

**From:** Evolyn Mobility Ltd

**To:** ORR (Martin Jones, Ian Biggar)

[stationsanddepots@orr.gov.uk](mailto:stationsanddepots@orr.gov.uk)

Dear Mr Jones and Mr Biggar

**EVOLYN'S APPLICATION FOR DIRECTIONS UNDER SECTION 17 OF THE RAILWAYS ACT 1993 FOR ACCESS TO TEMPLE MILLS INTERNATIONAL DEPOT**

We appreciate the opportunity you have given us, through your letters dated 5<sup>th</sup> and 12<sup>th</sup> June, to demonstrate that Evolyn, as a potential new operator of the HS1 line, is the most suitable option to provide a sustainable service in the coming years. While we acknowledge the high standards of quality that the current operator of the line offers to travellers, we believe that our experience in the passenger transport sector in various countries will enable us to configure a high-quality service at competitive prices.

Evolyn is a project that began in 2021 with the aim of operating the high-speed line between London and the European continent. Driven by the Cosmen family office, the feasibility of offering a quality service at competitive prices from London St Pancras International station in London to various destinations in Continental Europe was identified.

Since then, every effort has been made to advance efficiently and achieve the start of commercial services as soon as possible. Several investment groups and prominent private investors have been contacted, who have shown great interest in participating in the project. Additionally, in collaboration with the rolling stock manufacturer Alstom, a high-capacity train has been designed, standing out for its versatility and comfort for travellers.

Over the years, strong relationships have been established with the various organisations involved in the development and control of the project, both in the United Kingdom and in France and other countries to which Evolyn plans to expand in a later phase. Among these organisations, the ORR, the DfT, and HS1 in the United Kingdom, as well as the SNCF and the ART in France.

Since the beginning of the project, one of the main obstacles has been the issue of the location of the maintenance depot. When the feasibility of the operation was evaluated with the investors, this issue always arose without a clear solution. Various options were analysed, but the only viable one, both technically and economically, was the use of the current depot owned by the DfT and until now exclusively used by the incumbent operator, Temple Mills International. Without an adequate facility for fleet maintenance, investing several hundred million pounds was very risky, especially operating under the Open Access model, where all the risk falls on the operator. It is important to remember that Evolyn expressed its firm interest in using Temple Mills during the summer of 2023, being the first potential operator to do so.

When analysing the process of awarding the excess capacity of Temple Mills, and especially after reviewing the letters sent by the ORR on 5<sup>th</sup> and 12<sup>th</sup> June 2025, it is clear that the incumbent operator has not requested capacity at any time for the maintenance of the new fleet that, according to the media, it is going to acquire

soon. In this regard, we would like to ensure that we are not participating in an incorrect process or that there are no parallel processes. We believe that the selection procedure should be the same for everyone. Any process that could differentiate the current operator from the rest of the potential operators could be considered discriminatory.

We are concerned that the current user's capacity to maintain their current and future fleet at facilities outside the United Kingdom, such as Le Landy and Le Forest, is not clearly mentioned. The current use and potential viability of more intensive use of these facilities would allow access to Temple Mills for other operators. We request that this be taken into account when analysing the excess capacity of Temple Mills.

In countries where high-speed rail plays a predominant role in passenger transport, such as in Spain and other European countries, the ratio used to calculate the necessary maintenance roads/tracks in relation to the number of trainsets varies between 6 and 9 trains maintained per track of the depot. Applying this parameter to Temple Mills and considering only the 8 covered tracks (shed roads 1 to 8), up to a maximum of 72 train compositions could be maintained. This calculation does not include other existing facilities in the same depot, such as parking and reception areas, all of which are precisely described in the report prepared by Ipex on 28<sup>th</sup> March 2025.

At Evolyn, we understand the importance of adapting Temple Mills for the maintenance of a new, additional fleet. Therefore, it is crucial to analyse the costs of this adaptation to discuss with the ORR the possible forms of financing. It would be beneficial to carry out a detailed technical analysis by the operators to accurately quantify the economic impact and technical feasibility of the adaptation.

The British government shows a clear intention to introduce competition on the HS1 line. It is essential that new competitors are incorporated, so it does not make sense for the capacity identified by Ipex as "excess" to be reassigned to the incumbent operator, thus eliminating the possibility of competition in this vital segment of the British and European rail market. We request that, although Eurostar maintains its current capacity, it should not be considered for the allocation of excess capacity, as it has other maintenance alternatives for both its current fleet and its potential future expansion.

