GEMINI TRAINS

Submission to the Office of Rail and Road

18 July 2025

Ian Biggar
Access Policy Advisor
Office of Rail and Road
25 Cabot Square,
London,
E14 4QZ

18 July 2025

Dear Ian

Application made under Section 17 of the Railways Act 1993

This letter introduces our responses to the questions you posed to Gemini Trains (Gemini) in your letter dated 12 June 2025. This response also includes a range of supplier and stakeholder material in support of our application to use the available capacity at Temple Mills identified in the independent IPEX report.

The purpose of this letter is to provide a short overview of the key features of Gemini's proposition, which perhaps won't come across from a straightforward response to the questions you've posed.

The Gemini proposition is both the only one that is designed to grow the market by making international rail travel more accessible to more people, as well as being the only Section 17 applicant that can fit into the space identified by IPEX at Temple Mills. We do this while delivering substantial benefits to passengers and creating wider benefits to the economies around Stratford in east London and Ebbsfleet in Kent, our UK stations. Our application includes extensive support from political leaders and stakeholders in these locations.

Starting our services at Stratford International, with all trains also calling at Ebbsfleet, we open the opportunity for a combined catchment of over 18 million people to travel to Paris, Brussels, and beyond. This increase in connectivity is confirmed by our business plan modelling, which expects around 60% of our passenger journeys to be new to international rail.

The world has changed dramatically since international services started running through the Channel Tunnel three decades ago, yet the offering remains largely the same. Innovation is at the very heart of what Gemini has been set up to deliver. Our partnership with Uber will bring a globally recognised brand to one of the world's famous rail routes. Uber's market reach assures Gemini services of immediate and rapid recognition as well as bringing commercial and technology expertise to our team. Furthermore, we will be able to offer our customers a ticket from door-to-door including Uber rides at both ends of the rail journey, like that offered to premium passengers by top Gulf airlines.

As well as opening new journey opportunities, our services will create extensive benefits to our customers, with lower fares, a brand-new fleet of trains and staff trained to provide exceptional customer service. We believe that all too often rail's offering is behind the times and too expensive. Our aim is to be a highly customer-focused, dynamic operator with attention to detail; something you are more likely to find in a boutique 5-star hotel. From the moment Gemini trains enter service, the natural effect of competition will restrain the prices of the incumbent, which

has been increasing fares in recent years to levels that are holding back growth in international rail. We aim to drive new business to rail from people who currently fly or don't travel at all.

Our plans for using Stratford International for cross-Channel services for the first time, and reopening Ebbsfleet for international services is key and will contribute to the growth and regeneration of those areas. We have attached a report from our architects, WW+P, who we have worked with to develop a transformation to the passenger experience at Stratford, enabling a seamless journey for passengers onto our trains. As any redevelopment project can be subject to unexpected events, we have built a resilient delivery plan, with a range of contingencies as works are undertaken to ensure we can start services in 2029.

Further evidence of our attention to the passenger experience lies in our plans, together with Uber, to offer a single booking from all GB rail stations to destinations over the Channel, untapped potential that has been ignored as 'too difficult' by the current incumbent.

We stand ready to continue to mobilise our plans, with a stable, highly experienced and forward-thinking team in place in the UK and France. Our team has established relationships with Infrastructure Managers, Regulatory Authorities, officials, businesses and politicians across our planned destinations, evidenced by Letters of Comfort from many of the access providers we will obtain agreements with. You will see from the extensive engagements we have been having on both sides of the Channel that we have made significant progress with the relevant stakeholders to our services. This includes making progress on depot access in France and Belgium.

Our services are clearly deliverable, with paths available on HS1, through the tunnel, and into Paris and Brussels. Our timetable has been reviewed by LSPH, this has confirmed that our services can be accommodated alongside the existing Eurostar and Southeastern services. The timetable is built around the available passenger paths through the tunnel, the availability of which has been confirmed by Getlink.

We are in advanced talks with rolling stock providers, ROSCOs, and wider finance providers. As the ORR is aware, at the point at which it grants Gemini access to Temple Mills, the constraint to closing agreements will be removed. We will then move swiftly to conclude train purchase and finance agreements—no train manufacturer or investor will confirm an agreement with any operator until access to the essential facility at Temple Mills has been secured.

In short, the Gemini access application offers a credible, simple route to growth in international passenger rail services using existing track, station and depot infrastructure, contributing to UK economic growth along the way. We look forward to continuing to engage with the ORR team in the coming weeks.

Yours sincerely

[redacted]

Chief Executive Officer

Our response to ORR's questions is set out below and provides sufficient detail to understand how Gemini's fleet will fit readily within that facility. We have structured our response in the order of your letter dated 12 June 2025, and the numbering below represents the numbering contained within your letter.

Our response should also be read in conjunction to our previous correspondence dated 24 February 2025 and 22 April 2025 relating to capacity at Temple Mills. We reference the pertinent points in this response, but our response to your earlier consultation provides greater detail on our assessment of the IPEX report and our view of the available capacity. In this response with provide greater detail on our commercial strategy and how we would use the capacity at Temple Mills to deliver our services.

2. In your application submitted on 28 February 2025 to the Office of Rail and Road (ORR) for a depot access contract under Section 17 of the Act, you stated Gemini's access requirements for TMI as follows:

1) One dedicated track (400m) in workshop shed for corrective and preventative maintenance,

2) Nighttime stabling: 3x200m sidings, either 1x400m + 1x 200m, or 3 x 200m, within the depot boundary,

3) Daytime stabling: 1x200m,

4) Wheel reprofiling: Preventive: c. 1,100 wheelsets per year, all scheduled during daytime hours, plus ad hoc corrective reprofiling,

5) Wash plant: three nighttime slots and one day slot,

6) CET facility: Four slots per night, one slot per day,

7) Access to dedicated stores facility and office accommodation,

8) Access to staff accommodation,

9) Access rights for a minimum of 10 years, which will support Gemini's purchase of suitable train sets.

3. Could you please confirm whether the requirements detailed above remain the same. If not, and if any or all of Gemini's requirements have changed, please provide details of your updated requirements. Please also provide any additional information about Gemini's requirements for access to TMI that would assist ORR in the assessment process provided in our letter of 5 June 2025 and attached at Appendix A for ease of reference.

Gemini proposes that four of our 200m trains will finish service each night in London and require servicing and stabling at Temple Mills (including use of the CET discharge, watering and train wash facilities), to which should be added accommodation for two further trains undergoing maintenance or designated as spare. Our straightforward space requirement at Temple Mills is therefore for one 400m road in the maintenance shed, accommodating two trains, and two 400m sidings for stabling of four 200m trains. This slight increase in overnight stabling reflects our understanding of the available capacity at Temple Mills (informed by the IPEX report), and a desire to minimise stabling in the platform roads at Stratford International to avoid any impact on overnight maintenance activities. The requirement here for two 400m stabling sidings at night is not exactly that quoted above, but in practical terms takes no more stabling space from the existing operator, with its fleet of 400m sets divided only occasionally into 200m half sets.

Gemini understands from the IPEX report commissioned by ORR that this level of capacity is currently available at TMI and requires neither additional investment nor infrastructure development.

Naturally, we would expect, in full co-operation with other users of the depot, to occupy on occasion specific maintenance shed roads where special facilities, such as the simultaneous lift or DC traction supply, are required. Similarly, we shall need on occasion to make use of the wheel lathe and bogie drop, but the overall space requirement will not change. Where service disruption increases our London stabling requirement, we may seek exceptionally additional stabling at Temple Mills for short periods, where it is available.

4. In addition to the above and in order that we can assess the application from Gemini could you please provide details on the following:

Availability of capacity

5. Please indicate how the available capacity identified at TMI is sufficient to support the delivery of Gemini's service delivery plans.

The Gemini team has studied carefully the publicly released version of the IPEX Temple Mills capacity report commissioned by the ORR and provided a detailed response to the ORR consultation. Whilst redactions make it difficult to understand precisely Eurostar's use of Temple Mills amongst the other facilities available to it, or indeed the deployment of the two classes of trains in its fleet able to operate on London services, Gemini is confident that our fleet could be accommodated without significant difficulty within the depot.

Gemini has noted specifically IPEX's findings that:

- Latent capacity of maintenance shed roads given current fleet maintenance requirements amounts to 1.61 roads, and never less than one road even at night. We are seeking allocation of one maintenance shed road.
- Latent depot set capacity amounts to between five and nine 400m sets with one of two decommissioned Class 373 sets removed. IPEX identified potential for three of the four reception roads, along with other areas, to be designated for stabling, providing significant capacity in addition to the current three stabling sidings. Our requirement is for just two sidings to accommodate four of our trains.
- There is spare availability amounting to some 35% of the usable capacity of the wheel lathe. Our fleet will represent an increase of 20% in the current cross-Channel passenger fleet, with a similar increase in the number of wheelsets.
- Latent depot arrival capacity of 0.85 sets per hour, with latent train wash capacity of two-thirds to one 400m set per hour. Our 200m trains will take half the time to pass through the wash and require half the water, reducing the replenishment time accordingly.

Gemini believes that only minimal physical change, if any, will be required at Temple Mills to accommodate our requirements in addition to the those of the current Eurostar cross-Channel fleet. This said, we note the recommendations made by IPEX for the consideration of minor improvements to secure more flexible use of the various depot facilities, such as improved staff and servicing facilities in the area of the reception and LDA roads, and would certainly support further consideration of such improvements to secure the most efficient possible expansion of use of this part of the network.

Our access request falls well within the readily available capacity in every area. Granting access to an operator which is not going to consume all the available capacity will allow for potential future growth by both occupants of the depot.

Performance

6. What, if any, will be the impact on operational performance of Gemini's proposed use of capacity at TMI?

Potential for performance impacts: In the case of Temple Mills, it is inevitable that increasing utilisation reduces recovery margins and increases intrinsic instability, but the economic argument for utilising spare capacity is irrefutable, for as long as performance impacts can be contained to the extent that acceptable reliability is maintained and the economic benefits of intensified asset use are not compromised. Indeed, it is right that railway assets should be fully utilised.

In the case of a depot, moving towards fuller utilisation could increase the risks arising from unplanned events. For example, margins to handle unexpected technical problems affecting a fleet may be reduced and lead to unreliability in service; service disruption causing arrival of trains requiring scheduled maintenance late or at the wrong depot may result in non-availability for service, or minor movement delays within a congested depot may be magnified such that trains cannot be presented for service on time.

In the case of Temple Mills, the current low level of utilisation means there is currently less focus on managing the facility operations and movements efficiently (and less than we have observed at facilities operating at a higher utilisation). Indeed, adding this focus that becomes necessary with higher utilisation, could well deliver a performance improvement compared to today.

Gemini Trains believes that the current significant underutilisation of Temple Mills, quantified and explained by IPEX in its report, is such that properly managed integration of a second operator's fleet within the depot operation would have a negligible impact on overall performance. We have explained in our response to the question of capacity how our operation increases the overall size of the cross-Channel passenger train fleet by only 20%, a value that appears to be much less than the capacity margins identified by IPEX at Temple Mills.

Mitigating actions: Gemini Trains wants to see growth across the railway sector and whilst competing commercially with Eurostar, we have every interest in maintaining positive public perceptions of all passenger train services and their quality.

Gemini recognises that depot and fleet performance depends not just on the adequacy of resource provision, but also on the co-operation and customer focus of everyone employed at the depot, regardless of their employer. It will be necessary to have a much clearer focus on managing the site and associated train movements to make best use of the available capacity and ensure no impact on performance. Gemini intends, when granted access to Temple Mills depot, to engage early with the current Depot Facility Owner with a view to defining depot organisation, protocols and procedures that will protect and enhance the performance of both companies and their fleets and train services. Existing and new depot staff should be fully engaged in this process, with the managements of the two operators and their respective contractors and partners committed to making a success of the new arrangements. Our team has experience working with fleets maintained in shared depot facilities and can draw on this to support a move to collaborative working.

7. How has Gemini assessed the impact on operational performance?

As we have highlighted to our response above, the key to minimising any performance risks arising from increased use of Temple Mills is effective management of the day-to-day operations at the facility – planning and coordinating exams and the movements of trains around the facility. To date this has not been managed to the level of discipline and planning that is seen in other facilities, reflecting the low utilisation of the asset to date.

As is evidenced from the IPEX report, there is sufficient capacity at Temple Mills to meet the requirements of Gemini trains and the combined utilisation of the facility is comparable, or still less, than other service facilities which operate on a high utilisation.

Mitigating actions: We will engage with Eurostar to ensure that the operation of the facility, both use of the maintenance roads and other facilities, are effectively planned and to enhance the focus on the management of train movements so the service facility can move onto a new normal level of operation where it has a higher level of utilisation. Gemini Trains commits to working proactively with Eurostar to seamlessly introduce the additional trains into Temple Mills and ensuring high performance is maintained.

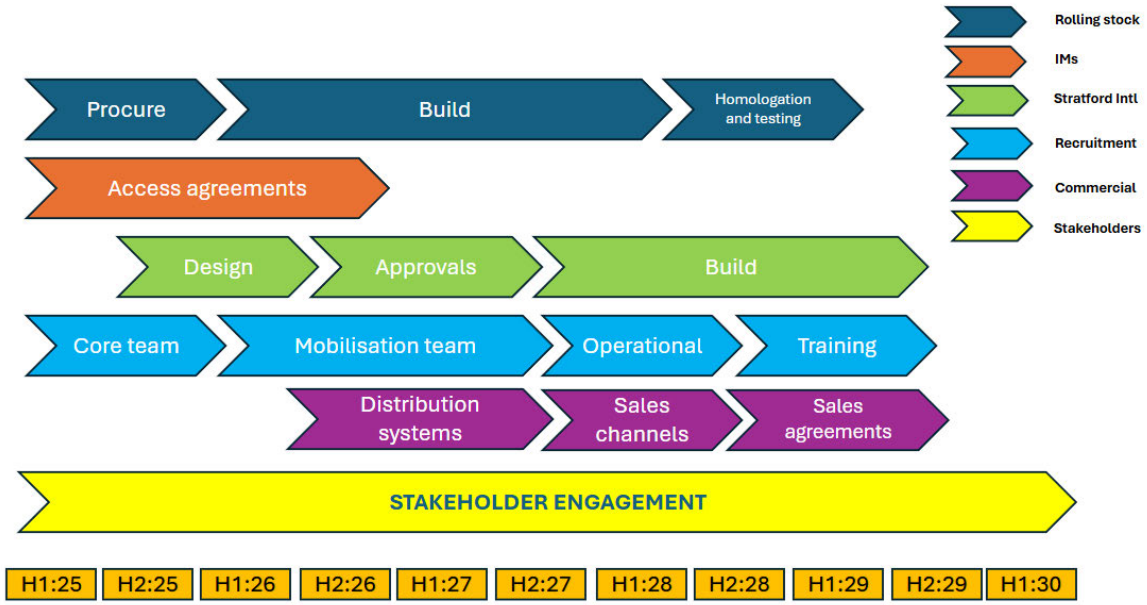
8. Please provide any evidence to support Gemini's assessment of impact on operational performance.

Please see our answer to question 7 for the impact on operational performance at Temple Mills. We consider the impact on network performance when discussing our planned timetable below.

Operational Readiness and Viability

9. Please provide evidence of Gemini's Delivery Plans, clearly detailing the timescales in which Gemini will utilise the requested capacity at TMI and how that capacity will be used to deliver services.

Delivery Plan: Gemini recognises the inevitable additional complexities that arise from establishing an international operation, traversing the boundaries between multiple infrastructure managers and multiple regulatory jurisdictions. Gemini has developed a delivery plan that draws upon the experience of its team in planning and setting up comparable international operations. Key activities within our Delivery Plan are illustrated in the diagram below, and include the following:



- Definition of business and operational concepts: Gemini will formalise the descriptions of its services and its operation contained within this document and elsewhere in an *Operational Concept* document. This document will in turn form the basis of operational planning and preparation of operating procedures. The document will include content describing Gemini's routes, service offer, connections, service development path, operational organisation, station operations, train operations, service performance management and other customer services. The document will cover normal, abnormal/degraded and emergency modes of operation. It will also cover fleet management and operational arrangements relating to depots, stabling, servicing and maintenance.

- Key contracts and agreements:
  - Track Access Agreements- Gemini has held meetings with LSPH to be clear on their requirements around operational readiness, to begin the process of agreeing a track access agreement, supported by the timetabling work they have written to us about alongside our application. Template track access agreements do not exist for other infrastructure managers, but our long track record of engagement with them means that – while these agreements will take longer to achieve – the work we have done to date enables us to be clear on the required next steps. The Letters of Comfort we have from

SNCF Réseau, Getlink, and LSPH demonstrate the progress we have made, and we are also in substantive discussions with Infrabel.

- Depot Access Agreements- This process we are participating in is one of three that we need to complete across our route network, to secure locations for stabling and servicing. We are in active engagement with depot access providers in France and Belgium (and have visited Le Landy and Forest depots in those countries). While the regulatory process is by no means as transparent as in the UK, we are able through our team's connections (see answer to question 10 below) to engage with regulators, governments, and access providers to make clear the benefits to them of growing the cross-Channel market and of having Gemini use their facilities. Our delivery plan can flex to accommodate timings for securing depot access in these countries in due course.

- Arrangements for station use and facilities- In addition to our dialogue and progress with IMs and depot access providers, we are having in-depth discussions with LSPH (particularly in relation to our exciting plans at Stratford International), SNCF Gares et Connexions and SNCB's stations team. For example, we have input into the consultation regarding the future development of Gare du Nord, and our credibility is reflected in the Letter of Comfort from SNCF Gares et Connexions. We are confident of the next steps we need to take to secure station access at each of our four main stations of interest.

- Specification and procurement of rolling stock: Gemini has engaged with four rolling stock manufacturers, all of whom are capable of supplying rolling stock suitable for Channel Tunnel accreditation and subsequent operation. In the absence of depot space, it is evidently not possible to conclude a procurement process, so discussions remain live with all manufacturers. In making the final procurement choice, Gemini will need to balance optimum passenger capacity, price, likely in-service date and technical risk. At the point of Gemini receiving an allocation of depot space at TMI, it is also likely that other rolling stock options potentially allocated to one of the other Section 17 applicants may become available. For this reason, it will be important to avoid a firm advance commitment. At the time of writing, Gemini's contacts are live with Siemens (UK CEO level), Talgo (Chairman), Hitachi (Sales Director) and Alstom (Sales Director).

- Development of timetables and service plans: A description of our timetable development work to date is contained within the section below covering progress with access arrangements.

- Organisation: Gemini's business plan assumes the following summary staffing structure:

Role	**Number**	**Comments**
Senior Management	7	
Headquarters functions	133	To include Operations, Safety, Marketing/Commercial, HR, Finance, Technology, Legal
Stations	49	
Drivers	48	
On board staff	144	
Total Headcount	**381**	

Our organisation will ramp up gradually, with the early mobilisation phase concentrating on project and programme management and some department heads. Functional managers will be recruited next, to build their teams (e.g. driver and on-board management, station management). Our business plan assumes recruitment well ahead of operations as we know from our own experience that recruitment takes time and that not all will go to plan. We are very conscious of the lead times for recruitment and training, drivers being the most obvious example, but applying to all staff also. Our financial model includes early recruitment costs reflecting the lead times and costs for training and mobilisation.

The Gemini team has direct experience of building operational functions and of organisational design and transformation and will draw on this, with suitable third-party support to design an effective and swift mobilisation. Our team members have built teams, departments and businesses sometimes from scratch and sometimes from existing operations. We have led and created operations and have managed change. We will ensure operational readiness for day 1.

- Recruitment: Gemini's recruitment plan will use external agencies to source the best candidates for our roles. We will have several key priorities:
  1. Represent the communities we serve. We will look first for recruits who live close to our key stations; Stratford, Ebbsfleet, Paris and Brussels.
  2. An international team: multilingual capability is key for some roles, our targeted recruitment will acknowledge this. Gemini will be a true pan-European operator and will use the Anglo-French experience within our current team to shape a multi-lingual recruitment policy
  3. Open to all: Gemini will recruit for personality and aptitude, irrespective of background or other circumstances.
  4. Recruit for success: successful organisations rely on engaged and motivated teams. Our experience building and leading teams in a range of industries has taught our senior team the value of a breadth of outlooks and of a common goal. Gemini people will be proud to work for our business.

- Development of operating procedures: Operating procedures will be prepared for each area of activity setting out the required actions of operating staff in all modes of operation. The procedures will reflect the Operational Concept and will match the rolling stock, station facilities and equipment and other assets and infrastructure utilised by Gemini in the delivery of its services. Operating Procedures prepared during the pre-operational period will be validated during trial operations. Where they relate to safety critical elements of the operation they will be approved in accordance with the requirements of the Safety Management System.

- Training and certification: Training and Certification processes matching industry standards will be established during the operational set-up period. Where they relate to safety-critical personnel these processes will form a part of the Safety Management System.

- Trial operations: Following commissioning and acceptance of new assets (principally rolling stock) provided for the inauguration of Gemini train services, a rehearsal period will allow operation of Gemini train services, stations and other business processes in the absence of fare paying passengers. This period of trial operation will permit the full validation of Gemini

operating procedures and the completion of familiarisation of Gemini personnel, and the staff of contracting and partner organisations, with their operating and other roles. Routine operation of the Gemini timetable will be accompanied by live exercises such as train evacuation. The trial operations period is expected to conclude with a short preview period in which invited guests travel on services in order to complete the familiarisation process.

- Regulatory approvals:
    - Operator Safety Management System and safety certification- Gemini will be a main line train operator and as a transport undertaking will be required under the terms of ROGS and its equivalents to obtain a safety certificate for operation of trains within each of the jurisdictions under which it operates. Safety certification will require that Gemini's Safety Management System meets the requirements of the safety regulator within each jurisdiction. Safety certification will precede the trial operations period.
    - Authorisations to place fleet in service- Gemini's Safety Management System will require that its fleet has been authorised to be placed in service over all routes it is to traverse under the terms of the interoperability regulations. Obtaining this authorisation is the responsibility of the train builder as the relevant project entity.

- Operating licences: Gemini will obtain the necessary licensing as a passenger train operator to satisfy the requirements of regulatory authorities for each of the sections of route it is to traverse. It expects to have to demonstrate that it is a fit and proper entity for this purpose, in terms not only of its safety certification, but also in matters such as its insurance cover, consumer protection arrangements and membership of industry bodies.

- Business management systems: Gemini's systems have not yet been selected but the team has a wide range of experience of systems, processes and business change. System implementation in a growing business is very different to that in a large and established business. Gemini will apply certain key principles:
    - Agility: an app is often far more effective than an ERP system. Gemini's outlook will favour small-scale and adaptable systems over complex integrated systems (e.g. Xero financials not SAP)
    - Use the cloud: we will have an assumed bias toward cloud-based systems supporting a mobile and flexible workforce and delivering security of data as well as failsafe support.
    - Prioritise security: running an international and fast-moving business, IT security is non-negotiable. Gemini's team has experience running critical infrastructure business and creating cyber-secure environments. We will immediately adopt UK Cyber Essentials Plus on mobilisation and will work towards ISO27001 as soon as processes are stable.
    - Use alliances: where Gemini can benefit from affiliate links, we will seek to do so. Our partnership with Uber will offer technology know-how and the access to a global network of expertise. We will draw on this where appropriate to bring speed and effectiveness to our operations.

10. Please provide an explanation of Gemini's progress towards securing other necessary access agreements and regulatory approvals.

Access Agreements: Gemini has developed positive working relationships with each of the access providers on sections of the routes it will traverse:

London St Pancras Highspeed. Gemini holds regular meetings with LSPH, focusing on paths and station access. We have had several site visits to Stratford International (the first was two years ago), including in recent months with our architects (see below). LSPH has supported Gemini in discussions with other infrastructure managers. The process for obtaining a track access agreement with LSPH is clear, based on our discussions to date. Unlike other access providers, LSPH has a model track access agreement, which means the process will be rather faster than in other cases. We have factored their agreement timings into our delivery plan.

Eurostar. Gemini has had two productive meetings with Eurostar, and a tour of the facilities at Temple Mills. While our meetings have been positive and cordial, Eurostar nevertheless have declined to offer access to Temple Mills – noting the ongoing ORR process. It was due to Eurostar declining to offer access to Temple Mills that in turn led Gemini to submit its own Section 17 response, reflecting the earlier submission by other potential operators.

Getlink. Gemini holds fortnightly meetings with Getlink and has done for c. 18 months. They have provided us with assurance in relation to their access charges and the paths they have available. We have supplied our draft timetable to Getlink who have confirmed that the capacity it assumes is available. Once Gemini has finance and rolling stock confirmed, we will proceed to develop an access agreement with Getlink. Getlink's letter in support of our continued engagement and our future path to an access agreement is supplied in the Appendix.

SNCF Réseau. Gemini has met the senior SNCF Réseau management team, including the President, the Sales Department, and the Key Accounts Department (Customer Accounts). We have met SNCF Réseau representatives on several occasions over the last two years, presenting the Gemini proposition and understanding the nature of SNCF Réseau and its operations as network manager. This relates specifically to train path allocation, the implementation of potential framework agreements (negotiated on a tripartite basis with regulator ART present) and the provision of services to operators.

SNCF Gares et Connexions. Similarly, Gemini has met the entire SNCF Gares et Connexions management team, including the Managing Director and relevant managers – in both Paris and London. We have undertaken a detailed visit to Gare du Nord and participated in a consultation on the cross-Channel Terminal expansion project, due to complete in 2029/30 - including sharing Gemini's operating requirements with the project team.

SNCF Voyageurs. Gemini has had regular meetings with SNCF Voyageurs as operator of Le Landy depot near Paris. We have been able to visit the depot, together with experts from the company, with a view to reaching an access agreement in relation to stabling some sets in Paris overnight. We are in discussions with the company and ART in relation to securing access to Le Landy and are confident that there is sufficient capacity at the depot for Gemini's needs.

ART. Gemini has met the Director of rail regulation at ART and engaged on the nature of track and depot access regulation. ART has seen various open access requests on the SNCF network and is growing in experience is dealing with these.

Infrabel. As with SNCF Réseau, Gemini has had extensive contact with the Belgian infrastructure manager. We presented the Gemini proposition and Infrabel reiterated its independence from all rail operators. We have obtained a detailed description of its operations as network manager, particularly regarding train path allocation, as well as a detailed understanding of the process for developing a track access agreement.

SNCB. We have been engaging with SNCB, which operates and manages the stations, including Brussels Midi Station and the maintenance facilities, including the Forest depot and maintenance facility located near the same station. In mid-June this year, Gemini visited both the terminal station and the depot, with good cooperation from SNCB. The visit and subsequent meetings established the basis for future access requests, which SNCB remains open to. This (and the engagement with SNCF Voyageurs) should give ORR confidence that Gemini is ready to take up access at Temple Mills, since we are highly likely to gain access to the depots we need in France and Belgium, thanks to our efforts in building confidence with access providers over the past two years.

Gemini has received Letters of Comfort from LSPH; Getlink; SNCF Réseau; and SNCF Gares et Connexions (see Appendix). SNCF Réseau has recognised Gemini as a potential network customer.

