due to commence at, or prior to, the May 2025 timetable), but also to allow the ORR to make a decision which is in the best interests of customers, stakeholders and taxpayers.

FTWCRL also supports the recent decision made by the Regulator, on the basis of information provided by Network Rail, which has led to the conclusion that a number of other applications should not be allowed to proceed [\[LINK\]](#). We believe that those applications used a disproportionate amount of network capacity at critical times of the day; FTWCRL seeks only a small incremental uplift comparatively to other applications and our current operations.

FTWCRL are clear that we strongly believe that there is sufficient capacity to operate the small number of incremental services we have applied for. We call on the ORR to provide it's clear and definitive support and approve our applications based on the information that we have provided throughout this process.

2. Section Two: Avanti West Coast (AWC)'s Timetable Step Up Strategy.

Avanti West Coast has a mission to be the transport of choice, connecting customers and communities along the West Coast Main Line. This is with the vision of delivering a service that sets new standards for customer experience and operational excellence.

Delivery of additional services within the next timetable change in December 2025 is an essential part of this mission and is a key part of what FTWCRL has worked towards over the course of the past three years. We have worked collaboratively with Network Rail during this time throughout all stages of the ESG process through to implementation & regularly updated relevant Route & Regional Directors throughout the intervening period [\[Link – Pages 33 – 36\]](#)

FTWCRL have welcomed Network Rail's recent reassertion that these services were included within the December 2022 ESG timetable [\[Link to NR Letter\]](#), [\[Link to FTWCRL Response\]](#). We note that our additional access applications made in advance of the ORR's 20th May 2024 deadline are all aligned with this timetable specification and are part of the originally intended operation within the December 2022 ESG.

FTWCRL has applied an effective readiness process which has enabled a more reliable and robust delivery of our timetable, increasing provision at each change date in line with available traincrew

resource. The importance for customers of a train service they can rely on, and which provides effective and reliable journey opportunities, is recognised by FTWCRL; this is evidenced in our latest positive net advocacy scores regarding our service – with Period 2513 providing the highest result since the pandemic.

Since the implementation of the December 2022 timetable, we have reliably increased our weekday service offering from 264 trains to 294 trains, an increase of 30 trains per day. At the same time, we have undertaken several upgrades to our fleet, including our multi-award winning Pendolino refurbishment, and the introduction of our new Evero fleets - a combination of bi-mode and electric Class 80x trains which have replaced the previous all-diesel Class 221 fleet and obviated the previous diesel operation on electrified routes.

FTWCRL trained over 200 drivers to operate the new Class 80x trains within in an initial twelve-month period, with all required productive drivers now trained. These trains are already providing customers with an improved experience and greener journeys.

Our new Evero trains will also allow FTWCRL to increase our proposition on the Liverpool route, with the first of our additional all-electric second hourly return services already operating from November 2024. This new service frequency has been welcomed by customers and stakeholders alike, and we look forward to increasing our provision over coming timetable changes in September and December this year. In line with the ORR's determination in October 2023 for our 2nd Supplemental Agreement, FTWCRL intends to convert these rights to firm once sufficient time has elapsed for performance analysis to be undertaken; this later activity is already underway.

As part of our proposal, FTWCRL is looking to continue operation of a small number of services that have been reintroduced in the past twelve months or are due to be introduced at the December 2025 timetable change. Those which are currently operating are doing so under contingent rights.

All the services where access rights have been applied for were included within the December 2022 ESG agreed by the industry, and as such FTWCRL believe that there is sufficient capacity for the very small number of services which have additional rights applied for.

Our relentless focus on increasing our timetable offering with a stable and reliable approach has already driven growth, for which the whole industry is benefitting. FTWCRL is a net contributor to the public purse, as one of only two DfT operators not requiring a subsidy for its operation [\[Link\]](#). This is a

clear result of the actions taken to stabilise operations and move forward with our new mission and vision.

FTWCRL strongly believes in the plans developed for the future; that they will deliver the most optimal outcome for customers and the wider economy, with more trains and better journey opportunities to be realised within the next 12 months.

3. Section Three: Background on the ORR's Process on Competing Access Applications – May 2024.

Referring to the ORR's letter issued on the 24th April 2024, which focused on competing access rights, this resulted in a significant number of applications from prospective and existing operators submitted on the 20th May 2024 [\[Link\]](#).

FTWCRL originally put forward a range of applications focused on the December 2024, May 2025 and December 2025 timetables. This included a small number of trains where rights had been temporarily relinquished but were required back earlier than had been anticipated.

The supplementals for these rights were shared with Network Rail and the ORR on the 20th May 2024.

Given FTWCRL's intention to operate services in line with its timetable step-up trajectory, all trains within both the 3rd Supplemental and 17th Supplemental are currently operating under contingent rights from the December 2024 and May 2025 timetables respectively. Regardless as to other applications submitted, these timetable change dates had always been the intended commencement date of these services.

In the remainder of this letter, FTWCRL will demonstrate that of those trains requested to operate, only a limited number are for full through trains and are instead an extension or redirection of an existing service. In reality, the number of additional trains accessing the network at locations contested by Network Rail as nearing capacity is exceptionally limited.

The applications which remain live and under consideration for this process are shown on the next page.

Table 3.1 – Access Rights Applied for by Supplemental Agreement.

Supplemental	Rights Applied For <i>SX – Weekdays, SO – Saturdays Only, SU – Sundays Only</i>
3rd Supplemental Agreement <i>Originally from May 2025 Timetable.</i> Now: December 2025 Timetable [LINK]	<u>Up Services</u> SX, SO, 9M53 0939 Glasgow Central to Preston (<i>service continues to London Euston using existing firm rights, no additional quantum required south of Preston</i>). SX, SO, 9M84 1336 Glasgow Central to Preston (<i>service continues to London Euston using existing firm rights, no additional quantum required south of Preston</i>). SX, SO, 1A92 1251 Blackpool North to London Euston. <u>Down Services</u> SX, SO, 9S47 1032 Preston to Glasgow Central (<i>Service operates through from London Euston at 0716 using an existing firm right</i>). SX, SO, 9S65 1442 Preston to Glasgow Central (<i>Service operates through from London Euston at 1138 using an existing firm right</i>). SX, SO, 1P92 0939 London Euston to Blackpool North. Note: South of Preston & on West Coast South, this application only represents an additional 1 train in each direction each day. All SX trains are currently operating under temporary contingent rights.
17th Supplemental Agreement <i>Originally from December 2024 & May 2025 Timetables.</i> Now: December 2025 Timetable [LINK]	<u>Up Services</u> SX, 1R19 0700 Manchester Picadilly – London Euston. SX, 1A78 1932 Chester – London Euston. SU, 9A50 0943 Liverpool Lime St – Birmingham New St (<i>Service continues to London Euston</i>). SU, 1A70 1955 Crewe to London Euston (<i>Service operates from Holyhead to Crewe currently</i>). Note: all SX trains included within the 17 th Supplemental are currently operating in the May 2025 timetable under contingent rights.
18th Supplemental Agreement December 2025 Timetable [LINK]	<u>Up Services</u> SU, 1AXX 1613 Liverpool Lime St – London Euston. <u>Down Services</u> SU, 1FXX 2006 London Euston – Liverpool Lime St. Note: Both trains operate on Sundays; where the full LTP timetable can operate, there is generally greater capacity due to more limited network utilisation.

4. Section Four: FTWCRL's Response to Network Rail's specific representations regarding the 3rd Supplemental Agreement.

4.1 FTWCRL Response to NR's Representations for Trains North of Preston in the 3^d Supplemental.

4.1.i – Background on Train Service Proposal.

As laid out in the table above, this application sought to amend the destination of two return trains originating at London Euston from Blackpool North to Glasgow Central, with a new direct service for Blackpool. This was with the aim of filling the final remaining gaps in the Euston-Birmingham-Scotland (EBS) service specification, and is a requirement of our Train Service Requirement (TSR) as agreed with the Department for Transport.

Paths for the operation of these trains also formed part of the ESG timetable structure and, although at the time of implementation of this timetable FTWCRL did not, due to the impact of the pandemic on driver training, have the required driver resource to run these, it was a key strategic goal to reinstate these services as soon as practical. This was achieved in the May 2025 timetable – as per our timetable step-up strategy. Bringing these trains back into the timetable has had strong stakeholder support and has been warmly welcomed by all. It restores previously provided connectivity between Birmingham and Glasgow and also fills significant gaps in the service level during the afternoon at locations such as Oxenholme. The withdrawal of these services will, therefore, have a significant adverse stakeholder reaction.

For four of the trains where rights already exist south of Preston (via Birmingham), we wish to be explicit that in the event that this application not being approved, these trains would continue to operate between London Euston and Preston via Birmingham with amendments to end destinations only; there will be no relinquishment of these rights south of Preston.

All of these trains are currently operating on weekdays (SX) in the May 2025 timetable under contingent rights.

4.2 – Capacity Analysis for Services Operating North of Preston.

FTWCRL have appreciated the collaborative work with Network Rail Capacity Planning to successfully incorporate these trains into the timetable in May 2025 and, although paths in the southbound

direction were not as desired - due to freight clashes, the strategy was to bring these trains into the timetable and look for opportunities for improve paths in future timetables. We note that at no point during May 2025 validation process, or during the application for access rights for these services, did Network Rail formally raise concerns about the performance of these specific trains.