In summary, I hope that through this response, we have been able to demonstrate our credibility as an organisation, and show that so much preparation work has already been undertaken to allow us to be ready to launch quickly assuming we are awarded the relevant capacity at Temple Mills Depot

To facilitate the ORR's evaluation of Evolyn's capabilities, our response will be split into the 7 areas that you have requested information on in your letter of 12<sup>th</sup> June 2025.

## **1.- Availability of capacity**

Evolyn aspires to be an operator that not only brings competition to the market but also financial stability. After an exhaustive selection process, it has been decided to opt for the French manufacturer Alstom and its Avelia Horizon double-decker model. This high-speed train offers several outstanding advantages in the market, including a capacity of nearly 600 seats per 200-metre train, an interior design developed by specialised companies in the sector, and a large luggage capacity that is probably the largest in its segment.

The Evolyn project by Alstom Horizon is a quad-voltage high-speed train designed to connect the United Kingdom with various points on the European mainland without significant adaptations. Initially, it is planned to operate on the London-Paris route, and in later phases, subject to economic and technical feasibilities, to expand services to other UK stations (HS1) and potentially other destinations such as Brussels, Amsterdam, as well as

evaluating the German and Swiss markets. Additionally, the possibility exists to expand the fleet in future phases to offer high-speed services to other countries on the continent.

In this context, contacts are being established with organisations in the United Kingdom that have shown interest in promoting connectivity. This can be achieved by increasing the number of stops on the London-Ashford route or increasing the final destinations on the continent

Evolyn conducted a preliminary analysis on the possible adaptation of Temple Mills for the maintenance of these trains. Initially, no major problems were identified, and it would be feasible for Evolyn to bear the adaptation costs, provided that the use of the depot is awarded to them. Another aspect to consider is that, according to the report conducted by IPEX, the theoretically available capacity would be sufficient for the maintenance of the Evolyn fleet without causing alterations in the maintenance schedules of the incumbent operator.

## **2.- Performance**

Evolyn has carefully planned the incorporation of a new fleet of 12 high-speed trains, ensuring their compatibility with the existing facilities at the Temple Mills International depot, currently managed by Eurostar. This planning is based on a detailed technical analysis of Evolyn's maintenance needs, as well as the parking/stabling and auxiliary service requirements for the new fleet. In all the scenarios analysed, the current operations of the incumbent operator are respected, taking as a reference the report prepared by IPEX and requested by the ORR. In parallel, Evolyn conducted a visit to the Temple Mills facilities, accompanied by Eurostar staff. Although it would be advisable to have more comprehensive information before the final award, the impression of Evolyn's technical and engineering team is that Temple Mills has the capacity to accommodate a second operator of a similar size to Evolyn.

Firstly, it has been verified that the available capacity at Temple Mills is sufficient to meet the light maintenance needs of the new fleet, without interfering with Eurostar's current operations.

Evolyn has developed a depot usage plan that only utilises the surplus capacity, without claiming already committed spaces. Additionally, minimal and non-invasive modifications to the facilities have been proposed to adapt the depot to the technical specifications of the new trains, such as the length of 202 metres and the first and second level maintenance requirements, without these alterations causing operational or structural harm to the current operator. From a regulatory perspective, the Office of Rail and Road (ORR) has established a transparent process for allocating excess capacity at Temple Mills, in which Evolyn has played an active role.

Finally, it should be noted that the entry of a new operator like Evolyn not only does not harm the current operator but also contributes to the development of the international railway market, generating additional economic and social benefits, such as increased passenger offerings, job creation, and generating competition in the sector. In summary, the use of the depot by a new fleet of 12 trains has been designed to be complementary, not exclusive, and is based on technical, regulatory, and public interest criteria that ensure no impact on the incumbent operator.

## **3. Operational readiness and viability**

Evolyn has been involved in the project since 2021, carrying out key activities such as drafting manufacturing and fleet maintenance contracts, which are essential for the viability and sustainability of using TM. Significant figures

have been advanced to the manufacturer ALSTOM for the reservation of materials and capacity in their factories. However, the delay in the allocation of surplus capacity at the depot (2 years from the initial request in the summer of 2023) has forced the manufacturer to make commercial and production adjustments, negatively affecting Evolyn both economically and in their market access. Although the commercial service was planned to start in 2026, the delays in the allocation of Temple Mills capacity have generated consequences that are difficult to quantify. Evolyn trusts the current allocation process promoted by the ORR and has included a budget item in its business plan for the adaptation of the depot to its fleet, obviously in case they are awarded the surplus capacity.

