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Sent by email to: stationsanddepots@orr.gov.uk

18 July 2025

Dear Martin,

Eurostar response to the ORR's letter dated 12 June 2025 regarding applications for directions under section 17 of the Railways Act 1993 for access to Temple Mills International Depot

Introduction

- 1) Thank you for your letter of 12 June 2025, inviting Eurostar to provide its representations on its plans and use of Temple Mills International Depot (TMI). We welcome this further work and are pleased to have the opportunity to provide information to assist the ORR.
- 2) Eurostar is a great advocate for international passenger rail services and the benefits that this mode of transport delivers. We want to see growth in the international passenger rail market. We expect to compete for that growth with other rail operators, just as we do with air and other modes of transport today, and just as we have done throughout our years in operation. We welcome the drive to innovate and improve that comes from fair competition. Indeed, we approached the recent multi stakeholder Periodic Review of HS1 for Control Period 4 with the possibility of new entrants firmly in mind.
- 3) Eurostar has expertise in, and a proven track record of, providing international transport services for the benefit of customers and the countries in which we operate, with all the attending complexities that are involved in providing an international service crossing multiple countries and infrastructure systems¹. We link the UK with, and operate between, destinations in continental Europe. We design, innovate and deliver our services in a competitive, multimodal market that includes air transport. We do this day in, day out² in a complex operating environment comprising many stakeholders, and have done so for over 30 years. In doing this we draw together our expertise in cross border rail to deliver a reliable, frequent service for our customers. Since the start of operations in 1994, we have carried more than 380 million customers across our UK and continental routes, of which over 220 million have travelled on our cross-channel routes.
- 4) Our focus in providing our services is always on our customers and our goal is to offer them a service that they choose to use for international travel. Indeed, our customers tell us that they value our services³.
- 5) We innovate, successfully delivering on bold plans which benefit customers and the countries in which we operate. For example:
 - At Temple Mills International (TMI), Eurostar employs over 450 skilled UK staff directly, and our expansion and investment model will further increase this including local employment opportunities, contributing positively to UK plc by providing key engineering capabilities and our commitment to investment to train the engineers of the future; and

1) ¹ Eurostar has a strong, reliable track record of operation and possesses the permits, licences, certificates, skilled staff, crew and rolling stock to continue to do this, delivering benefits across multiple routes and destinations.

² For example, operating services to and from the UK every day of the year except on Christmas Day.

³ []

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- The groundbreaking multiyear work with Governments, infrastructure managers, train manufacturers and across the Eurostar business to establish new opportunities for rail passengers to travel to new destinations⁴.
- 6) Eurostar makes a contribution that is broader than the service that we run. In addition to paving the way for direct rail services between the UK and the Netherlands, we:
- Benefit the economies and societies where we operate, including through our recruitment and training programmes as well as through the customer productivity gains, connections and trade that we enable⁵;
 - Have been shown to grow the overall market size for travel between the cities where we operate⁶; and
 - Have consistently championed the environmental benefits of high speed rail and encouraged the switch to sustainable modes of transport. Our environmental programme was launched as far back as 2007⁷ and has brought market-leading focus to the importance of lower carbon travel. Our commitment to sustainability continues today⁸ and into the future⁹
- 7) This ambitious, customer focused approach and drive to innovate and invest is demonstrated in our forward-looking plans. We will:
- Carry 30 million passengers per annum in the 2030s;¹⁰
 - Purchase a new fleet to operate across our network and provide a unified passenger experience¹¹; and
 - Establish new destinations for our customers¹².
- 8) Our future plans can be set out as two, interlinked, phases – each important and necessary for our strategy:
- **Phase 1** sees the continual increase in usage of the existing Eurostar fleet until the early 2030s. This is underway now and will continue.
 - **Phase 2:** purchase a new fleet. This will unlock further growth potential, including new routes for customers. This requires new depot capacity that we are in the process of planning at TMI.
- 9) These plans, which are central to our successful continued operation, mark a progression from the significant impact felt by the business during the pandemic¹³, and will require even more intensity from our existing (as well as future) fleet. This will impact the fleet's maintenance requirements and, in turn, at TMI, the strategic centre of maintenance for the Eurostar Group.
- 10) TMI is, and will be, central to our ability to achieve and continuously deliver on all of this. It is the critical, core depot supporting the Eurostar service. It ensures the operation of the existing fleet, including all e320

⁴ A new route between the UK and the Netherlands, serving Amsterdam and Rotterdam, was launched in 2016 <https://www.globalrailwayreview.com/news/18970/eurostar-announces-new-direct-service-between-london-and-amsterdam/>. We have recently announced our ambition to further expand the Eurostar offer to Geneva and Frankfurt https://mediacentre.eurostar.com/mc_view?language=&article_id=ka4Rz00000Frp0XIAR.

⁵ We discuss this further in chapter 5.

⁶ In 2011, Eurostar gave evidence to the Transport Select Committee that since its launch in 1994, it doubled the size of the market for travel between London and Paris: <https://publications.parliament.uk/pa/cm201012/cmselect/cmtran/1185/1185we22.htm>.

⁷ https://mediacentre.eurostar.com/mc_view?language=&article_id=ka43z000000kM6pAAE#:~:text=Eurostar%20celebrates%2025%20years%20with,high%20speed%20rail%20are%20significant.

⁸ For example, in November 2024 Eurostar was awarded a gold medal by EcoVadis, an international company that helps manage, measure, and improve sustainability performances across our entire value chain. Source: <https://www.eurostar.com/be-en/sustainability>.

⁹ Eurostar sets out its sustainability objectives in its 2023 sustainability report, available at <https://www.eurostar.com/rw-en/sustainability>.

¹⁰ https://mediacentre.eurostar.com/mc_view?language=&article_id=ka4Rz00000AIIRaHIAx, first announced in August 2022 (https://mediacentre.eurostar.com/mc_view?language=&article_id=ka43z0000004S4CAAU), this represents significant growth from the 19.5 million carried in 2024.

¹¹ "Eurostar to invest in up to 50 new trains as it reports strong financial performance"; https://mediacentre.eurostar.com/mc_view?language=uk-en&article_id=ka4Rz000007RgGrIAK, 16 May 2024.

¹² The recent announcement of new routes to Geneva and Frankfurt marks a welcome post-pandemic return to expanding our network. Indeed, the Eurostar story has been one of growth over the decades with new destinations introduced, including the Netherlands which required significant work from both the company and the governments concerned in order to make this a reality for international rail customers travelling to and from the UK. We are pleased to announce our plan to introduce a fifth daily frequency from December 2025 https://mediacentre.eurostar.com/mc_view?language=&article_id=ka4Rz00000Gdi6PIAR.

¹³ Where services to and from the UK fell to one frequency in each direction between each of Paris and Brussels and the company had to raise more than £700m in commercial debt (as, unlike our competitors in air, we did not benefit from Government backed loans).

maintenance requirements, and will be the core centre of maintenance for the interoperable fleet that Eurostar plans to purchase and operate across our network. In particular, this will increase reliance on TMI and its ability to deliver a reliable and resilient fleet for essential fleet availability as we increase the utilisation of our fleet, and purchase the new fleet. This will locate skilled, industrial work in the UK and benefit local and regional employment.