The next section clearly identifies that there is sufficient capacity on the network for these trains to continue operating under firm rights.

4.2.i - 9M53 09.39 Glasgow Central – Euston (considered between Glasgow and Preston)

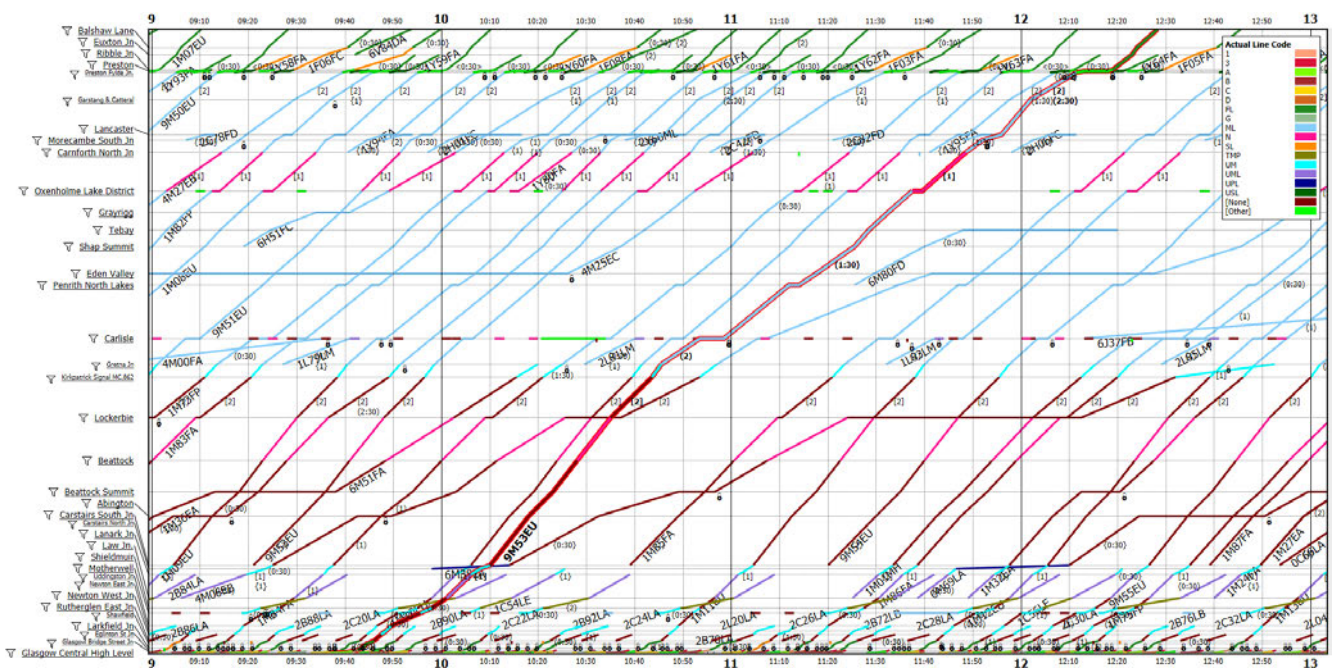
While this service was an assumed QJ path in the December 2022 ESG Timetable, the actual path being used in May 25 is quite different, due to various freight services bidding into the capacity released by the temporary withdrawal of this service.

The service departs at 0939, 3 minutes behind the 0936 Glasgow Central – London Euston. FTWCRL are putting suitable mitigations in place to assist with customer flow with these two similar departures. The timing of this service is to ensure it runs ahead of 6M38 0949 Ravenstruther – Carlisle Yard at Carstairs.

At Carlisle there is an extended dwell of 5 minutes and then with 7.5 minutes of pathing time between Carlisle and Preston and a 5-minute dwell at Preston, all will assist in helping ensure a right time departure from Preston, where it runs in the same path as the former 9P53 1151 Blackpool North – London Euston, an ESG train which has been running since December 2022.

A capacity graph confirming this follows on the next page.

Graph 4.2.i.a – 9M53 Capacity Analysis.



4.2.ii - 9M84 13.36 Glasgow Central – Euston (considered between Glasgow and Preston)

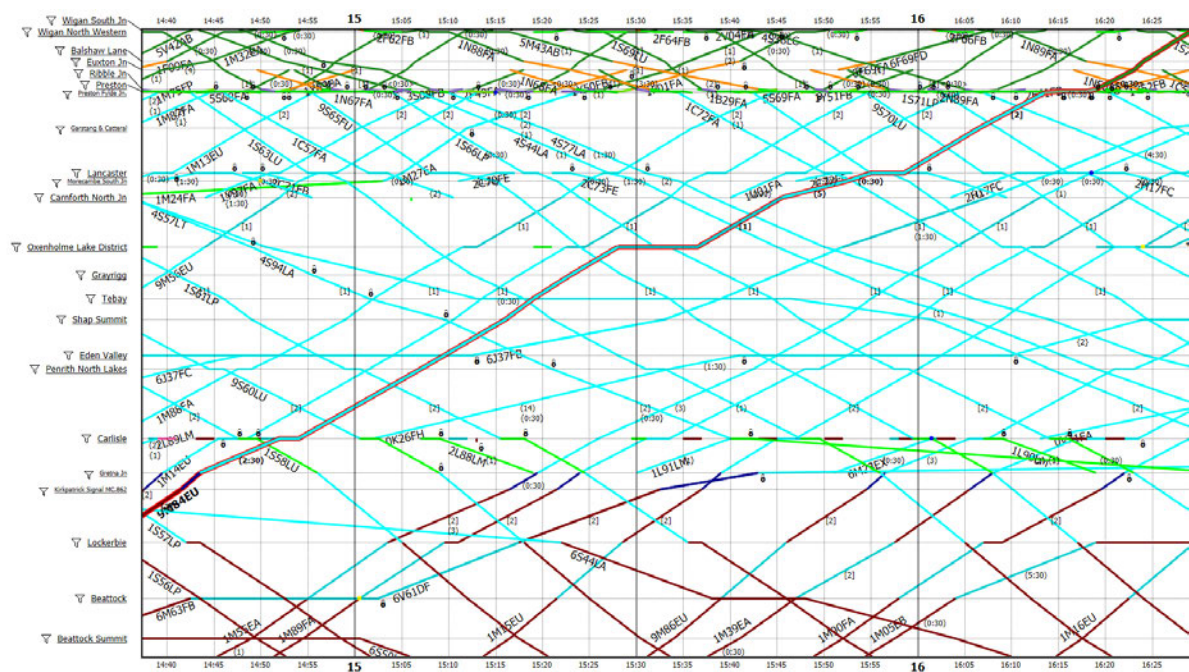
While this service was an assumed QJ path in the December 2022 path, the actual path being used in May 25 is quite different, due to freight bidding into the capacity released by the temporary withdrawal of this service since 2022.

The service departs at 1336, 3 minutes behind the 1333 Glasgow – Euston. Similar to 9M53, FTWCRL are putting suitable mitigations in place to assist with customer flow with these two similar departures. Flighting these services close together to Carlisle helps with maximize capacity for freight on this section.

9M84, however, needs to depart Carlisle earlier than the optimal departure to ensure a path for 6J37 1356 Carlisle Yard – Chirk freight service. To then link this departure time from Carlisle with its standard departure time at Preston 9M84 has an extended dwell at Oxenholme (which helps maximises connectional opportunities to the Windermere branch) – however there is no risk this will delay following trains as can be seen from the graph below. Pathing time and a slightly extended dwell at Lancaster again will help ensure a high chance of a right time departure from Preston, where it would

run in the same path as the former 9P84 1551 Blackpool North – Euston service, an ESG train which has been running since December 2022.

Graph 4.2.ii.a – 9M84 Capacity Analysis.



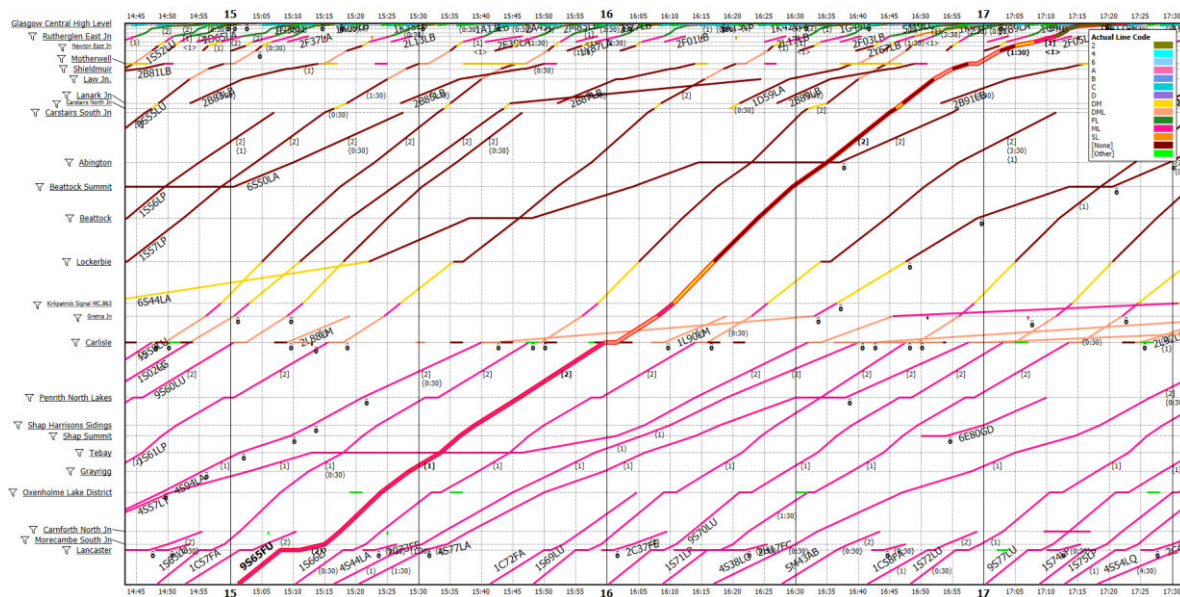
4.2.iii - 9S47 07.16 London Euston - Glasgow Central (considered between Preston and Glasgow)

This path between Euston and Preston is well established, having been used by 9P47 07.16 London Euston-Blackpool North since the December 2022 ESG. Beyond Preston, this service runs in its assumed December 2022 ESG path (where it was considered as a QJ path) and departs Preston 6 minutes in front of 1S46 1004 Manchester Airport - Edinburgh.