Unfortunately, due to the large investment required for the acquisition of the fleet, it is unrealistic to think that without a firm right to use the Temple Mills facility, the final manufacturing contracts for the fleet cannot be signed. The date on which the project will enter commercial service depends on when access to the workshop is confirmed. Once the project has been launched, Alstom will update the delivery schedule based on the industrial situation at that time and other relevant factors. In general, Alstom can start delivering trains in around 45 months, as confirmed on several occasions, including in the attached Bridge Contract (first four trains and the 1st vehicle authorisation is planned for 41 months after NTP) (NTP+41).

Evolyn's primary goal is to secure licenses and safety certificates for the company. To achieve this, they have initiated preliminary contacts with the relevant organisations. A specialised consulting firm with prior experience in this field is currently working on obtaining both documents, having successfully provided this service to several companies in the sector. Within the CMC group, there are continental licenses available in two of its companies. Alsia Rail, operating in Spain, holds a license for both passenger and freight traffic, which has a European scope and would need to be adapted and homologated in the United Kingdom. Additionally, Mobico, the second-largest rail operator in North Rhine-Westphalia and one of the top five operators in Germany, also holds a license.

Regarding the safety certificate, the consulting firm hired by Evolyn is already in contact with the ERA responsible for granting it in Europe and is also working to obtain it in the United Kingdom. It is crucial to manage the timing of the latter, with the intention of presenting it to the relevant authorities approximately six months before the start of commercial operations. At the same time, Evolyn is working on a plan to obtain the necessary licences and certificates. Since 2024, they have been working with a consultancy specialising in the management of safety certificates and are making progress in the various FTAA with the infrastructure managers involved (HS1, Eurotunnel, SNCF).

Regarding the establishment of the necessary companies, Evolyn has already registered the company Evolyn Ltd in the United Kingdom and has created Evolyn France. Currently, procedures are underway to establish the company in Belgium.

The proposal is to concentrate most of the initial activity in the United Kingdom, which will result in the creation of more than 324 direct jobs. The maintenance will be the responsibility of the manufacturer, and the people involved in this task are not included in the mentioned number.

#### **4.- Financial viability**

Evolyn is part of the CMC group, a family business owned by the Cosmen family, who are the main shareholders of Mobico (formerly National Express) in the United Kingdom, with a 25% stake. To confirm their participation in

the Evolyn high-speed project, a solid business plan was developed in collaboration with BCG (Boston Consulting Group), which has been involved since the beginning of the process.

Regarding the group's investment capacity, Mobico, a leading passenger transport company, operates in various countries such as the United States, Canada, the United Kingdom, Ireland, Morocco, Portugal, Spain, Germany, Bahrain, France, Saudi Arabia, and Switzerland, with revenues exceeding £3.4 billion according to the 2024 Annual Report and accounts. Mobico has an international presence in more than 50 cities across 12 countries. Additionally, the CMC (Cosmen family group) independently participates in various sectors such as hotels, agriculture, and laundries, and has significant transport activity in Malta and Cyprus, where it employs over 1,200 people and has a turnover of €170 million.

The CMC group has extensive experience in passenger transport, especially in bus and coach transportation. However, the railway sector is not unfamiliar to them. Alsa Rail, a subsidiary of Alsa Spain, holds a European license for passenger and freight transport. In Germany, Mobico is the second-largest railway operator in North Rhine-Westphalia and one of the top five operators in Germany, with revenues of £256.5 million in 2024. Mobico operates seven suburban railway lines in North Rhine-Westphalia, Rhineland-Palatinate, and Hesse, using 120 zero-emission trains. It operates the Rhein-Münsterland-Express (RE7) and the Rhein-Wupper-Bahn (RB48) and is the sole operator of the Rhein Ruhr Express (RRX) until 2033.

Alsa Rail's beginnings in the railway sector date back to 2003 when it began providing support services in the maintenance and commissioning of new High-Speed Lines (LAV), currently managed by the Railway Infrastructure Administrator (ADIF). Since then, Alsa has continued to contribute its experience and knowledge through multiple maintenance contracts at various railway facilities in the network. Additionally, Alsa is approved by the State Railway Safety Agency (AESF) as a Railway Rolling Stock Maintenance Centre, allowing it to perform preventive and corrective maintenance on different types of rail vehicles, including high-speed trains, electric locomotives, diesel locomotives, auxiliary rolling stock, and historical trains. Alsa offers management, development, and execution of maintenance services, as well as fleet management of any type of railway vehicle operating in the EU member states' networks, as it is certified as a Maintenance Entity (EEM).

Currently, Alsa Rail is emerging as a strong candidate to operate the new high-speed lines that the Spanish government will put out to tender this year. Although the CMC group and its associated companies have the necessary capital to fully fund the Evolyn project, discussions have been held with various banks and investors who have shown interest in participating.