- 11) Eurostar has operated and maintained at TMI since it opened in 2007 and, before that time, did the same at the previous maintenance depot, North Pole. In addition to strategic and day to day operational planning and operation providing essential support to a busy international operation at TMI, we have direct experience of introducing a new fleet to the depot; the Eurostar e320 fleet began operations in 2015¹⁴. This experience means, amongst other things, that we understand the requirements for maintenance and depot capacity that come with this as well as additional issues that can arise and have an impact on the depot operations such as the initial unexpected operational or maintenance issues that can occur, coming up the learning curve, and ironing out issues with maintenance regimes which are a universal characteristic of new fleet introduction (we provide further detail on this in chapter 3).
- 12) Eurostar's future growth plans continue to put TMI at the heart of the entire operation and place additional depot capacity requirements on TMI, at a time when TMI is already used heavily, as attested by the ORR's independent study conducted by IPEX. The increase in frequencies with our existing fleet during Phase 1 will necessitate additional depot capacity for mileage-driven routine and reactive maintenance, []. Eurostar knows that current depot capacity is insufficient to accommodate its new fleet in Phase 2, which is why it commenced the process of considering options for expanding and adapting maintenance capacity at TMI that needs to be available in the early 2030s and in time for receiving the new fleet.
- 13) We understand the importance of the ORR's process and, as stated above, we welcome this further work. We note the timeline provided by the ORR in its letter of 5 June sent to all stakeholders. Looking toward this, it is, of course, open to the ORR to decide in October that it would be premature to make any determination on the various applications at that time, not least because:
 - To our knowledge, no examination of economically viable alternatives, such as those suggested in our response to the ORR's consultation on capacity at TMI¹⁵, exists;
 - The ORR has not yet examined a number of elements key in determining access, including the important question of technical compatibility with the depot of the rolling stock seeking access, as well as consideration of the questions of space requirements for stores, welfare and other elements that may be necessary to effect access;
 - The exercise cannot assume the capacity discussed in the IPEX report is actually deliverable. We have made legitimate, detailed representations on this important topic to the ORR and await its response¹⁶.
- 14) In particular, it will be important to bear in mind that any of the capacity that has been identified is not contiguous. That is, it is not available on one road as a constant. Instead, it would be an inefficient distribution across the depot creating a requirement to adapt multiple roads. This is because, as we have shared with the ORR previously, not all roads in TMI can be utilised for all maintenance tasks.
- 15) Further, we anticipate that the maintenance needs for which other operators are applying will be based on OEM statements of those needs. We would urge the ORR to treat such statements cautiously and as a part of the overall picture being examined in this circumstance. We would expect to see, for example, a careful assessment of the risks associated with the introduction of:
 - a new fleet;
 - to a new depot;
 - by a new operator to the route.
- 16) This is necessary as the consequences of insufficient contingency in any presented plans would be highly disruptive, both to the depot and other operators. Whilst we recognise ambition we would be concerned that

¹⁴ https://mediacentre.eurostar.com/mc_view?language=&article_id=ka43z000000kN40AAE.

¹⁵ "Eurostar calls for big picture plan and investment to unleash international rail growth",

https://mediacentre.eurostar.com/mc_view?language=uk-en&article_id=ka4Rz000000EoUNpIAN, 28 April 2025.

¹⁶ Eurostar's response to the ORR's consultation on capacity at TMI, 28 April 2025, link to response available in press release above.

an overly optimistic presentation, and an ORR acceptance of such requirements and estimates, could significantly impact the ability to operate the depot, and existing and planned services which would be detrimental to customers, Eurostar, any other affected operator(s) and other international system stakeholders.

- 17) Experience shows that new fleets are more demanding on introduction than may be expected at the time of purchase. Any realistic assessment of capacity and potential disruption - and any credible application for capacity - must allow for this operational risk.
- 18) Below we set out our responses to each of the questions asked of us by the ORR on our future plans for the use of TMI. We provide further commercially confidential information in annexes to our response. This provides further evidence to support our response.
- 19) In doing so, we are certain that the ORR is alive to the fact that, in seeking information on business planning, strategic decisions and other commercially sensitive information, this response contains a significant amount of confidential information which, if it were disclosed, would significantly harm the legitimate business interests of Eurostar and potentially affect its ability to compete now and/or in the future. We have provided a non-confidential version of this response which we are content for the ORR to publish in the manner envisaged in its correspondence of 12 June 2025.

We look forward to our further engagement.

[signature redacted]

Gareth Williams
Eurostar General Secretary

Eurostar's evidence regarding its future plans for use of Temple Mills International Depot (TMI)

1) Availability of capacity

"4. Please indicate how the available capacity identified at TMI is sufficient to support Eurostar's intended service delivery plans, including its plans for future use of TMI."

ORR evidence description:

Evidence that use of the available capacity is justified by operators' service plans and is sufficient to support delivery of those plans.

Key points:

- 20) Eurostar has well developed short- and long-term plans that rely on using all of the available capacity at TMI over the next years. These are based on continuing to increase its train plan to run more services with its existing fleet. These plans will require the use of any available additional maintenance capacity within the existing shed, prior to modifying and expanding TMI in anticipation of receiving its new fleet from the early 2030s. We explain these growth plans in more detail in this section and explain what additional depot capacity requirements they drive.
- 21) For the avoidance of doubt, as we explained in our response to the ORR's consultation on the IPEX capacity report, we disagree with IPEX' findings that 1.6 maintenance roads can be made available subject to some depot enhancements that themselves we regard as unrealistic both as to their feasibility as to their effectiveness to achieve the desired impact. However, even if the 1.6 roads could be considered as available, this incremental capacity would be absorbed by our additional requirements from intensifying the use of our existing fleet and for the depot modification works that we will have to carry out for the new fleet.

Overview of Eurostar's growth plans

- 22) Eurostar has clear and well communicated plans to grow the number of passengers across its network to 30 million by the 2030s.¹⁷
- 23) In 2024, Eurostar transported over 19.5 million passengers¹⁸. To work towards achieving its ambition (which has been endorsed by Eurostar's shareholders, further details on Eurostar's long term plans are provided below), Eurostar plans to increase significantly the number of services in two phases:
- **Phase 1:** It increases the number of services by densifying the operation of its existing fleets in the short to medium term.
 - **Phase 2:** It unlocks further growth through additional routes (we announced Geneva and Frankfurt on 10 June 2025) and services, which will be enabled by its planned acquisition of up to 50 interoperable new trains for which it is in advanced negotiations with manufacturers. We anticipate that the new fleet will be introduced in the early 2030s¹⁹.
- 24) Eurostar has held these growth plans since it merged with Thalys in 2022 and these were communicated when Gwendoline Cazenave was appointed Eurostar Group's CEO in August 2022.²⁰
- 25) We provide further detail below on these two separate phases, as well as the requirements for depot capacity at TMI that these plans drive, after explaining the basis for Eurostar's capacity assessment.
- 26) []
- 27) []

¹⁷ https://mediacentre.eurostar.com/mc_view?language=&article_id=ka4Rz00000Frp0XIAR.

¹⁸ https://mediacentre.eurostar.com/mc_view?language=&article_id=ka4Rz00000Frp0XIAR, 10 June 2025.

¹⁹ https://mediacentre.eurostar.com/mc_view?language=&article_id=ka4Rz000007RqGrIAK, 16 May 2024.

²⁰ https://mediacentre.eurostar.com/mc_view?language=&article_id=ka43z0000004S4CAAU, 22 August 2022.