After Lancaster, 9S47 only calls at Carlisle, so by Carlisle the gap between the two service is around 14 minutes. The ESG path included a call at Penrith, omitting this call helps to mitigate any performance risk to the following TPE service.

Arrival into Glasgow Central is at 1315, giving a 21-minute turnround to form 9M84 (the minimum turnround in the TPRs is 20 minutes at Glasgow Central). However, to minimise the risk of this short turnround FTWCRL chose not to call 9S47 at Motherwell and in its place, there is 6 minutes pathing

Graph 4.2.i.va – 9S65 Capacity Analysis.



4.2.v – Capacity Conclusions for Services North of Preston in the 3rd Supplemental.

FTWCRL subsequently concludes that there is significant evidence that there is capacity to continue operation of this limited number of services North of Preston. Given that Network Rail's own Capacity Planning team have supported the introduction of these trains within the May 2025 timetable, it should be self evident that the network is in a place to support their operation.

The fact that these were supported in the December '22 Events Steering Group process suggests that NR previously supported the trains, and FTWCRL has therefore incorporated them into our timetable strategy and long term business plans. To withdraw support for these trains following the ESG puts the process for major timetable change into question. If the industry has agreed a train plan as part of an ESG, this should be adhered to in future timetable changes.

Our evidence based approach for Capacity clearly demonstrates that there is sufficient time and space in the schedule to not only operate these trains, but to do so reliably without detriment to other operators, who we have worked around flexibly.

We therefore strongly recommend to the ORR that it supports the 3rd Supplemental to allow continuation of these passenger services.

4.3 FTWCRL's Response to NR's Representations for services on WCML South in the 3rd Supplemental.

4.3.i – Background on Train Service Proposal for Additional Blackpool Services.

With the redirection of the two services in May 2025 from Blackpool North to Glasgow Central, FTWCRL commenced operations of a new service which ensured a continued direct connection between London and Blackpool. The current proposal within the 3rd Supplemental was included within the December 2022 ESG agreed by the industry, and sees fewer trains using the route between Preston and London Euston via the Trent Valley than originally envisaged.

Without the operation of this return trip to Blackpool North, the other two trains which have recently seen their destination change to Glasgow Central would have to divert back to Blackpool North for compliance with our Train Service Requirement.

It is therefore essential that all 6 trains considered in this chain are approved together.

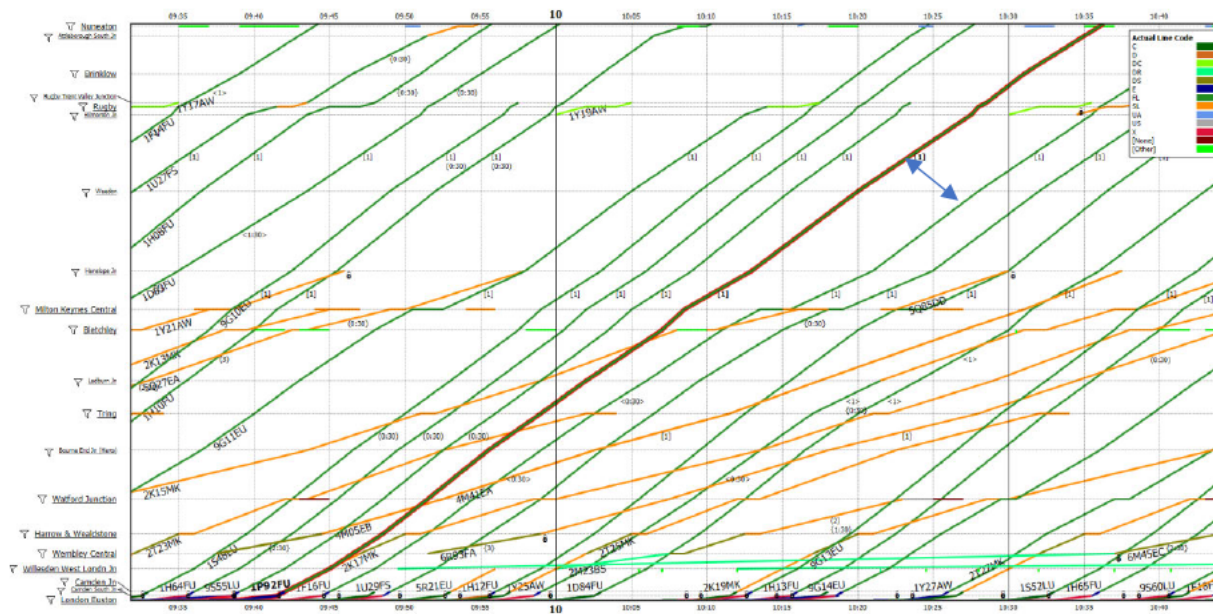
The capacity analysis below demonstrates why there is space for these services.

4.3.iii - 1P92 0939 London Euston - Blackpool North

This path, although assumed to operate in the December 2022 ESG has been timed into a different path between London Euston and Rugby. In the ESG timetable, it was assumed to leave Euston at 0920 and have an extended dwell at Milton Keynes. However, FTWCRL made the decision that, to improve journey times from London to the North-West, it would be a more commercially attractive solution to depart Euston at 0939. This means the EBS service needs to run at 0936 instead of its normal xx40 path and 1P92 does use the natural firebreak path in this hour (or potential Open Access path as identified in the ESG) between Euston and Milton Keynes.

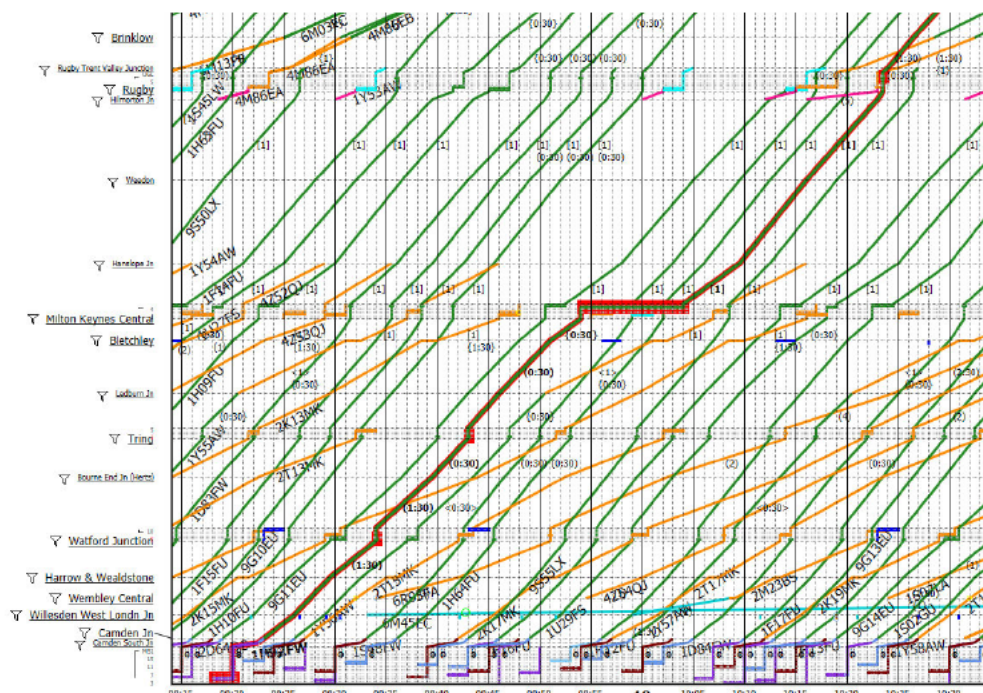
But, even with this service, there is still a 1 minute 'firebreak' out of Euston before the xx43 Liverpool departs. This Liverpool service also calls at Milton Keynes, so by Rugby there is significant gap between the two services and the firebreak is restored.

Graph 4.3.iii.a – 1P92 Capacity Analysis.