Gemini has developed outline timetables that form the basis of detailed discussions of access arrangements, and from them rolling stock diagrams that support discussion of both depot access and fleet procurement. These timetables and diagrams have been reviewed by London St Pancras Highspeed in conjunction with Network Rail High Speed. Our current timetable remains indicative; we expect it will be updated prior to the start of operation. We highlight the following key points:

- Our draft timetable has been built around the paths that exist through the Channel Tunnel, with our timetable constructed around the tunnel entry and exit times on both sides of the tunnel. These paths are taken from the current Getlink catalogue, which has four high speed paths available in each direction per hour at fixed times each hour. We have utilised paths that are not currently used by Eurostar. We have discussed this approach with Getlink and they concur with our approach.
- The timing of our trains on the LSPH infrastructure can be accommodated and is confirmed in more detail in the letter from LSPH attached within our Appendix. In particular, we highlight the service pattern leaving London where our services depart Stratford in a path ahead of a Eurostar before calling at Ebbsfleet, where the Eurostar passes and the Gemini Train then follows the Eurostar to arrive at the tunnel portal to pick up the subsequent Getlink high-speed path through the tunnel. This structure of the timetable has been validated by HS1.
- In principle, were any decision to be made to serve also Ashford International station, selected trains could make an Ashford stop in place of an Ebbsfleet stop without significant alteration of the timetable. Ebbsfleet passengers using such services could commence or complete their journeys using existing domestic high-speed train services

running twice hourly between the same stations. At present we assume all trains will call at Ebbsfleet and no calls are currently proposed at Ashford.

- We note based on the current draft timetable there are some minor re-timings necessary to SET empty movements to accommodate Gemini Trains shunt moves and in two instances there is a conflict between the path proposed by Gemini Trains and an existing freight service between Ashford and Ebbsfleet. These will need further work to resolve.
- As with any detailed timetable, there remains work to be done to refine terminus arrival and departure times and to confirm that any clashes with existing traffic can be managed. LSPH have already provided various constructive comments of this nature in their review, which was supported by Network Rail High Speed. All of these will be taken account of before work on the working timetable is undertaken by the Infrastructure Managers two years ahead of our start date.

Therefore, our work shows that the necessary capacity exists and is deliverable. We however recognise further work will still need to be done prior to the start of the introduction of services. We will work with all parties, including the Infrastructure Managers on both sides of the tunnel, Eurostar, Southeastern (and/or any replacement GBR entity) and the operators including SNCF, SNCB, and DB on mainland Europe.

The most significant issue highlighted in validating our timetable was turnround times in Paris, where in several instances the current timetable creates turnrounds that are too tight to be operationally robust. This will need to be addressed with minor adjustment, so timetables are aligned on all networks.

Nevertheless, our timetable is structured around the current available paths through the Channel Tunnel - i.e. utilising the four paths per hour pattern that Getlink have established for high-speed services. Getlink however is proposing to restructure the service pattern through the tunnel to create an additional fifth path per hour. When this is implemented (at a point before the start of Gemini Trains' operation), it will be necessary to restructure the full timetable on either side of the tunnel, including existing Eurostar and Southeastern services.

Currently we do not have visibility of the intended Eurostar (and other operator) timetables when the Channel Tunnel path slots change; once this is available, we will update our draft timetable accordingly – working with the respective IMs and operators. As part of this exercise to determine the actual timetable that Gemini trains will operate, we will ensure the timetable addresses the minor conflicts identified based on the current tunnel paths (which will change) and balance the turnround times, especially in Paris. The fifth path will create valuable additional capacity for all, albeit Gemini will need very little of it.

Regulatory approvals: As an open access commercial train operator, Gemini Trains will be subject to safety regulation and the requirement to obtain safety certification, its fleet will be subject to regulatory approval under the interoperability regulations and it will have recourse to regulatory determination where specific issues relating to access arise – such as the one here.

Gemini will be operating services in competition only with other open access commercial operators and regulatory provisions protecting government sponsored services are not expected to apply. Nor will it be subject to any form of economic regulation where pricing is concerned.

In addition to the ORR, Gemini has met Channel Tunnel Safety Authority representatives on the UK and French sides; engaged extensively with ART in France (see above); and met senior members of the French Ministry of Transport and UK DfT. We met the Rail Minister Lord Hendy earlier this year.

11. Please provide details of Gemini's rolling stock plans, to include:

- *Rolling stock class*
- *Rolling stock compatibility*
- *Rolling stock delivery plan*
- *Rolling stock depot strategy*
- *Rolling stock maintenance plan*
- *Rolling stock stabling*
- *Rolling stock delivery timescales*
- *Modifications to TMI that Gemini envisages are required to accommodate its rolling stock plans.*

The proposed Gemini service will be delivered by an efficiently deployed fleet of 10 high-speed trainsets, each of 200m length, able to be coupled to form 400m trains, but normally operated in single formation.

This fleet is to be compared with Eurostar's current operational fleet of 25 trainsets of 400m length deployed on its London routes. These 25 trainsets are formed of 50 half-sets of 200m length and are divided for some maintenance and depot procedures. Gemini's planned fleet represents therefore an increase of 20% in the current cross-Channel fleet measured in terms of 200m units. The Gemini fleet will represent less than 17% of the combined cross-Channel operational fleet.

Gemini's timetables, operating diagrams and business plan support a fleet of 10 trains. This delivers a good level of fleet availability and underpins a service with high levels of operating efficiency.

Gemini has engaged with four Original Equipment Manufacturers with all indicating availability of rolling stock. With no depot capacity yet available, it is not possible to reach a firm conclusion on choice of rolling stock since no order can be placed. We have therefore continued to maintain contact with all manufacturers and are at slightly different stages with each. The outcome of the ORR's process will open up further rolling stock options.

Our submission contains a letter of support from Siemens, where we continue discussion with the mobility team via the UK CEO. Siemens offers the Velaro Novo set which would fit well with the equipment already maintained at Temple Mills.

Gemini has further engaged in detail with Talgo, whose Avril set offers benefits via energy efficiency and accessibility. The Avril is locomotive-hauled, and Temple Mills already maintains locomotive-hauled units. The Avril is starting homologation trials on the French network for another operator.

We have additionally held constructive discussions with both Alstom and Hitachi, who have provided us with detailed technical assessments of their respective high-speed products, indicative pricing and delivery timescales.

Financing of these trains is readily available, with a strong appetite among rolling stock financiers. Gemini has support from Rock Group who would offer financing in support of our fleet, although no commitment is yet possible from either side. We continue to engage with other financing providers, including direct investors and traditional ROSCOs (notably Eversholt and Porterbrook). Under the current circumstances Gemini has chosen to keep all options open ready for a rapid mobilisation once depot capacity is available. We are confident that this will have no adverse impact on ultimate delivery time, since manufacturers are keen to see sets in use.

Gemini's new fleet will be based primarily at Temple Mills depot, but a small fleet of 10 trains requires only one maintenance track, which the IPEX report has identified as available with the minimum of adaptation.

Financial Viability

12. Please provide a copy of Gemini's Business Plan(s). 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. Economic and societal benefits associated with the application

Gemini Trains has built a detailed financial model supported by two top-tier professional services firms.

In January 2024, Deloitte, a big four professional services firm, completed its review of the initial Gemini Trains business plan, pointing to several improvements that could be made to ensure that passenger numbers and growth assumptions were achievable.

In 2025, the financial model has been further refined by specialist modellers at S&W Group, a top ten accounting firm, to allow investors to assess the viability and financial ability of the business.

Gemini is engaging with two major investors to conclude funding ahead of launch. As for all applicants, the availability of funding is materially impacted by, and linked to, access to depot space. Without a depot, a firm order for rolling stock is impossible and with the risk that an applicant may be denied depot space altogether, investors will only commit small setup sums. Gemini is in the same position as other applicants in this regard.

As already explained above, Gemini has engaged with various rolling stock financing organisations including ROSCOs. All these organisations require a level of financial commitment not yet available to us before they are able to provide detailed offers. We remain open to new and different models of rolling stock finance, this may include our lead investor directly purchasing the rolling stock, since they have the resources to do so.

Once depot access is granted, funding will be low risk and will be immediately forthcoming, including from sources who have so far declined to support Gemini. It is vital that the ORR appreciates the 'chicken and egg' nature of this relationship, which is at the very heart of this process and does not insist on investors placing large sums at risk ahead of a clear regulatory decision.

Revenue assumptions

Gemini wants to make international rail travel more accessible to more customers and has reviewed the available market which includes Eurostar's existing customer base, the existing traffic by air and the potential for market growth. The recent publications by LSPH and The Campaign for Better Transport of future growth predictions for our market further supports the likelihood that a new cross-Channel operator is likely to grow the market overall.

Gemini's plan to operate from Stratford International and stop every train at Ebbsfleet offers further market access widening the pool of potential passengers beyond that drawn on by Eurostar.

Cost assumptions

Cost assumptions are dominated by infrastructure access charges, which have been validated with Infrastructure Managers, or drawn from publicly available information on infrastructure charges. These charges are not expected to change materially.

Some elements of access charges vary with passenger numbers, but most are based on the number and parameters of trains in service.

Rolling stock leasing costs are taken from figures provides by manufacturers, taking a reasonable professional view of the likely cost using the Gemini team's personal experience of rolling stock procurement.

Staff cost assessments are based on the organisation described above. All Gemini team members have first-hand experience as managers or executives in rail businesses, so we have assembled the team shape that we believe best suits the business. We have assumed a high level of internal capability and have added resource to our own team in preference to including cost for outsourced services.

We have full costed mobilisation costs, including staff recruitment, training and salaries during the training period prior to start of operation.

Our business plan includes a generous allowance for contingencies.

Devising a proposed business plan for operations several years in advance will inevitably require a high degree of estimation. All aspects of the Gemini business plan may be subject to change if circumstances change. The existence of a plan demonstrates a level of engagement with the practical realities of swift mobilisation; it will be based on ever better supporting data as time progresses.

The Gemini Team

Gemini has assembled a senior team with broad and deep expertise in train operations, with significant experience across the rail industry and beyond. The alliance with Uber adds further strength to this operation, bringing a powerful global brand that recognises the strength of Gemini's proposition and team.

Gemini is unique among applicants in having had a full multi-disciplinary team identified and mobilised for around two years, with strong industry knowledge across all areas of train operations and a senior UK and European presence. Gemini will draw on this expertise, supplemented by a wide network of third-party providers, to continue to mobilise as soon as depot access is obtained.

Non-Executive Chair: Lord Berkeley

Lord Tony Berkeley is a member of the House of Lords and a civil engineer. He spent 15 years developing and building the Channel Tunnel, followed by chairmanship of the UK Rail Freight Group, the industry representative body.

He was a Board member and Chair of the European Rail Freight Association and was a founder and is currently Honorary Board Member of Allrail, the association of independent European rail operators.

He is a regular contributor in the House of Lords on rail, competition and other transport issues and is currently a member of the Lords Parliamentary and Scientific Committee.

Leadership: Adrian Quine, CEO

Adrian Quine is an entrepreneur, strategic advisor and former BBC World Service current affairs and business journalist with a strong interest in transport. A creative thinker, he has a track record in delivering complex projects by adopting 'out of the box' thinking while challenging the status quo.

He brings strong strategic leadership and is well-versed in communicating persuasively, new and creative ideas to the rail industry which is often culturally averse to change. He was one of the initial founders of 'Alliance Rail Holdings Ltd' and recently founded a bespoke daily tourist rail service on the popular Settle – Carlisle line, of which he is a trustee and CEO of the line's listed heritage property portfolio.

He has written think tank policy papers and blogs on rail policy and is regularly invited to comment in the print and broadcast media. He is a keen supporter of rail liberalisation, yet a pragmatist who believes that not all rail models are the same with a role for both the private sector and the state. When time allows, he's also an ad-hoc columnist for The Telegraph.

Finance: Tom Fielden: CFO

Tom Fielden is a chartered accountant and CFO in operational businesses, including rail. He brings leadership experience in real-time critical industries as well a broad commercial background and financial rigour.

Tom was most recently CFO of Northern Powergrid, where he oversaw investments in hydrocarbons, smart meters and engineering contracting as well as the main utility business.

Previously he was CFO of Great North Eastern Railway, operating passenger services on the East Coast main line, with industry-leading customer service quality and operational standards.

Tom trained as a chartered accountant with Coopers and Lybrand (now PwC) in London before moving to their business improvement consulting practice. He has also worked for BT where his roles included regulation and international ventures.

Commercial: Ian Chaplin, Commercial Director

Ian Chaplin has over 25 years of experience in the UK and international rail sector in customer service, sales and commercial roles. He is currently an advisor in the European travel technology sector and is also an advisor to Allrail, the association that campaigns for faster rail market opening.

Having worked as Eurostar's Head of Distribution and being Trainline's former Business Development Director who helped expand Trainline beyond the UK, Ian's primary expertise is in sales and distribution, policy and commercial topics.

Retained Advisers:

France, Belgium, Operations and Policy Adviser: Francis Nakache

Francis Nakache is a highly experienced rail professional with a deep understanding of the French rail market. After having held key positions in companies such as Matra Transport, TFN, Penauille Polyservices, he was CEO of EuRailCo, a joint venture of Transdev et RATP in European Regional Rail Passenger Transport and CEO of CAF France, the French subsidiary of the CAF group, a major international player in Rail Rolling Stock manufacturing.

With expertise in product development, strategy, and change management, Francis now runs his own consulting firm, ILITI.

He has been actively involved in professional associations and conferences, including the Rail Commission of UTP, Oxera Rail Policy Group, and Fédération des Industries Ferroviaires. Francis is also a member of Avenir Transports and the Scientific Council of GART

Regulation, Policy and Analysis Adviser: Andrew Meaney

Andrew Meaney is a consultant with 25 years' experience providing economic insight to the transport sector. He has worked at Oxera, the economics, finance and data science consultancy since 2000, where he is the Partner leading the Transport Practice.

Andrew has worked throughout the rail value chain across Europe and further afield, and has a deep understanding of regulation, competition, demand and revenue.

Stations and Customer Experience Adviser: Barbara Marie-Reine

Barbara has worked in the international rail sector for more than 25 years holding various senior operational roles for Eurostar at both Waterloo and St Pancras International. Prior to leaving Eurostar in 2020, Barbara was a Terminal Duty Manager, leading all aspects of the daily operation of a busy international terminal. Barbara was additionally responsible for complex relationships with security services as well as border force agencies from both UK and France.

Operations Adviser: Richard Stuart

Richard Stuart has a strong background in liberalised transport markets and brings over 30 years' experience working across the UK and European rail sectors in operational and commercial roles. Richard's primary expertise relates to market entry strategies and implementation, railway operations, rolling stock procurement, leasing and financing. He is a former Board member of Allrail.

His work has seen him advise clients on European passenger rail market opportunities for both operating contracts and rolling stock procurement and leasing, providing policy advice on market opening and reform programmes, and leading benchmarking studies. In a previous role, he was Director International Development for the Go-Ahead Group where he was responsible for the establishment of their German and Nordic rail businesses.

Brand Partner: Uber

Uber needs little explanation, a global mobility brand centred on rides currently serving around 170 million users per month globally, including 5 million active UK users. Uber is available is more than 70 countries and 15,000 cities, but London and Paris are Uber's two largest European hubs, so it is a natural fit for Uber to be associated with connecting London, Paris and Brussels. Uber's annual revenue in 2024 was $44billion.

Gemini and Uber have joined forces in a brand and distribution partnership that will see Gemini trains carry Uber's brand and Gemini tickets distributed via Uber's network, among others.

13. Please provide evidence of Gemini's assessment of the benefits to passengers, or any wider benefits, of introducing new services.

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

Our response below to questions 13 and 14 is intended to provide clear evidence that Gemini's model is intended to be truly different compared to the existing operator and will deliver significant passenger and societal benefits. In turn, this new approach will lead to a significant growth in the market. Gemini firmly believes that this is approach is a key differentiator compared both to the incumbent and to other potential applicants.

Gemini's goal is to grow the overall market for international rail travel by making it more accessible to more passengers by bringing innovative and value for money travel opportunities to a much wider audience. Passengers have had only a single option for over 30 years yet the demand for international rail travel has never been greater. Now the time is right for a new operator to deliver a better customer experience and offering better value for money than the incumbent.

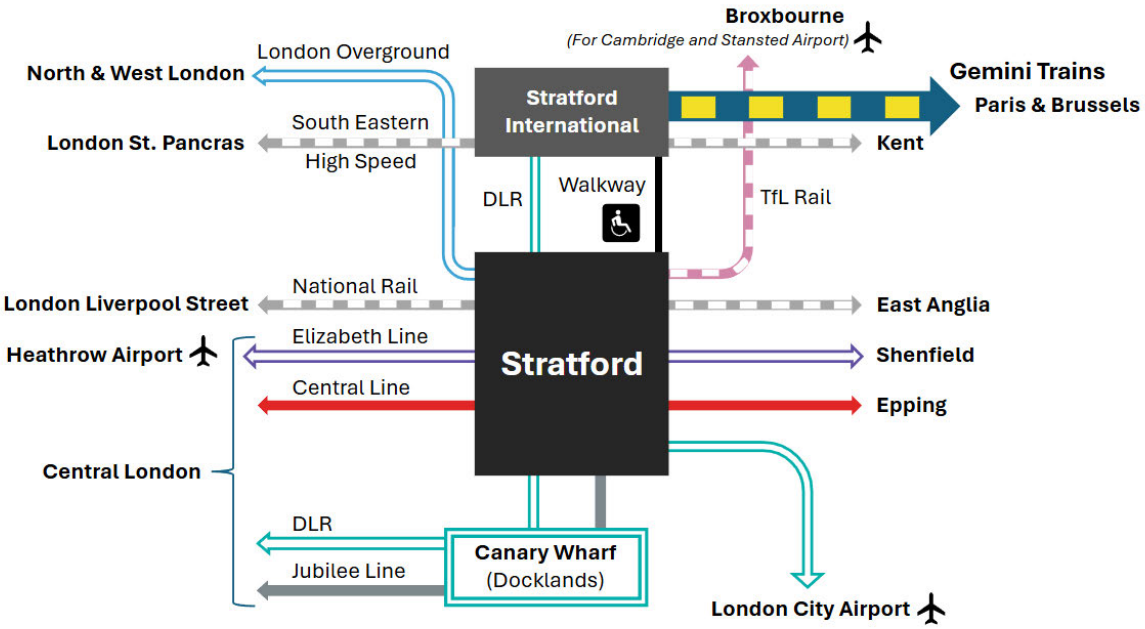
Gemini will provide this alternative by introducing a fleet of new trains, offering better station experiences, reinstating calls in Kent and opening new journey opportunities for customers across the UK and Europe. Gemini's brand partnership with Uber brings a distinctive and globally known participant into this market.

Gemini will not simply copy the St Pancras-centric model of the incumbent; rather Gemini will offer a truly complementary service, designed to stimulate new demand, not just taking existing market share. Gemini's business plan assumes that it will grow the cross-Channel rail market by more than 3m passengers in its 3rd year of operation.

UK Stations – Gemini's choice of UK stations will appeal to a wider audience and will bring significant additional economic benefits.

Stratford International: Gemini has been in extensive discussions with LSPH about the use of Stratford International as its terminus station. Gemini believes that Stratford International creates a blank canvas for a station that is specifically designed around the needs of our passengers and is not just a copy of the existing operator's service.

Stratford is superbly connected by multiple public transport options including the new Elizabeth line alongside two other tubes lines, London Overground, the DLR and high frequency national rail services and buses. Stratford International also has its own dedicated pick-up point for Uber rides and taxi rank. According to 2024 ORR data, Stratford domestic station was the fifth busiest station in the whole of the UK with c. 56m users. With the addition of passengers using Stratford International, this number rises to around 60m. As such, this provides greater accessibility to a wider number of customers.



Stratford has been and continues to be at the very heart of the regeneration of the East of London and Gemini's choice of operating from Stratford International is wholly aligned with this long term central and local government strategy.

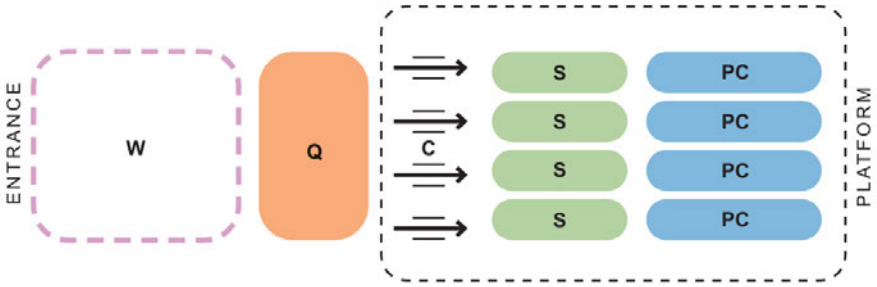
We will achieve this by taking advantage of the blank canvas that is Stratford International station. Gemini engaged the services of professional architects (WW+P) to define an efficient and smooth passenger flow through the station to boarding the train.

Alongside WW+P, Gemini has considered multiple options of how the passenger flow should be developed at Stratford to make the best use of the space and to provide customers with a comfortable and seamless experience. Our proposed model will be similar to travelling by long distance rail in the UK or international rail within the EU rather than the today's cramped and queue-centric experience. As such, Gemini has developed a plan to create a wonderful experience for customers in what is the current public concourse area of Stratford International and for this to be the main collection and waiting zone – before check-in and security procedures.

Gemini proposes to create a 'Station Square' experience that will bring benefits to travellers as well as providing new experiences and facilities for local residents. Given the proximity of Westfield to Stratford International, we see the opportunity for passengers to take advantage of the retail and dining options offered there, far beyond what can be provided within a small station footprint. We are engaging with the owners and management of Westfield with a view to exploring those possibilities.

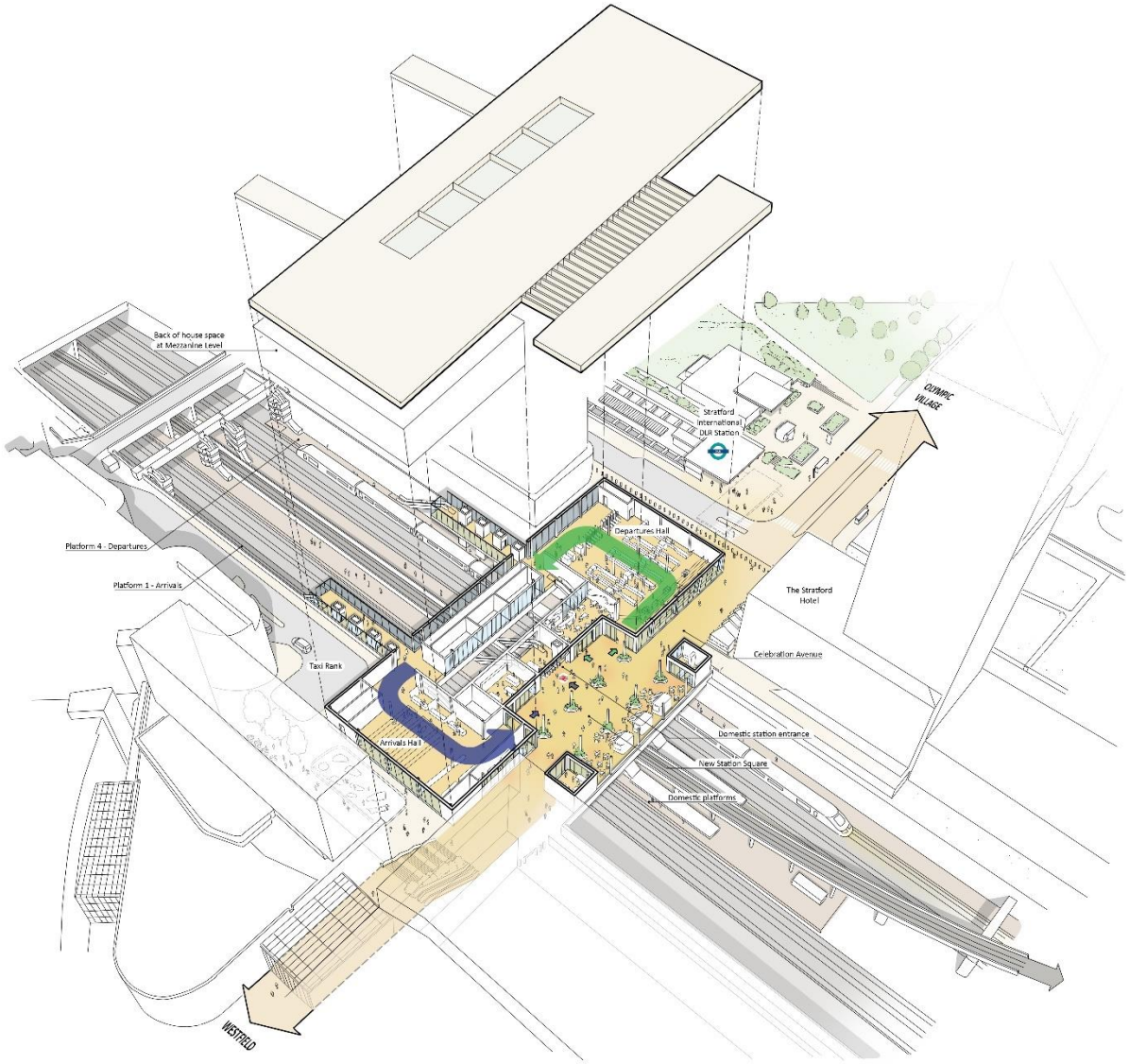
An impression of Stratford International Station Square (WW+P)

Customers' main waiting zone will be in the Station Square. They will be able to proceed through ticket check and subsequent processes from around 30 minutes before departure and will be able to board the train immediately once all such processes are completed.



The schematic above shows the proposed passenger journey through the terminal at Stratford International. Given that it was not designed as a terminus station, we need to adapt the space to provide appropriate capacity for comfortable throughput whilst respecting the core security and immigration processes.

Gemini's analysis with the architects recognises that additional access points to platform level are required (additional escalator and lift(s)); however, this modest development will provide more than adequate vertical transport for the volume of passengers that Gemini expects to carry.



Concept design for Stratford International Station by WW+P

Gemini is fully committed to using Stratford International as its London terminus and is excited by the prospect of re-imagining the passenger experience, which we expect to lead to significant growth in the market for international rail travel. We are mindful that such infrastructure work has lead-times and bringing Stratford International into service may require certain additional authorisations.

Gemini has therefore developed a series of high-level mitigation plans that could be considered if the Stratford International facility is either not, or not fully, operationally ready, by the time of our planned launch of services.

Mitigation Plan 1: The outline proposals for the Stratford Terminal present an ambitious vision for a new public concourse, which require some external alterations to the existing station building. Once we can do so, we would stress test these proposals, looking in detail at issues and seeking to use the existing architecture and infrastructure as efficiently and expediently as possible. A key driver for this will be timeframe, with approaches that minimise the timeframe and complexity of the building works being prioritised, in order to hit our operational deadlines and be ready in time for the full service.

Mitigation Plan 2: However, assuming that Stratford is only partially ready to accommodate a proportion of passengers, Gemini will plan to spread its passenger load across both Stratford and Ebbsfleet stations. This can be achieved using commercial levers which could include the introduction of differential pricing between Stratford and Ebbsfleet e.g. make it cheaper to travel from Ebbsfleet and / or only sell a limited number of seats from Stratford. Whilst not ideal, it is also worth highlighting the option to support passengers travelling between these stations using existing Southeastern high speed services.