28) []

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31) []

Basis for Eurostar's capacity assessment

- 32) Our assessment is based on Eurostar's expert knowledge of the depot over nearly 20 years, our current usage of TMI to operate a cross channel service and the available capacity, which differs from IPEX' assessment. In particular, we are sceptical that the 1.6 roads identified by IPEX in the report are a realistic estimate of the incremental capacity that could be made available over and above Eurostar's current needs in the maintenance depot, with or without the proposed enhancements of outside roads, as we explained in our response to the ORR's consultation on the IPEX report²¹. IPEX itself described these options as uncoded and untested.
- 33) This is further supported by Eurostar's own analysis of TMI's current average occupancy rate. While the overall occupancy rate broadly reconciles with IPEX' findings, the available capacity is not contiguously available on a single road but instead is, by necessity, distributed across all roads²². Indeed, it sometimes exists in increments that would be insufficient to accommodate additional maintenance shifts, particularly for trains with different technical specifications that would require some additional change over activities to switch between different fleets. This is hardly avoidable as not all roads have the same technical capabilities and a degree of flexibility of managing road utilisation during the night is important. Figure 2 shows the distribution of maintenance road utilisation at night for the month of June 2025. []
- 34) However, this incremental capacity would be absorbed by our additional requirements from intensifying the use of our existing fleet and for the depot modification works that we will have to carry out for the new fleet. In fact, we will need to close some roads at that time for us to adapt the depot, meaning that any capacity available now will be used. Based on Eurostar's own plans and analysis, we project that meaningful spare capacity will not be available within the existing shed in a manner sufficient to accommodate a separate fleet, which is why Eurostar has started the process of preparing for an expansion of capacity at TMI for its own fleet. Eurostar adopts this position in relation to its own future fleet, consistent with what we have told the ORR and other potential operators.

Impact of Phase 1 on TMI capacity requirements:

- 35) In Phase 1, Eurostar plans to increase the number of services it operates with its existing fleets. Below we provide further detail regarding the scale and timing of the planned growth.
- 36) []
- 37) []
- 38) []
- 39) Densifying the operation of the existing fleets drives additional maintenance needs (both maintenance driven by mileage and reactive maintenance) and need for additional depot reserves to ensure operational performance of the service for customers (the more trains are used, the less contingency is available, so where necessary depots must be able to carry out a repair and return to service quickly).
- 40) This consumes additional capacity both during the day (typically for additional reactive maintenance) and during the night (typically for routine light and heavy maintenance driven by mileage). We derived estimates for the additionally required maintenance capacity by 2030 by applying the same assumptions as used by the IPEX report regarding maintenance intervals and reactive maintenance frequency to the planned level of increase in train-km across our existing fleets. []
- 41) []

²¹ "Eurostar calls for big picture plan and investment to unleash international rail growth", https://mediacentre.eurostar.com/mc_view?language=uk-en&article_id=ka4Rz00000EoUNpIAN, 28 April 2025.

²² For example, as not all roads are capable of all maintenance activities it is necessary to use certain roads for certain activities.

42) []

43) []

44) As noted above, Eurostar has firm intentions to purchase new rolling stock. We are in the wider planning stage for this at present, which includes evaluating and confirming options and plans necessary and allied to this key purchase. Amongst the multiple workstreams focusing on new fleet purchase, one is considering how the depot may be expanded and adapted to accommodate the rolling stock to be purchased. Given the stage the project is currently at, no final decision has been made on this but options include adaptations to and expansion of the depot infrastructure. For example, Eurostar commissioned a feasibility study that developed options for this expansion (further detail is provided below).

45) []

46) Based on our own planning, the existing TMI capacity is sufficient to accommodate Eurostar's plans for incremental and successive growth that comes from its existing fleet. The maintenance needs of the existing fleet are well understood and do not require any further depot modifications in order to accommodate them. There is an efficiency challenge, which Eurostar has started addressing through a number of accompanying efficiency initiatives in order to achieve the fleet reliability and resilience that is required to deliver Eurostar's growth plans. We discuss these in more detail in chapter 3. The downside risk associated to these plans is however easily manageable, as we explain further in chapter 2. Since the additional utilisation of capacity at TMI is based on additional services operated by the existing fleets, should performance suffer, the train plan can be calibrated accordingly. This flexibility would not, however, be available if some TMI maintenance capacity were to be reserved for a different train fleet and the risk for disruption to all operators (Eurostar and other operators) relying on TMI capacity for their train plans would be much greater.

Impact of Phase 2 on TMI capacity requirements:

47) Eurostar is in advanced negotiations to acquire a new fleet of up to 50 trains that we plan to use across the entire network and TMI will have a pivotal role in the maintenance of the whole of this inter-operable fleet. We provide further detail about Eurostar's current plans below.

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53) []

54) As part of its planning Eurostar may introduce new trains into the existing shed (with associated technical investments). It can only do so after withdrawing the e300 fleet from service. Even then, this only works as a solution if (and because) it can be combined with more expansive additional facilities which currently under consideration and would need to be built alongside, including for heavy maintenance.

55) This will allow the UK depot to fulfil a whole-fleet role with the associated employment and wider economic benefits. Future capacity opportunities in the existing facility are insufficient as a complete and self-contained solution for Eurostar's new fleet or that of any other operator.

56) Eurostar plans to invest substantial amounts in additional maintenance capacity at TMI to accommodate the new fleet. []

57) In addition to the initial feasibility study for expanding the TMI depot maintenance capacity, Eurostar also has identified a range of modifications to the existing maintenance shed at TMI that would be required to accommodate the new fleet since the existing shed capacity will also be required at least as a partial contribution to the new fleet solution in relation to some light maintenance. More detail is provided below.

- 58) This gives an indication also of the likely scale of modifications and additional capacity requirements that would be required to accommodate any other new fleet in the depot, even if it could offer a self-contained solution.
- 59) The e320 fleet will continue to operate alongside the new fleet, so that the future Eurostar fleet eventually comprises up to 67 trains. During the introduction of the new fleet there would inevitably be a period of overlap during which both the new fleet and the old e300 trains continue to be maintained at TMI, alongside the continued heavy and light maintenance of the e320 fleet.
- 60) Eurostar expects that with its new fleet, it will fully utilise the existing and new planned maintenance capacity at TMI. This is the case from the start of introduction of the new fleet. Firstly, there will be a period of overlap with the outgoing e300 fleet, which will place additional strain on the depot capacity to maintain three different fleets and continue to support the operational needs of the service. Secondly, a new train with a new maintenance schedule will need to embed over time as engineering teams gain in experience and knowledge of the new maintenance schedule. Thirdly, it is not uncommon for unexpected issues to arise that a depot needs to have capacity to accommodate.
- 61) Eurostar has been actively engaged on this topic for some time []. As would be expected, final detailed plans will continue to be developed as the project moves closer to build stage. In support of this, Eurostar has already made significant provisions to invest in additional depot capacity, and has plans that are detailed, and reflective of the current project stage. We provide further detail on the scale of the provisions, the detail of planning and the timeline below and in chapter 3.

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- 62) []
- 63) []
- 64) []
- 65) []
- 66) []
- 67) []
- 68) []
- 69) []
- 70) []

2) Performance

“5. What, if any, will be the impact on operational performance of Eurostar’s proposed future use of capacity at TMI?”

6. How has Eurostar assessed the impact on operational performance?

7. Please provide any evidence to support Eurostar’s assessment of impact on operational performance.”

ORR evidence description:

Demonstration that operators’ plans for more extensive use of TMI will not negatively impact operational performance.

Key points

- 71) Fleet availability and reliability, and therefore depot maintenance capacity, are critical to Eurostar achieving its growth plans. Efficient and sufficient depot capacity plays a key role in securing the level of fleet availability and reliability that Eurostar and its customers require.