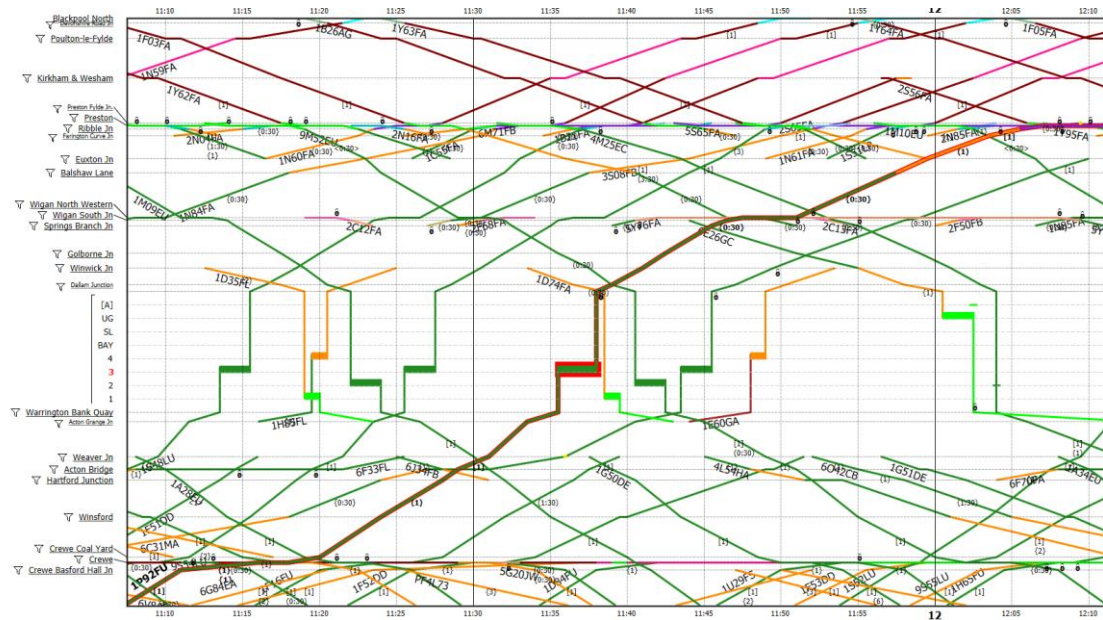
It is perhaps worth noting though that the ESG solution (as shown in the graph below) is arguably a worse solution as it uses the firebreak path north of Milton Keynes and has the train held in platform 5 at Milton Keynes for around 10 minutes, noting platform 5 is useful to regulate trains in both the up and down direction if needed.

Graph 4.3.iii.b – 1P92 Capacity Analysis.



North of Rugby the path is as per the ESG timetable and is well spaced with other traffic, with no conflicting traffic at Winwick, Golborne or Euxton Junctions to generate any performance risk. This service is planned to run on the slow lines from Balshaw Lane into Preston, again minimising conflicting moves in the Preston station throat.

Graph 4.3.iii.c – 1P92 Capacity Analysis.

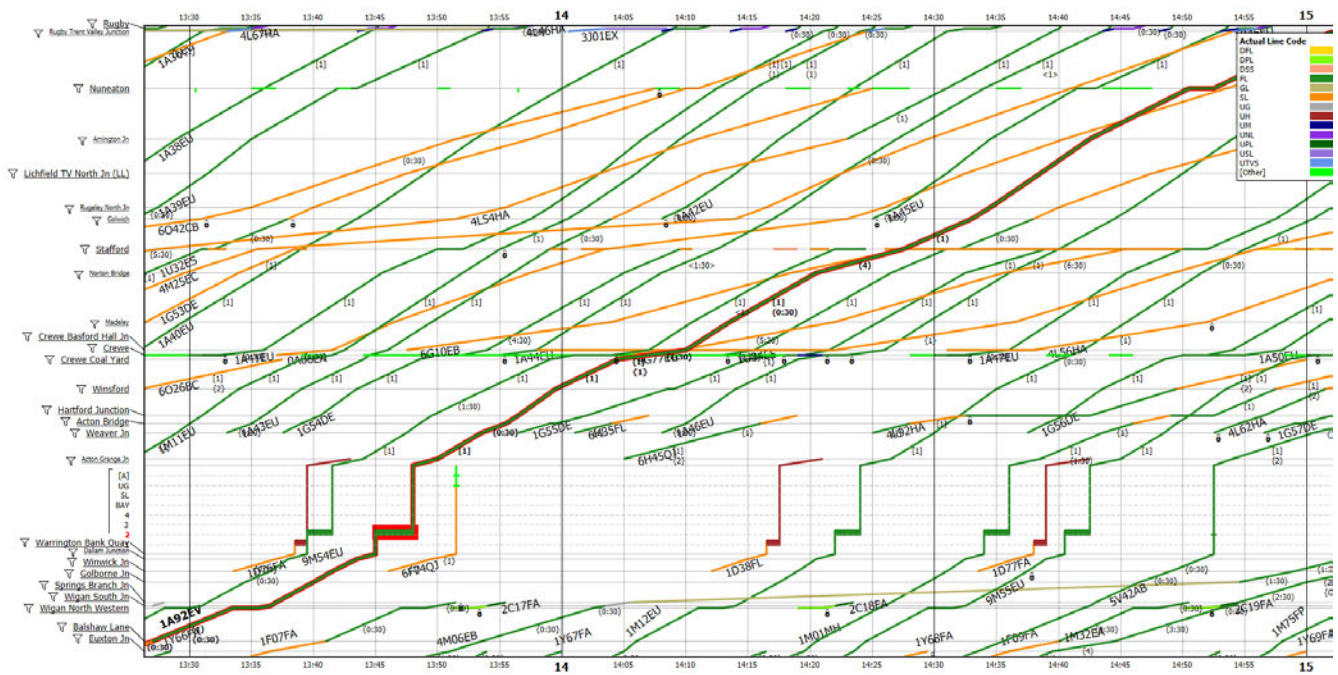


4.3.iv - 1A92 1252 London Euston - Blackpool North

Similar to 1P92, this path is as per that assumed in the December 2022 ESG, although timed as a class 80x rather than a class 390. It uses the slow lines at Preston, minimising conflicts with other traffic and crossing onto the fasts at Balshaw Lane in a robust 9-minute gap in down traffic (a 6-minute margin is required as a minimum).

There is a 3-minute dwell at Warrington BQ, over the minimum requirement 120 seconds which will help with right time presentation at Weaver Jn. There is also a significant amount of pathing time in this service south of Crewe, to ensure it is timetabled into the spare path south of Rugby, again significantly improving its chances of right time presentation at Rugby and into Euston.

Graph 4.3.iv.a – 1A92 Capacity Analysis.



4.3.v – Capacity Conclusions

Proved in this analysis, it is clear that there is sufficient space in the timetable for this one additional train to operate. This is reinforced by the current operation of this service, wherein Network Rail have found sufficient capacity to support it.

Having been established since the May 2025 timetable change, FTWCRL is clear that the inclusion of the one return trip still provides a necessary and important connection, whilst only using this path on a very limited basis still allows for multiple firebreaks within the timetable throughout the remainder of the day.

FTWCRL therefore asks the ORR to direct in favour of operating this service by approving the 3rd Supplemental Agreement.

5. Section Five: FTWCRL's response to Network Rail's representations surrounding the 17th Supplemental Application.

5.1 – Trains Supported in this Application

We welcome Network Rail's support for the following services listed in this application:

- SX - 1R19, 0700 Manchester Picadilly to London Euston
- SU – 9A50 0943 Liverpool Lime St to London Euston (via Birmingham).

FTWCRL is encouraged that Network Rail has recognised that there is sufficient network capacity to operate these services with 1R19 having operated since December 2024. We note that the rationale for this specific service is that it would have to operate as empty coaching stock in either case. We welcome the pragmatic and considered approach which Network Rail have applied in this case.

We were also encouraged by Network Rail's willingness to support the Sunday only 9A50 service given the same rationale, in addition to acknowledging that this specific train does not add any additional quantum of operation onto West Coast South, in addition to providing opportunity to develop additional resilience and journey opportunities.

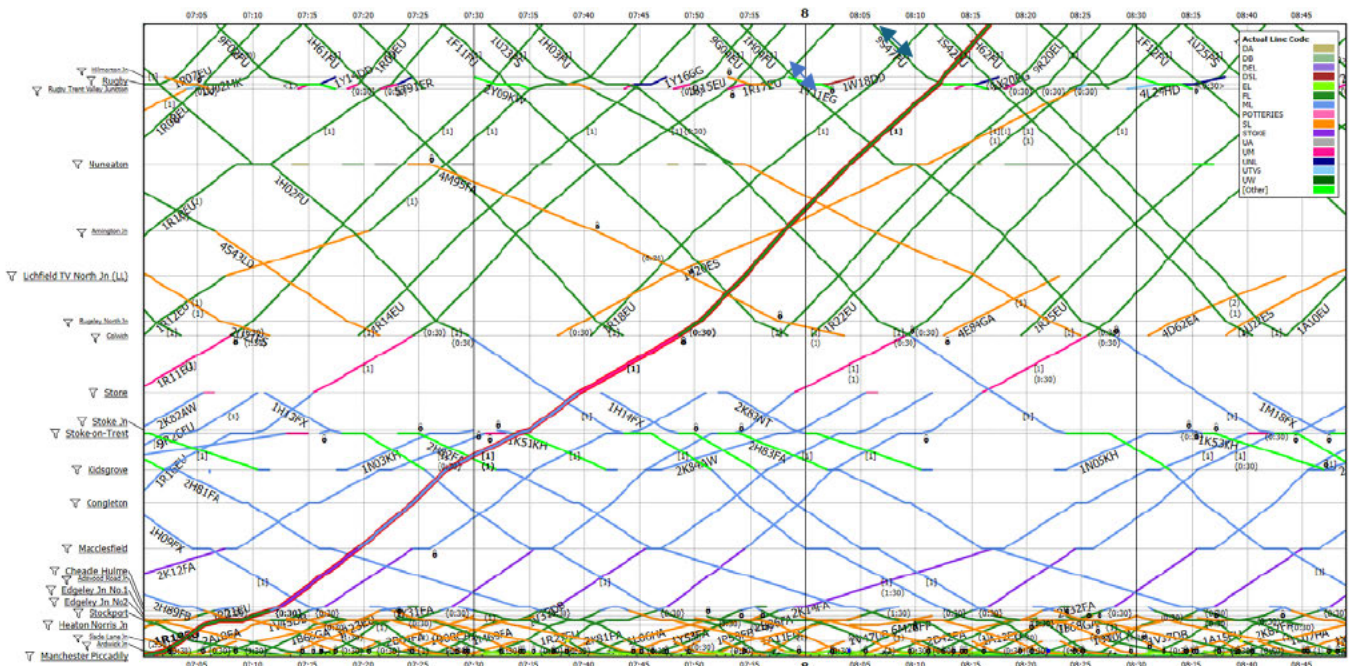
Given the support for these specific trains, FTWCRL requests that the ORR direct in favour of continued operation of these services.