Mitigation plan 3: If Stratford is not ready to accommodate any new passengers by the time of launch, Gemini would seek to use part of St Pancras International as a temporary London terminus. Several years ago, Eurostar created a small additional departure terminal known as 'zone 6' out of part of the arrivals hall. This is used occasionally at times of disruption or in particularly busy periods. Zone 6 is completely independent from the main Eurostar terminal. Its capacity will allow us to accommodate the majority of the passengers of a Gemini train, some further mitigations may be used in conjunction with this space. It has its own entry, security machines and space for the PAF booths. This would mean negligible impact on Eurostar and, if this space could be negotiated with them as a temporary solution, it would allow Gemini to present its own independent brand identity and be staffed with its own personnel.

In developing the business plan, we have considered how the station will continue to function during periods of disruption and during special events, particularly the regular West Ham home fixtures.

Mitigations in relation to these events will need to be examined closely as part of our detailed design development and in collaboration with the existing operation. However, we have developed several strategic principles which will guide this thinking at this early stage:

- Our proposals include the possibility of a mezzanine above the Departure Concourse. If this option is developed, its scale is sufficient to accommodate delays to Gemini services;
- While the initial design ideas for transforming the station focus on the creation of a new covered station square, extending the existing linear concourse at its centre onto the current bridge, we also propose additional entrances and exits at each end of the station, where the current doors to the existing concourse are. These dispersed entrances would allow effective crowd management systems to be put into place, with Gemini passengers able to be separated from crowds arriving or departing from Southeastern services, during a West Ham game for example, or vice versa. These additional entrances mean that the large external

paved area, under the canopy in front of the Departure concourse, could also be organised using 'tensa barriers' to create additional queue space for Gemini passengers without interfering with Southeastern services.

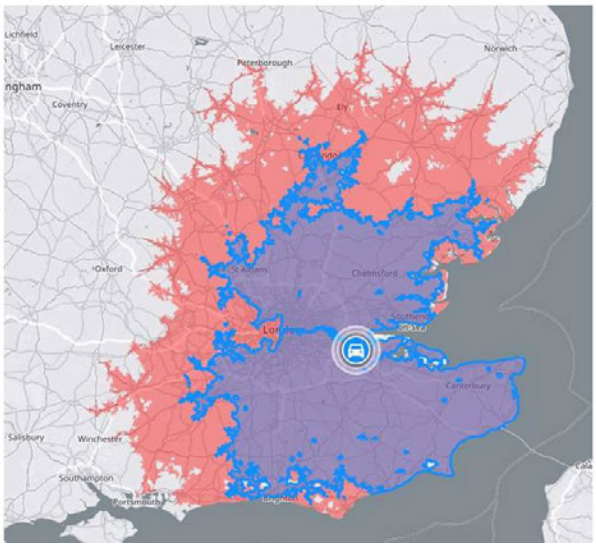
In our work on the future use of Stratford International, the asset owner, LSPH, has provided considerable support and access to the station for us and our advisers and we are grateful for the time and assistance offered. In addition, LSPH reviewed the design concept prepared for us by WW+P and consulted internal subject matter experts. This review raised numerous points of practicality, compliance and obligation, including evacuation and crowd control, engineering design, site boundaries, core facilities and the preservation of the existing Southeastern accommodation. All these points and many more, will need to be considered fully and properly as we progress to the next phase and review the details of a proposed renewal of Stratford International.

We are conscious that while the proposals are Gemini's, the asset is part of LSPH's estate and their consent, involvement and support is essential if we are to realise the vision of a new inter-capital service from Stratford International station. We have already engaged with the DfT and as proposals continue to be developed, we will extend our engagement to Border Force and the Police Aux Frontieres, all of whom will need to agree the proposals for Stratford International.

Kent stations: All Gemini services will stop at Ebbsfleet International, introducing a regular and reliable international connection for the c.18m customers that live within 1.5 hours' drive of Ebbsfleet[1]. International traffic served Ebbsfleet with an occasional stopping pattern until the pandemic. The service has never resumed; we believe the sparse nature of these services constrained growth.

Ebbsfleet International Drive Time Catchment

- Drive time catchment of Ebbsfleet International station
- Significant – owing to proximity to M25 & Dartford Crossing
- Based on departure time of 0700 on a weekday
- Created using TravelTimeAPI
- Blue – 1.5-hour catchment – contains c. 13.8 million people
- Red – 2-hour catchment – contains c. 18.5 million people



Credit: Kent County Council

[1] For further information on the demographics around Ebbsfleet and Stratford, see the SQW report prepared for Dartford Borough Council attached as an appendix to this submission.

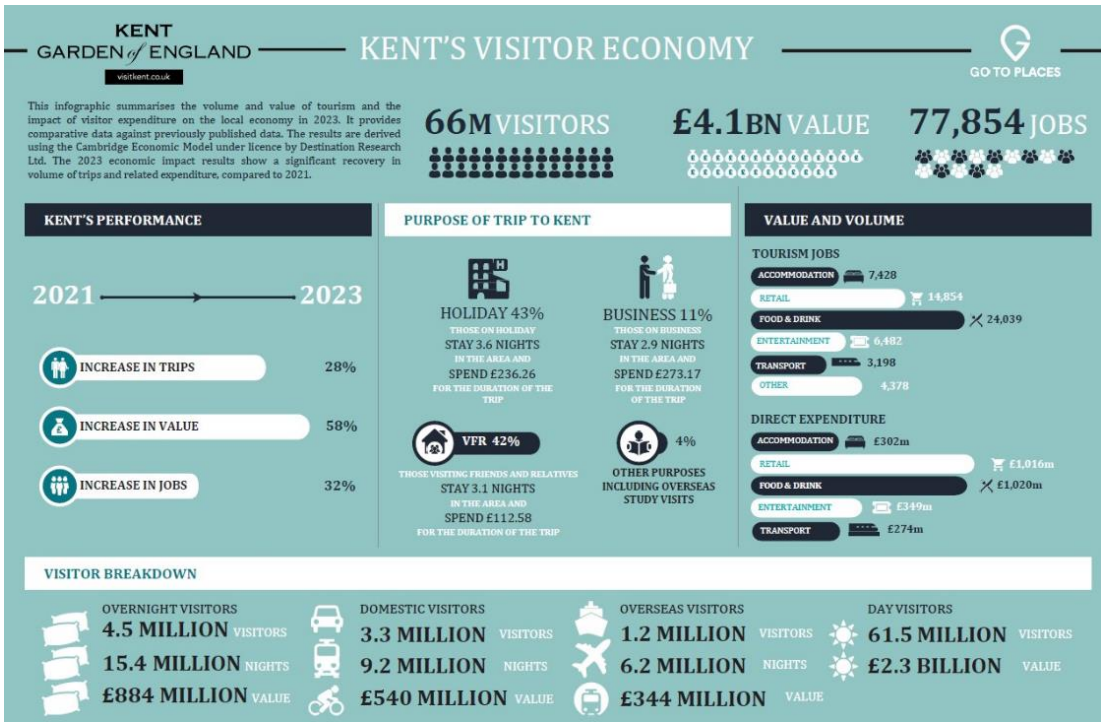
If journey time is extended to 2 hours, then the catchment area extends to 18.5m people across the south eastern counties and a large proportion of East Anglia. Given the ease of connections to Ebbsfleet and the convenient and extensive car parking capacity at the station, this provides a significant opportunity for Gemini to realise its objective to bring international rail travel to a wider audience.

We understand that the government has given the go ahead for the Lower Thames Crossing which will significantly improve the accessibility of Ebbsfleet for a large proportion of customers from eastern counties.

There is significant untapped economic growth for the Kent region that could be unlocked by reinstating international services in Kent. As an example, the volume of international business travellers to Kent reduced by around 34% between 2019 and 2023 (source: Visit Kent Economic Impact Cambridge Report: 2023). Given that business traveller average spend per stay is significantly higher than for leisure travellers, this represents a material decline in the economic contribution of this segment. Whilst it may not be possible to directly attribute all of this decline purely to the absence of international rail services, the reinstatement of these services to Kent will serve to make the region much more accessible. In turn this will become more attractive and popular for business travel bringing associated economic benefits.

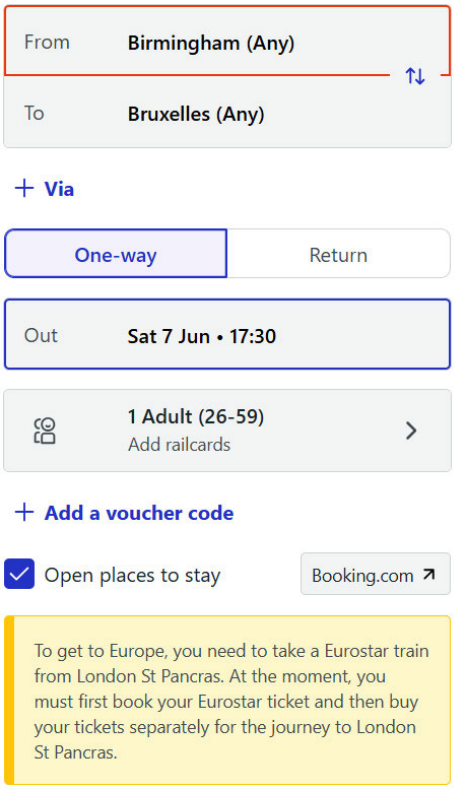
There is significant political support to reinstate services at Ashford International station. Whilst Gemini has not explicitly included stopping at Ashford in its initial business plan, we are very open to working with local stakeholders in East Kent to explore the commercial viability of re-opening Ashford International.

This analysis focuses on the 'outbound' opportunity and benefits of reinstating stops in Kent; however significant additional benefits exist from inbound travel too with tourism accounting for c. 11% of all jobs within Kent. Re-opening just Ebbsfleet International station is likely to bring significant additional benefits in terms of both employment opportunities as well as an increased spend by international tourists.



Credit: Visit Kent

Wider GB Rail network: Not only does Gemini want to broaden access to international rail services in London and the South East, but we also wish to make this more easily available to travellers from across a wider area of Great Britain. We intend to achieve this by offering the ability for customers to buy 'through tickets' from any GB Rail station to any Gemini destination. For example, passengers will be able to buy a journey for travel from Birmingham to Brussels or Plymouth to Paris in a single transaction. Following initial discussions with the Rail Delivery Group (RDG), it is understood that an existing range of 'London International' fares is already available within GB Rail systems; however, these are neither routinely made available to customers through existing Eurostar channels, nor through high profile apps such as Trainline.



Gemini aims to make these new journey opportunities available to customers through all Gemini branded retail channels. We will also work in collaboration with our co-branding partner Uber and third-party retail partners to provide such journey options to customers. Indeed, where passengers' end-to-end journeys start and finish in London, Paris or Brussels, an add-on Uber ride will be available giving people a true 'door to door' option.

As part of this, Gemini believes that it is crucial that customers that are connecting from other rail services within Great Britain can travel with confidence and have guaranteed journey continuation in the event of disruption. To this end, Gemini has commenced initial discussions with RDG on this topic about the mutual arrangements that are necessary to deliver these benefits to customers.

Furthermore, the new HS2 station at Old Oak Common will be served by the Elizabeth line offering passengers from the North of England and Scotland a one stop connection direct to Gemini Trains at Stratford International.

Continental Stations – Gemini will take advantage of the redevelopment of Paris Nord as an expanded and neutral channel tunnel terminal

Paris Nord: Gemini has undertaken detailed and productive conversations with our industry colleagues at SNCF Réseau and SNCF Gares et Connexions to better understand the Paris station options. To ensure that Gemini's customers have the best possible experience, we have discussed in significant detail the re-development of the current Channel Terminal area at Gare du Nord station to accommodate both an increase in passenger numbers as well as accommodating new operators alongside Eurostar.

Brussels Midi: We have been in close contact with SNCB, which operates and manages the stations, including Brussels Midi Station, and the maintenance facilities, including the Forest workshop located near the same station.

In operational discussions and on-site visits, SNCB provided comfort that new services will be able to be accommodated in due course. Specifically, we understand that there is an ongoing station re-development programme that will increase capacity in the departure lounge by 30%. This will be complemented by smoother and more efficient passenger processing facilities such as the introduction of new passport e-gates.

In line with the objective of allowing customers to buy tickets in one single transaction from any GB Rail station to Gemini destinations, Gemini would like to replicate this model on mainland Europe and allow customers to buy tickets in a single transaction to as many European stations as possible. Given the complexity of integrating the offers of multiple train companies, Gemini will engage the services of a rail inventory aggregator to facilitate this process.

New destinations – Gemini will drive incremental growth by encouraging modal shift from air.

Gemini aims to serve the existing Paris and Brussels destinations from launch with services starting at Stratford International and calling at Ebbsfleet International. However, in the 3rd year of operation, we also plan to extend some of the Brussels services to Cologne. This will serve not only one of the most populous areas of Germany – Nord-Rhein Westfalen – but also acts as a connection gateway to the rest of Germany and Central Eastern Europe. The July 2025 announcement of inter-governmental work towards UK-Germany rail ties further supports the viability of this opportunity.

We expect that this direct service to Cologne will have a similar positive impact as Eurostar's direct services to Amsterdam given similar journey times – Stratford International to Cologne could be achieved in as little as 4 hours.

In 2023, according to CAA data, there were c. 3m passengers flying from London to Cologne, Dusseldorf, Dortmund or Frankfurt, all of these are accessible within 1 hour of Cologne. Gemini's business plan assumes that nearly 0.5m of these air passengers will switch to using Gemini rail services instead of flying.

Gemini is also considering other European destinations such as cities in Switzerland. We are aware that SBB (Swiss Railways) is exploring potential cooperation models. It is understood that SBB prefers to partner with third-party operators to run cross border services and Gemini would

welcome the opportunity to bring its expertise to such a partnership with a view to including London to Switzerland services in the Gemini portfolio in due course.

Gemini plans to offer its services at fair and reasonable prices to appeal to a wider audience and to build faith in international rail travel as a viable and sustainable mode of transport. We will be able to do this by reducing the level of overheads by operating a lean and efficient business. We will also aim to work its assets efficiently with trains sets operating more journeys per day compared to Eurostar who often park trains for long periods of time taking up valuable depot space.

Gemini will make tickets more accessible through more sales channels to appeal to a wider audience

In the early days of the Eurostar service, the only ways to buy tickets were either by going to a station or via a call centre. This position evolved to include digital sales through Eurostar's own brand sales channels, but only relatively recently has Eurostar started to open distribution through other third-party channels. This approach also limits the accessibility of ticket sales and does not serve to grow the market.

Gemini will adopt a much broader and inclusive approach and will embrace the opportunity to distribute tickets through a wide range of third-party channels, led by Uber, to ensure that cross-Channel rail travel is made available more often to more passengers and is always front of mind when customers are considering travel options.

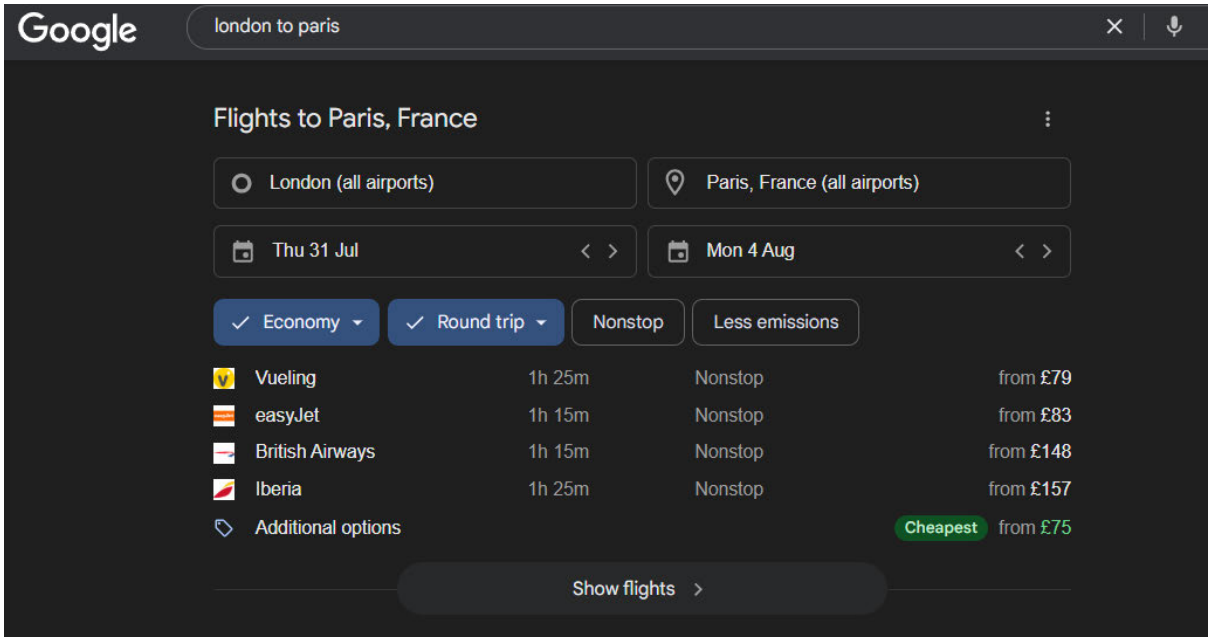
To achieve this, we will develop a technology solution (API) that allows third parties to easily integrate Gemini inventory and to make available to its customers through intuitive interfaces. Examples of partners that have already agreed in principle to distribute Gemini tickets include:

- Uber: Gemini has developed a deep 'co-branding' partnership with Uber, the two parties signing an agreement in May 2025. This will see Uber branding on Gemini Trains - similar to the Thames Clipper boat in London (Uber Boat by Thames Clipper) - plus agreement to distribute Gemini services through its mobility app. Globally, Uber has 170m active monthly users which represents a huge, captive user base which will have access to buy Gemini tickets.

- Trainline: Europe's leading train and coach travel booking app has agreed in principle to distribute Gemini tickets. Notably, Trainline confirms that its model of providing customers with a choice of operators on common routes not only delivers value to users, but also serves as an enabler to grow the market

In addition to these high-profile sales channels, Gemini will also seek to be present on classic air retail and information channels such as OTAs (online travel agents), Skyscanner, Google Flights and on GDS channels that are traditionally the preserve of airlines.

A simple London to Paris search on Google gives a Google Flights result page as below with no mention of any rail options. This lack of presence of rail options is suppressing demand and we will solve this by ensuring our data and rail booking options are made available at all relevant touchpoints.



As referenced above, Gemini aims to provide GB-wide customers with the ability to buy through tickets from any of the c. 2,500 GB rail stations to Gemini destinations. These new journey opportunities will drive incremental growth and meet Gemini's objectives of making international rail travel more accessible to more people.

Gemini will be an inclusive operator seeking to remove all barriers to international rail travel to stimulate additional demand

Gemini wants to provide high quality affordable international rail travel to everyone. This extends from booking tickets from anywhere in the Great Britain to Gemini destinations through providing the ability to buy tickets face to face (not just online) to travelling without physical barriers.

Gemini has engaged with inclusivity specialist Transreport that seeks to facilitate the experience for both customers and Gemini as operator by providing its innovative Accesslink software.

15. What, if any, assessment has Gemini made of the financial impact on existing operators of introducing new services? If available, please provide evidence to support Gemini's assessment.

Gemini response: As detailed above, Gemini's goal is to grow the market and make international rail travel accessible to a much broader audience. Much of our market share will be comprised of customers that, either would not have travelled at all without Gemini trains being available, or would have travelled by alternative modes, in particular by air. However, we fully expect a cohort of existing Eurostar customers to switch to Gemini due to greater value, greater convenience and perhaps because they have been starved of alternatives for the past 30 years.

This is initially going to lead to some revenue abstraction to the incumbent operator; however, it is equally plausible that some Gemini passengers will also use Eurostar services especially as single leg pricing allows that flexibility. There is evidence from other markets in Europe that competition not only grows the scale of the market, but it also leads to growth for all providers, not simply the new entrant. In Italy for example where open access competition has existed in high speed rail since 2012, not only has Italo secured a meaningful market share, but the incumbent Trenitalia has also shown an increase in ridership brought about by a relentless customer and quality focus – something that was not necessary before the emergence of competition.

However, given that Eurostar is currently operating on a purely commercial basis, i.e. with no public subsidy, it is not considered that revenue abstraction as a result of open access is a relevant consideration for the Regulator to take into account.

Views of Stakeholders

16. Does Gemini wish to make any representations on issues raised by other stakeholders that it has not had the opportunity to make to date? Any other information, clarification and/or representations

Gemini response: Press Coverage:

Since Gemini went public on 24 March 2025 there has been considerable press interest in us. Gemini was featured prominently in the national press and extensively in local publications especially around Kent and the South-East. We also featured on broadcast media (Radio and TV) plus in the trade and industry press and online blogs and podcasts.

There was a second and understandably bigger wave after our co-branding partnership with Uber was announced on 21 May 2025.

The interest from wider stakeholders and public has been biased toward Gemini's potential benefits for the poorly served Kent and South East London market. In addition, our launch revived a regional campaign for international services to resume from Ashford.

In terms of key stakeholders, the Gemini team has engaged over the past 30 months with a wide variety of interested parties and stakeholders, these include but are not limited to:

- London Legacy Development Corporation: Formed in 2021 to continue the work of the Olympic Delivery Authority after the London Olympics, the LLDC is a mayoral development corporation seeking to promote the Olympic Park and surrounding areas, including the area adjacent to Stratford International Station.
- Kent Count Council: The Local Authority for Kent, with an interest in the economic benefits unlocked by regular international services from Ebbsfleet International.
- Dartford Borough Council, which has a well-developed economic development function with a strong interest in regional growth.
- Ebbsfleet Development Corporation: established in 2015 to support housing and employment development, and associated infrastructure in the Ebbsfleet Valley.
- Thames Estuary Growth Board: Formed in 2020, a result of the 2018 report of the Thames Estuary Growth Commission to drive economic growth in the region.
- Visit Kent: Driving leisure and business visitors to Kent.
- MPs for Stratford & Bow, East Ham, West Ham and Beckton: all with constituencies including or adjacent to areas that will be positively impacted by Gemini's new services.
- GLA member for City & East (including Stratford International).
- URW: Unibail-Rodamco-Westfield, owner of the Westfield shopping centres.
- Department for Transport: engaging with officials and the rail minister to describe our ambition for Stratford.
- AllRail: The organisation of open access operators in Europe, which Gemini will join as soon as mobilisation begins.
- Since Q1 2025, Gemini has been working with Uber to share and develop the plans that will bring the Uber brand to international rail services. Our alliance with Uber will represent a partnership between a rail operator and a global mobility brand unique in the rail industry.

Gemini is pleased to be able to provide, appended to this submission, a series of stakeholder letters of support for our vision to bring new international rail services to the Southeast, enabled by access to Temple Mills International depot.

17. Please take the opportunity to provide any additional information and evidence in support of your application that you wish ORR to take into account.

Gemini response:

- Gemini will grow the market, not simply take market share: our operating footprint is different to Eurostar's and will drive economic growth in areas close to the international line yet not currently well served by it.
- Gemini will support regeneration around Stratford, with new investment bringing Stratford International into inter-capital use as asset for London.
- Gemini will re-instate stops in Kent. A regular and consistent stopping pattern, with every Gemini train stopping at Ebbsfleet, will drive growth and expand the market.
- Carrying Uber's brand, Gemini's service will be instantly recognisable and immediately accessible from across the country.
- Gemini will provide a connection from HS1 to HS2 via the Elizabeth line. Regional and national connections via Stratford domestic station are superb and will bring passengers to a new and attractive service.
- Gemini's team is already in place, with the knowledge and first-hand experience required to launch.

Summary

Gemini aims to grow the cross-channel rail market by making international rail travel more accessible to more people. We are the only Section 17 applicant that can fit into the space at Temple Mills depot which has been identified by IPEX as available.

Our proposal to start all our services from Stratford International will both ease congestion at St Pancras and bring economic benefits to East London, one of the fastest growing areas in the capital. Stratford is well served by public transport and when HS2 opens, the Elizabeth Line will provide a direct link between Old Oak Common and Stratford - further creating an easy connection from the North of England into our cross-Channel services. The Elizabeth Line also provides a direct link to/from Paddington, allowing an easy connection for passengers in Southwest England and South Wales.

Our proposal to stop every train at Ebbsfleet in Kent will provide a gateway for 18.5 million people who live within 1.5 hours' drive. Our modelling suggests that around 60% of our passenger journeys will to be new to international rail with a significant shift from plane to train with obvious environmental benefits. The level of support shown in the appendix at the end of this document shows how Gemini's dynamic and well thought through business plan has really caught the imagination of stakeholders.

Gemini is keen to work with both GBR in the UK to offer through ticketing from anywhere in GB, and with continental rail operators for onward connections beyond Paris and Brussels. Indeed, we are also looking at extending our own services beyond France and Belgium to Germany and Switzerland. Gemini will also work closely with the UK tourism industry to promote not just London but the whole of the UK.

Gemini will align our brand with the needs, expectations and demands of the current and future generations. Our partnership with Uber further underpins the sustainability of our business plan

with Gemini benefiting from immediate brand recognition. London and Paris are Uber's biggest markets in Europe.

We are a highly professional team with strong and diverse industry skills; we are also dynamic and entrepreneurial in our approach with one goal: to deliver a better service. In doing so, we will generate modal shift from air and greater utilisation of the route. Our services will create extensive benefits to our customers, with lower fares, a brand-new fleet of comfortable trains, an enhanced onboard offering and superb customer service.

The Gemini teams has worked extensively on this project for over 2 years. Our proposed services are deliverable and will bring huge passenger, societal and economic benefits to East London and North Kent. We offer a credible and simple route to growth in international passenger rail services using existing track, station and depot infrastructure and remain ready and willing to work with the ORR team in the coming weeks and months.

Appendix – Stakeholder Submissions / Letters of support

- Uber
- Sir Stephen Timms, MP, Uma Kumaran MP, James Asser MP, Umesh Desai AM
- London Legacy Development Corporation
- Mayor of Newham
- Ebbsfleet Development Corporation
- Thames Estuary Growth Board
- Dartford Borough Council
- Canary Wharf & Docklands Business Association
- Kent County Council
- Siemens
- Eurotunnel
- SNCF Reseau
- SNCF G&C
- LSPH

Also included in our supporting Appendix are a report from SQW concerning the demographics of our service area and the Concept design for Stratford International Station by WW+P

Uber London Ltd
Aldgate Tower
First Floor
2 Leman Street
London
E1 8FA

27 June 2025

Mr Ian Biggar
Access Policy Advisor
Office of Rail and Road
25 Cabot Square
London
E14 4QZ

Dear Mr Biggar,

Gemini TOC Limited's application for directions under section 17 of the Railways Act 1993

I write on behalf of Uber London Ltd (Uber) in support of Gemini TOC Limited's application for access to Temple Mills International (TMI) depot, submitted 28 February 2025.

Introduction to Uber
Uber is the leading Rideshare Mobility & Food Delivery provider operating in more than 70 countries. In 2024, we completed over 11 billion trips globally, with over 171 million active users of the Uber platform.