72) TMI already has a high utilisation rate. Eurostar's plans, while ambitious, can be accommodated without significant risk for the operational performance.

- In Phase 1, prior to expanding the depot, this is only possible because it is based on the existing fleets and incremental growth that can be scaled flexibly should it impact on performance. Eurostar can balance growth with impact on operational performance to avoid deterioration of performance.
- The construction phase to expand the depot and modify the existing shed in anticipation for the new fleet will no doubt present additional challenges regarding maintaining operational performance. However, the future benefits gained from the depot expansion more than make up for any temporary bottlenecks. Furthermore, Eurostar has experience of managing a depot efficiently during a phase of depot modifications, which it needed to carry out for its e320 fleet prior to its introduction.
- In Phase 2, additional capacity will be sufficient to accommodate [] as well as continuing the heavy maintenance of the e320 fleet and light maintenance for both fleets such that it can secure operational performance. Eurostar has significant relevant experience from the introduction of the e320 fleet to understand the potential initial issues that may require unplanned additional capacity in order to moderate any potential impact on performance.

73) We provide further detail for Phases 1 and 2 individually below.

Phase 1:

- 74) The increase in depot capacity usage that arises from a more intensive use of the existing fleets that are already being maintained at TMI carries the smallest amount of risk adversely to affect the performance of the current depot operations.
- 75) The fleets exist; their maintenance regimes are well known and understood; no technical adaptation is necessary; and the engineering teams at TMI have ample expertise to be able to accommodate additional maintenance requirements driven by increased mileage in an efficient manner and in a manner that does not lead to an overall deterioration of the depot's performance.
- 76) There is a marked contrast between increasing maintenance activity for an existing fleet with a well understood and long standing maintenance regime, driven by increasing mileage, and introducing additional trains with different maintenance regimes and technical specifications to a depot. The former can be handled flexibly within the parameters of the existing depot infrastructure, maintenance processes and engineering workforce knowledge, whereas a new train requires technical modifications. Since technical modifications may be cost efficient only for a single or small number of roads, this reduces the flexibility and therefore overall efficiency of the depot to allocate resources at any point in time. This is before considering any wider disruptions to the overall depot operations from embedding a new maintenance regime that is likely to consume additional resources. Where this is done within the existing confines of the existing depot capacity, this would likely give rise to an overall loss of efficiency and therefore put at risk Eurostar's plans to realise its full growth ambition and deliver more services for customers in Phase 1.
- 77) Furthermore, the increase happens incrementally starting from this year. This gives the depot sufficient opportunity to scale up incrementally and adapt flexibly to any issues that may arise.
- 78) The depot expansion and modifications necessitated by the arrival of Eurostar's new fleet from the early 2030s will make some of the depot capacity temporarily unavailable. Organic, incremental growth as planned by Eurostar with its existing fleet is most capable of being managed effectively and efficiently around these temporary restrictions. Were these depot modifications to come on top of a previous modification programme necessitated by the earlier entry of another access seeker's fleet, the disruptions would be longer term and reduce overall available capacity for all operators, most likely placing restrictions on everyone's growth ambitions, not just Eurostar's.

Phase 2:

- 79) The depot modifications and expansion of TMI required to accommodate the new fleet will require extensive construction works at TMI affecting most areas of the depot. These must be carried out well in advance of the arrival of the new fleet, during which time the continuing operation of the depot must be safeguarded.

- 80) While Eurostar has conducted a first assessment of possible modifications to the existing shed and a feasibility study for building additional maintenance shed capacity, these plans can only be progressed once Eurostar has signed an agreement for the acquisition of new trains with a manufacturer.
- 81) Eurostar has experience with carrying out depot modifications for a new fleet: it modified the TMI facilities to make them compatible with its then new e320 fleet which it introduced in the mid-2010s in two stages (10 trains from 2015 and 7 additional trains from 2018)²³. Eurostar also gained relevant experience of the process of introducing a new fleet with the e320 fleet so it has a good appreciation of the scale and type of likely unexpected events that need to be addressed in the early stages of operating any new fleet with a new maintenance schedule. These come in addition to operating in parallel at least for a time both the outgoing e300 fleet and the new fleet, in addition to the e320 fleet, as well as a general efficiency and knowledge gain over time which mean that maintenance at the start is likely to be more capacity intensive. The is one reason Eurostar will further examine the role of the existing shed in relation to future fleet maintenance and sees this as being feasible only as part of a wider investment in additional facilities.
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- 82) []
- 83) []
- 84) []
- 85) []
- 86) The depot modifications required to accommodate the additional maintenance shed capacity overlap with the depot enhancements that had been proposed by IPEX, in order to unlock the full 1.6 roads of available shed capacity they identified. The IPEX options could not be delivered alongside the new fleet facility that Eurostar is planning.
- 87) In contrast to the IPEX enhancements, however, Eurostar's plans will unlock a far greater gain of maintenance shed capacity, by building additional new maintenance roads.
- 88) This means that, while the reduction in capacity during the construction phase will create challenges that Eurostar aims to meet by making its maintenance regime more efficient in order not to jeopardise its growth ambitions arising from the use of its current fleet, it brings clear future benefits (see section 5 below) from unlocking Eurostar's future growth plans based on its new fleet.

3) Operational Readiness and Viability

"8. Please provide evidence of Eurostar's Delivery Plans, clearly detailing the timescales in which Eurostar proposes to utilise the available capacity at TMI and how that capacity will be used to deliver services.

9. Please provide details of Eurostar's rolling stock plans, to include: RS class, compatibility, delivery plan, depot strategy, maintenance plan, stabling, delivery timescales, modifications to TMI that Eurostar envisages are required to accommodate its RS plans."

ORR evidence description:

Delivery plans demonstrating clear intent and ability to use the capacity promptly.

Explanation of progress towards securing other necessary access agreements and regulatory approvals.

Key points:

- 89) Eurostar's short term plans and long term strategy (more detail is provided in chapter 1) drive the timeline for Eurostar's plans for utilisation of additional capacity at and its future plans for TMI, starting from this year.

²³ <https://press.siemens.com/global/en/feature/eurostar-e320-high-speed-trains-eurostar-international-limited>.

- 90) Phase 1, requiring more intensive use of the depot for more mileage driven maintenance for the existing fleet of 17 e320 and 8 e300 trains, [] following the completion of the ERTMS upgrade campaign for the e300 fleet, is already underway and a continuation of the current growth trajectory that Eurostar has embarked on since its recovery from the pandemic. It is incremental growth that is expected to reach its full potential by the early 2030s. Eurostar has been increasing its operations significantly over the previous years: in 2023 we increased the number of cross channel services we operated by 26%, in 2024 by 5%, bringing more capacity and choice to international passengers. We plan to achieve similar growth again this year.
- 91) Eurostar has already been investing in accompanying and enabling growth initiatives to unlock this growth and will continue to do so. This includes investments in upgrading station capacity (for example border control in stations) and operational initiatives to increase the efficiency of the train operations but also initiatives in the depot including increasing the engineering workforce and plans to build additional welfare and training facilities. We provide more detail below.
- 92) Eurostar has carried out a feasibility study for the depot expansion and will commission a more detailed design study once it has a confirmed purchase agreement for the new fleet and the maintenance regime of the new fleet is understood. In addition, Eurostar has also carried out an initial compatibility study for the prospective new trains, the results of which Eurostar is in the process of evaluating.
- 93) Eurostar has already committed significant funds to support its plans and has the support of its shareholders. We provide more detail below.