## **5. Economic and societal benefits associated with the applications**

Since its inception in 2021, Evolyn has collaborated with leading consulting firms to drive its project forward. Boston Consulting Group (BCG) has been instrumental in creating the supporting documentation, working alongside external advisors (ex-Eurostar, ex-Renfe, ex-SNCF, ex-Amtrak, among others) to make optimal decisions in the project's evolution. Additionally, consultancies such as SAFFRON, Ontier, and Inartium have significantly contributed to areas such as the interior design of the fleet, providing legal advice, and expertise in engineering, respectively. BCG has also helped to develop Evolyn's business plan and, together with the IT department of the CMC group, the IT plan. From its creation, Evolyn has been conceived as a digital-first company, where digitalisation is the foundation of its development and not just an additional layer. As a newly established company, Evolyn has the advantage of not having heritage systems nor functional or operational

dependencies that could slow down its digitalisation. Furthermore, it is believed that the creation of a digital company will help improve operational flows and, therefore, achieve a more seamless customer experience.

Market studies have been conducted with companies specialising in the sector, which has allowed us to identify the traveller profile and design our train fleet accordingly. Our commercial offer has been structured into different categories and classes, each tailored to a specific type of traveller, with the aim of providing a high quality, sustainable, and environmentally friendly service.

Recognising the broad diversity of travellers using the international service between the United Kingdom and the continent, we have designed a train that offers very high standards for business and premium travellers and but also for those travelling for leisure with larger volumes of luggage, as is common among international travellers. The storage of large suitcases has been a central concern for the design teams of Evolyn, Saffron, and Alstom, especially during high-demand periods such as summer and Christmas, when the number of passengers from outside Europe increases significantly.

We are currently in negotiations with companies specialising in catering services to offer a differentiated service, primarily aimed at business and premium travellers. However, the Evolyn Alstom Avelia Horizon train will also feature a café and, in some carriages, vending machines to facilitate the consumption of certain items for those travellers who prefer not to go to the train's café. Digitalisation and highly efficient management of operational costs will allow Evolyn to offer very competitive prices. Nevertheless, we are aware of the high cost of constructing and maintaining the high-speed line and the need for the infrastructure manager to adequately renew and maintain the line. This aspect is particularly relevant for Evolyn, as proper, high-quality maintenance will ensure better service for users.

In phase 1 of our project, we will focus on launching the service between London and Paris. We recognise the social need and political pressure to consider the intermediate stops on some services, particularly on the UK side of the tunnel. Evolyn is already collaborating with local authorities to offer services with stops at some stations on the HS1 line, particularly in Ashford. This station is of some strategic importance as it connects the HS1 line with the traditional railway network. Using Ashford will allow Evolyn to design a contingency plan that minimises negative consequences for travellers in case of disruption on the network. Great customer service during service disruption situations is one of Evolyn's main priorities.

The train model that has been selected by Evolyn will operate on four voltages, and as such will allow for future expansion to other destinations within Europe. Phases 2 and 3 of the operational and commercial plans are designed to connect London with Brussels and Amsterdam, and subsequently we will consider other cities on the continent. Furthermore, thanks to our bus and coach road transport companies, we will be able to offer rail/coach connecting services at very competitive prices. Evolyn believes that the entry of a new operator in the high-speed market is unlikely to impact the current operator but will most likely significantly increase demand and create modal shift. This is more likely with the planned expansion of the international zones at both London St Pancras and Paris Gare du Nord, with greatly increased capacity coming on stream towards the end of the decade. There are examples in other countries that support this view, such as in Spain and Italy, where the presence of two or three open-access operators has led to a notable increase in passengers on lines with competition, achieved through a combination of modal shift and market growth.

## 6.- Views of stakeholders

At Evolyn, we firmly believe in the importance of providing accessible information to ensure transparency and foster continuous improvement of the services offered. Therefore, we have and will make ourselves available to all parties involved in the Temple Mills depot awarding process to answer any questions that may arise. We have no other representations to make at this stage.

## 7. Memorandum of Understanding between FS Group and Evolyn

The negotiation process between both Evolyn and FS Group is progressing satisfactorily in accordance with the initial framework agreed by both companies. As of the date of this letter, a definitive agreement has not yet been reached on all the matters under negotiation. Accordingly, each company will continue its application process independently. Considering the current situation:

- there are no implications of the MoU on Evolyn's application for directions for access to TMI, and,
- the requirements for access to TMI contained in Evolyn's application do not require today any changes because of the MoU with FS Group.

## 8. Attachments

[REDACTED]

[REDACTED]

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