In the UK, which is one of Uber's largest markets, our Mobility business is live in over 70 towns and cities, and our Delivery business partners with over 70,000 restaurants, grocery and convenience stores. Moreover, the UK is our first market globally where we offer train and coach tickets in-app. We're growing this thriving business, with the aim of becoming a major train ticket retailer in the UK and across Europe.

Uber has a number of unique differentiators setting us apart from other retailers - including our global scale, the multiple modes of transport in-app, including trains, and custom technology features that enable the best experience at transport hubs such as airports and train stations, our ability to offer connected journeys and our commitment to sustainability.

Role of Uber in enabling public transport journeys
Enabling public transport journeys is a major focus for our business globally. Last year we completed millions of trips to and from train stations in the UK, with 8 of the top 10 destinations being train stations. This serves to highlight the crucial role that Uber plays in addressing the first/last mile concerns for passengers travelling by rail. By bridging the gap and enhancing connectivity for passengers, Uber makes rail travel a much more convenient option.

Technology and products for station trips
We're continuously improving our products and custom technology at stations, giving both drivers and passengers the best experience. We offer a broad suite of products which caters for different needs, including Uber XL for families with luggage, wheelchair accessible vehicles and UberAssist for riders who may need extra help.

From a technology perspective, we help ensure that passengers can be picked up at the optimal location depending on which station exit they use, thereby reducing congestion.

Sustainability progress to-date
Our sustainability commitments are evidenced by nearly 40% of Uber miles in London being driven in EVs, with the vast majority of the remainder being driven in hybrids. Uber is leading the PHV industry on electrification and we are making significant investments to support drivers switching to EVs, while products such as Uber Green make it easy for passengers to choose greener options.

Gemini and Uber:
We at Uber are excited about the opportunity to partner with Gemini to launch the new cross-channel service. Together, we aim to transform the end-to-end passenger journey and help make train travel the most convenient and compelling choice for millions.

Our shared vision is to deliver truly connected, door-to-door travel. With seamless integration, passengers will be able to reserve their Uber ride to and from the station as soon as they book their train ticket - removing friction and increasing the appeal of trains.

Today, millions of passengers rely on Uber to reach the airport. We believe that with a seamless connected experience we can encourage more people to choose trains over cars or short-haul flights. Uber's services are live across London, the South East, and France, allowing for seamless door-to-door travel from day 1.

Our collaboration with Gemini also presents a unique opportunity to reimagine the private hire vehicle (PHV) experience at train stations. For the first time, PHV users—families, groups, and travelers with luggage—will be considered a core part of the passenger base, not an afterthought. By designing stations with their needs in mind, we can make train travel convenient and stress-free.
Our ambitions include:

- Optimised pick-up and drop-off zones with clear wayfinding
- Dedicated check-in for Uber-booked passengers to reduce waiting times
- Streamlined integration between train schedules and driver availability to reduce wait times and improve reliability.

Together with Gemini, we are committed to creating a world-class, future-ready travel experience that supports modal shift, enhances accessibility, and positions trains as the backbone of sustainable mobility in the UK and France.

We fully support Gemini's application and look forward to working together to realise this shared vision.

Yours Sincerely,

Andrew Brem
General Manager UK
Uber

Uma Kumaran, *MP for Stratford and Bow*
James Asser, *MP West Ham and Beckton*
Sir Stephen Timms, *MP for East Ham*

House of Commons, London SW1A 0AA

Mr Adrian Quine
Chief Executive, Gemini TOC Ltd
3rd Floor, Great Titchfield House
14-18 Great Titchfield Street
London W1W 8BD

3 July 2025

Dear Adrian,

We are the three Members of Parliament representing the different parts of the London Borough of Newham, and the Member of the London Assembly for the area.

When *"Stratford International"* station in Newham opened in 2009, it was the culmination of a twenty-year campaign by the London Borough of Newham and local MPs. The idea of an international station had been identified in the 1980s as a key catalyst for regeneration in the area.

The station has already played a crucial role in local development. It opened up the possibility of hosting the London 2012 Olympic and Paralympic Games, with the stadium at Stratford. That has led on to the remarkable developments in and around Stratford since then.

Despite the name of the station, only domestic services have ever stopped there. It has been a great disappointment to us that Eurostar has refused to stop trains at Stratford. It has long been the ambition of local representatives that international services might serve Stratford too. We are therefore delighted to learn of the plans of Gemini Trains to run international services to and from Stratford.

We agree with Gemini's assessment that international passengers travelling to and from many parts of London – including Westminster – are likely to find it more convenient to use Stratford than St Pancras. We are convinced that international rail services at Stratford represent a major commercial opportunity, as demand for international rail travel grows. We believe that Stratford could play a key role in the European rail network, and, in doing so, stimulate further positive regeneration – businesses and homes – in our part of London.

We support the plans of Gemini to gain access to the depot at Temple Mills, and will be following the development of its plans with great interest.

With all best wishes,

Yours sincerely,

[redacted]
Uma Kumaran
MP for Stratford and Bow

[redacted]
James Asser
MP for West Ham and Beckton

[redacted]
Stephen Timms
MP for East Ham

[redacted]
Unmesh Desai
GLA Member, City and East

QUEEN ELIZABETH OLYMPIC PARK
Level 9
5 Endeavour Square
London, E20 1JN

9 July 2025

Mr Adrian Quine
Chief Executive,
Gemini TOC Ltd
3rd Floor, Great Titchfield House
14-18 Great Titchfield Street
W1W 8BD

Dear Adrian,

Re: Section 17 Application for Access to High Speed 1 and Temple Mills Depot

London Legacy Development Corporation (LLDC) is the organisation behind Queen Elizabeth Olympic Park. Formed in 2012, our mission is to drive inclusive growth and investment in east London and the UK. As part of this, LLDC has long advocated for international rail services at Stratford International station, which is a key piece of infrastructure that was originally conceived to support both domestic and international connectivity.

The arrival of international services at Stratford has been a long-standing local and regional ambition, and one which we believe could bring wide-ranging benefits to east London, including increased international connectivity, further inward investment, and support for the area's rapidly growing innovation, cultural and higher education sectors. We also note the potential for such services to deliver environmental benefits through modal shift from air to rail.

We are encouraged to see proposals being brought forward by operators seeking to realise this potential, including the Section 17 application submitted by Gemini TOC Ltd. While LLDC is not in a position to endorse a single commercial operator, we support the principle of enhanced international connectivity via Stratford International and believe that enabling open access proposals to be properly considered is in the public interest.

We also understand that access to Temple Mills Depot will play a crucial role in supporting the operational viability of any future international services from Stratford. We encourage a fair and transparent process that allows for competition, innovation, and the full realisation of Stratford's strategic potential within the European rail network.

We remain committed to working with Government, the Office of Rail and Road, London St Pancras High Speed, TfL, LB Newham and interested operators to help deliver this long-held vision for Stratford: a station built to connect London to Europe.

Yours sincerely,

[redacted]

Shazia Hussain
Chief Executive
London Legacy Development Corporation

MAYOR OF NEWHAM

Newham London

London Borough
of Newham
Newham Dockside
1000 Dockside Road
London
E16 2QU

newham.gov.uk

Adrian Quine
Chief Executive
Gemini TOC Ltd
3rd Floor, Great Titchfield House
14-18 Great Titchfield Street
LONDON
W1W 8BD

11 July 2025

Dear Adrian,

Section 17 Application for Access to High Speed 1 and Temple Mills Depot – Support for International Rail Services at Stratford

I am writing in support of proposals to introduce international rail services to and from Stratford International, including the Section 17 application submitted by Gemini Rail for access to the High Speed 1 infrastructure and Temple Mills Depot.

When Stratford International station opened in 2009, it was the culmination of a twenty-year campaign by the London Borough of Newham and local MPs to enhance transport connectivity and to drive investment and opportunity into East London. It has already played a transformative role in enabling the London 2012 Olympic and Paralympic Games and in supporting the extraordinary growth that has followed. However, despite the name and the original ambition, international services have never stopped at the station, representing a long-standing missed opportunity.

Newham's Local Plan sets out a clear vision for inclusive and sustainable growth. We are planning for more than 50,000 new homes and tens of thousands of new jobs across the borough. Stratford sits at the heart of that growth and has become one of London's most dynamic and strategically important locations. Introducing international rail services at Stratford would not only support Newham's growth ambitions, it would serve the wider capital and help shift long-distance travel towards more sustainable modes.

We are therefore pleased to see proposals being brought forward by Gemini Rail, and while the Council is not in a position to endorse any single operator, we support the principle of international connectivity from Stratford and believe such proposals deserve serious consideration.

We also recognise that access to Temple Mills Depot is a necessary enabler of these plans, and would encourage partners to ensure that such infrastructure is made available in a way that supports long-term public value.

Stratford is ideally placed to serve international rail passengers from across London and other parts of the UK. Realising its international potential would represent the fulfilment of a vision many decades in the making, and one we continue to champion.

Yours sincerely,

[redacted]

Rokhsana Fiaz OBE
Mayor of Newham

19 June 2025

Martin Jones
Deputy Director, Access, Licensing & International, Office and Rail and Road

Dear Martin,

I am writing in support of the proposals by Gemini Trains to run new services between London and continental Europe calling at Ebbsfleet International in North Kent. We understand that access to the maintenance facility at Temple Mills is key to running such services.

Ebbsfleet Development Corporation is an Arms-Length Body of the Ministry of Housing, Communities and Local Government, charged by the Government with delivering a major new community of up to 15,000 new homes at Ebbsfleet Garden City, with its commercial and civic heart on land owned by the Corporation all around Ebbsfleet International train station. We are accountable to the Secretary of State and Deputy Prime Minister for the achievement of that objective.

There are two principal grounds for our strong support for international stopping services at Ebbsfleet.

The first is the economic benefits that will be felt locally by new businesses being attracted to the area, and the expansion of existing businesses that will use services from Ebbsfleet. This will contribute to the Government's priority of delivering economic growth, and is particularly important within the North Kent area, parts of which, in Gravesham, are in the lowest quartile nationally on many indicators of economic prosperity.

The second ground for support is the financial benefits to the wider public sector of stopping services at Ebbsfleet, arising from the increased attractiveness of employment space that the Development Corporation plans to bring forward as part of new development around the station. As the master developer of this scheme, the Development Corporation intends to invest significant public money in the infrastructure required to deliver the new homes, offices, retail and restaurants that will form the heart of Ebbsfleet Garden City. Stopping services at Ebbsfleet will improve the financial viability of these proposals and therefore result in improved recovery of the initial public sector investment – a direct financial benefit.

Yours sincerely,

[redacted]

Ian Piper
CEO

Executive Assistant– Elizabeth Roach

[redacted]

ebbsfleetdc.org.uk

Thames Estuary
GROWTH BOARD

08 July 2025

Mr Adrian Quine
Chief Executive
Gemini TOC Ltd
3rd Floor, Great Titchfield House
14–18 Great Titchfield Street
London W1W 8BD

Dear Mr Quine,

We were pleased to hear about Gemini's plans to introduce international rail services to and from Stratford International.

Improving sustainable travel options between the UK and mainland Europe is an important ambition, and the potential to unlock new international routes from Stratford could represent a significant step forward for transport convenience, and in wider efforts to reduce emissions from air and road travel.

Stratford occupies a unique position in London's transport network, with strong connections to the capital, the South East and further into the Thames Estuary. As momentum continues to build around growth and investment across the Estuary, high-quality transport links will be key, particularly those that support cleaner, greener travel and open up new opportunities for business, industry and fair economic growth.

We welcome initiatives that contribute to that picture and recognise the role international rail could play in strengthening economic ties, enhancing connectivity, and supporting regeneration and development.

We look forward to seeing how your proposals progress and to exploring the potential benefits for the wider region as they evolve.

Yours sincerely,

Kate Willard, OBE
Thames Estuary Envoy
Chair, Thames Estuary Growth Board

DARTFORD
BOROUGH COUNCIL

Mr Adrian Quine
Chief Executive, Gemini TOC Ltd
3rd Floor, Great Titchfield House
14-18 Great Titchfield Street
London W1W 8BD

11 July 2025

Dear Adrian,

As Leader of Dartford Borough Council, I welcome the opportunity to support your plan for the return of international services to Ebbsfleet.

The strategic case for resumption of international passenger services at Ebbsfleet is strong. International connectivity has always been at the heart of the vision for Ebbsfleet.

However, as I'm sure you're aware, stopping services on Eurostar were suspended during the Covid-19 pandemic and have not returned since. Dartford Borough Council and its partners have since made a strong case for their reinstatement.

Not only does Ebbsfleet provide an important gateway to North Kent, South London and the hinterland beyond, it was originally designed to support a number of key infrastructure developments such Ebbsfleet Garden City, Cross-Rail, Bluewater Shopping Centre and the wider Thames Estuary growth agenda to name but a few.
Dartford Borough Council has been working in partnership with local government in Kent and we have collectively made the powerful case in the public interest for a return of international passenger services to Ebbsfleet station.

We agree with Gemini's assessment that international passengers travelling to and from many parts of the South East are likely to find it more convenient to use Ebbsfleet than St Pancras and are convinced that the return of international services to Ebbsfleet represents a major commercial opportunity, as demand for international rail travel grows. We believe that Ebbsfleet could play a key role in the European rail network, and, in doing so, stimulate further positive regeneration in the area.

We also support Gemini's proposal for access to the depot at Temple Mills and will be following the development of this with great interest.

Dartford Borough Council are ready to continue to work to get the best outcome for international growth, competition and use of Ebbsfleet station. If you would like to discuss matters further, please let me know.

With all best wishes,

Yours sincerely,

Councillor Jeremy Kite MBE
Leader, Dartford Borough Council

CANARY WHARF+ DOCKLANDS
BUSINESS ASSOCIATION

Wharf life

FROM
CWDBA / Wharf Life Newspaper
Registered office
c/o Kidd Rapinet LLP
29 Harbour Exchange Square
London, E14 9GE

TO
Adrian Quine
Chief Executive,
Gemini TOC Ltd
Third Floor, Great Titchfield House
14-18 Great Titchfield Street
London, W1W 8BD

July 14, 2025

Dear Adrian,

I write in my capacity as co-founder of both **Wharf Life Newspaper** and the **Canary Wharf + Docklands Business Association** regarding Gemini Trains' exciting proposal to begin running rail passenger services between Stratford International station in east London, Paris and Brussels. It is clear to me and to those I've shared these plans with, that the introduction of these routes would be of enormous benefit to one of the most deprived boroughs in the capital (Newham) and those that surround it.

I've worked as a journalist covering these areas since 2008 – co-founding Wharf Life in 2018 to continue that work – and have witnessed first hand the extraordinary rebirth of Stratford thanks to the machinations of the 2012 Olympics. But even in 2025, this has the feel of a story that's only just getting started. The arrival of major cultural institutions such as the V&A, the BBC, Sadler's Wells and the London College Of Fashion is simply the latest chapter in a tale that includes a population boom, a massive increase in social and economic opportunities and the emergence of the area as a major retail and hospitality destination. Clearly an international link would supercharge an engine of change that's already powering forward.

What impact might Gemini's plans have? The story of regeneration and prosperity in east London is inextricably linked to transport. Without the Jubilee Line extension, Canary Wharf was a failing project. The arrival of the Elizabeth Line has brought further success to the Wharf and Stratford. It is now galvanising efforts in areas such as Royal Docks and Woolwich. It's not too simplistic to say that when the trains arrive, so too does economic activity, social benefit and opportunity.

In 2023 we founded the CWDBA as a networking organisation because we believe the increasing numbers of institutions and businesses based in these areas should connect, collaborate and champion them. Without exception the organisations I've spoken to about Gemini Trains' plans have been very supportive. All can see the clear benefits and social value that a direct connection to the continent will bring.

I would also urge the ORR to consider what further good may be done here by spreading international capacity to a fresh location in London – how that would confer tangible, concrete benefits on a part of the city that is ready and waiting for it while also increasing resilience for passengers seeking to travel to France and Belgium. With Stratford, Gemini isn't looking to the future, it's looking to a part of the capital where residents and businesses are ready and eager to receive international services at a station that has long promised them with its name.

Yours sincerely,

Jon Massey
co-founder and director
Wharf Life Newspaper + CWDBA

[redacted]

Mr Ian Chaplin
Gemini TOC Ltd

[redacted]

BY EMAIL ONLY

Growth, Environment
& Transport

Sessions House
Maidstone
Kent
ME14 1XQ

Date: 9th July 2025

Dear Ian

SECTION 17 APPLICATION FOR TEMPLE MILLS DEPOT AND PLANS FOR INTERNATIONAL RAIL SERVICES

I write to express my thanks for engaging with Kent County Council officers since you announced your plans in March 2025 to run services between the UK and Europe. Your published proposals include a plan to operate from Ebbsfleet International station in Kent and we welcome this ambition.

As you will be aware, Kent international stations ceased being served by Eurostar in March 2020 owing to travel restrictions to address the COVID-19 pandemic. Unfortunately, with only Eurostar as the operator of passenger services on HS1, Kent has been left with no services connecting with Europe. This was a significant shock given the previous 24 years of continuous services that reconfigured parts of the Kent economy and drove locational decisions by businesses and residents.

We recognise that competition, in general, would be a beneficial outcome given Eurostar virtually has a monopoly which has lead to a very substantial under utilisation of more than £10bn of rail assets (when converted to current prices and allowing for inflation). As the Transport and Environment NGO reported in 2024[1], based on their ranking system Eurostar was the worst international rail operator in Europe. The prospect of the new services that you have described to us are an exciting development and could provide a promising new future for maximising the potential of international rail between the UK and Europe.

We have welcomed the opportunity to have an open and constructive dialogue about the market opportunity for Gemini Trains to serve not just Ebbsfleet International station, given it is already part of your considerations, but also Ashford International station. We look forward to working with you further to ensure that stopping services in Kent can remain part of your plans.

[1] https://www.transportenvironment.org/te-united-kingdom/articles/eurostar-and-uk-trains-hit-the-brakes-at-the-bottom-of-europes-rail-rankings

On that aspect, and as we have shared with you, we are of a view that there are further actions that the government, DfT and London St Pancras Highspeed could do to improve those conditions for operators and we will continue to work at getting those changes made. The introduction of the new draft proposals for the London St Pancras High Speed Growth Incentive Scheme were a promising first step, subject to the amendments we have collectively sought to ensure that it is fair and incentivises effectively in respect of the intermediate stations.

Concerning your Section 17 application to the ORR, we wish to make you aware that we have been invited by the ORR to make a submission to the 10th July deadline as a party with a wider interest. Within that submission we will set out evidence that we have previously shared with you, demonstrating the societal and economic benefits of a new operator being given depot access in order to facilitate new service operations in competition with Eurostar and which would increase the likelihood of services returning to Kent.

Our view that will be set out to the ORR is that a new operator deserves the opportunity to make use of Temple Mills International depot on a shared arrangement so that it can be demonstrated to the operator and passenger market what competition and innovation in service provision can provide. Furthermore, generating competition and enabling far better utilisation of the HS1 link and Channel Tunnel would likely be the best stimulus for creating a business case and commercial case for the government and operators to further explore in partnership the potential long term delivery of new depot and stabling facilities, which we recognise may entail considering options with our county.

We look forward to working further with you and other operators to realise the potential of the international rail link and the international stations in Kent.

Yours sincerely

[redacted]

Haroona Chughtai (Ms)
Director of Highways and Transportation

SIEMENS

Siemens Mobility Limited, 6th Floor, The Lantern, 75 Hampstead Road, London NW1 2PL.

Name Kate Blackford
Department Sales
[redacted]

Adrian Quine
3rd Floor Great Titchfield House
14-18 Great Titchfield Street
London
W1W 8BD

Date July 15, 2025

Letter of Support

Dear Adrian

Siemens Mobility Limited is pleased to provide this letter of support for Gemini Trains in relation to their Section 17 application to the Office of Rail and Road (ORR) for access rights to operate an open access rail service.

We have been engaged in constructive discussions with Gemini Trains regarding their rolling stock requirements and operational aspirations. These discussions have focused on identifying suitable rolling stock solutions that align with Gemini Trains' proposed service model, performance expectations, and passenger experience goals.

Drawing on a wealth of existing experience in high speed rolling stock in the UK and mainland Europe, Siemens Mobility Limited is confident in our ability to support Gemini with proven, efficient, and reliable rolling stock options that meet the technical and regulatory standards required for International Open Access.

We understand that Gemini Trains' application is a key step in securing the necessary train paths and regulatory approvals to bring their innovative service to market. Siemens Mobility Limited recognises the potential benefits of increased competition and passenger choice that open access operators can bring, and we are happy to continue supporting Gemini Trains in the successful delivery of their plans.

Should the ORR grant the requested access rights, Siemens Mobility Limited looks forward to continuing our collaboration with Gemini Trains and contributing to the development of a high-quality, customer-focused rail service.

Your sincerely,

[redacted] *Electronically signed by: Sambit Banerjee Date: Jul 14, 2025 15:42 GMT+1*

Sambit Banerjee
Joint CEO UK&I
Siemens Mobility Ltd

[redacted] *lectronically signed y: Lena Voorbach ate: Jul 15, 2025 8:41 GMT+1*

Lena Voorbach
Finance Director
Siemens Mobility Ltd

Gemini Trains
Gemini TOC Limited
Great Titchfield House, 3rd floor
14-18 Great Titchfield Street
London W1W 8BD
United Kingdom

Eurotunnel
UK Terminal
Ashford Road
Folkestone
Kent CT18 8XX
United Kingdom

Tel: +44(0)1303 282222
Fax: +44(0)1303 850360

www. eurotunnel.com

15th July 2025

Dear Sirs,

Eurotunnel Guidance & Framework Agreement Commitment

I refer to our exchanges and regular meetings of the last 2 years, and in particular Gemini Trains's announcement of 24/3/2025 and your outline timetable of 2/7/2025, setting out Gemini TOC Limited's ("Gemini") capacity requirements for the development of cross-Channel high-speed passenger services on the London-Paris route (10 return paths per day, 60 and 120 minutes frequency pattern) and London-Brussels route (8 return paths per day, 120 minutes frequency pattern) from 2029 onwards (hereafter the "**Gemini Capacity Requirements**"). I hereby confirm that **Eurotunnel is capable of offering adequate capacity through the Channel Tunnel Fixed Link**, both in quantitative terms (number of train paths) and qualitative terms (pattern & frequency of service) satisfying the Gemini Capacity Requirements.

The delivery of this capability by Eurotunnel is underpinned by the following existing mechanisms and processes:

- the current **train path catalogue offering 4 train paths per hour in each direction**, producing 64 return train paths per day for high-speed passenger services, compared with regular historic use of 27 return train paths per day by the incumbent operator in peak periods with its current fleet;

- in complement to the systematic catalogue offer, **additional ad-hoc train paths in response to requests during the annual timetable process** can be produced by derogation, so as to ensure the satisfaction of capacity requirements (in particular during peak periods) with increased flexibility within shorter timescales;

- **transparent allocation criteria** published within the Network Statement and applied in the capacity allocation process, providing highest priority for regular service patterns and taking into account actual path utilisation rates, ensuring **certainty and sustainability of access rights** for operators introducing new services and fleet, established on a first-come-first-served basis in line with non-discrimination principles;

- a **coordinated international capacity development process** with all route IMs, preparing the future coordinated train path catalogue offering **5 return trips per hour in each direction**, for deployment timed to satisfy planned demand build-up (currently expected from the 2029 timetable).

- a market-leading international route coordination approach delivering **end-to-end train paths on the London-Paris-Brussels network**, implemented between national railway network managers and Eurotunnel since 1994 as provided under the 1987 Railway Usage Contract.

Furthermore, in order to provide contractual certainty on capacity & access rights, **subject to the conclusion by Gemini of firm cross-Channel rolling stock fleet procurement & financing agreements before other potential operators** and within a period of 6 months from the date of this letter, Eurotunnel commits to entering into a **Framework Agreement (EFA) securing rights to the provision of Channel Tunnel Fixed Link train paths satisfying the Gemini Capacity Requirements**. The Eurotunnel Framework Agreement will include [inter alia] substitution rights for fleet funding providers and subsequent owners or operators of the fleet in the event of restructuring or failure of Gemini TOC Limited as operating company, as appropriate to ensure that capacity rights remain attached to the fleet.

In line with EU and national regulations, Eurotunnel's Framework Agreement on capacity rights will be entered into with the first operator concluding fleet procurement & financing agreements, which will be the subject of a **public announcement** (to intervene no later than 7 days after signature of the agreements) and thereafter EFA notification to regulatory authorities, in line with market efficiency objectives & transparency obligations. Subsequent operators proposing to conclude firm fleet procurement & financing agreements may equally be able to secure framework agreements on capacity rights on the same model, subject to (and to the extent of) Eurotunnel's verification of availability taking into account the respect of capacity commitments to operators having established cross-Channel services & fleet prior to them.

The exercise of rights under the Eurotunnel Framework Agreement for applying for & using capacity will naturally be conducted in compliance with all applicable access regulations and Eurotunnel Network Statement conditions, including the requirement for the operator to secure the relevant licences and safety certification in due course.

Yours sincerely,

Jean-Pierre Ramirez
Railway Network Director - Eurotunnel

DIRECTION COMMERCIALE
CAMPUS RIMBAUD
12 rue Jean-Philippe Rameau
CS 80 001
93212 LA PLAINE SAINT DENIS CEDEX

Monsieur Adrien QUINE
Directeur Général

GEMINI TOC Limited
3rd floor, Great Titchfield House
14-18 Great Titchfield Street
Londres
W1W 8BD
Royaume-Uni

La Plaine Saint Denis, le 27 février 2025

Objet : Lettre de SNCF Réseau à l'attention de Gemini Trains

Monsieur le Directeur Général,

La société Gemini est entrée en contact avec SNCF Réseau fin 2023 afin d'exposer son projet d'offre ferroviaire internationale à grande vitesse entre Londres, Paris et Bruxelles. La société Gemini a notamment adressé une lettre d'intention formelle le 08 mai 2024 présentant son souhait d'opérer des trains empruntant le réseau ferré français afin d'assurer, à partir de décembre 2028, 8 services par jour dans chaque sens entre Londres et Paris Gare du Nord et 8 services par jour dans chaque sens entre Londres et Bruxelles.

SNCF Réseau accueille positivement toute initiative visant à développer le transport ferroviaire ainsi que l'utilisation de son infrastructure et se félicite de votre intérêt à circuler en France. En tant que gestionnaire d'infrastructure, je vous confirme notre mobilisation pour vous accompagner au mieux.

Dans cette perspective, plusieurs réunions et échanges réguliers par courriel en 2024 ont eu lieu entre SNCF Réseau et Lord Berkeley, M. Nakache, M. Chaplin, M. Stuart et vous-même M. Quine. Au cours de ces discussions, nous avons fait la connaissance d'une équipe professionnelle et expérimentée et avons pu appréhender au mieux les contours et les ambitions de votre projet pour tâcher de vous conseiller aussi utilement que possible à toutes les étapes qu'il vous sera nécessaire de franchir pour le concrétiser.

Nos échanges sont bien évidemment couverts par les obligations de confidentialité qui s'imposent à SNCF Réseau dans le cadre de son activité, lesquelles ont été formalisées, comme vous le savez, par un accord de confidentialité.