Phase 1:

- 94) Eurostar has a well-documented target of transporting 30 million passengers. To get closer to this target, Eurostar has plans, approved by its Board, to increase its service frequency with its existing fleet over the coming years, well in advance of any new fleet being delivered. The details of this plan have been discussed in chapter 1.
- 95) To enable this growth, Eurostar has been recruiting additional maintenance engineers in TMI in order to deliver the additional maintenance requirements resulting from a growing train plan. It also already invested in capacity enhancing upgrades. []
- 96) In addition, Eurostar has invested in and launched a range of initiatives to increase the resilience of operations and efficiency overall, not just in the depot, in order to support this ambitious growth agenda. All of these initiatives are planned to complete years before any new fleet can be introduced by any operator, so the expansion of existing fleet operations is an important factor in unlocking these passenger benefits/investments early.
- 97) Of those projects, the expansion of station facilities and increase of passenger throughput is a key enabler to facilitate the projected growth by Eurostar, and Eurostar has already invested significantly in the projects listed below and is committed to investing in further projects supporting station operators' expansion plans:
- New expanded international departure terminal at Amsterdam Centraal: in February, Eurostar opened its new terminal in Amsterdam Centraal in February 2025. It increased the capacity for departing passengers from previously 275 passengers per train to up to 650 from this autumn.
 - In 2024 Eurostar increased the number of the British and French border control posts at SPI and Paris Nord. []
 - []
 - At Brussels Midi station, various initiatives have been carried out by the station operator SNCB who invoices Eurostar for these works through its access charges: doubling of manual border control posts, installation of egates and a redesign of the departure lounge.
 - Going forward, Eurostar signed a letter of intent with LSPH to expand the station capacity at St Pancras International for international passengers over the coming years²⁴.

²⁴ <https://stpancras-highspeed.com/news/eurostar-and-london-st-pancras-highspeed-join-forces-on-major-expansion-to-double-station-capacity/> and https://mediacentre.eurostar.com/mc_view?language=uk-en&article_id=ka4Rz00000GdkeTIAAR.

- f. At Paris Nord, the station operator is in the process of preparing a station expansion project that involves also extending the international terminal capacity, which Eurostar and other operators need to fund through future station access charges.

98) Further initiatives are discussed below.

99) []

100)[]

101)[]

102)[]

103) While not without challenge, to realise Phase 1 and the benefits from it (which we discuss in more detail in section 6 below), Eurostar can deliver these now. That is, no new operating or safety licences, or establishing a new maintenance regime is required.

104) The increase in TMI capacity use is expected to happen gradually and in line with the projected growth of Eurostar's train plan. Eurostar has already demonstrated its ability to deliver significant year on year growth in 2024, when it operated 5% more trains than in the previous year, 2023.

105) This can be delivered out of "Business as Usual" processes since it is based on utilising the existing fleets that are already being maintained at TMI which are well understood and for which established processes exist.

106)[]

Phase 2:

107) Eurostar is in advanced negotiations to purchase up to 50 new trains. []

[]

108)[]

109) Eurostar has already carried out assessments of its TMI depot capacity both in terms of overall capacity and in terms of compatibility of its existing facilities with the potential new fleet of trains.

110) It has a detailed initial feasibility study for how it can expand maintenance capacity at TMI within its existing footprint that, as and when agreement is reached with a train manufacturer, it can take to the next stage of development for detailed design and construction plans to be established.

111) Further detail on both the compatibility assessment and feasibility study are provided in the appendix to chapter 1.

112) It is anticipated that acceptance and certification processes can be completed with the relevant authorities and Infrastructure Managers well ahead of the anticipated delivery of the first tranche of trains. Eurostar has unique experience in having successfully homologated 2 previous classes of cross-channel fleet.

113)[]

114) Eurostar plans to carry out heavy maintenance for the new fleet at TMI, as is the case with the e320 fleet. The planned additional capacity is envisaged to accommodate this. The planned depot expansion will necessitate extensive changes to the depot layout affecting also track layout and stabling roads.

115) In addition, it is envisaged that the existing maintenance shed requires modifications in order to accommodate light maintenance of the new fleet. It would not be possible to deliver all of the heavy and light maintenance for up to 50 new trains in the planned additional shed capacity alone. Nor will it be possible, from this stage, to continue to offer heavy maintenance services for non e320 sets at the existing facility. This is in addition to continuing to use the continental depots for light maintenance in order to support a smooth train-plan delivery.

116)[]

117)[]

4) Financial Viability

“10. Please provide a copy of Eurostar’s Business Plan(s) that clearly detail its plans for future use of the capacity at TMI. Please include evidence of the finance secured to enable services to be run in the short, medium and long term. Details should also include rolling stock financing arrangements.”

ORR evidence description:

Appropriate business plans, suitable expertise and a reasonable expectation of securing the required investment and rolling stock.

118) Eurostar has been operating international services from London to destinations on the continent for 30 years.

119) In 2022 it merged with Thalys, creating a company with a broader route offer and well published growth agenda as shown Eurostar’s business plans.

120) []

121) If and where the need arises, Eurostar has a track record of successfully raising finance.

- a. Acquisition of fleet of 17 e320 trains signed in December 2010, was funded by a £465.7m asset facility with a £115m standby revolving credit facility negotiated in 2015 to provide additional liquidity, both secured against some of Eurostar’s trainsets. These facilities were amended and restated in 2016 to extend their maturity²⁵
- b. During the pandemic in 2020 and 2021, Eurostar successfully secured two successive refinancing packages, in June 2020 and May 2021 respectively. The detail of these financing packages is described in Eurostar International Limited’s Statutory Accounts for the year to 31 December 2020. They included Eurostar taking on additional commercial loan facilities, secured against nine of Eurostar’s trainsets as well as shareholder loan facilities and equity injection from Eurostar’s shareholders.²⁶ This demonstrated Eurostar’s shareholders’ and banks’ confidence in the long term commercial and financial sustainability of Eurostar’s business at a time when Eurostar found itself at unprecedented traffic lows and amid great uncertainty over the path of economic recovery.
- c. In April 2024, Eurostar successfully refinanced all existing loans with a new single facilities agreement consisting of a €650m corporate *unsecured* 5-year Green term loan facility and a €100m Green revolving credit facility. The securities against assets relating to the asset finance facility (related to the financing of the e320 fleet, see point a above) and the Covid-10 commercial term loan (related to the debt raised during the pandemic, see point b above) were released.²⁷ This again proved that external lenders and Eurostar’s shareholders have full confidence in Eurostar’s short and long term plans, which include in the short to medium term growth generated from its existing train fleet, and in the long term the acquisition of a new fleet of up to 50 new trains, enabling Eurostar to grow its route portfolio and the seat capacity it can offer across its network with a modern and sustainable fleet.

122) The 2024 refinancing arrangement, in addition to Eurostar’s cash flow generated from its ongoing business operations, is expected to cover all of Eurostar’s operational and capex needs in the short to medium term. In other words, Phase 1 of Eurostar’s growth plans do not require any additional or dedicated financing arrangements. This includes also significant investments required to support the growth plans, such as the investment in station capacity enhancements and any investments at the depot

²⁵ Eurostar International Limited Statutory Accounts for the year to 31 December 2016, available at <https://find-and-update.company-information.service.gov.uk/company/02462001/filing-history/MzE4NTk5NTQwMmFkaXF6a2N4/document?format=pdf&download=0>.