5.2 – Capacity for Trains Supported in this Application

5.2.i -1R19 07.00 Manchester Piccadilly - London Euston

While 1R19 is a headline train in terms of offering a sub-2-hour journey time between Manchester Picadilly and London Euston and therefore only calls at Stockport. It still has all the allowances as required in the TPRs and 1 minute's pathing time approaching Stoke on Trent.

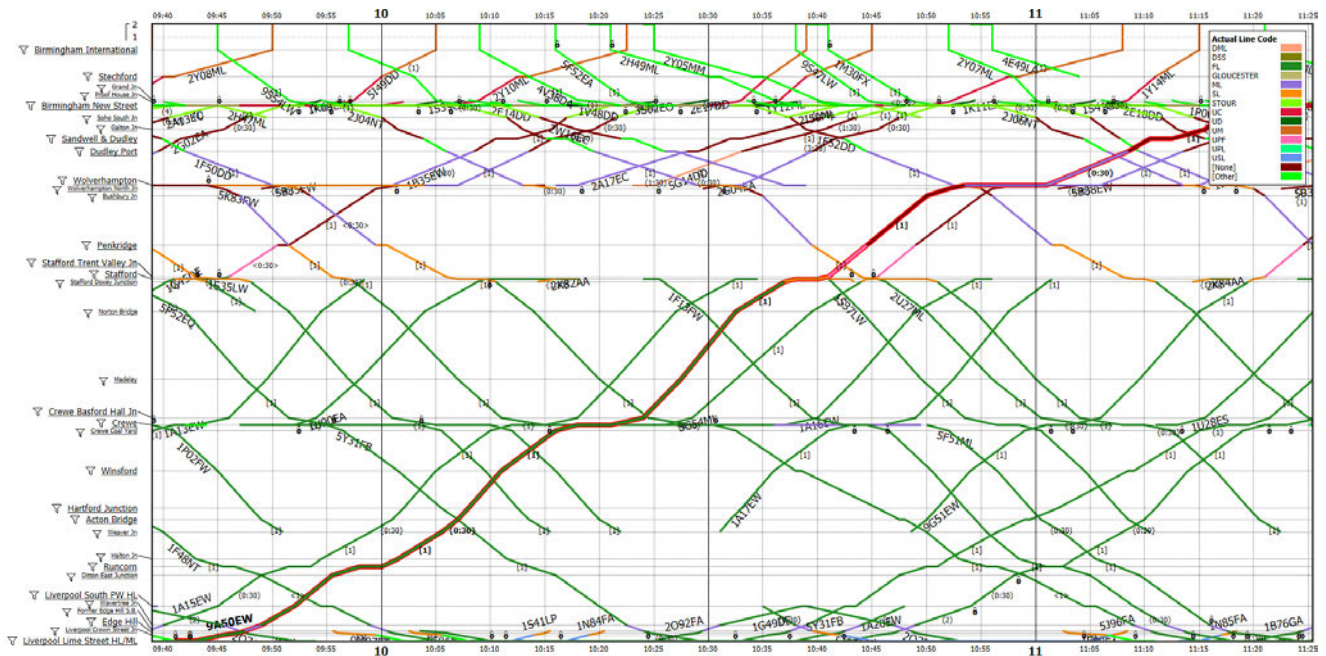
The actual path has minimal impact on other services though, with the only one directly impacting it being 2K12 0635 Manchester Piccadilly – Stoke-on-Trent, which is the minimum headway in front of 1R19 at Stoke (hence the requirement for 1 minute's pathing time in 1R19). Beyond that no train is close to being on minimum margins behind or in front of 1R19 until London Euston, meaning if there is a small delay to 1R19 it will not cause any reactionary delay. At Rugby, for example, the following train



The closest train to this to Birmingham, in terms of minimum margins, is an ECS move (5G54 1009 Crewe CS – Birmingham NS), which departs 5 minutes after 9A50 has departed from Crewe and follows 9A50 to Birmingham New Street. The closest passenger service is 1B38 1115 Wolverhampton –

London Euston, which departs Wolverhampton 14 minutes behind this service. Therefore we would expect its operation is going to have no notable performance impact on other service.

Graph 5.2.ii.a – 9A50 Capacity Analysis.



5.3 Trains Not Supported by Network Rail in the 17th Supplemental.

Whilst we appreciate Network Rail's support with two trains included within this application, we are disappointed that support has not been provided for the other trains included. This specifically refers to:

- SX, 1A78 1932 Chester – London Euston
- SU, 1A70 1753 Holyhead – London Euston.

FTWCRL strongly believes that there is sufficient capacity for these services due to their operation during times when other service groups are reducing their frequency, providing more space within the timetable.

All of the weekday (SX) trains are currently operating and have been accommodated in the May 2025 timetable under contingent rights.

5.3ii – Capacity Analysis

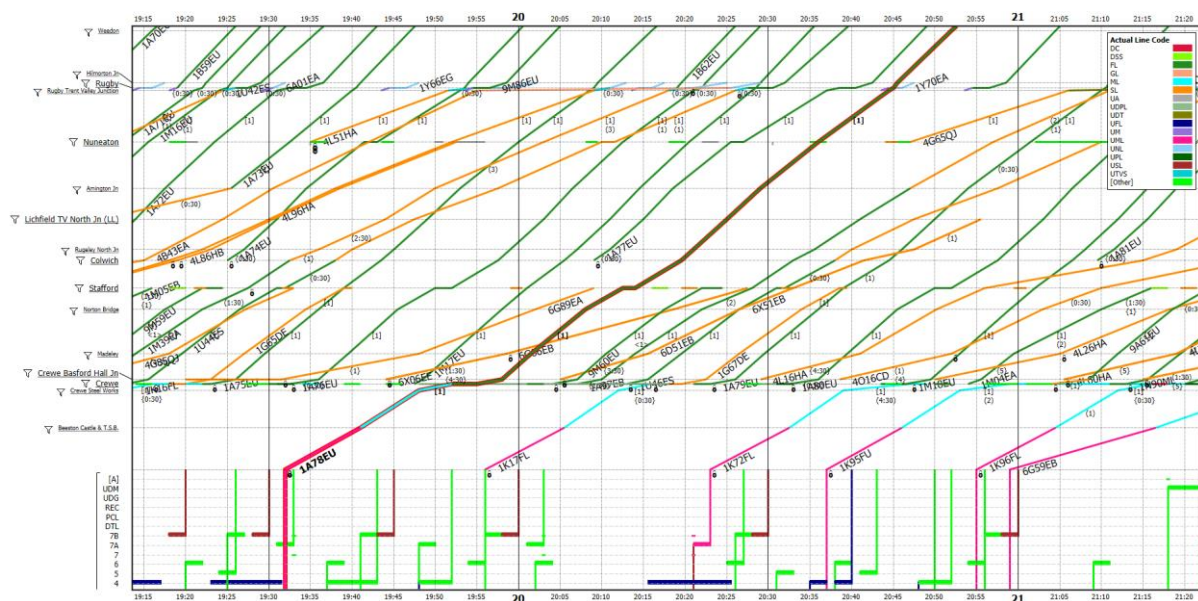
5.3ii.a – 1A78 1932 Chester – London Euston

This service runs in the standard hourly path for Chester – London Euston between Chester and Milton Keynes. It runs at a time of day when other service groups are naturally reducing their frequency, so there are less trains overall on the WCML south.

This does also mean that this service calls additionally at Milton Keynes, unlike other trains in this service group.

However, with less trains in the WCML south, there are no trains interacting with this service on 'minimum margins'. The closest being 1Y68 1936 Birmingham New Street – London Euston, which crosses onto the fast lines at Ledburn Junction 6 minutes behind it.

Graph 5.3.ii.a – 1A78 Capacity Analysis.