Le dialogue commercial et technique entrepris avec vous répond au parcours type d'accompagnement développé par SNCF Réseau à l'attention de ses nouveaux clients potentiels pour permettre d'aborder de façon pédagogique les éléments essentiels à connaître pour bien appréhender l'environnement ferroviaire français ainsi que les démarches à réaliser. Vous ont ainsi notamment été présentés les rôles respectifs de SNCF Réseau et de sa filiale Gares & Connexions dans l'accès au réseau ferré national, les modalités d'accès à celui-ci, le rôle de l'Autorité de Régulation des Transports (ART) le régulateur français, le processus de demande capacitaire, la tarification de l'infrastructure ferroviaire ou encore l'accès aux installations de services.

Ainsi que cela a été rappelé, SNCF Réseau assure de façon équitable, transparente et non discriminatoire l'accès à l'infrastructure ferroviaire du réseau ferré national. Les demandes susceptibles d'être formulées par la société Gemini seront ainsi traitées par SNCF Réseau selon le même processus que pour toute autre demande émanant de n'importe quel opérateur souhaitant utiliser l'infrastructure de SNCF Réseau.

L'ensemble des modalités d'accès à l'infrastructure sont ainsi décrites dans le Document de Référence du Réseau Ferré National (DRR) disponible sur le site internet de SNCF Réseau en français dans sa version officielle et en anglais. En particulier :

- Le processus d'attribution des capacités d'infrastructure sur le réseau ferré national par SNCF Réseau est exposé en détail dans le chapitre 4 « ATTRIBUTION DE CAPACITÉ » du DRR, complété d'informations utiles au chapitre 3.3 « MODALITÉS D'ACCÈS AU RFN / Contrats » en matière notamment d'accords-cadres Voyageurs. Toute demande de capacité auprès de SNCF Réseau sera examinée et traitée de manière équitable. Concernant les accords-cadres, selon le DRR 2025, l'ouverture d'une ligne-cadre nécessite la présence de 2 candidats distincts (ayant des personnalités morales différentes) prévoyant des circulations sur une typologie de ligne identique (LGV ou ligne classique). Le DRR 2025 distingue ensuite deux cas, soit la ligne concernée est publiée, soit elle ne l'est pas. A ce jour, la ligne Paris-Nord – Tunnel sous la Manche n'est pas encore publiée comme ligne-cadre.

    - Si un candidat demandeur souhaite conclure un accord-cadre sur une ligne qui n'est pas encore publiée comme ligne-cadre, il peut en formuler la demande dans les conditions définies à l'article 3.3.1.3 du DRR. Une telle demande est possible dès le premier semestre A-3, voire plus tôt, si elle est justifiée par des éléments objectifs liés, notamment, au lancement d'un nouveau service. Pour autant, la signature de l'accord-cadre ne pourra intervenir plus de 5 ans avant la date d'ouverture de la première période de commande de sillons-jours ciblée par le candidat demandeur. SNCF Réseau analysera alors la demande, notamment au regard de la présence d'au moins deux candidats sur la ligne concernée et de la maturité du projet du

demandeur sur la base des critères définis à l'article 6 du règlement n°2016/545.

- Si à l'issue de cette analyse, selon que SNCF Réseau exprime ou non son intention de conclure un accord-cadre avec le demandeur, la ligne concernée devient éligible à la conclusion d'autres accords-cadres. Cette éligibilité se matérialise par la publication de la ligne comme ligne-cadre, laquelle ouvre un délai (de 1 à 4 mois conformément au règlement n°2016/545) durant lequel d'autres candidats potentiels peuvent également soumettre des demandes. A l'issue de ce délai, si les demandes reçues excèdent la capacité cadre maximale déterminée en lien avec le Plan d'Exploitation de Référence (PER), SNCF Réseau pourrait devoir appliquer la procédure de coordination prévue à l'article 9 du règlement n°2016/545, laquelle vise à rechercher, en concertation avec les candidats concernés, la meilleure répartition possible des capacités disponibles. Sa durée et son issue dépendront des échanges avec l'ensemble des candidats.

- Concernant l'accès aux installations de service, les modalités applicables actuellement en vigueur figurent au chapitre 7 « INSTALLATIONS DE SERVICE » du DRR et sur le site internet de la Plateforme de Service aux Entreprises Ferroviaires (PSEF) : www.psef.sncf-reseau.fr. C'est sur le fondement de ces dispositions que l'intérêt que vous avez indiqué marquer pour le centre de maintenance du Landy serait examiné.

- Enfin, ainsi que vous pourrez le lire, en matière de tarification pour les offres en Open Access notre document de référence du réseau peut proposer, sous réserve de pouvoir remplir les conditions d'éligibilité applicables, deux dispositifs d'aide au démarrage : l'aide au développement et la tarification négociée. Les dispositions qui s'y rapportent sont détaillées à l'article « Autres dispositifs incitatifs et d'aides » du chapitre 5 « SERVICES ET TARIFICATION » du DRR. Il est à noter que la possibilité de bénéficier de ces dispositifs ne dépend en aucun cas de la signature d'un accord-cadre.

Dans le respect du cadre règlementaire dans lequel s'inscrivent nos missions et nos actions, je tiens à vous assurer que les équipes de SNCF Réseau sont et seront pleinement mobilisées pour vous accompagner dans la concrétisation de votre projet sur le réseau français. Par ailleurs, SNCF Réseau entretient des échanges réguliers avec ses homologues (Getlink, HS1 et Infrabel entre autres), afin que les réponses apportées par les différents gestionnaires d'infrastructure aux clients souhaitant, comme vous, développer une activité internationale, s'articulent du mieux possible sur l'intégralité du parcours.

Souhaitant vivement vous voir concrétiser votre projet, je reste ainsi que mes équipes à votre écoute pour vous accompagner en ce sens et vous prie d'agréer, Monsieur le Directeur Général, mes sentiments les meilleurs.

28-02-2025 | 15:26 CET

[redacted]

Etienne DELPY
Directeur Commercial

SNCF GARES & CONNEXIONS
Direction Clients & Numérique
16, avenue d'Ivry
75013 Paris

Mr Adrian Quine
Gemini TOC Limited
3rd floor, Great Titchfield House
14-18 Great Titchfield Street
London
W1W 8BD
UK

Paris, le 12 juin 2025

Monsieur le Directeur Général,

En février 2024, la société Gemini a pris contact avec SNCF Gares & Connexions afin d'exposer son projet d'offre ferroviaire internationale à grande vitesse, reliant notamment Paris à Londres et Bruxelles. À ce titre, nous avons pris connaissance de la volonté de cette entreprise d'exploiter des services en gare de Paris Nord à partir de décembre 2028, afin d'assurer jusqu'à 8 services par jour dans chaque sens entre Paris et Londres.

SNCF Gares & Connexions accueille positivement tout projet concourant au développement du transport ferroviaire et à l'ouverture du marché. En tant que gestionnaire des gares de voyageurs sur le réseau ferré national (RFN), nous vous confirmons notre entière mobilisation pour accompagner les projets de chacune des Entreprises Ferroviaires, dans le strict respect des principes de transparence, d'équité et de non-discrimination qui régissent notre action et en adéquation avec les orientations stratégiques de SNCF Gares & Connexions.

Dans ce cadre, plusieurs échanges sont intervenus avec les représentants de la société Gemini. Ceux-ci se sont révélés constructifs et nous ont permis de mieux cerner les contours de leur projet, de comprendre leurs besoins en prestations, et d'initier un dialogue opérationnel sur les modalités de leur future desserte.

Nos interactions sont couvertes par les engagements de confidentialité auxquels SNCF Gares & Connexions est tenue. Elles s'inscrivent dans le cadre du processus d'engagements contractuels réciproques prévu par le Document de Référence des Gares (DRG), document réglementaire qui précise les conditions d'accès aux prestations régulées en gare, leur tarification et les démarches associées.

Le DRG, accessible sur notre site internet, décrit les prestations de base (information voyageurs, gestion des flux, propreté, sûreté, etc.) ainsi que les prestations particulières (assistance PSH/PMR, espaces en gare, prestations transmanche, etc.). Les prestations demandées par la société Gemini seront bien entendu étudiées dans ce cadre réglementaire, de manière équitable, comme pour tout autre candidat.

À ce titre, la société Gemini pourra notamment accéder, dès lors qu'elle aura accès aux sillons ferroviaires correspondants :

- à la prestation de base,

SNCF GARES & CONNEXIONS
Direction Clients & Numérique
16, avenue d'Ivry
75013 Paris

- à la prestation transmanche
- aux prestations particulières obligatoires
- aux prestations facultatives s'il en fait la demande
- à un accompagnement rapproché par un chef de projet référent au sein de notre Direction Clients Transporteurs.

Nous tenons également à souligner que toute demande d'occupation d'espaces, de prestations spécifiques ou d'ouverture étendue d'installations sera traitée dans le respect des procédures définies au DRG et fera, le cas échéant, l'objet d'un contrat spécifique, dans le cadre d'une convention d'accès ou d'occupation.

Dans le respect du cadre réglementaire et de nos engagements de service public, nos équipes restent pleinement mobilisées pour accompagner la société Gemini dans la concrétisation de son projet.

Souhaitant vivement vous voir concrétiser votre projet, je reste ainsi que mes équipes à votre écoute pour vous accompagner en ce sens et vous prie d'agréer, Monsieur le Directeur Général, mes sentiments les meilleurs.

Morgane Castanier
Directrice Clients & Numérique

LONDON ST.PANCRAS HIGHSPEED

Mr Adrian Quine
Chief Executive Officer
Gemini TOC Limited
3rd floor, Great Titchfield House
14-18 Great Titchfield Street
London,
W1W 8BD

16 July 2025

Dear Adrian,

RE: Statement of HS1 Route Timetable Compatibility – Gemini TOC Ltd

I am writing in relation to the ORR's adjudication of spare capacity at Temple Mills Depot under Section 17 of the Railways Act. You have asked us to review and comment on your timetable request for the HS1 Route in support of your application for the allocation of the spare capacity at TMD that the ORR has identified.

London St. Pancras Highspeed (LSPH), as the Infrastructure Manager for the HS1 Route, has been in regular contact with you. This engagement began on 14 June 2023 and has been to support the development of your business case, as well as your plan of mobilisation for a new cross-Channel service. Specific joint activities have included support and discussions on the following topics: timetable development and review, confirming route capacity, consideration of stations capacity and enhancement, track access charging and discounts, market evaluation and business plan review.

Gemini TOC Ltd's Timetable Request

LSPH has carried out a high-level review of your timetable request. The purpose of this review has been to confirm whether in principle there is sufficient capacity on the HS1 Route for your proposed services in the event of you being granted access to Temple Mills Depot. Accordingly, I am pleased to confirm that your request, as attached here in annex, is potentially compatible

London St. Pancras Highspeed
5th Floor Kings Place
90 York Way
London N1 9AG

T +44 (0) 207 014 2700
E info@stpancras-highspeed.com

stpancras-highspeed.com

with the HS1 Route and the spare capacity available. If this were the case, we could proceed to allocate corresponding firm rights should the operator wish to proceed to this next stage.

Consideration for Stratford International Terminal Services

To avoid 'wrong' way running and the significant capacity inefficiency this would introduce on the HS1 route, we have indicated that any operator wishing to operate terminal services from Stratford International would be required to do so respecting the existing flow and rotation of traffic between Stratford International UP to Stratford International DOWN.[1] In other words, after passengers disembark at Stratford International arrivals, the empty stock would continue to London St Pancras for turnaround and then return to Stratford departures for embarking. This established path does not exist today on HS1 route or in our notional catalogue. Moreover, such a path is yet to be coordinated with adjacent Infrastructure Managers. However, such paths in principle could be created and we are committed to supporting any operator that wishes to achieve this. The path would be a hybrid of the existing international path and a domestic path for the turnaround and would be dependent on platform availability at St Pancras. Our initial assessment with Network Rail Highspeed and Network Rail Infrastructure Limited System Operator who is charged with delivering the HS1 route timetable, has indicated that this is theoretically possible, noting that in most hours there is sufficient spare domestic capacity between Stratford and St Pancras. Further work is required, notably to establish turnaround on and off the HS1 route.

Moreover, this assessment is further reliant on the following conditions being met:

i. The Operator being able to demonstrate operational integrity, as outlined in 'ORR's HS1 Criteria and Procedures'.

ii. That no other operator with operational integrity initiates the Framework Track Access Agreement (FTTA) process to create a new agreement or extend an existing one before the Operator reaches operational integrity.

iii. Full validation of the Operator's timetable by the Network Rail System Operator and the application of the timetable change process and the Decision Criteria, as set out in the HS1 Network Code for a typical year of the Operator's request to demonstrate full compatibility.

[1] HS1 Route is a bidirectional railway. However, any switch of running direction requires a service gap to ensure sectional clearance and would be dependent on next available cross-over at Wennington, which is 25.5km from London St Pancras.

London St. Pancras Highspeed
5th Floor Kings Place
90 York Way
London N1 9AG

T +44 (0) 207 014 2700
E info@stpancras-highspeed.com

stpancras-highspeed.com

iv. Successful coordination of the Operator's request with adjacent Infrastructure Managers.

v. The Operator enters into a Cost Recovery Agreement with London St Pancras Highspeed that holds LSPH and other operators harmless of the costs of its mobilisation.

Finally, you indicated for your deliberations that you would find it helpful if LSPH could outline general capacity on the route. Accordingly, please find in annex a summary of these topics.

We stand ready to support the regulator in their decision in relation to allocation of spare capacity at Temple Mills Deport. We remain at your disposal for further questions on this submission or any other relevant topic where we may be of assistance.

Yours sincerely,

Mr Mattias Bjornfors
Chief Strategy and Regulatory Officer

Attached:

- LSPH General Statement on HS1 Route Capacity

London St. Pancras Highspeed
5th Floor Kings Place
90 York Way
London N1 9AG

T +44 (0) 207 014 2700
E info@stpancras-highspeed.com

stpancras-highspeed.com

LONDON ST.PANCRAS
HIGHSPEED

General Statement on HS1 Route Capacity

Established International Paths

The HS1 route is a mixed traffic network with a notional catalogue of established paths configured and coordinated with adjacent Infrastructure Managers for each existing traffic segment: high speed international passenger services, high speed domestic passenger services and freight services. Accordingly, under the current configuration of these paths, we offer four high speed international paths an hour in each direction. Two of these paths are coordinated for onward international connectivity to Paris Gare du Nord and the other two for Brussels Midi or Amsterdam Centrale.

This configuration provides for a notional half hourly service between London and Paris and a half hourly service between London and Brussels Midi or Amsterdam Centrale. There are currently a small number of services operated out of sync of this configuration under derogation by Eurotunnel between London and Amsterdam, using off peak unutilised domestic capacity on the HS1 route. Under future plans, these Amsterdam paths will be stabilised and be brought back into an hourly rotation, as described below.

Accordingly, the current established and coordinated capacity on the HS1 route equates to a notional quantum of total available international paths of 64 paths a day or 23,232 paths per year in each direction or 46,464 in both directions. Of this, 50% are coordinated with onward paths to Paris Gare du Nord and 50% are coordinated for onward paths to established Benelux destinations.[2]

Existing Allocated International Firm Rights

As you will be aware, during the last Periodic Review process the ORR approved Eurostar International Limited's (EIL) Tenth Supplementary Agreement, relating to their Framework Track Access Agreement.[3] Allowing for permitted seasonal variation, EIL currently has firm rights of between 8 and 16 paths a day in each direction between London and Paris, between 4 and 8 paths a day in each direction between London and Brussels and between 0 and 5 in each direction between London and Amsterdam. There is also opportunity for all operators to run additional services over and above their FTTA through spot bids.

[2] Allowing for route closure for Easter Sunday and Christmas day.
[3] https://www.orr.gov.uk/sites/default/files/2025-04/eil-10th-supplemental-agreement-implemented-through-pr24.pdf

London St. Pancras Highspeed
5th Floor Kings Place
90 York Way
London N1 9AG

T +44 (0) 207 014 2700
E info@stpancras-highspeed.com

stpancras-highspeed.com

Accordingly, EIL currently holds a theoretical maximum quantum of firm rights as below.[4]

Route	Path Quantum per day (each way)	Path Quantum per annum (each way)
London – Paris	16	5,808
London – Brussels	8	2,904
London – Amsterdam	4	1,452
	Out	10,194

Paris – London	16	5,808
Brussels – London	9	3,267
Amsterdam – London	5	1,815
	Return	10,920

Maximum Theoretic Path Quantum	21,054

Unallocated International Capacity

Comparing the total established international capacity of 46,464 paths against the maximum theoretical expression of international firm rights granted to EIL of 21,054 paths, leaves today 25,410 unallocated international paths on the HS1 Route. This demonstrates there is currently sufficient unused spare capacity on the HS1 Route to meet the Operator's request.

Timetable Change Process and Conflict Resolution

As outlined in the HS1 Network Code, operators allocated firm rights may exercise them through the timetable change process, which starts at least 55 weeks before the commencement of services. This is an iterative process requiring flex and engagement from all

[4] The theoretical maximum quantum is shown for illustrative purposes by multiplying the highest daily quantum by 362 (accounting for Easter Sunday? and Christmas Day). In practice, EIL's exercising of seasonal variation is subject to agreement between LSPH and EIL and approval from the ORR.

London St. Pancras Highspeed
5th Floor Kings Place
90 York Way
London N1 9AG

T +44 (0) 207 014 2700
E info@stpancras-highspeed.com

stpancras-highspeed.com

parties.[5] Nevertheless, the Network Code establishes a regulatory-approved and industry-standard process for resolving any conflict that may arise from change requests where requests are competing and unresolved.

Broadly, EIL currently exercises the firm rights described above to deliver an hourly service between London to Paris, with occasional half hourly bolstering at the peak. Equally, it operates a two hourly service between London and Brussels or Amsterdam, with occasional bolstering as described above.

Where EIL seeks to exercise its London-Paris rights to bolster services at peak (it currently has seasonal variation that permits one path greater than running a path every hour), we can envisage minor conflict, i.e. this one path over and above an hourly service encroaches on to the second half hourly path slot. It is important to note that the Operator's proposed service pattern does not envisage a London-Paris service every hour in this second half hour slot. Therefore, there will be a number of unused paths across the day which can be used for EIL's one path over and above an hourly service. We cannot pre-empt the outcome of any future timetable change process to predict the exact allocation, as outlined in the Part D of the HS1 Network Code. In this instance, we will apply the Decision Criteria at outlined in Part D, paragraph 4.6.

Rest assured, we stand ready to oversee this process and ensure compliance with the ORR's HS1 Criteria and Procedures and the application of the HS1 Network Code Decision Criteria This will also of course be subject to coordination with adjacent Infrastructure Managers.

Future Fifth Path

To meet the needs of existing and future operators, notably in relation to timetable resilience and performance, LSPH has been coordinating with adjacent Infrastructure Managers on the creation of a fifth hourly path in each direction from 2028. If this coordination is successful, this will increase the total quantum of cross-Channel paths by 5,445 each way. This provides further assurance of the abundance of spare capacity to meet your needs.

[5] https://stpancras-highspeed.com/wp-content/uploads/2025/01/2012-december-hs1-network-code.pdf

London St. Pancras Highspeed
5th Floor Kings Place
90 York Way
London N1 9AG

T +44 (0) 207 014 2700
E info@stpancras-highspeed.com

stpancras-highspeed.com

SQW

Potential economic impacts arising from new international rail services via Ebbsfleet

July 2025

Introduction (i)

- International connectivity has always been at the heart of the economic vision for Ebbsfleet: the 2015 vision for Ebbsfleet Central referenced the site's *"unparalleled connectivity to London and Paris"* as a driver for a significant business hub. However, international Eurostar services ceased in March 2020 as a response to the Covid-19 pandemic and have not resumed.

- Reinstating services is a local and county-wide priority. The Kent Local Transport Plan (LTP5) contains a strategic objective to *"obtain a resumption of international services stopping at Ebbsfleet and Ashford International stations"*, based on benefits to the county's economy. KCC, supported by Dartford and Ashford Borough Councils, ran a survey in 2023/24, which indicated strong business support for the restoration of services, and a petition to "bring back Eurostar train services to Kent" has so far secured around 64,800 signatures.

- Currently, proposals are being advanced by Gemini Trains to offer services from Stratford International, via Ebbsfleet, to Paris and Brussels, with the potential for future extended services to Cologne. In summary, the proposition is that:

  - From 2029, there will be 10 return services per day (5 to Paris, 5 to Brussels), with all trains stopping at Ebbsfleet. This will ramp up to 21 return services per day by 2032/33. The expectation is that this will yield at least 6 million passengers per year in steady state (from both Stratford and Ebbsfleet)

  - Ebbsfleet will be a different offer from the existing Eurostar service from St Pancras, given good road access and parking and quicker boarding times facilitated by shorter trains, with Stratford International very well connected by public transport

  - The new service will make use of substantial spare capacity on the HS1 network and in the Channel Tunnel

Introduction (ii)

- It is likely that there will be economic benefits to Kent and to the wider area served by new services to continental Europe. Understanding these economic benefits will be important considerations to the Office for Road and Rail in determining network access.
- In this context, this paper sets out:
  - An overview of the general economic scale and growth potential within the area that is likely to be impacted
  - A description of the potential 'routes to impact' that might be expected (i.e., how and in what way might additional international services plausibly generate economic benefits?)
- At this stage, we have not attempted to quantify the economic benefits that might result, given the relatively early stage of Gemini's current proposals. However, this may be possible as the proposals develop and some suggestions for next steps are set out at the end of the paper.

Potential catchments (i)

- The map on the next page illustrates the approximate areas within different drive times to Ebbsfleet (and, for comparison, Stratford and Ashford). We assume that drive times are especially relevant for Ebbsfleet, given its 'parkway' nature
- Within a **90-minute** drive time of Ebbsfleet, a very large part of the South East is accessible, including the whole of the M25 and extending north to Cambridge and south to Brighton. Obviously, this indicative drive time is very dependent on traffic conditions, and the area also includes all of London's airports.
- Within a **60-minute** drive time, the area includes most of Kent, Surrey, the M23 Corridor, South and Mid Essex, parts of Hertfordshire, and about two-thirds of Greater London
- Within a **30-minute** drive time, the area covers North and most of West Kent, part of Surrey, Southeast Essex and part of Southeast and East London. The 30 minute drive time area is quite substantial in population terms, with around 2.33 million residents. This is larger than the population pool within the equivalent journey times to most of the UK's major metropolitan stations, outside London, as the table indicates. **Stratford**'s 30-minute drive area is larger still, with around 4 million residents.
- For comparison, **Ashford**'s 30-minute drive population pool is substantially smaller (about 430k). It is mostly separate from Ebbsfleet's 30-minute pool, with the exception of the area around Maidstone, which is equidistant.

Pop. within 30 minutes' drive of major stations (m)*

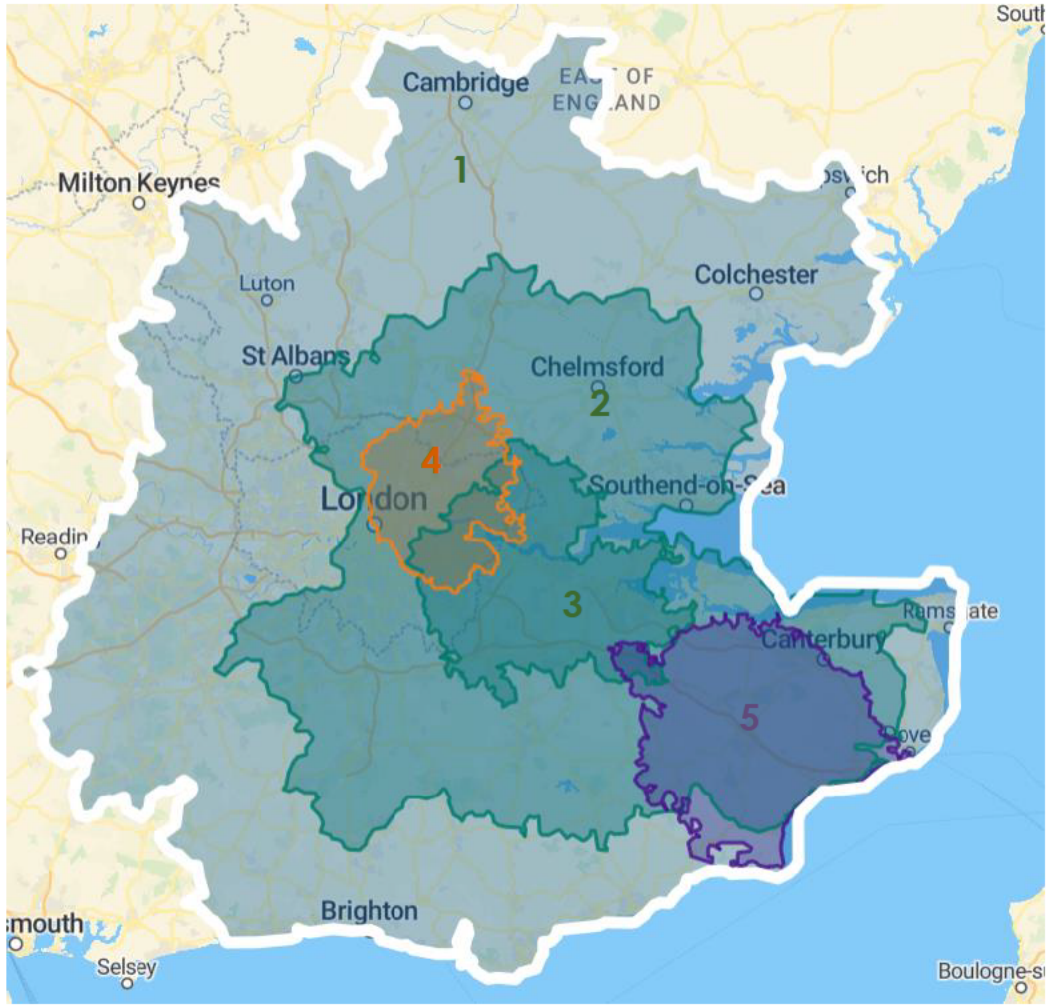
Station	<30 min drive
Stratford International	4.013
London St Pancras	3.702
Manchester Piccadilly	2.841
Birmingham New St	2.545
Ebbsfleet International	2.328
Leeds	2.094
Glasgow Central	1.695
Newcastle	1.564
Liverpool Lime St	1.548
Nottingham	1.132
Bristol Parkway	0.990
Cardiff Central	0.754
Edinburgh Waverley	0.730

Smappen/ OpenStreetmap, using Census 2021 data

** Obviously, public transport journey times will be different and in some cases are more relevant –e.g., 30 minutes by rail from St Pancras yields a bigger population pool than 30 minutes by car. The comparators in the table are simply illustrative, to give an indication of the relative scale of the population base within the Ebbsfleet and Stratford hinterlands*

SQW

Potential catchments (ii)



Population within a range of drive time areas

Approx. drive time area	Est. pop. (2021)
1. 90 minutes of Ebbsfleet	18.58 million
2. 60 minutes of Ebbsfleet	10.74 million
3. 30 minutes of Ebbsfleet	2.33 million
4. 30 minutes of Stratford	4.01 million
5. 30 minutes of Ashford	430,000

Smappen/ OpenStreetmap, using Census 2021 data

Defining economic impact areas

- Based on these indicative catchment areas, we have approximated a series of four areas of potential economic impact, built up from local authority districts, which are generally the standard building-blocks for key economic data. These are created as follows:

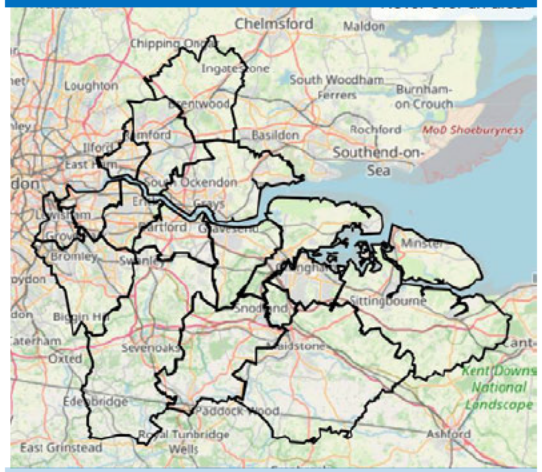
Area	Districts	Rationale
1 – Ebbsfleet Local	Dartford, Gravesham	Includes the area immediately surrounding Ebbsfleet, including major housing and employment sites which may be positively impacted by international connectivity
2 – Ebbsfleet Subregion	*Ebbsfleet Local plus:* Barking & Dagenham, Bexley, Brentwood, Bromley, Havering, Lewisham, Maidstone Medway, Sevenoaks, Swale, Thurrock, Tonbridge & Malling	Approximates to the 30-minute travel time, and excludes areas that are likely to be more accessible to Stratford than Ebbsfleet (although there will be some overlap in Greater London and parts of Essex. This is mostly separate from a notional Ashford 30-minute area (although there is overlap in Maidstone and Swale).
3 – Ebbsfleet Region	*Ebbsfleet Subregion plus:* Ashford, Canterbury, Dover, Folkestone & Hythe, Thanet, Tunbridge Wells	This is the 'Ebbsfleet Subregion' plus the rest of Kent. This approximates to the 60-minute travel time, *minus* the rest of Essex (which has better public transport connectivity to Stratford) and the M23 Corridor (which is served by Gatwick and has fast direct rail connectivity to St Pancras). Thanet is just outside the 60-minute drive time, but is obviously closer to Ebbsfleet than to any London airport or international station.
4 – Wider Region	*Ebbsfleet Region plus:* Basildon, Broxbourne, Castle Point, Chelmsford, Epping Forest, Enfield, Hackney, Haringey, Maldon, Newham, Redbridge, Southend, Rochford, Tower Hamlets, Waltham Forest,	This extends to include the area around Stratford, extending north and east into Essex and Hertfordshire, but excluding areas adjacent to Stansted, and excluding Central London (apart from Tower Hamlets). This area is harder to define, since in practice, Stratford is easily accessible to most of North, East and Central London, and is almost a Central London facility.