²⁶ Eurostar International Limited Statutory Accounts for the year to 31 December 2020, page 4, available at <https://find-and-update.company-information.service.gov.uk/company/02462001/filing-history/MzMxNTA3OTMzNWFKaXF6a2N4/document?format=pdf&download=0>.

²⁷ Eurostar International Limited Statutory Accounts for the year to 31 December 2024, pages 4, 16 and note 23, available at <https://find-and-update.company-information.service.gov.uk/company/02462001/filing-history/MzQ3MDA0OTkxOWFKaXF6a2N4/document?format=pdf&download=0>.

123)[]

124)[]

125)[]

126) Importantly, Eurostar is able to commit to its fleet procurement and place any initial orders without any new financing requirements.

5) Economic and societal benefits

“11. Please provide evidence of Eurostar’s assessment of the benefits to passengers, or any wider benefits of its future plans, including the introduction of new services.

12. Please provide evidence of how your proposed future plans and services will contribute to growth of the market for international rail services to/from the UK.

13. What, if any, assessment has Eurostar made of the financial impact on existing operators of introducing new services? If available, please provide evidence to support Eurostar’s assessment.”

ORR evidence description:

Evidence so that we can assess the benefits (e.g. to passengers) of introducing new services and the anticipated financial impact on existing operators.

127) Eurostar has a proven record of providing benefits to passengers in terms of:

- travel time and comfort,
- the destinations we connect, enabling increased business, travel and tourism opportunities as well as closer cultural connections; and
- the environment through the contribution towards greener and more carbon friendly travel, a cornerstone of the EU and the UK’s climate change agendas for a more sustainable transport sector.

128) Its growth plans, which are based on utilising the capacity available at TMI and its future capacity expansion, will build and expand the benefits Eurostar has delivered over the last 30 years. As already noted, our growth plans will go further to expand the market for international rail travel to/from the UK and across Continental Europe, enabled in the short term by increased fleet utilisation, and in the long term by its new fleet enabling Eurostar to open new routes.

129) Below we highlight the passenger, economic and environmental benefits that Eurostar provides, and that our growth plans will provide. This is important context to understand our focus and objectives for our growth plans, which are centred around providing added value to our customers, and serving the communities in which we operate and that we connect. In addition, we respond to question 13 below (financial impact on existing operators of introducing new services).

Existing Benefits

130) As noted in section 1 above, Eurostar has operated services for over three decades and transported over 380 million customers during this time. The benefits of the service we provide have been well documented and recognised not just by Eurostar itself but also by a range of independent commentators and stakeholders:

131) **Passenger benefits:**

- a. Shorter travel times than other modes of international transportation provide benefits to rail passengers and have been valued by various studies.
 - i. []

- b. Rail travel is in many aspects more convenient than other modes of travel: in contrast to car journeys, rail passengers can engage in other activities during their journeys instead of focusing on driving, including work. Rail travel also can be more convenient than air travel as passengers are less constrained in their movements and use of their electronic devices during their journey. Rail services connect with other city transport networks in city centres, which not only saves travel time but also removes some onward travel.
 - i. Business traveller productivity gains have been considered by the Department for Transport's project appraisal guidance, which found that the value of working time for train journeys over 400km is £67 per hour.²⁸
- c. Eurostar offers customers clear, flexible tariff structures, providing:
 - i. Tickets with unlimited exchanges with no fee up to one hour before departure and tickets that can be refunded up to 7 days before travel for a fee of €/£25²⁹;
 - ii. flexibility in the tariff range with upgrade options available to passengers after booking³⁰
 - iii. flexibility as a reward with the SNAP product that allows savings on last-minute tickets, where customers can be flexible on the time of travel on the chosen day of travel³¹
 - iv. []
- d. Expanded network. A new route was announced to open to the Netherlands (Rotterdam and Amsterdam) from London adding a fifth daily service at the end of 2025³². This is now on sale.
- e. Maintained a critical travel link throughout the pandemic to Paris and Brussels for essential travel despite Eurostar incurring significant losses during 2020 and 2021.³³

132) Macroeconomic benefits:

- a. Eurostar has increased the total number of journeys between the destinations it has been serving, notably London and Paris. In 2011, it gave evidence to the Transport Select Committee that it doubled the size of the market for travel between London and Paris since it started operating in 1994.³⁴
- b. Passengers transported by Eurostar make clear and significant contributions to travel and tourism spend in the UK, as well as supporting outbound travel and tourism and connections from the UK to the EU. A study by Steer published in 2020 estimated that visitors to the UK from France, the Netherlands, Belgium and Germany spend on average £150 per visit³⁵. Applying this to the number of passengers that Eurostar transported in 2024 on cross channel routes (11.7m), and assuming that around 50% of passenger journeys are made by inbound visitors to the UK, Eurostar supported customers to make over £800m visitor spend.
- c. According to the 2025 report by the Campaign for Better Transport, Eurostar also contributes to additional spillover benefits in terms of new business activity, improved productivity, tax

²⁸ Department for Transport, Transport Analysis Guidance (TAG) data book (2018, last updated 2025): <https://www.gov.uk/government/publications/tag-data-book>. This is also mentioned in the Campaign for better transport (2025) "Runways for railways: unlocking the potential of the Channel Tunnel", available at: <https://bettertransport.org.uk/wp-content/uploads/2025/04/Runways-to-Railways-Report.pdf> (page 10).

²⁹ <https://www.eurostar.com/uk-en/travel-info/travel-planning/eurostar-fares-and-fees>

³⁰ <https://help.eurostar.com/faq/uk-en/question/How-do-I-upgrade-my-Eurostar-ticket>

³¹ <https://help.eurostar.com/faq/uk-en/question/What-is-Eurostar-SNAP>

https://mediacentre.eurostar.com/mc_view?language=&article_id=ka4Rz000009TEaKIAW

³² https://mediacentre.eurostar.com/mc_view?language=&article_id=ka4Rz00000Gdi6PIAR

³³ Eurostar International Limited Statutory Accounts to 31 December 2021, page 3: "In recognition of the business' obligations to its customers and other stakeholders, Eurostar has maintained at least one service daily to and from Paris, Brussels and Amsterdam to protect an essential link between the countries even when the crisis was at its most severe. This has facilitated repatriations, essential travel for medical purposes and the movement of key workers. Where customers have been unable to travel - or have simply wanted to change their travel plans - Eurostar has provided vouchers exchangeable for travel, regardless of ticket conditions or cancellation. Where requested, Eurostar has also refunded customers." Available at: <https://find-and-update.company-information.service.gov.uk/company/02462001/filing-history/MzMxNTA3OTMzNWFKaXF6a2N4/document?format=pdf&download=0>.

³⁴ <https://publications.parliament.uk/pa/cm201012/cmselect/cmtran/1185/1185we22.htm>.

³⁵ Steer (2019) "Delivering for Britain and Beyond: the economic impact of HS1"

<https://stpancras-highspeed.com/wp-content/uploads/2020/03/delivering-for-britain-and-beyond-the-economic-impact-of-hs1-march-2020.pdf> (page 19)

collected by the authorities, GDP growth and environmental benefits³⁶. Before 2020, Eurostar's international rail services to the UK generated over £280 million in annual socioeconomic benefits, including from reduced journey times, productivity gains for business travellers and environmental benefits³⁷.

- d. Contribution to increased trade in services and goods³⁸
- e. Providing high quality employment
- f. As noted above, Eurostar maintained a critical travel link throughout the pandemic in very difficult operating conditions for a company whose sole business is international-only passenger transport.