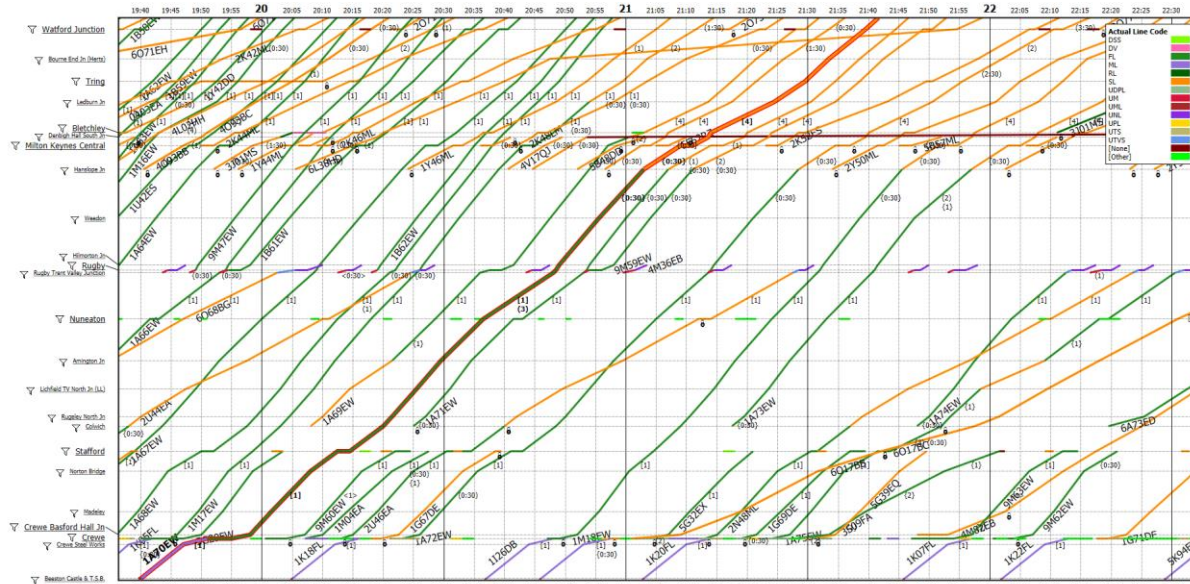


5.3.ii.b – 1A70 1753 Holyhead – London Euston

This service is an extension of the 1753 Holyhead- Crewe, and runs in the standard path from Crewe to Rugby. At Hanslope Junction, the service is planned to divert onto the slow lines as part of the two-track railway plan as published in the Engineering Access Statement. It has no services on minimum

margin behind it throughout its journey, the closest being 1A71 1935 Manchester Piccadily – London Euston, which is 5 minutes behind 1A70.

Graph 5.3.ii.b – 1A70 Capacity Analysis.



If 1A70 didn't run as a passenger service, it would still need to run as an ECS from Crewe to Wembley via London Euston, with an extended dwell in Crewe station while the unit is brought out of passenger service. This would require a different path for this movement approximately 15-20 minutes later from Crewe, during which there would be interactions with stopping services and other FTWCRL services on the two track railway.

This would require a further increase in moves on minimum margins that already exist in this part of the hour and, arguably, lead to a larger performance risk than if 1A70 ran as a passenger service throughout, both in terms of the two track railway and occupying platforms at Crewe for longer.

Similarly, whether these trains run in Empty Coaching Stock (ECS) or passenger service, many have critical turn arounds as they form passenger trains. ECS moves are not prioritised on the network, therefore running them in this way may actually worsen overall performance rather than improve it, which contradicts the argument used to reject the trains. As a good and efficient operator, running trains ECS where they are fully crewed is a waste of money and resource and contrary to condition J of the Decision Criteria. Consequently, it would be preferable for all parties in the industry to take the revenue on these trains and to continue running them as passenger services.

5.3iii – Capacity Conclusions

FTWCRL welcome Network Rail's support for both 1R19 (Weekdays) and 9A50 (Sundays), continuing their operation within the capacity available. We ask that the ORR direct in favour of operating these two trains, based on the acknowledged available capacity.

We also assert that there is sufficient capacity to operate the two other trains included within this application, 1A78 (Weekdays) and 1A70 (Sundays), proved by the fact that Network Rail have been able to accommodate these services into the May 2025 timetable. In any case, 1A70 would be required to operate as an ECS.

6. Section Six: FTWCRL's response to Network Rail's Representations surrounding the 18th Supplemental Agreement.

6.1 – Requirement for Trains in the 18th Supplemental Agreement.

The trains included within the 18th Supplemental operate on Sundays only, and had always been intended to commence from the December 2025 timetable. FTWCRL operates 215 trains on a Sunday, 75 less than a given weekday equivalent.

Unfortunately, despite the ORR not having provided any determination, Network Rail has rejected these trains on the grounds that they do not currently have access rights. We are therefore unable to show any capacity analysis graphs for these trains.

However, FTWCRL continues to strongly believe in the requirement for, and capacity to operate these trains. Sundays are an important leisure market on the WCML, with a combination of weekend travel and events taking place in major cities across the country. These trains are designed to move this capacity effectively across the network, adding additional seats at key points needed.

Sundays are a challenging day for the movement of customers attending football matches, with the WCML home to a number of the UK's largest clubs. Therefore, the strategic requirement for these services is to support the movement of additional customers, where demand is stimulated by external factors.

Given the proposed times of operation, towards the extremities of the day, FTWCRL remain confident that there is sufficient capacity to support the operation of these services.

7. Section Seven: FTWCRL's respons to Network Rail's Representations on Performance.

7.1 – Performance Analysis of Services on West Coast South – In Relation to All Applications.

FTWCRL recognise performance on the WCML South is challenging and we are working collaboratively with Network Rail and other parties to identify and deliver initiatives to improve performance. We note that whilst overall punctuality is a challenge, the ORR has recently recognised that FTWCRL is only responsible for 22% of the delays it suffered in FY25 (April 2024 – March 2025) [[LINK](#)]. Comparing this nationally, other comparable long-distance train operators were responsible for 32% of the delays on their respective routes. This shows that FTWCRL are competently managing delays that we are responsible for.

We remain equally concerned with operational performance in general on the West Coast Main Line and view it as our priority to work with and support Network Rail and the wider industry with reducing the punctuality impact to our customers.

In collaboration with Network Rail, we have launched our FY26 Joint Performance Strategy which focuses on tangible performance improvement schemes to improve punctuality and reliability across both our own geography, and that of West Coast South (our lead Network Rail Route).

This includes several mitigations as part of the collaborative "60 Mile Plan" between Euston and Hanslope Jn, the Timetable Performance Programme, Euston to Manchester strategic Steer review, and Integrated Track and Train funding improvements.

Separate to this, we are exploring changes to the timetable structure by looking at alternative use of firebreaks and calling patterns and whether they may lead to a more robust solution. As FTWCRL is responsible for 10% fewer (22 vs 32%) ToS delays compared to similar operators, this suggests these targeted timetable workstreams have the ability to release a significant amount of performance compared to performance improvement measures targeting specific incidents.

Back in autumn 2024, FTWCRL, after consultation with West Midlands Trains (WMT), did propose a slightly revised use of the xx36 'firebreak' path, by proposing to depart the xx40 Euston – Birmingham

- Scotland service and xx43 Euston – Liverpool service 2 minutes earlier from Euston (1 minute earlier if the xx36 path was required in that hour) to provide a more robust path for WMTs xx46 Euston – Crewe. Right time presentation at Stafford and Crewe for this service being critical to the successful wider operation on the WCML.

This proposed timetable mitigation was disappointingly rejected by Network Rail; the only explanation given was not wanting to deviate from the ESG timetable structure. Given that Network Rail have now opposed operation of these trains due to performance concerns, we would request this option to be reconsidered to ensure all avenues are explored that could enable these services to operate.

Similarly, if the better use of the firebreak was rejected because it deviated from the ESG structure, not supporting trains in the same ESG timetable is also contradictory.

The December 2022 timetable was approved by industry stakeholders via the TP HAZID process; notably, all trains Network Rail have opposed were knowingly included in the ESG timetable, with similar services having previously run pre COVID. These services previously formed a core part of FTWCRL's original service offering. Network Rail's representations on this subject question the whole ESG process.

7.2 – Performance Analysis – North of Preston – Relevant to the 3rd Supplemental Agreement.

FTWCRL have separately asked Network Rail to urgently provide detailed information pertaining to its concerns specifically in relation to operations north of Preston for services within the 3rd Supplemental.

We note that Network Rail's representation letter of 20th June 2025 largely references performance south of Preston and on West Coast South. In the minimal quantifiable data provided for North of Preston, we note that Network Rail's analysis indicates an **improving** year-on-year trend for punctuality at Carlisle, with a slight year-on-year deterioration at Oxenholme (although the three-year-trend continues to show an overall improvement).

Additionally, the information provided by Network Rail in their representation letter actually shows the Birmingham to Scotland section of the EBS service with continually improving performance, which sets it **against the trend described**; this route has gone from being the worst performing at the start of the December 2022 timetable for On-Time to being the second highest performing route at the start of April 2025. This is **contrary to the commentary** provided in Network Rail's letter of the 20th June

2025, wherein the North-Wales and Birmingham to Scotland service groups have been confused – presumably due to the similar colours used on the washing-line graph.