Defining economic impact areas

1 – Ebbsfleet Local

Core area immediately impacted by development/ employment around Ebbsfleet International

2 – Ebbsfleet Subregion

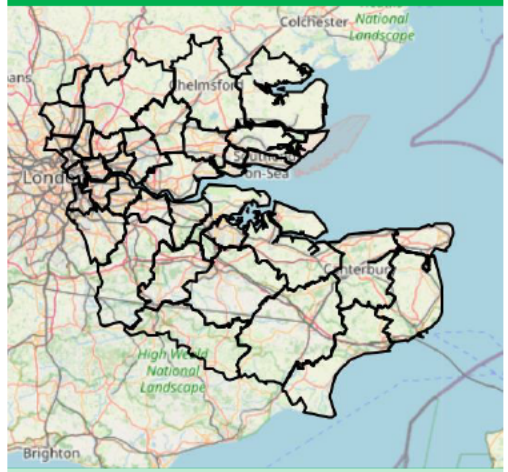


Approximates to area within c.30 minute travel time of Ebbsfleet International

3 – Ebbsfleet Region

Approximates to area within c.60 minute travel time of Ebbsfleet, excluding areas closer to other international rail terminals and airports

3 – Wider Region



Approximates to area within c.60 minute travel time of Ebbsfleet and Stratford , excluding areas closer to other international rail terminals and airports

SQW

Key metrics: Population (i)

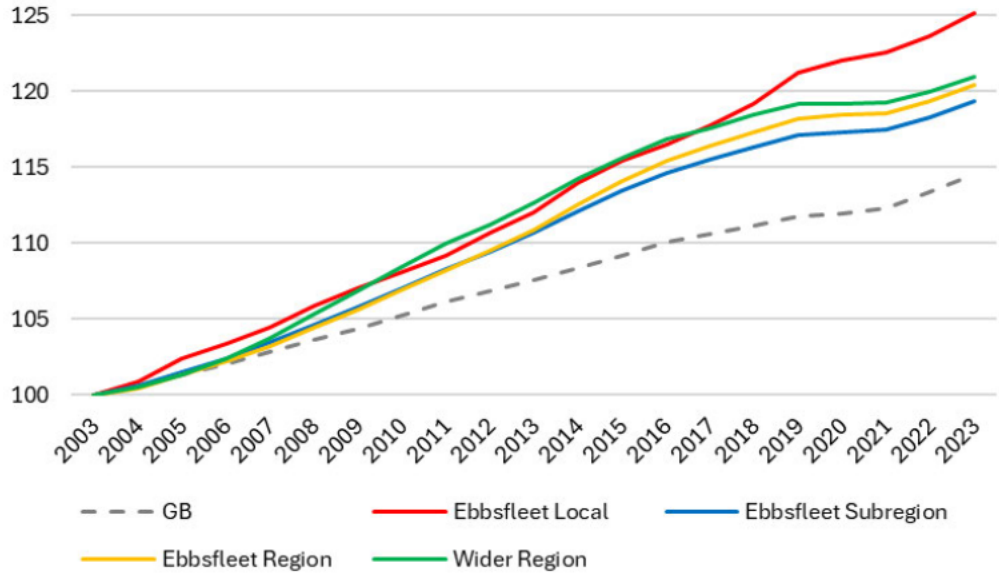
- The past 20 years have seen faster population growth in all the defined impact areas than in the country as a whole. Growth has been fastest in the 'Ebbsfleet Local' area immediately surrounding the station, where it has accelerated in recent years as a result of housing delivery coming forward at Ebbsfleet Garden City and elsewhere in Dartford.
- There has also been faster growth in the 'working age' population (i.e., people aged 16-64) than the national average*. Again, this is especially the case in the 'Ebbsfleet Local' area. Growth in the 'working age' population is likely to be especially important from an economic perspective, in terms of propensity for business travel.

Estimated population, 2023	
Ebbsfleet Local	228,436
Ebbsfleet Subregion	3,033,426
Ebbsfleet Region	3,818,693
Wider Region	6,993,332

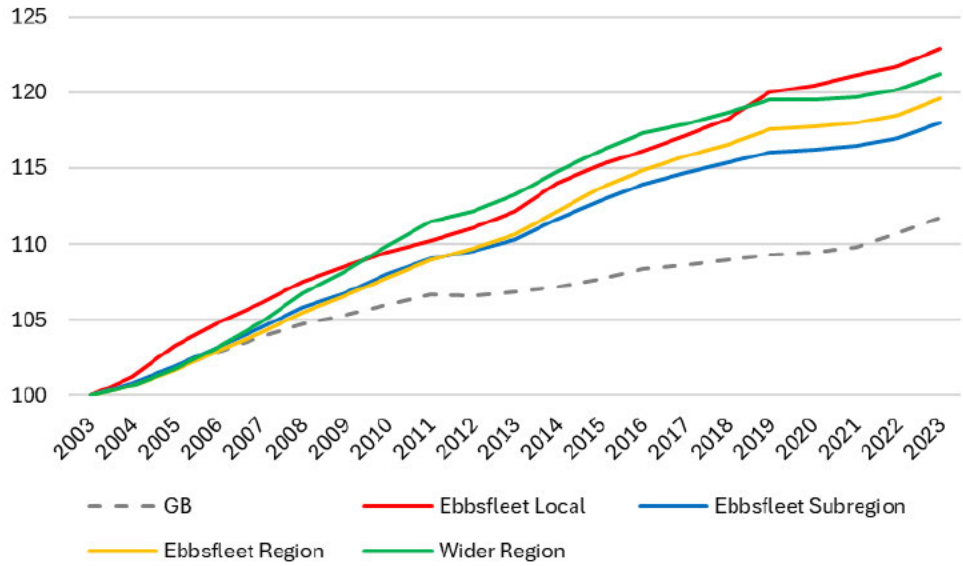
Source: ONS, Mid Year Population Estimates

** Within the context of an ageing population, working lives – and the state pension age – are rising. 16-64 is a commonly accepted shorthand for 'working age', but the reality is changing rapidly.*

Index of total population growth (2003=100)



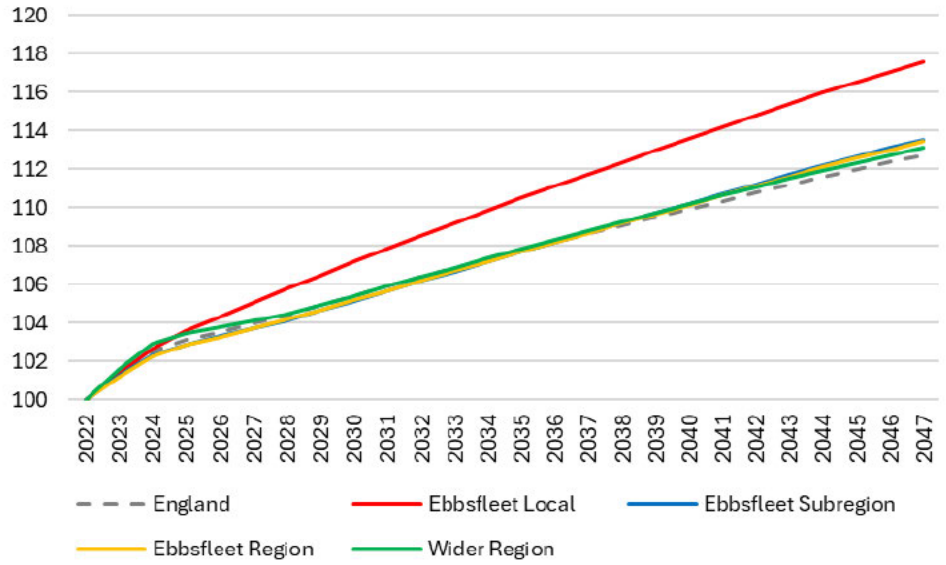
Index of 16-64 population growth (2003=100)



Key metrics: Population (ii)

- Future growth is also projected to be significantly higher in Dartford and Gravesham over the next 20 years than the England average (mainly accounted for by Dartford). Growth is more modest in the other impact areas, although slightly higher than England overall.
- Growth in the 16-64 age population is also projected to be much higher overall than it is nationally – especially in the 'Ebbsfleet Local' impact area.

Index of total projected population growth (2022=100)



Projected population to 2032 and 2042

	2032	2042
Ebbsfleet Local	244,970	259,034
Ebbsfleet Subregion	3,190,814	3,342,613
Ebbsfleet Region	4,018,631	4,205,518
Wider Region	7,379,398	7,704,204

Source: ONS, 2022-based subnational population projections

Key metrics: Jobs

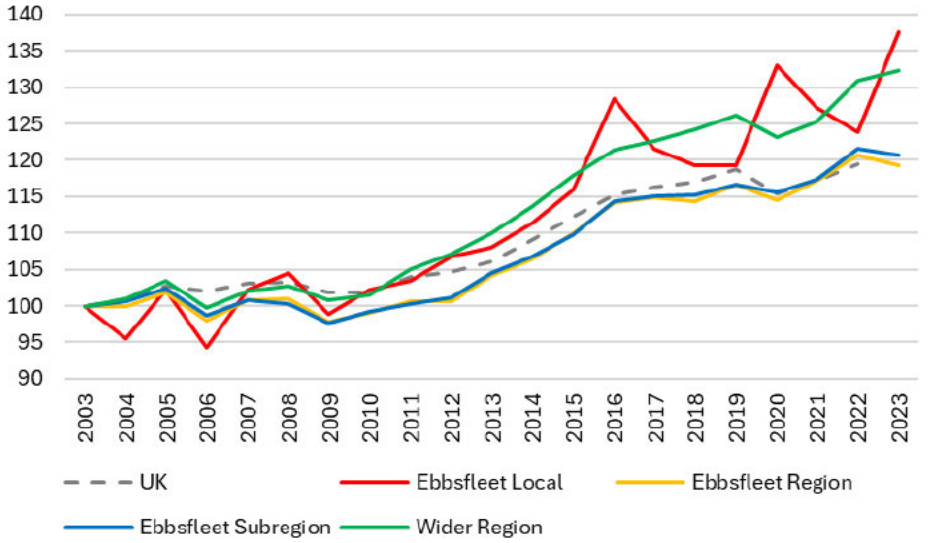
- Jobs growth over the past 20 years has generally been faster than the UK average in the 'Ebbsfleet Local' area, reflecting rapid population growth. It has also been higher the 'Wider Region', which includes some areas (such as Tower Hamlets) which are essentially part of the Central London economy.
- However, jobs growth has been somewhat slower in the 'Ebbsfleet Subregion' and 'Ebbsfleet Region' geographies (effectively, the rest of Kent and parts of Essex and East London), despite relatively high working-age population growth. Jobs per person are also lower than the UK average in all geographies. This is partly due to the effect of outbound commuting to Central London – but it does indicate potential capacity for additional jobs growth.

Total jobs (2023)

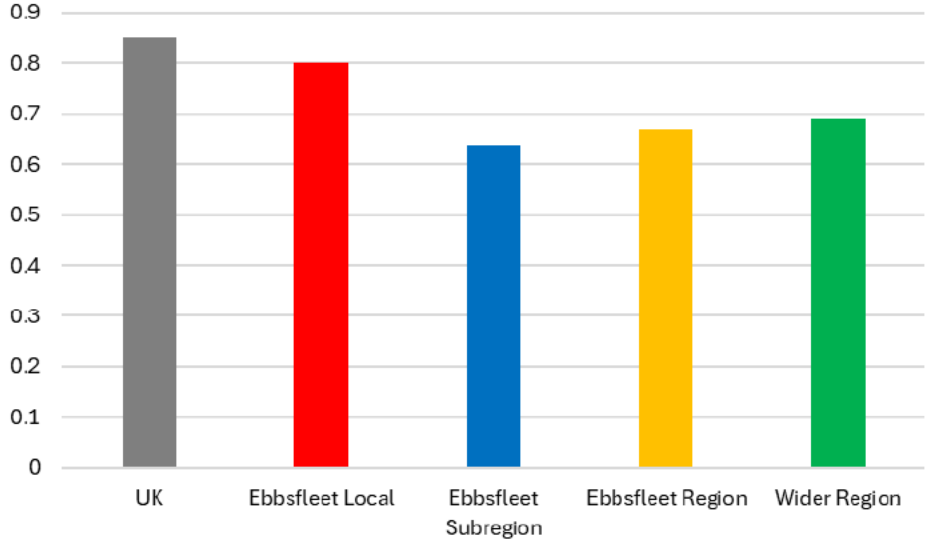
Ebbsfleet Local	121,000
Ebbsfleet Subregion	1,249,000
Ebbsfleet Region	1,617,000
Wider Region	3,246,000

Source: ONS, Jobs Density

Index of jobs growth (2003=100)



Jobs per resident aged 16-64 (2021)



Key metrics: Businesses

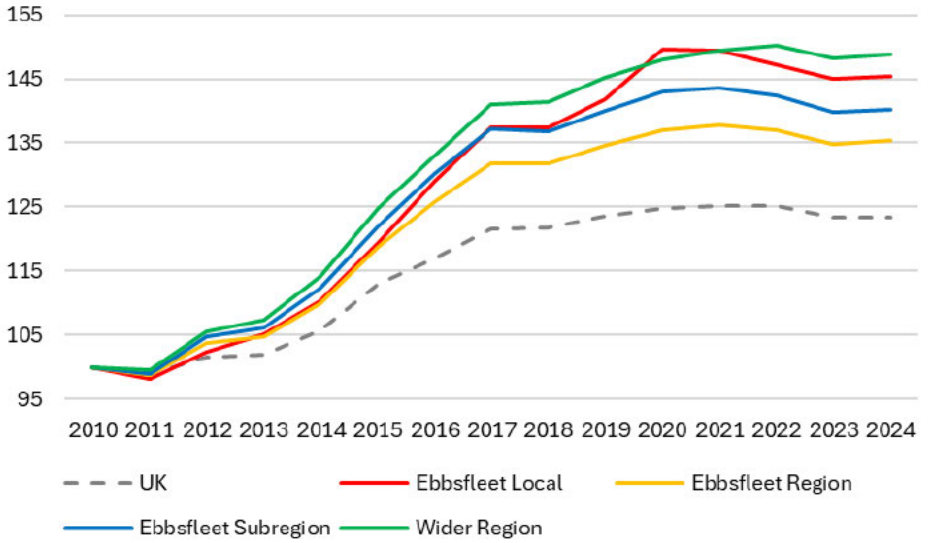
- Business stock has grown relatively strongly since the financial crash in all the impact areas – and especially within the 'Ebbsfleet Local' and 'Wider Region' geographies.
- The 'enterprise density' – the number of businesses to every 10,000 working age people – is somewhat lower than in the UK as a whole, although the 'Wider Region' and 'Ebbsfleet Local' densities are reasonably positive for largely urban areas (generally business densities are lower in cities given the higher number of larger employers).

Total businesses, 2024

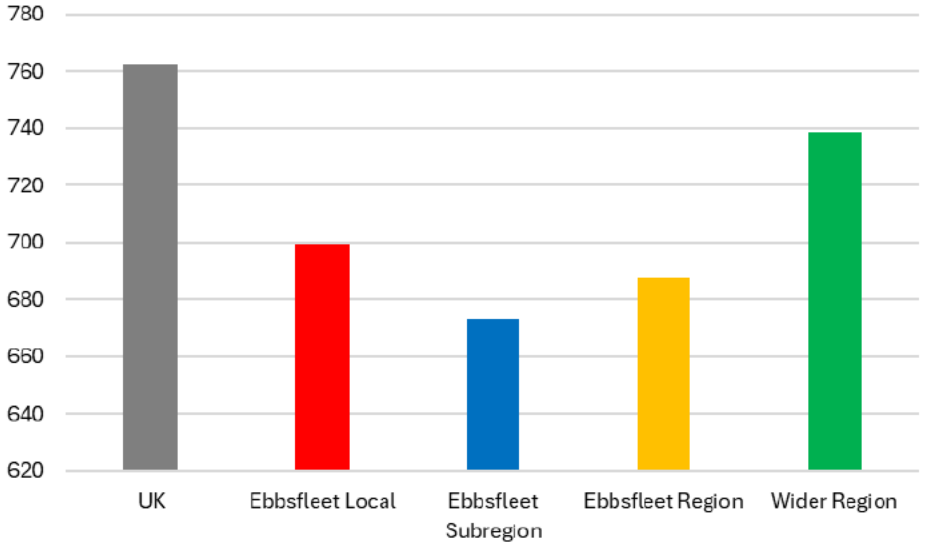
Ebbsfleet Local	10,000
Ebbsfleet Subregion	130,395
Ebbsfleet Region	165,425
Wider Region	335,180

Source: ONS, UK Business Count, based on local units

Index of business stock growth (2010=100)



Enterprises per 10,000 'working age' people, 2023



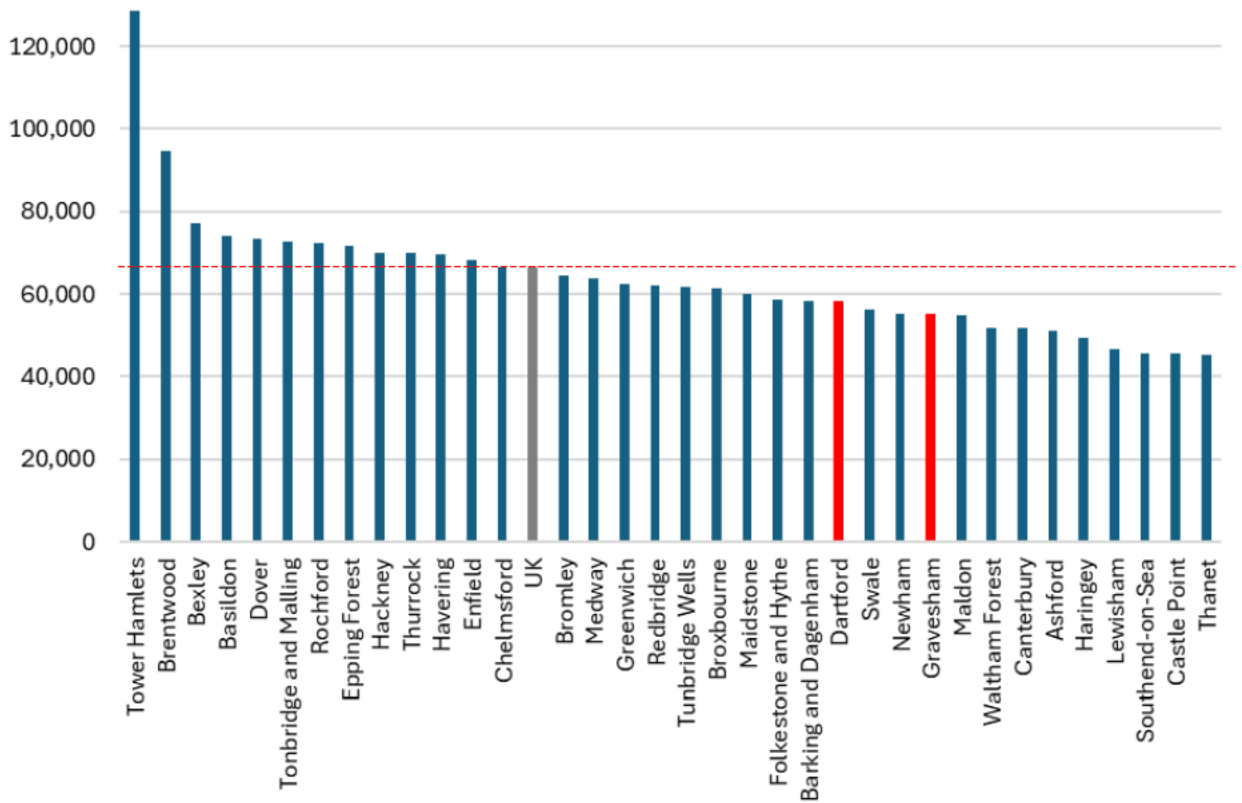
Key metrics: GVA and productivity

- The area surrounding Ebbsfleet International is of substantial economic scale: the 'Ebbsfleet Subregion' impact area (which excludes Tower Hamlets) generates annual gross value added of about £80 billion. For comparison, that is roughly the same size as the economy of the West Midlands conurbation in terms of total output.
- Productivity (i.e., the amount of GVA generated for every job) varies across the area. The 'Ebbsfleet Local' area (Dartford and Gravesham) is somewhat below the UK average, with scope for gain given population and housing growth and connectivity strengths.