133) Environmental contributions

- a. Sustainability has been a core element of Eurostar's identity, as reflected in the company's tread lightly initiative and its continued commitment to sustainability, as referenced in section 1.
- b. High speed rail travel has been proven to produce significantly less carbon than road and air³⁹, and Eurostar's operations have measurably contributed to a reduction of emissions produced by other modes of transport that it partially replaced:
 - According to the 2025 the report from "Campaign for better transport" Rail travel produces approximately 13 times less greenhouse gas emissions per passenger kilometre than air travel, and up to 17 times for business travel⁴⁰.
 - Eurostar's sustainability report for 2023 details that Eurostar's trains currently emit an average of 5,5g of CO2 per passenger per kilometre, which is on average 90% less CO2 than travelling by car and 95% less than going by plane⁴¹.
 - []
- c. Eurostar has been increasing its share of renewable energy for traction in recent years. Eurostar trains already run on 100% wind power in the Netherlands, and current initiatives in Belgium and the UK are in place to promote the use of solar energy. Eurostar has the strong ambition to use 100% of renewable energy for traction by 2030⁴².
- d. Eurostar has a continuing ambition to be more sustainable across the business, for example through a responsible use and consumption policy, initiatives relating to its on board catering that led Eurostar to be awarded a 3* rating from the Sustainable Restaurant Association and an ambitious waste management in all its locations, including in TMI⁴³
- e. []

134) Eurostar's growth plans for Phases 1 and 2 build on the above and will continue to have at their heart the added value this will bring to passengers, the wider economy and the environment.

Phase 1 benefits

135) Eurostar will continue to grow operations from the existing fleet to maximise the value we can generate from our existing assets.

³⁶ Campaign for better transport (2025) "Runways for railways: unlocking the potential of the Channel Tunnel", available <https://bettertransport.org.uk/wp-content/uploads/2025/04/Runways-to-Railways-Report.pdf> (page 10)

³⁷ Department for Transport (2016), First Interim Evaluation: HS1 Main Report, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/466084/first_interim_evaluation_hs1_main-report.pdf. Also mentioned in Campaign for better transport (2025) « Runways for railways" <https://bettertransport.org.uk/wp-content/uploads/2025/04/Runways-to-Railways-Report.pdf> (page 10)

³⁸ Steer (2019) "Delivering for Britain and Beyond: the economic impact of HS1" <https://stpancras-highspeed.com/wp-content/uploads/2020/03/delivering-for-britain-and-beyond-the-economic-impact-of-hs1-march-2020.pdf> (page 21 and following)

³⁹ See, for example, the table at <https://www.eurostar.com/uk-en/sustainability> and the independent study of November 2024 by EcoRes SCRL November 2024 which is linked on the same webpage.

⁴⁰ Campaign for better transport (2025) « Runways for railways: unlocking the potential of the Channel Tunnel <https://bettertransport.org.uk/wp-content/uploads/2025/04/Runways-to-Railways-Report.pdf> (page 7)⁴⁰

⁴¹ <https://cdn.sanity.io/files/1wyn2xo2/cms-production/ec5fb53dc1263452373b5d379a3b812963661f50.pdf>, page 39

⁴² https://mediacentre.eurostar.com/mc_view?language=&article_id=ka4Rz000004zWS5IAM

⁴³ <https://cdn.sanity.io/files/1wyn2xo2/cms-production/ec5fb53dc1263452373b5d379a3b812963661f50.pdf>, (page 48)

- 136) Eurostar will increase frequencies on existing routes, for example the additional frequency between the UK and the Netherlands. This will provide benefits to customers who choose to travel with us, offering a further alternative to other modes of travel. Frequency is a benefit to our customers whether they choose to use our services often, need to plan flexibly for their journey or for those customers who would prefer more choice of time to travel.
- 137) It also enables us to offer better connection options for onward travel at the customer's destination. For example, Eurostar offers a connecting service (via France) to several destinations in Switzerland in partnership with TGV Lyria⁴⁴. Connections will also improve to Germany paving the way for future direct services. Added frequencies will provide more connection opportunities, including possibly shorter waiting times, with the national offers at destination and help realise Eurostar's ambition to develop big cities into connecting hubs for the benefit of customers and those countries in which customers will spend time⁴⁵.
- 138) We are continuously improving our customer offer. For example:
- []
 - Eurostar has recently signed the Charter of commitments relating to the inclusion of travellers with autism in the rail environment. Concrete actions to make Eurostar services more accessible and neurodivergent-friendly will now follow⁴⁶.
- 139) Increasing frequencies to Amsterdam is a significant element of our growth ambition during Phase 1. On 10 July 2025 Eurostar announced the introduction of 4th daily service from September and a 5th daily service from December 2025.⁴⁷ Since Eurostar introduced direct services to Amsterdam in 2018, more than 1.6 million passengers had by 2023 travelled on Eurostar services that otherwise may have taken the plane, car or bus, or may not have travelled at all⁴⁸. Eurostar reacts to this proven demand by increasing its services and already invested in an expanded state of the art terminal in Amsterdam.
- 140) Eurostar has already expanded the local employment offered for qualified engineering positions in the local area around TMI, as well as operational staff in other areas, in anticipation of its growth. We provide more detail in chapter 3.

Phase 2 benefits:

- 141) As noted above, Eurostar plans to purchase a new interoperable fleet, an investment that will benefit customers and the journeys they wish to make with Eurostar.
- 142) The new fleet will increase the capacity Eurostar has available and enables Eurostar to expand beyond its current route portfolio and to open new routes.
- 143) In June 2025, Eurostar announced that it plans to open new direct routes from London to Geneva and Frankfurt, shortly after the British and Swiss Governments signed an agreement in May 2025 to work together towards establishing direct rail links between the UK and Switzerland⁴⁹ - A similar agreement was between the UK and Germany in July 2025, with the Governments recognising that a direct rail link would have benefits for the economy, tourism, education and providing a greener alternative to flights⁵⁰
- 144) As would be expected, Eurostar has been developing its future plans for its new fleet for some time, and we share further detail about these plans below.
- 145) []
- 146) []
- 147) []
- 148) []

⁴⁴ <https://www.eurostar.com/rw-en/travel-info/connecting-train/trains-to-switzerland#Eurostar-and-TGV-Lyria>

⁴⁵ Interview Gwendoline Cazenave (in French), January 2024 <https://www.e-marketing.fr/Thematique/marques-1296/business-case-2253/Breves/Eurostar-ne-doit-plus-etre-seulement-un-operateur-de-transport-387414.htm>

⁴⁶ https://mediacentre.eurostar.com/mc_view?language=&article_Id=ka4Rz00000EDyeDIAT

⁴⁷ https://mediacentre.eurostar.com/mc_view?language=uk-en&article_Id=ka4Rz00000Gdi6PIAR.

⁴⁸ https://mediacentre.eurostar.com/mc_view?language=&article_Id=ka4Rz000003a5E2IAI

⁴⁹ <https://www.gov.uk/government/news/transport-secretary-forges-landmark-deal-to-progress-new-swiss-rail-link>

⁵⁰ <https://www.gov.uk/government/news/government-agrees-landmark-plans-to-lay-down-the-tracks-for-direct-trains-to-germany>.

149)[]

150) The evidence of Eurostar's current route portfolio, and particularly its experience of opening of direct services between the UK and the Netherlands, suggests that opening a new route generates benefits by introducing a new alternative and convenient travel option as an alternative to air travel for customers. It will likely help generate new overall demand, as was the case when Eurostar started operating on the London-Paris⁵¹ route.