However, the analysis provided is lacking in specific detail surrounding the key drivers of the punctuality issues referenced north of Preston, which we believe can be attributed a wide variety of infrastructure and operator (passenger and freight) causes. The limited commentary actually points to the “nature of the infrastructure” as the key constraint when referencing “Delay Per Incident (DPI)”, but neglects to include any specific data informing delay or incident causes.

As part of the process, FTWCRL has undertaken some limited analysis for the specific trains which have recently commenced operation. This is limited because there is only four weeks of data, however monitoring of these trains will continue. This initial review suggests that the key drivers of punctuality affecting incidents being “PB” service recovery due to the condition of the track, in addition to “PA” temporary speed restrictions. FTWCRL are aware of the infrastructure challenges on this section of route and are actively participating and supporting Network Rail with their West Coast North Modernisation Programme (WCNMP).

The initial analysis also identified the following in relation to T-3 punctuality:

- All of the additional 4 trains (2 in each direction) operating north of Preston are, so far, performing more punctually (3 out of 4) or equivalent to (1 out of 4) average AWC T-3 performance for the equivalent period of time.
- The largest causes of T-3 failures for the 4 trains operating north of Preston are in relation to the condition of the track (3 out of 4) and temporary speed restrictions (1 out of 4).

Given the performance data provided by Network Rail does not include (nor forecast) the operation of the proposed services, nor the specific detail which attributes specific causes to punctuality concerns raised, it is not credible for Network Rail to argue that the operation of these limited number of additional trains North of Preston alone would drive a significant deterioration to performance, especially where in the hours proposed, there are other paths and slots available to act as a firebreak.

7.3 Liverpool Route Performance – In Relation to the 18th Supplemental Agreement.

FTWCRL notes Network Rail’s comments in relation to the operational performance of the Liverpool Route. We note that this service group is FTWCRL’s best performing service group for On-Time and Time-3, as evidenced by Network Rail’s own representations.

NR's representations also demonstrate that FTWCRL's punctuality (in respect of both On-Time and T-3 Moving Annual Averages [MAA]) has also levelled out following a gradual decline since a reduction in footfall and sub-threshold delay during the COVID-19 pandemic. This is at the same time as increasing provision on the route and introducing new rolling stock.

Above all, this should demonstrate FTWCRL's ability to effectively operate services on this route.

8. Section Eight: FTWCRL's response to Network Rail's Representations Surrounding London Euston Station.

FTWCRL recognise Network Rail's concerns surrounding passenger flow at London Euston. We have been supportive of Network Rail since it launched its Euston 5-Point Improvement Plan and have actively engaged on the items to improve concourse management at the station. This has included increasing those trains boarding trains minutes prior to departure and providing additional management support during major events.

We are now collaborating on the second tranche of no-regrets improvements for this year, focused on improving facilities, customer information and developing and implementing a wider station strategy. FTWCRL are working closely with the local team at Euston surrounding development and implementation of further Tranches 3 and 4 of the improvement plan, as the local teams continue to integrate and work more closely with each other.

It should be noted that customer behaviour in relation to dwells on the concourse is only applicable wherein a train is departing from the station; for arrivals, customers will in most scenarios leave the station for onward destinations. For the applications being considered here within the 3rd, 17th and 18th supplementals, only one train departs northbound from Euston during the week (1P92 – 3rd SA), and one on a Sunday (1FXX – 18th SA). Both are outside of core peak hours.

In the case of 1P92, this train is currently operating during weekdays in the May 2025 timetable and will therefore not stimulate any disproportionate additional flow of customers beyond that currently experienced. Preventing future operation of 1P92 will not reduce dwell on the Euston concourse, but will however shift demand onto other existing trains (none of which will be able to provide any additional seating capacity), and which may see customers actually dwelling longer at Euston, or earlier during peak hours.

FTWCRL's Sunday service generally sees a lower quantum of trains operating in general, so heightened consideration (under Short Term Planning [STP] arrangements) is often given to the increased flows of customers stimulated by external sports events and concerts amongst others.

In the case of the Sunday only 1FXX 20:06 London Euston to Liverpool Lime St, FTWCRL believes that operation of this train will provide a significant benefit for concourse management at Euston. The West Coast Main Line is home to 12 Premier League and 10 Championship football clubs. Two major top-flight football clubs reside in Liverpool, with a significant travel demand between the two cities over the season – especially on weekends.

In the year just gone, FTWCRL has provided a significant number of additional trains for football events heading back to the North-West post match for both season fixtures and finals held at Wembley Stadium. A total of five additional trains were provided to destinations in the North-West following final and semi-final fixtures, moving an estimated average of 500+ customers per train. This potentially represents 500+ customers not dwelling on the concourse.

In the case of the Sunday only 1FXX 20:06 London Euston to Liverpool Lime St, this would provide a regular, pre-planned service which would sufficiently move the capacity of fans & other customers back to the north-west. On this basis, preventing it's operation on the basis of station capacity would be entirely counter-productive.

FTWCRL will continue to support Network Rail with it's Euston Improvement Plan and be a collaborative and engaged partner throughout this workstream.

9. Section Nine: FTWCRL's Response to Network Rail's Representations Surrounding Power Supply.

FTWCRL notes Network Rail's representations on Power Supply. We welcome and support the interim improvements that have been made at Bushey Feeder Station, in addition to strategic plans to secure funding to upgrade other feeder stations on the route, including Crewe and Weaver – which we are working with Network Rail to resolve. We are aware through engagement with Network Rail that the 11kV switchgear at Weaver Junction is 10-years over it's 50-year design life, which is a contributing factor in respect of the power supply challenges identified. Planned renewal of this asset later in

Control Period 7 (CP7) is likely to negate current issues being experienced in the medium term, removing requirements for currently proposed restrictions.

FTWCRL continues to be an engaged and supportive partner in respect of strategic power upgrade ambitions, given requirements ahead of introduction of High-Speed services for HS2.

Since the creation of the December 2022 ESG, FTWCRL has consistently and proactively offered our support modelling potential mitigation scenarios for the concerns raised. However, FTWCRL has been disappointed that our offers of support were not utilised until the point at which modelling had been completed, meaning that mitigations which FTWCRL have long offered were not considered or modelled. We have since met with Network Rail's power supply team on three occasions in an attempt to work collaboratively and provide practical and workable interim solutions with minimal to no cost.

FTWCRL are still yet to receive the full suite of modelling from Network Rail. We note the following statement from Network Rail's letter to the ORR on the 24th April 2025:

"Network Rail is conscious of its legal and regulatory obligations for power capacity to be allocated in a fair, open and transparent manner and in the least restrictive way possible, and are always mindful of our duty of non-discrimination and equal treatment.

In its power modelling, Network Rail (NR) has attempted to maximise the capability of the network by assessing a realistic timetable which takes into account aspirations as well as a timetable running under normal operations today and in the expected future timetable (December 2025).

We have modelled a quantum of operations and traction reflective of the actual operational position."

Following a direct request for a meeting made at the Performance & Planning Steering Group (PPSG) on the 3rd May 2025, meetings were held with the Power Supply team on the following dates:

- Wednesday 11th June 2025
- Friday 20th June 2025
- Friday 27th June 2025

In these sessions, we have been told a small number of trains (separate to these applications) are unable to be accommodated due to restrictions of use (power supply constraints). FTWCRL notes that

the Restriction of Use is being applied to four trains where previously temporarily relinquished contingent access rights are returning ahead of the December 2025 timetable.

Given that Network Rail's modelling accounts for trains operating today (trains in the 3rd & 17th Supplemental are), in addition to those which are aspirational in the December 2025 timetable (18th Supplemental Sunday services only), by definition the Restriction of Use should therefore not be applicable to these trains, as they are already considered. Indeed, the trains included within each of the 3rd, 17th and 18th Supplemental Applications largely traverse the affected areas away from the shared affected peak power utilisation time bands.

In good faith, we have proposed the following mitigation measures to effectively manage the power supply challenges. FTWCRL have been told that these cannot be accommodated without further modelling; an activity which is exceptionally time prohibitive. Mitigating activities proposed are:

- Imposing a notching restriction in N-1 on services at the key affected locations around times identified.
- Geo-fencing power-draw on all Class 80x operated services at all affected locations.
- Operation of alternative bi-mode traction in the same hour time-band in diesel mode through the aforementioned affected areas, noting FTWCRL has a very limited bi-mode fleet.

Network Rail have stated that they do not believe that a notching restriction would be successful at mitigating the issues at Crewe and Weaver Junction feeder areas. FTWCRL are unable to validate this statement, having not been involved in the development of the modelling – nor been given access to the full suite of final outputs. However, we continue to believe that a notching restriction (which is acknowledged by Network Rail in their representations as a viable control) would provide a benefit, either on its own or in combination with other mitigations.

FTWCRL note Network Rail's general representations letter on the 24th April 2025 [\[LINK\]](#) in relation to power supply:

"Network Rail may need to impose further operational controls and restrictions on the use of electric or bi-mode trains (which follow existing procedures) and/or may need to object to the introduction of further electric/bi-mode trains where there is not the requisite power capacity."

In this regard, we are concerned that Network Rail's Power Supply modelling for the December 2025 timetable included a new bi-modal freight traction type which is yet to achieve Vehicle Change, hold

a Statement of Compatibility for active operations, or have updated rights to operate. This traction type is not expected to operate within the currency of the December 2025 timetable. FTWCRL is keen to be able to support the introduction of this traction in a way which mutually benefits all industry partners and stakeholders.