Total GVA (£m), 2023

Ebbsfleet Local	6,549
Ebbsfleet Subregion	80,247
Ebbsfleet Region	101,319
Wider Region	221,659

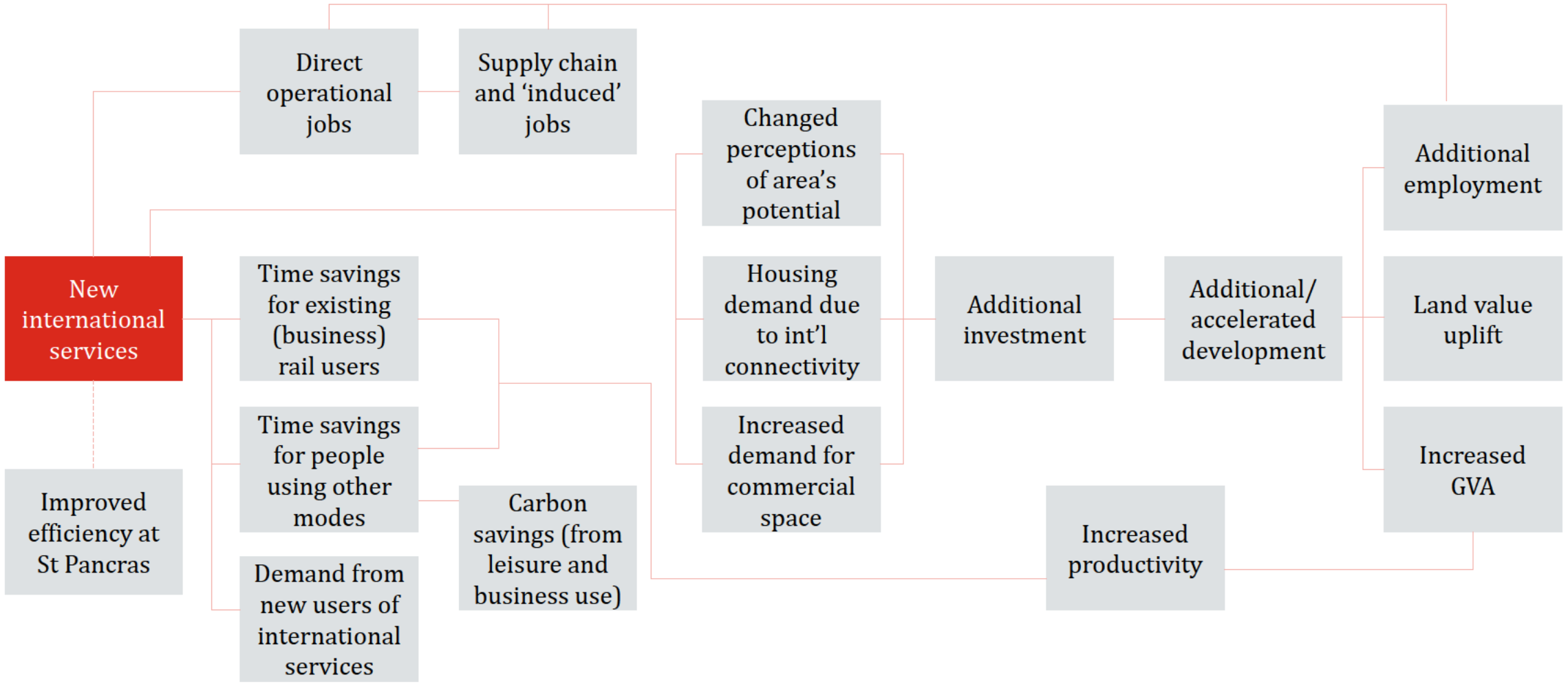
GVA per filled job, 2023



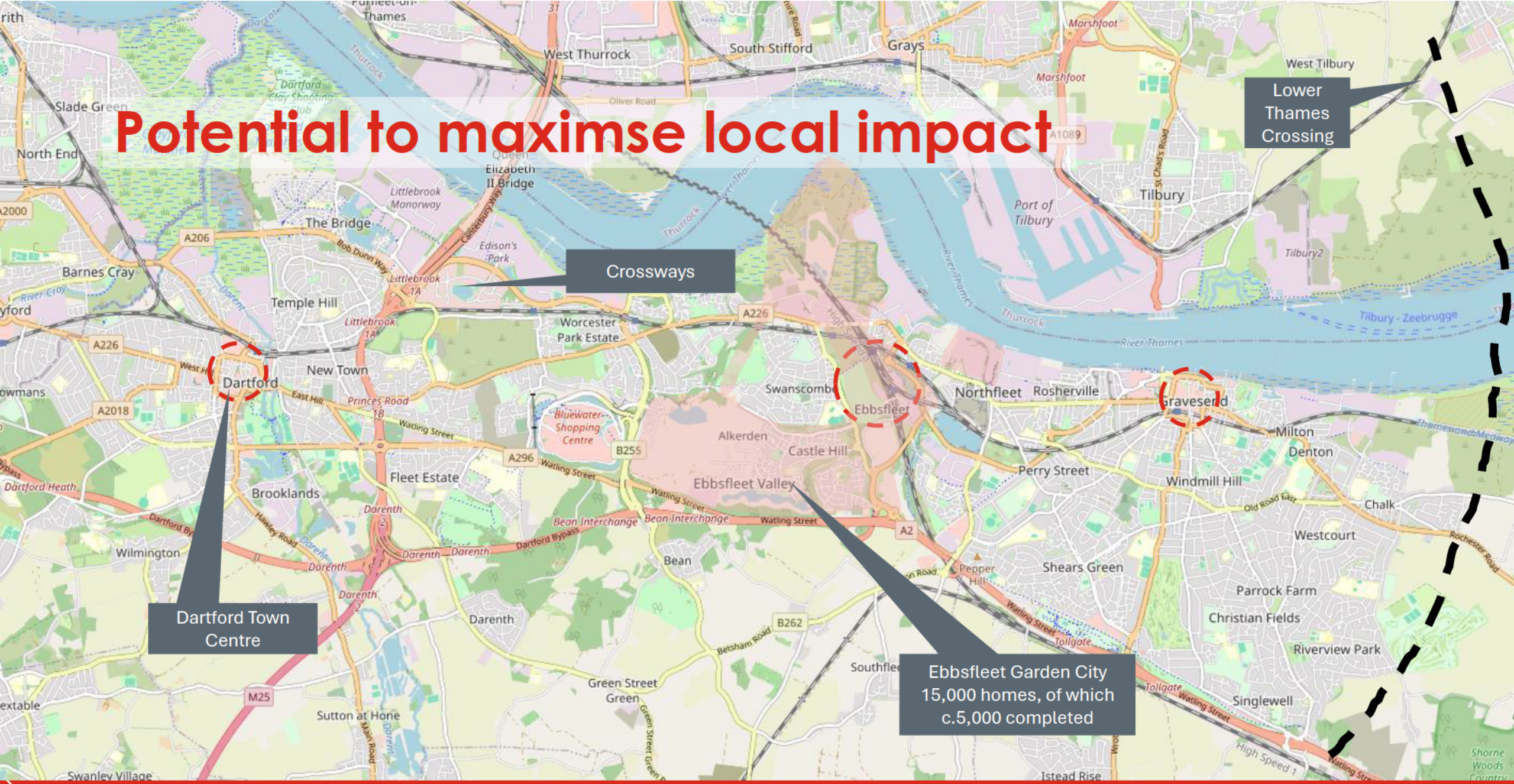
Potential routes to economic impact

- The following slide illustrates how new international services could yield local and regional economic benefits. This is mainly written from the perspective of Ebbsfleet, although similar 'routes to impact' might be expected at Stratford:
  - In the first instance, new services will lead to some direct and indirect job creation (which ought to be net additional assuming there is substantial additional demand that is unmet at St Pancras). It will also directly lead to journey time savings, either for those who would otherwise have travelled to St Pancras, or who would have used alternative (more carbon-intensive) modes.
  - New connectivity would also change perceptions of the area surrounding Ebbsfleet. Given that the original economic vision was geared around international connectivity, resumption of services ought to improve confidence in and awareness of opportunities, especially linked with Ebbsfleet Garden City.
  - This may also be linked with residential demand from people using international services (and it is plausible that regular travellers to Brussels or Paris will be in higher-earning jobs) and from businesses that value international access. This ought to lead to additional investment demand, translating into land value uplift in the vicinity of the station (and potentially further out) and generate higher GVA over time.
- These 'routes to impact' are likely to reflect the same logic as when international services were first proposed and introduced. However, it is plausible that there is now a stronger opportunity for realisation, given that housing delivery at Ebbsfleet Garden City is well underway (as is growth elsewhere in Dartford), and plans are further advanced for the Ebbsfleet Central business district. It is also likely that the area of benefit will be extended once the Lower Thames Crossing is delivered, improving access to Essex and relieving access via the Dartford Crossing.

Routes to impact



Potential to maximse local impact



SQW

Issues to consider in assessing economic impact

- This paper provides a snapshot of current economic conditions in the area that is likely to be most impacted by the resumption of international services from Ebbsfleet (and Stratford) and sets out the type of economic benefits that might arise.
- An economic impact assessment could use the logic model presented on Slide 14 as a starting point for analysis, making use of:
  - Evidence of inward investment enquiries (or losses since previous services were withdrawn)
  - Passenger data (origin-destination and business/ leisure, both for existing services and projections for new services)
  - Expressed demand, some of which may be accessible from the survey that KCC has recently run
  - Evidence from elsewhere, recognising that there are likely to be few international rail connection projects of this nature.
  - The potential effects of extending the impact area via the Lower Thames Crossing, and potential demand in the wider subregion/ region beyond Ebbsfleet.

Research, analysis and advice on economic and social development

SQW

Contact

For more information:

Ross Gill
Associate Director
SQW
t. 07837 872705
e. rgill@sqw.co.uk

www.sqw.co.uk

Stratford International Feasibility Study

Gemini Trains

WW+P GHD movement strategies A GHD company

12 Valentine Place London SE1 8QH
Tel. 020 7401 8877
www.wwparchitects.com

egis GROUP

Prepared for and on behalf of:
Gemini Trains

Project Name:
Stratford International Feasibility Study

Report Name:
Stratford International Feasbility Study

Status:
First Issue

This document has been issued and amended as follows:

Issue	Description	Date	Prepared by	Reviewed by	Approved by
01	First Issue	27.06.2025	SB	AG	SD
02	Executive Summary Revised	04.07.2025	SB	AG	SD

Contents

Acronyms

BOH	Back of House
LoS	Level of Service
NR	Network Rail
PAF	Police Aux Frontiers (French Border Force)
PAX	Passengers
PREM	Premium
PRMs	Persons with Reduced Mobility
STD	Standard
UKBF	UK Border Force

1. Executive Summary

This report has been developed alongside Gemini Trains using industry best practice for operational layout and function and placemaking. It forms a pre-brief study looking at how Stratford International can support Gemini's proposal to run services from London to the continent. The contents of the report are formed of ideas and strategies that will be tested and expanded if the project is successful with a full design team. WW+P and GHD take no liability for the accuracy of the contents of the pre-brief report and this has been prepared to support Gemini's proposal to the ORR.

The work forms the foundation for a future-stage brief, based on high-level spatial and operational testing. The proposals aim to create a new international gateway and public space at Stratford, through public realm improvements and a re-imagined station utilising the existing structure.

Proposals assume 8-car, single-deck, 200m long trains (approximately. 520 passengers, with 20% premium). Future flexibility for 400m long trains is preserved. Static and dynamic modelling were carried to evaluate layouts in response to Gemini's draft timetable that indicates the worst-case scenario of three trains departing within 1.5 hours and trains arriving within 20 minutes of each other.

The recommended operational model takes precedent from European high-speed rail where passengers wait within the public realm and are processed directly prior to train departure and advance straight to platform. This allows for a more flexible passenger experience and streamlined process of a turn up and go model.

The recommended layout operates on the basis of segregated check-in and security lanes for premium and standard passengers which combine at passport control. The maximum security lane provision of 8 was provided with a 10 lane option being discounted due to layout constraints.

Recommended vertical transport options of four (13 person lifts) and two escalators were shown to accommodate the processing of a train load of passengers within half an hour for departures, but further testing is required for the arrivals.

Final dynamic modelling highlighted, with 8 lanes with throughput capacity of 19s/PAX/lane, it would take 31 minutes to process a trainload of passengers. Recommendations to reduce this are highlighted in the final chapter of the report.

All recommendations will require further development, including surveys and detailed analysis.

2. Introduction

2.1 Introduction

This study was commissioned to support the Gemini Business Case, exploring the feasibility of using Stratford International as a terminus for international rail services to and from the continent. The objective was not only to assess the viability of this proposal but also to establish a clear vision for the station and its surrounding context.

The report sets out to inform the development of a design brief that can be taken forward into subsequent stages of the project. The design team comprised WW+P, responsible for architectural design, and GHD Movement Strategies, who led on passenger flow analysis and modelling.

The findings presented are based on high-level testing and indicative assessments. As such, any recommendations made within this report will require further, more detailed analysis and surveys in the next stages of development. Similarly, no other engineering or construction inputs have been included. Verification of the proposed design will be required by a full multi-disciplinary team at a later design stage.

St. Pancras International was used as a benchmark to determine the spatial requirements and functional components necessary for an international rail terminus. However, this proposal adopts a different operational model similar to a European Highspeed service, emphasising a ‘turn up and go’ approach that reduces waiting times and increases flexibility for travellers.

The design options outlined are based on full train occupancy, assuming a capacity of 520 passengers. While the proposed platform layouts accommodate future operation of 400-metre-long trains, any progression of this scheme will require updated modelling and analysis to reflect revised passenger projections and provision requirements.

2.2 Station Background

Stratford International sits between Westfield to the south and the existing DLR station to the north with the Olympic Park beyond.

The station was designed on the assumption of being used for a stopping international service. Eurostar services currently run through the station, on high-speed through tracks, between the stopping service tracks for the central island platforms and the side platforms.

The four platforms of the existing station sit within a cutting that runs east to west. There are four platforms; Platforms 1 and 4, that were designed for international services but have never been used, and Platforms 2 and 3 for domestic services. Platforms 1 and 4 are 400m long with escape stairs at either end and passenger Vertical transport at the centre in the form of one (8-person) lift, one escalator and one switchback stair.

The station building is supported by a concrete deck that spans the cutting which also forms a wide unpaid bridge deck across the rail corridor.

3. Brief, Requirements & Design Assumptions

3.1 Introduction

The design was developed based on the brief and assumptions outlined below. The initial high-level brief was produced by Gemini with additional assumptions added by the design team. These assumptions were used as the baseline for the purposes of this high-level feasibility study but require further testing and substantiation should this work be continued into future stages.

3.2 Requirements

The following were provided in the initial brief from Gemini, forming the basis for design development:

- 8 car, single deck, 200m long trains
- 516 PAX per train
- Approximately 20% premium class
- No. of return trips/day based on timetable from Gemini, diagram opposite
- Two 200m train sets
- Office space for Gemini if feasible

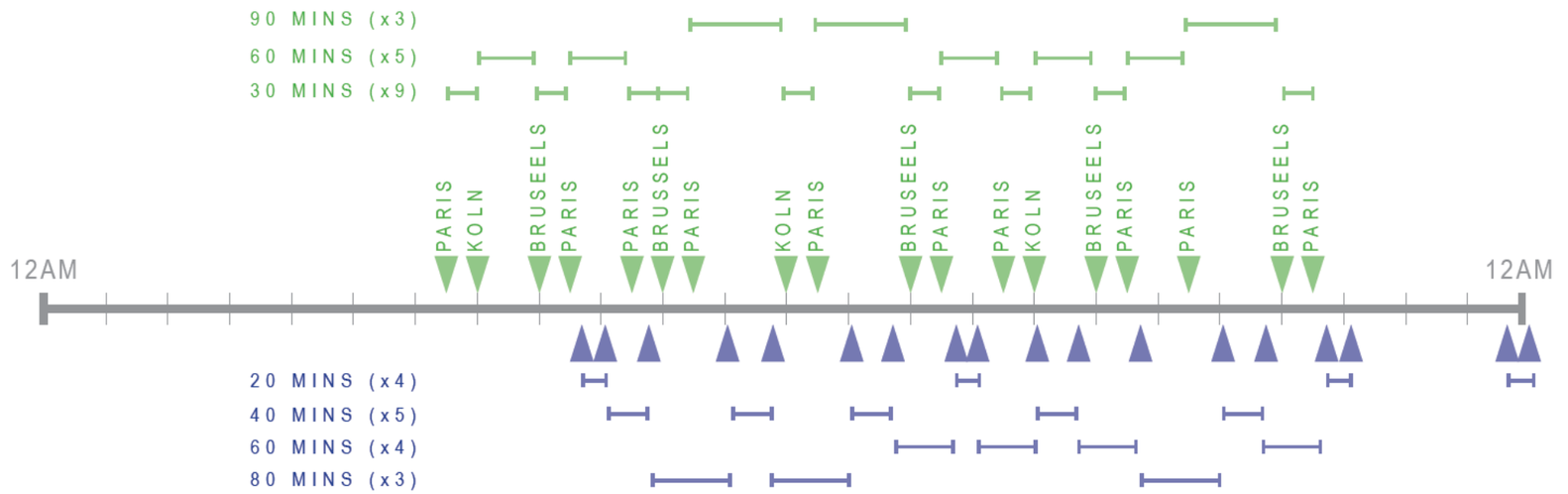
3.3 Assumptions

The following assumptions were agreed with Gemini through a series of meetings and workshops:

3.3.1 Timetable and Processing Durations

The following information is based on the latest timetable 'Gemini Train Diagrams v4' which is the baseline assumption for the train timetable for this study.

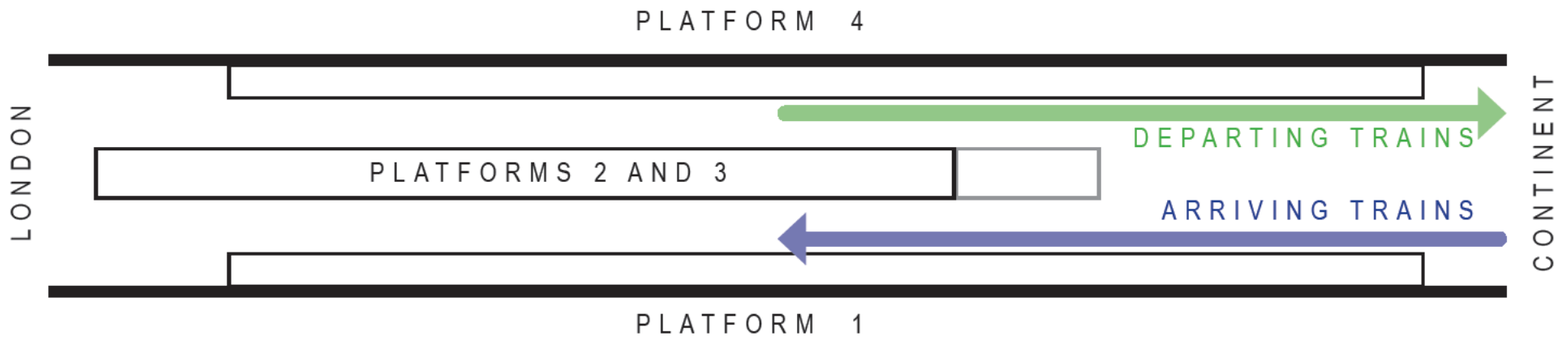
- Trains will be departing as close as 30 mins apart with the worst-case scenario showing three trains leaving within a 1.5 hour time period.
- In addition, trains will be arriving as close as 20 mins apart



3.3.2 Platform Use

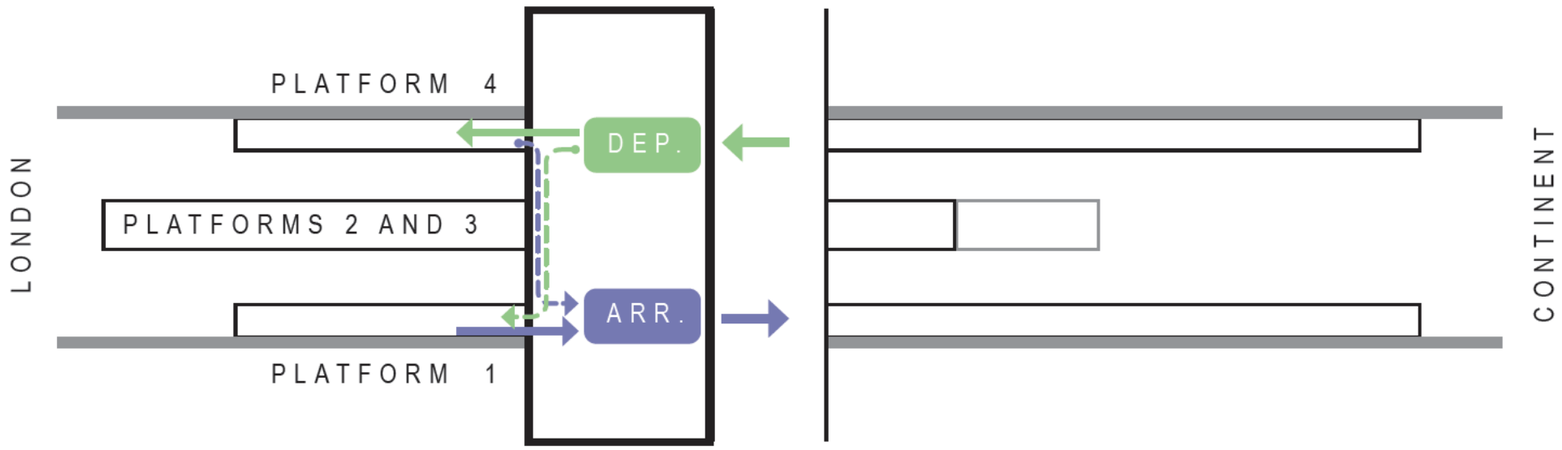
The existing 400m long platforms will be retained in their current layout with enhancements made to vertical transport which will support the function of the station as a terminus. The platforms will function as follows, and as shown in the diagram right:

- Platform 4 will be the departing platform for trains leaving for the continent
- Platform 1 will be used as the arrivals platform for trains arriving from the continent



3.3.3 Platform Flexibility

In standard scenarios Platforms 1 and 4 will be used as arrivals and departures respectively as outlined above. However, the proposals should design for flexibility for the platforms use to be reversed and passengers to move between them in the secure zone at concourse level.

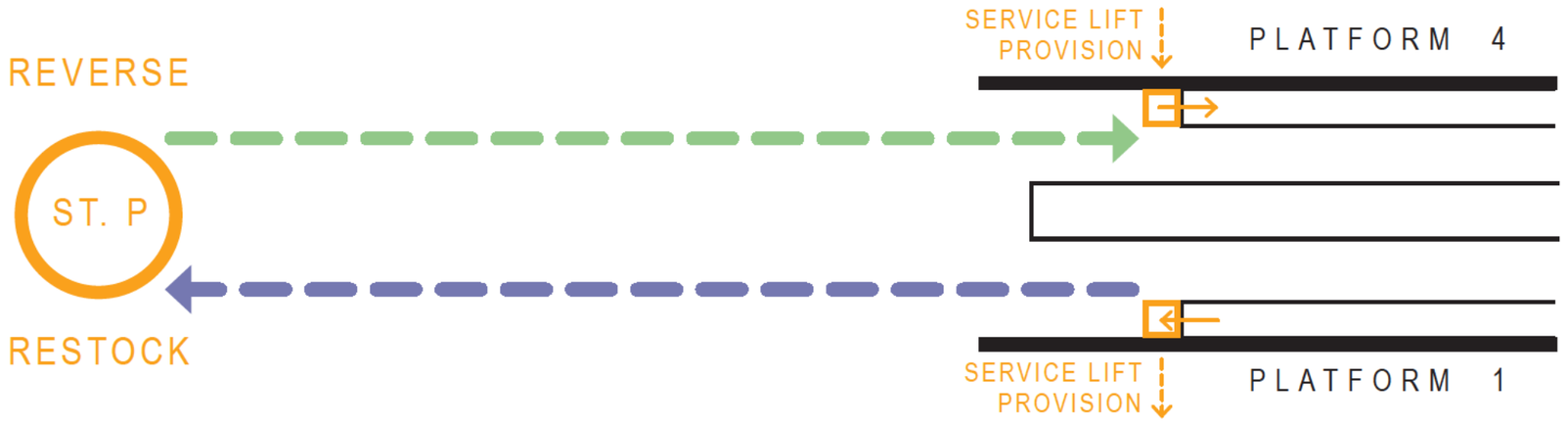


3.3.4 Reversing and Servicing

Trains arriving from the continent will first stop at Stratford to allow passengers to disembark, then continue to St. Pancras to reverse direction. After turning around, they will return to Stratford to pick up passengers for the next departing service to the continent.

The trains will be serviced and restocked at St. Pancras. The train crew will therefore arrive on the train rather than boarding at Stratford.

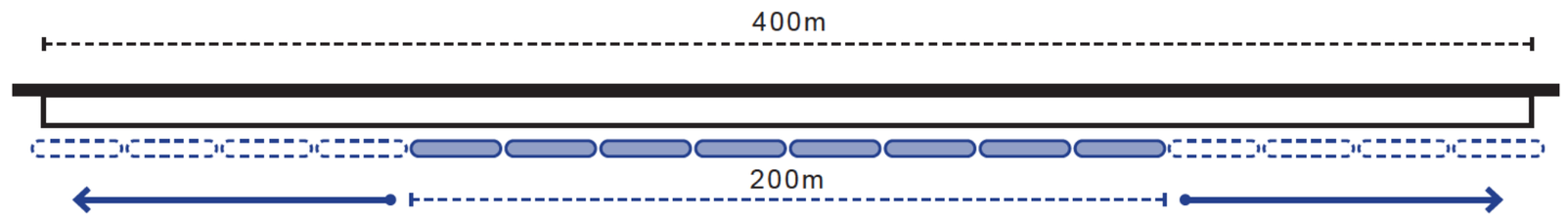
Despite servicing being carried out at St. Pancras, it was agreed that a servicing provision (lift) should be provided at Stratford in the case that servicing cannot occur at St. Pancras and to provide flexibility for the future of Stratford services.



3.3.5 Train Length and Stopping Positions

The standard length of train will be 200m comprised of 8 cars. However, flexibility for the future introduction of 400m long trains should be incorporated.

The train stopping positions are flexible due to the long platforms but will be determined by the appropriate vertical transport arrangement and a review of signalling in future design stages.



4. Constraints & Opportunities

4.1 Introduction

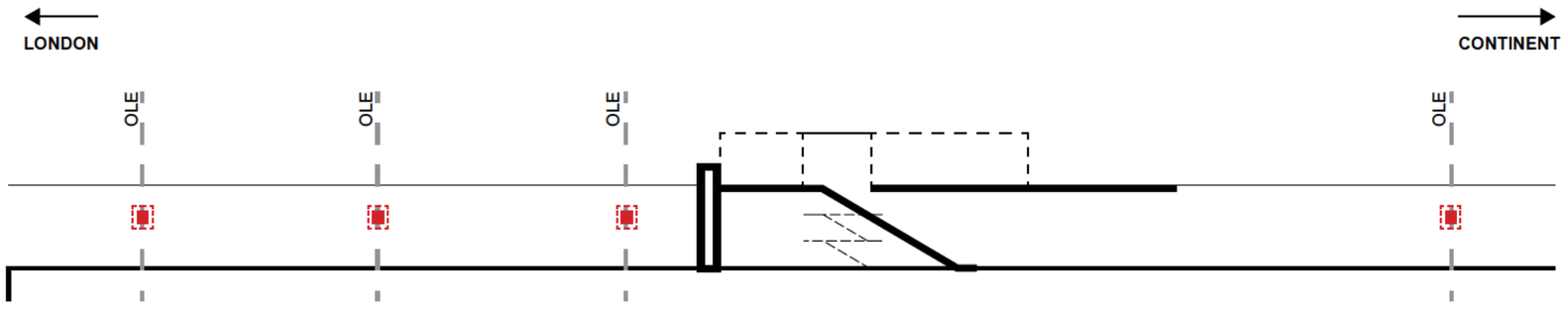
Constraints and opportunities were highlighted at the outset of the design process to inform the developed proposals. These were discussed with Gemini through workshops to agree a response for the purpose of this study – details of which are outlined below.

4.2 Overhead Line Equipment (OLE)

The existing OLE is supported by large gantries spanning across the station box at approx. 7m above platform. The exact size and location of these are not known as surveys have not been carried out. The OLE have been drawn approximately from site photographs and aerial imagery, and provided with a +/- 2m tolerance to account for the likely inaccuracy.

These lines support the function of the trains running through the station and any alterations to these lines would result in interruptions to these services during construction.

Following discussions with Gemini at *'Design Briefing Workshop'* on 30.05.25, Gemini confirmed the assumption for this study is to retain the OLE in their current location and not propose solutions that would require their relocation.



4.3 Space for Expansion

There is a safeguarded expansion zone northwest of station. This was safeguarded following a previous study undertaken by Arup. It identified an opportunity to expand the departures facilities using the extension as a waiting lounge for passengers.

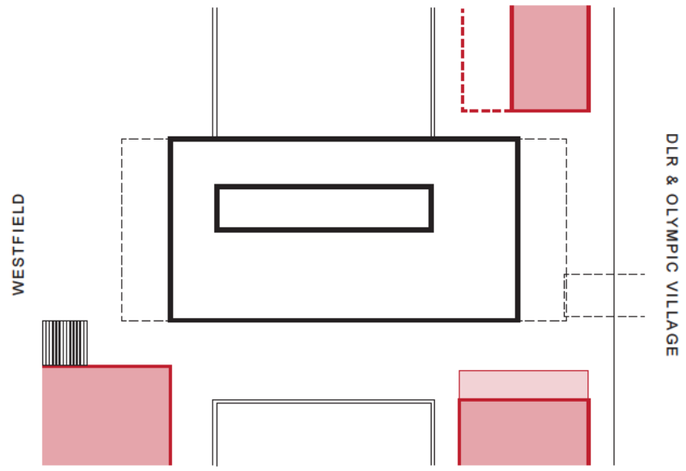
There are several surrounding buildings that significantly constrain the expansion potential of the building:

- Westfield to the south – inactive frontage onto the bridge, active frontage onto south façade of the station
- New residential development to the north-west
- The Stratford Hotel and Brasserie bar to the north-east – across the bridge deck with active frontage onto the bridge

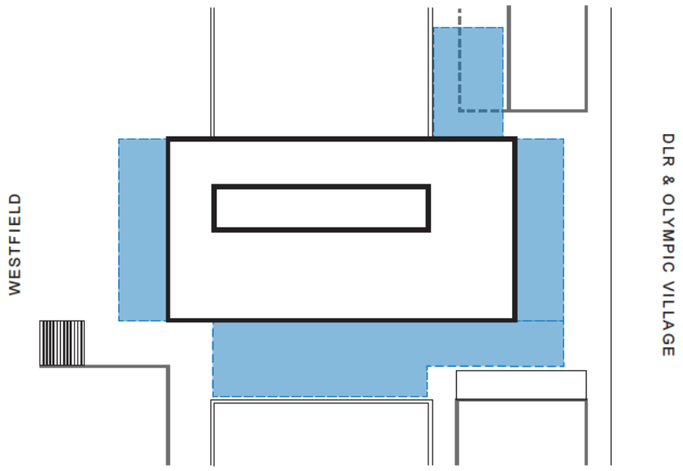
The existing areas under the canopies to the north and south of the building present opportunity for expansion of the internal fabric within the existing footprint.