151) Geneva and Frankfurt are both important business and financial centres. Convenient high speed rail travel between these centres and the UK can significantly contribute and support business, trade in services and goods and customer visits between them⁵².

152) In terms of the new fleet design, Eurostar's new trains will be designed with, for example, customer journey experience and sustainability in mind. []

153) []

154) With sustainability and carbon reduction in mind, the new trains will be required to be more energy efficient than the current fleets⁵³.

155) Finally, Eurostar's commitment to invest significantly in the modification and expansion of TMI will provide a further boost to the local construction and engineering sectors. This view was supported by Waltham Forest Borough council (local to TMI) in its response to the ORR consultation following the IPEX report on capacity at Temple Mills. A London Borough of Waltham Forest representative confirmed for instance that *"the Council is of the view that expansion could be very positive for the borough, particularly in driving inclusive economic growth through the creation of high-quality jobs - both temporary opportunities during the construction phase and permanent employment once the expanded depot is in operation"*⁵⁴

156) We are confident that benefits will be delivered from our forward looking plans, as they have been from those we have delivered to date.

Risk and Certainty of Benefits

157) In considering these passenger and economic benefits we believe that it is essential that the ORR considers the risk or likelihood of their delivery, especially when considering them against alternative allocations of the same enabling capacity.

158) In relation to Phase 1, and for all the reasons previous described – such as the fact that the fleets, approvals, technical compatibility and knowledge already exist – it must be concluded that not only does Eurostar offer a wider range of benefits, but the delivery of these benefits has a far higher level of certainty attached.

159) In relation to phase 2, similar considerations apply. No other operator is proposing to offer so wide an expansion of new routes and connections to future passengers; no other operator is in a position to locate at TMI maintenance services for an entire inter-operable fleet, using directly-employed UK staff. And only Eurostar has a track record of successful delivering on such plans.

Financial impact on existing operators from introducing new services

160) Since Eurostar is the existing rail operator on the routes on which Eurostar is planning to run additional frequencies in Phase 1, and since there currently are no existing rail operators operating direct services between London and Frankfurt and Geneva, the two new destinations Eurostar is planning to launch with its

⁵¹ <https://publications.parliament.uk/pa/cm201012/cmselect/cmtran/1185/1185we22.htm>

(written evidence of Eurostar in front of the transport committee of the UK parliament in 2011)

⁵² For example, these two destinations are mentioned in the 2025 Campaign for Better Transport report as opportunities to increase business travel <https://bettertransport.org.uk/wp-content/uploads/2025/04/Runways-to-Railways-Report.pdf> (page 10)

⁵³ https://mediacentre.eurostar.com/mc_view?language=uk-en&article_id=ka4Rz000007RqGrIAK

⁵⁴ London Borough of Waltham Forest submission to ORR <https://www.orr.gov.uk/sites/default/files/2025-06/march-2025-temple-mills-depot-capacity-consultation-responses.pdf>.

new fleet, we consider that our plans do not carry a negative financial impact on any existing rail operators. In fact, to the extent that Eurostar is the existing rail operator, its growth plans directly benefit customers wishing to use its services for their international travel.

- 161) Elsewhere, and in contrast, we have discussed the financial risks to Eurostar – and, just as importantly, the risks to the maintenance which underpins existing passenger services - of any allocation of capacity based on uncertain assessments of available capacity, an over-optimistic assessment of the maintenance needs actually associated with introducing any new fleet, and a lack of information about technical compatibility.

6) Views of stakeholders

“14. Does Eurostar wish to make any representations on issues raised by other stakeholders that it has not had the opportunity to make to date?”

ORR evidence description:
Operators' responses to issues raised by other stakeholders during the process.

- 162) In this section we make brief further representations.

IPEX's report

- 163) Eurostar has made detailed submissions about IPEX's report, principally in its 28 April 2025 response to ORR's 31 March 2025 consultation on Capacity at TMI. Those submissions remain pertinent and we maintain our views. At the time of writing, the ORR has not responded to Eurostar's submissions about IPEX's report. We look forward to receiving this.
- 164) For now it must be noted that IPEX's report is very uncertain about what capacity currently exists. ORR's conclusions that there *“is some available capacity at TMI for more trains to be stabled, serviced and maintained”* and *“some of this capacity can be accessed without any changes to current operational practices at the depot”* (emphasis added in both cases) are therefore, of necessity, imprecise. Exactly how much capacity is currently available (and, as discussed elsewhere, in what configuration it is available) without changes to operational practices at or enhancements to TMI is essential information for decision making.
- 165) IPEX's report is also heavily caveated as to what capacity could be created. It cannot be assumed that the enhancements discussed in IPEX's report would deliver the capacity increases that IPEX regarded as potentially being achievable. Eurostar's view, as expressed elsewhere in this document and previously, is that they would not. Furthermore we do not see the route within s.17 process to direct the implementation of those enhancements. This is one reason why Eurostar argues so strongly for the oRR and others to look beyond s.17 and look at the wider system opportunities which would unlock much more significant growth and investment, including Eurostar's own plans for much more significant enhancements to TMI).

Applicants

- 166) Eurostar has already made submissions about each of the applications. Those submissions remain pertinent and we maintain our views.
- 167) Eurostar considers that this submission should be about the benefits that our ambitions will deliver and services we are already delivering, rather than other applicants who will rightly have their opportunity to provide comments to the ORR also as part of this process.
- 168) In this context, we think the appropriate time to comment further on the applications would be after we have seen the (non-confidential) submissions that the ORR has requested be provided by 18 July 2025. We have taken steps in this response to ensure that confidential information is identified and separated from non-confidential information to allow for transparency and scrutiny. We trust that the ORR will ensure that this

also exists for other submissions received from other stakeholders and we look forward to the opportunity to consider them.

169) We also consider that this would be an appropriate time to make, or re-make, any further comments relating to scope, powers or the s.17 process itself. Once again, we maintain our prior views.

Other Stakeholders

170) Eurostar continues to support and encourage as wide as possible a consultation. Eurostar has previously identified that ORR should consult interested persons and interested parties in the United Kingdom, in respect of the Channel Tunnel, in the European Union and in each territory across which proposed services would operate. This will include, without limitation, police and security forces, infrastructure managers and owners, other operators, regulators and relevant government stakeholders (including local government stakeholders). Those stakeholders will have legitimate interests and potentially significant views. We are not aware if they have been approached.

171) Since ORR has specifically confirmed that it will *“not make any decisions on directions until we have gathered all relevant information”* (ORR’s letter of 30 June 2025 in response to Eurostar’s representations in March, April and May). That must be correct..

172) In addition we encourage the ORR to consider the general level of awareness from potential responders. As an example it appears that ORR’s 31 March 2025 consultation on Capacity at TMI was apparently insufficiently publicised with the consequence that London Borough of Waltham Forest (the local government authority for TMI) was not aware of the consultation until after it had closed.

7) Any other information, clarification and/or representations

173) In conclusion, Eurostar would re-emphasise two points:

- Eurostar wants to see growth in the international passenger rail market, we expect to compete for that growth with other rail operators, just as we do with air and other modes of transport and we are advocates for the benefits of international rail travel.
- Whatever capacity may exist at TMI is insufficient to meet anything but a small proportion of that growth and the associated investment and benefits.

174) That is why Eurostar has – and continues – push harder than anyone for a system-wider solution that delivers on this amazing potential – available to all operators willing to invest – rather than constrains it. We think ORR is entitled to take this into account in managing the s.17 process alongside its s.4 duties, and should do so.