We are therefore disappointed that modelling has been produced which is not wholly reflective of the December 2025 timetable and is punitive towards FTWCRL based on incorrect assumptions. FTWCRL have long sought a collaborative good-faith approach with Network Rail & other operators to prevent this outcome.

Whilst we therefore acknowledge and accept that there is a genuine issue and concerns to be worked through at the locations Network Rail have identified, FTWCRL strongly believes that it has implementable solutions which are swift to deliver at a limited cost, and that will help operation of existing services (included within this application and beyond), in addition to those specifically being introduced in December 2025.

Given all trains listed within the 3rd and 17th Supplementals are already operating, we firmly believe that these should be considered as proven against the available electrical supply capacity for the purposes of the December 2025 timetable. Equally, given reduced timetables on Saturdays and in particular, Sundays, we do not believe that there should be any restriction on services at these times. Therefore, we strongly assert that power-supply should not be an issue which prevents the operation of these largely pre-existing services.

FTWCRL would welcome further engagement with the ORR directly in respect of power supply to reflect on the experience outlined in this letter. We remain concerned that there is an over-reliance on modelling of assumptions (which has led to the outcomes described), with limited actual measurement (that we are aware of). Combined with assumptions surrounding N-1 notch restrictions as described, and a differential between assumed freight traction and what is turning up in reality, it is our belief that there are deficiencies in the power supply process which could, if not addressed, continue to negatively impact the whole industry in the long term.

We remain actively engaged with Network Rail, and are eager and willing to find a solution which solves the interim problem ahead of the launch of the December 2025 timetable, but also helps the infrastructure manager secure long-term funding to upgrade the feeder stations at Washwood Heath, Crewe and Weaver, and Willenhall.

10. Section Ten: Unintended Consequences for Timetable Readiness for December 2025.

As you will be aware, the December 2025 timetable will soon be in operation; as bid, this includes all of the rights applied for in this timetable.

Further delays to the decision-making process could negatively affect the December 2025 timetable and subsequent funds available to the Secretary of State through a reduction in forecast revenue. As one of only two operators currently returning a premium to government, this a significant concern.

What is more, in September, which we understand may be the last point for a decision to be made by the ORR, FTWCRL will be nearing completion of its timetable readiness process, which includes the final sign off-of train crew rostering. The process from initial diagram consultation through to the end of roster negotiations can take between 8 & 12 weeks in the shortest phasing.

As a result, any decision made by the ORR must be cognisant of the fact that changes to access rights may fundamentally affect our operational delivery and performance for the full duration of the December 2025 timetable. This degradation may result from broken, inefficient or incomplete train crew diagrams - placed into rosters which do not reflect the intended operation.

The impact of inefficient and emergency diagrams and rostering were cited in the ORR's report [\[Link\]](#) into the May 2018 timetable which largely impacted Northern and GTR. It recognised that in Northern's case, emergency rostering had a sizeable impact:

"4.25 As the May 2018 timetable was introduced, the failure to develop and implement train crew diagrams and rosters caused the introduction of emergency rostering at Manchester Piccadilly, Manchester Victoria and Leeds, affecting approximately 700 drivers and 2,300 trains per day.

4.26 Emergency rostering required Northern to revert to the last agreed roster and manage the allocation of work on the day, matching available resources to work requirements on an hourly-hour basis, resulting in services being at risk of cancellation until all options for cover (including overtime, cross-depot cover or alternative work times) had been exhausted...

4.31 Emergency rostering was adopted but a major displacement of staff and trains developed, resulting in the new timetable quickly falling over."

It is therefore essential that the ORR remain cognisant of this to avoid unintended consequences in respect of the December 2025 timetable and prevent an outcome which inadvertently causes significant disruption to customers.

11. Section Eleven: Comments in Relation to HS2

FTWCRL welcomes Network Rail's comments in respect of protecting capacity for High-Speed services as part of HS2. WCPD, the Shadow Operator for High Speed services and part of the wider West Coast Partnership works closely with Network Rail as WCPD leads the development of future train service provision for High Speed, Intercity and the opportunity created by capacity being released on the West Coast Mainline as part of this national infrastructure project. WCPD also chairs the Concept Train Plan Steering Group and this in turn reports to the industry High Speed Integration Steering Group.

12. Section Twelve: Recommended Actions and Closing Remarks

We thank the ORR for the opportunity to respond in respect of Network Rail's representations on our proposals for December 2025. We recommend that the ORR directs in favour of FTWCRL's applications for the upcoming timetable change.

11.1 - 3^d Supplemental Agreement

FTWCRL asserts that:

- Network Rail have permitted operation of these services from the May 2025 timetable, the point at which FTWCRL had originally intended to operate them; this act alone demonstrates that there is capacity on the affected parts of the network to enable these trains to operate.
- FTWCRL's own capacity analysis (included) also demonstrates that there is sufficient capacity for these services to operate.
- We have been able to demonstrate that the performance challenges asserted by Network Rail do not reasonably represent the real-world position north of Preston, and that there is a significant amount of collaborative work to improve performance across our geography, but especially on West Coast South, where we acknowledge that a joined-up focus is required.

- Given that only one additional service in this application departs from Euston; not approving this application would push existing Blackpool demand onto other services where physical capacity cannot be increased further.
- Given trains within this application have been operating from the May 2025 timetable and are therefore proven, and NR have stated are considered in their power modelling, we believe that power supply should not be a constraining factor in unduly preventing operation of these trains.

FTWCRL therefore asks the ORR to approve the 3rd Supplemental Agreement, and all services included therein.

11.2 - 17th Supplemental Agreement

FTWCRL asserts that:

- We appreciate the support from Network Rail in recognising that there is sufficient capacity for both SX 1R19 - 0700 Manchester Picadilly to London Euston and SU - 9A50 0943 Liverpool Lime Street - London Euston to be approved. FTWCRL's own capacity analysis demonstrates that there is sufficient space in the existing timetable to enable these services to continue.
- FTWCRL welcomes NR's recognition that these trains would otherwise have to operate as Empty Coaching Stock services, therefore utilising the same existing capacity in a different way, without any commercial benefit to the industry.
- We believe that there is adequate capacity for the other two trains included within this application; SX, 1A78 1932 Chester - London Euston, & SU, 1A70 1753 Holyhead - London Euston. This is evidenced by FTWCRL's own capacity analysis.
- We note that in the case of 1A70, this train would also have to operate as an ECS using the full length of the West Coast Main Line to reach Wembley Depot, including London Euston. We therefore assert that the same logic applied to 1R19 and 9A50 be applied to this service in respect of preventing long-distance empty coaching stock movements where a reasonable customer focused alternative exists.
- FTWCRL has recognised challenges to punctuality on West Coast South, and are working collaboratively with Network Rail on various improvement schemes. In the case of most of the services which NR do not support, they operate away from key busy hours where there are increased firebreak opportunities within the timetable. In the case of 1A70, this operates on a Sunday where there is a notable decrease in service frequency.

- None of the trains in this application have a bearing on the management of dwelling customers on the concourse at London Euston as all trains terminate at Euston, with customers leaving the station for onward destinations.
- Given some of the trains within this application have been operating from the December 2024 timetable and are therefore proven, and NR have stated are considered in their power modelling, we believe that power supply should not be a constraining factor in unduly preventing operation of these trains.

FTWCRL therefore asks the ORR to approve the 17th Supplemental and all trains therein; especially those where support exists.

11.3 - 18th Supplemental Agreement

FTWCRL asserts that:

- FTWCRL currently operates 215 trains on a Sunday – 75 less than a weekday. Given the time of day that these trains are proposed to operate, we are confident that there would be sufficient network capacity to support these trains. On the same basis, we believe that there would be limited performance implications from operating these services.
- We believe that their operation would have a net-positive benefit for managing crowding concerns at London Euston, given Sundays are an especially busy day for events, where additional capacity is often provided under an STP basis. In this case, the demand already exists, and these services would provide a suitable and reliable method of moving customers out of London.
- Based on the fact that both services traverse key areas affected by Power Supply on a day with lower service provision and less frequent operation, FTWCRL does not believe these trains to be of significant cause for concern.

FTWCRL therefore asks the ORR to approve the 18th Supplemental Agreement and all trains therein.

11.4. - Concluding Remarks

FTWCRL welcomes the opportunity to provide comment on Network Rail's representations on our applications. We recognise that much considered time and effort has gone into the analysis of this, and several applications by various parties involved in this process, not least the Regulator.

We believe that we have credibly proven that there is sufficient capacity to operate the small number of trains applied for in the 3rd, 17th and 18th Supplemental Agreements. Given that the vast majority of services operate currently, we believe that it is in the best interests of the customer and the wider industry that there is continuity of operations for these services.

We therefore ask that the ORR prioritises the continued operation of services, and approves FTWCRL's supplemental agreements at the earliest possible opportunity. We stand willing to work collaboratively with the infrastructure manager to implement our proposed services at the earliest opportunity.

Separately, we would also ask the ORR to meet with us in respect of our concerns regarding the process surrounding Power Supply as detailed in section nine of this letter. We believe it essential that there is greater transparency on traction power supply capability and the arrangements for allocation of capacity, including real-world testing and effective operator engagement.

Should the ORR have any questions regarding the content of our response, we are willing and able to meet at convenience to discuss any matters further.

Yours sincerely,



Andy Doyle

Head of Operational Readiness

Avanti West Coast