The existing bridge deck acts as an unpaid through-route across the rail corridor between Westfield and the DLR station and on towards the Olympic Village. This route must be retained in the proposed design. The current conditions are uninviting with the bridge being a wide, exposed, expanse of paving, with the blank, glazed façade of the station to one side. This presents an opportunity for public realm improvements to enhance the passenger journey as well as providing an enhanced unpaid through-route.

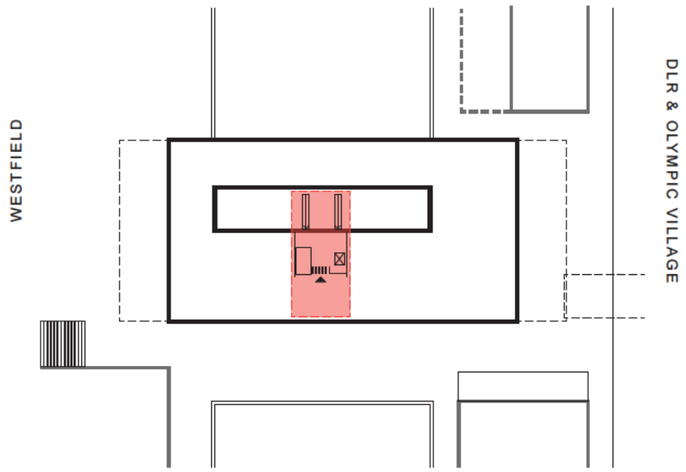
Following discussions with Gemini at *'Design Review Workshop'* on 05.06.25, it was agreed that extending into these areas was acceptable if the additional space was required for the functional layout.



ADJACENT BUILDINGS



BUILDING ENVELOPE EXTENSION OPPORTUNITIES



DOMESTIC SERVICES ENTRANCE / EXIT

4.4 Shear Walls in New Development

The new development to the northeast of the station is supported by shear walls that fall within or adjacent to the safeguarded expansion zone. Exact extents of the zone are not known at this stage and have been estimated based on site photographs. These shear walls are a fixed constraint that impinges on the width of the potential expansion zone making the space less efficient.

4.5 Platform Widths

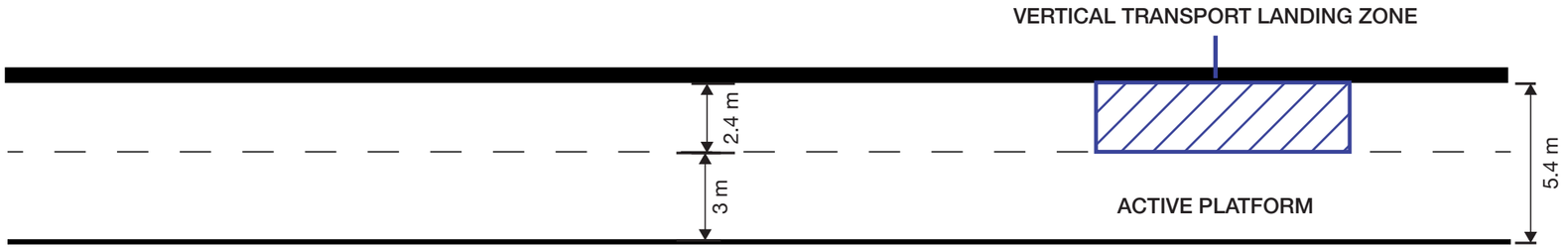
The existing platforms are 5.4m wide and 400m long.

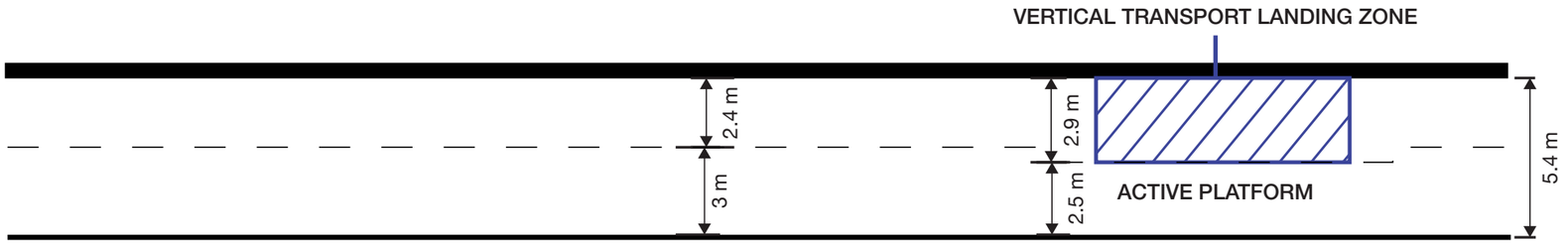
With high-speed trains running through the station the ideal recommendation would be to retain a minimum 3m active platform width along the length of the platform. However, in this case the high-speed trains running through are offset from the platform – running on adjacent tracks and therefore pose less risk to passengers on the platform.

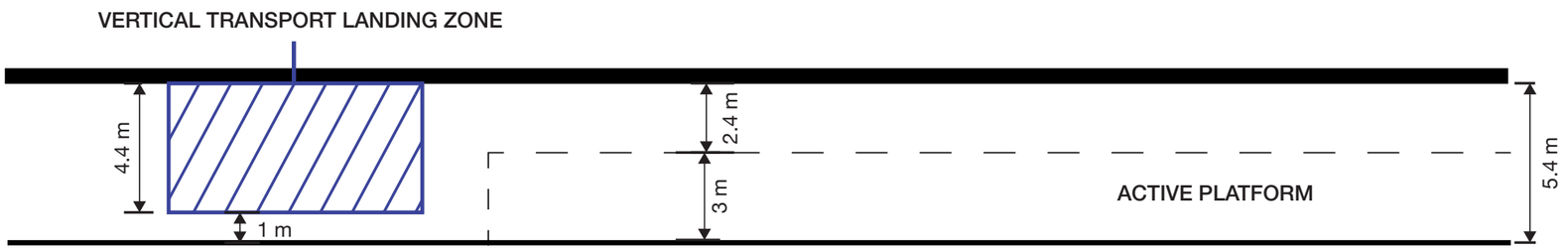
Three options (illustrated right0 were considered in relation to active platform widths:

- Retaining a platform width of 3m reduces the landing zone for vertical transport to 2.4m wide – allowing only single escalator/travelator or approx. 8-person lift.
- Due to the reduced risk of the offset high-speed trains there is an option to locally reduce the width of the platform to 2.5m allowing a 2.9m wide vertical transport landing zone which allows for larger, 13-person lifts to be accommodated.
- Another option would be to reduce the active platform length and provide large landing areas either end – this option was discounted due to impact on future flexibility for 400m trains

Following discussions with Gemini at *'Design Review Workshop'* on 05.06.25, it was decided that the locally reduced option was preferable to allow future flexibility for the 400m trains but also provide sufficient vertical transport capacity to platform.







4.6 Voids and Structure

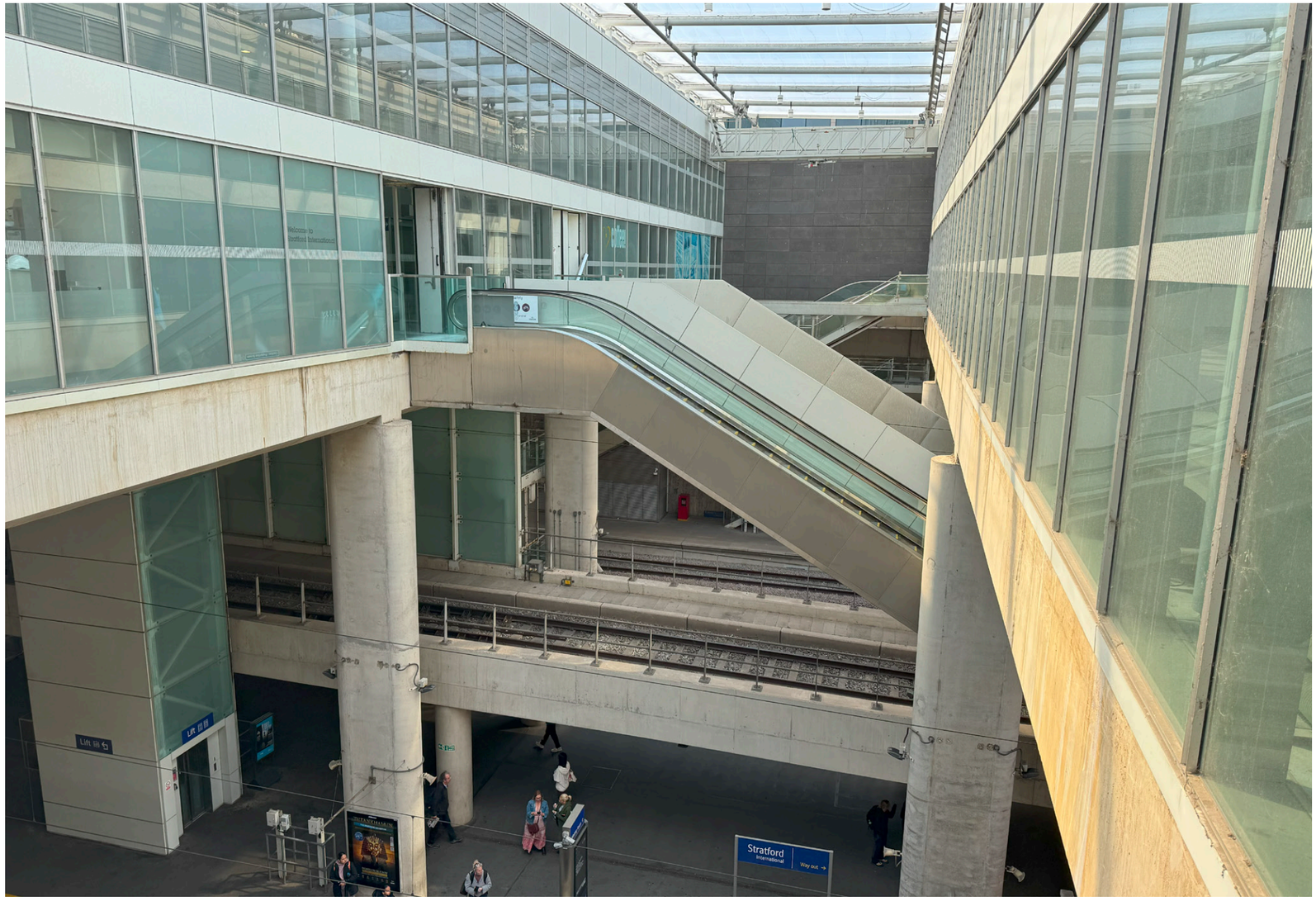
There is an existing void (pictured right) at the centre of the building that houses the Vertical transport running down to both the domestic and international platforms.

Structural beams that span the box to support the building run along the edge of this void reducing the headroom on the escalators. In plan this void also constrains the available width for departures and arrivals provisions.

Alterations to the void would present large structural challenges and interruptions to domestic services that may incur high costs.

4.7 Domestic Services Entrance

The existing domestic entrance and gateline is treated as a fixed constraint to minimise disruption. There is no alternative logical location to accommodate these functions, and any relocation or modification would result in unnecessary service interruptions and associated costs.



4.8 Benchmarks

Four benchmarks were considered to inform the early stages of deign development - three international rail stations and one airport. These benchmarks contain valuable insights into passenger processing models, spatial requirements and design aspirations.

4.8.1 St. Pancras

Used primarily as a sizing benchmark. This station offers the most comparable service, location, and operational requirements. Passengers are advised to arrive 60–90 minutes prior to train departure. Refer to Chapter 5: Sizing Assumptions for a detailed analysis of this benchmark.

4.8.2 London City Airport

Selected for its streamlined check-in and security procedures, supporting a “turn up and go” operational model. The airport promotes a 20-minute journey from “door to gate” for departing passengers and 10 minutes from “tarmac to train” for arrivals.

4.8.3 Amsterdam Centraal

Referenced for its modern architectural language and overall design quality, representing the desired look and feel for international rail services. Ticket gates close 30 minutes before departure.

4.8.4 Rotterdam Centraal

Chosen for its flexible use of space, operational management model, and efficient space-saving strategies. Passengers are recommended to arrive 20 minutes before departure.

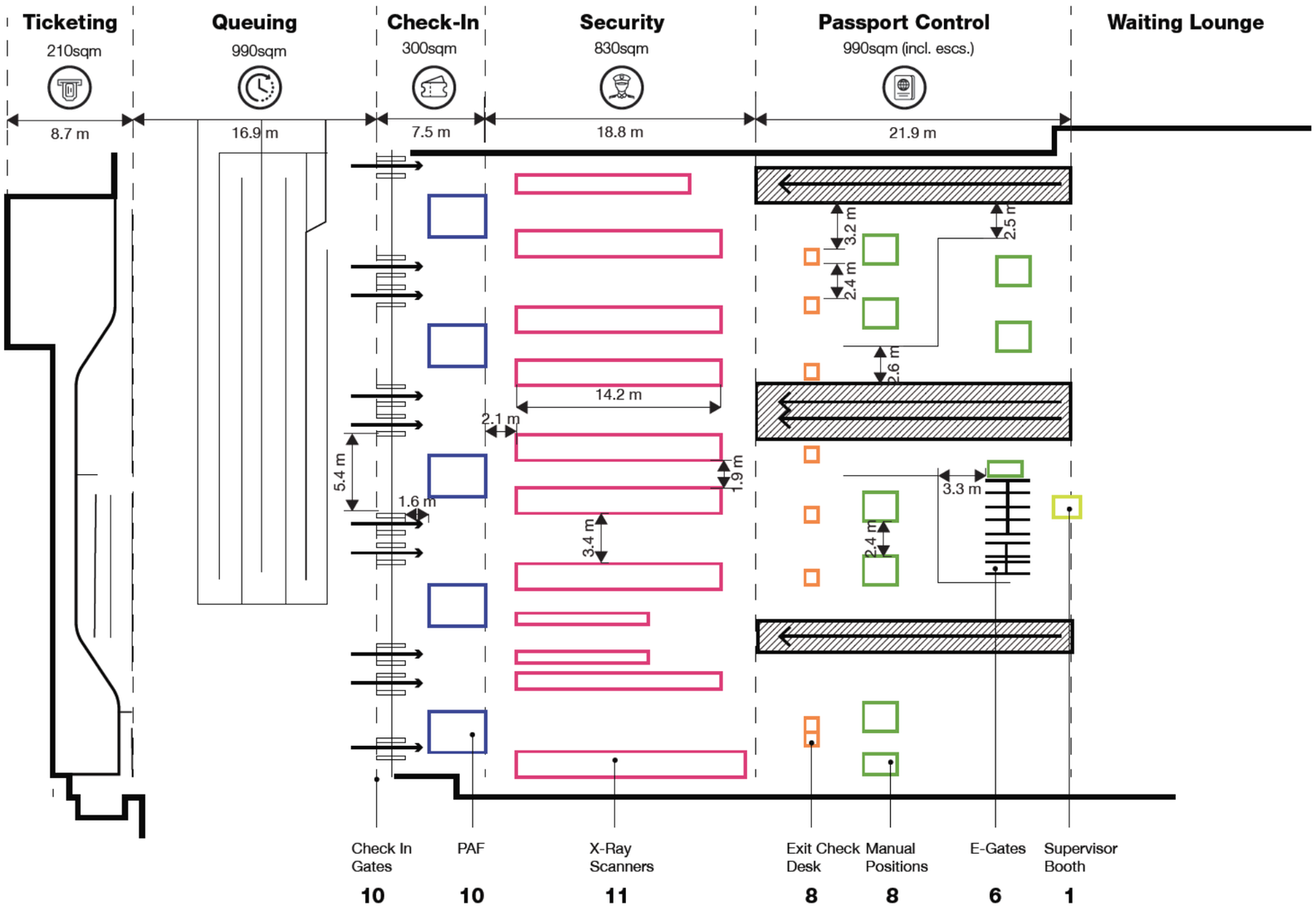
5. Sizing Assumptions

5.1 Introduction

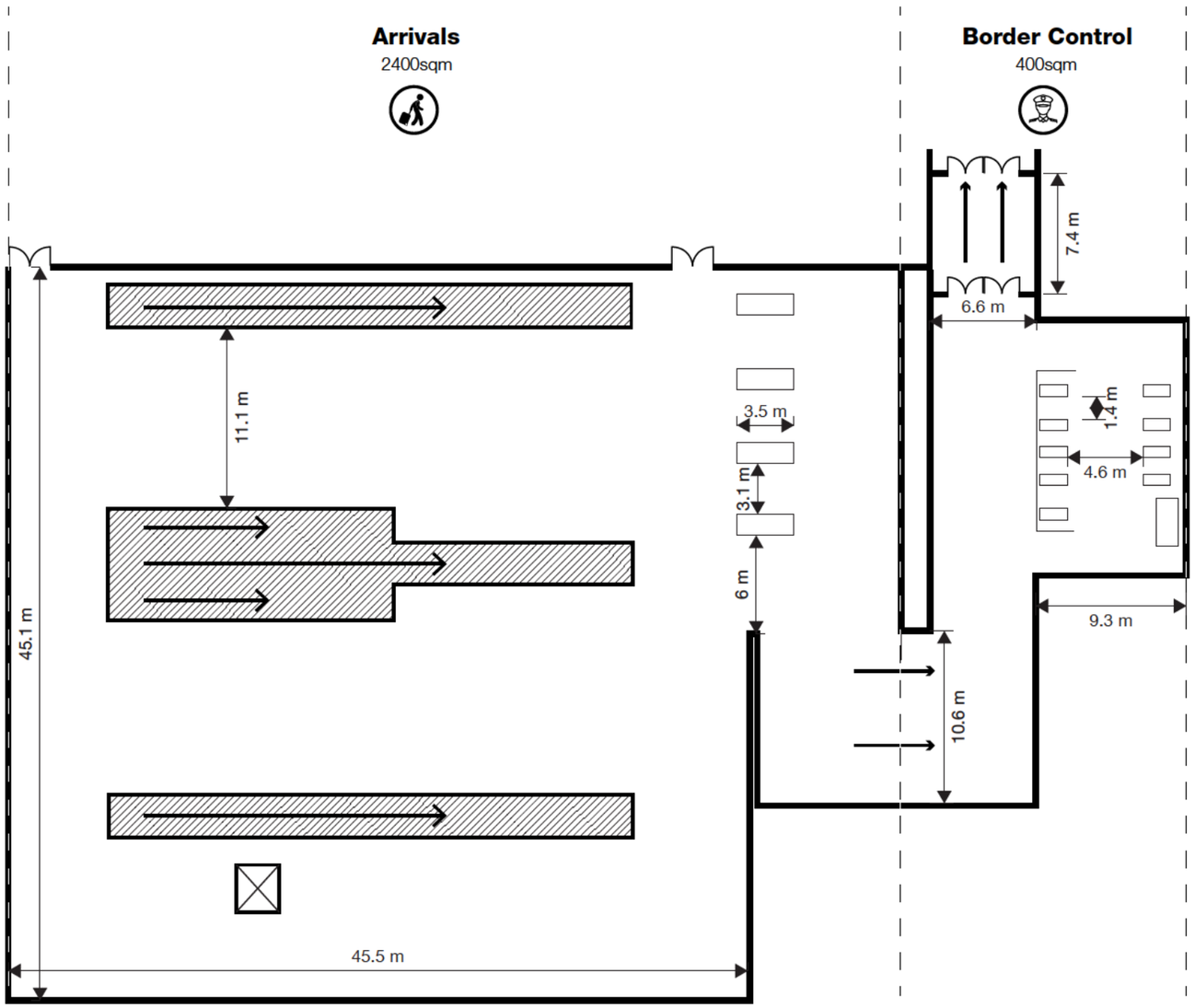
Accommodation schedules were not availabe. Assumptions were therefore developed by the design team and agreed with Gemini at the *'Design Review Workshop'* on 05.06.25.

5.2 St. Pancras Benchmark

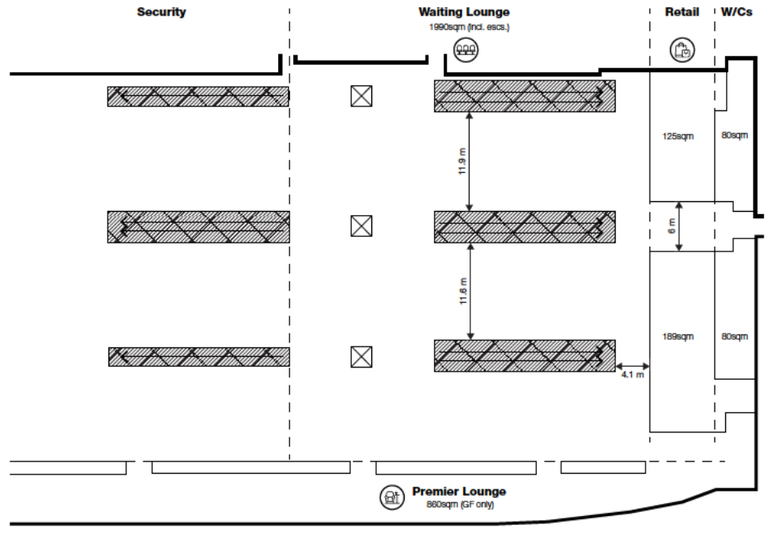
Given its close alignment in service type, location, and operational requirements, St. Pancras International was used as the starting point for developing the initial sizing assumptions. While the spatial areas at St. Pancras served as a useful guide, it is important to note that the station represents a unique case and does not necessarily reflect best practice. Its layout is significantly constrained by heritage considerations and existing vertical transport arrangements. The arrivals provision at St. Pancras provides sufficient space to carry out full passport checks in the event of a security risk.



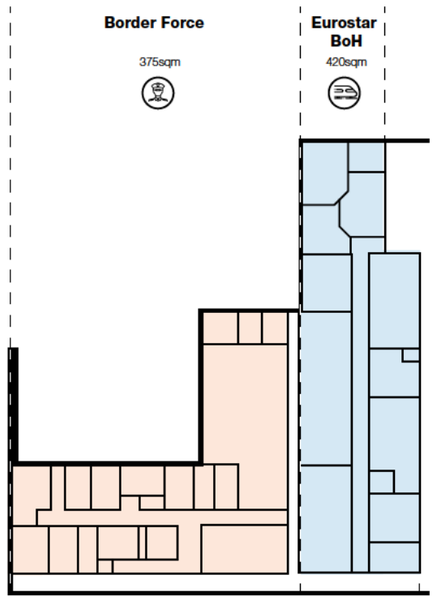
DEPARTURES



ARRIVALS



WAITING LOUNGE

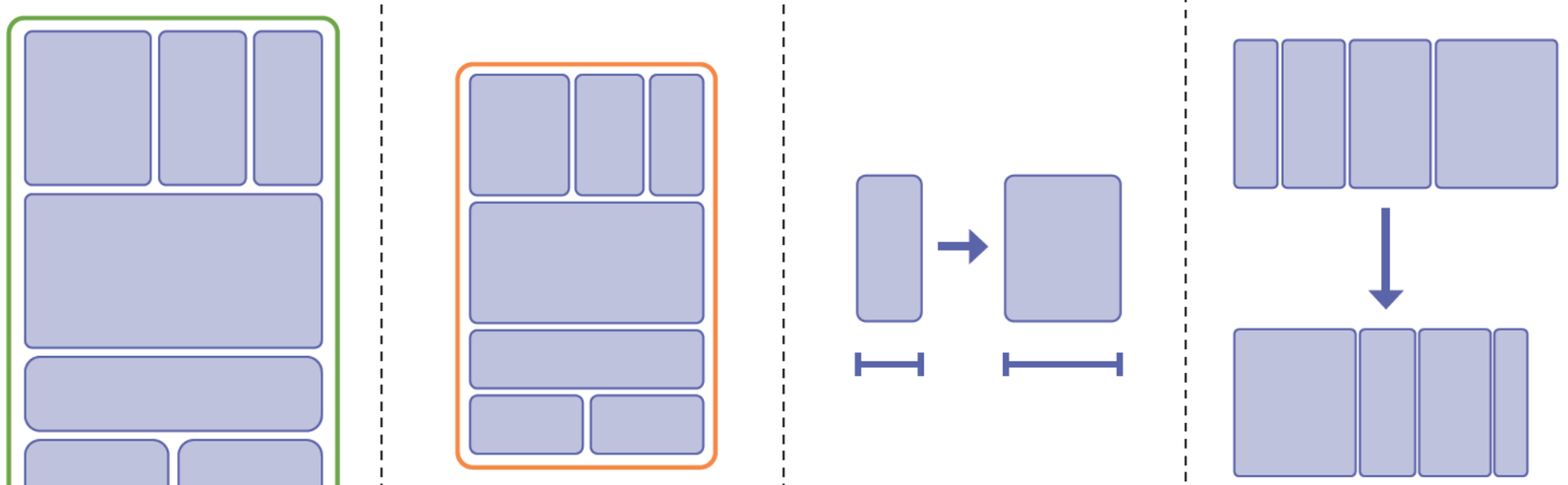


BACK OF HOUSE

5.3 Methodology

The following methodology was adopted to provide sufficient design basis without detailed accommodation information:

- The total area of St. Pancras Eurostar provision was measured and the percentage of each function of the total area was calculated.
- These percentages were then applied to the total usable space at Stratford – including both the mezzanine and proposed extended area under the canopies to derive indicative areas for each function
- Adjustments were made to reflect Stratford's operational model
  - The waiting lounge was relocated to the unpaid side of the station
  - Retail provision beyond the gateline was omitted
- The resulting areas were then tested within the building's footprint, ensuring critical dimensions were retained for specific functions:
  - Min 6m runoff between processes
  - Min 3.4m between facing security belts
  - Min 14m long security belts
  - Min 2.4m between facing passport booths
- All dimensions were assessed using static and dynamic passenger modelling of the preferred option. The design was refined based on the findings, with this report outlining final recommendations and identifying opportunities for further optimisation during later design stages.



1

CALCULATE EACH FUNCTIONS % OF THE TOTAL AREA OF ST. PANCRAS INTERNATIONAL

2

APPLY % TO TOTAL AVAILABLE AREA WITHIN EXISTING FOOTPRINT AT STRATFORD INTERNATIONAL

3

CHECK PROPOSED AREAS AGAINST CRITICAL DIMS, SPACE STANDARDS, SELECTED OPERATIONAL MODEL AND REGULATORY REQUIREMENTS

4

AMEND AREAS IN RESPONSE TO DESIGN DEVELOPMENT AND PASSENGER MODELLING

6. Departures Operational Strategy

6.1 Introduction

The departures operational strategy for the station has a large impact on the required accommodation and vertical transport strategy. To help inform the design, four different models were explored to understand the advantages and disadvantages of each approach.

6.2 Option A - St. Pancras Model

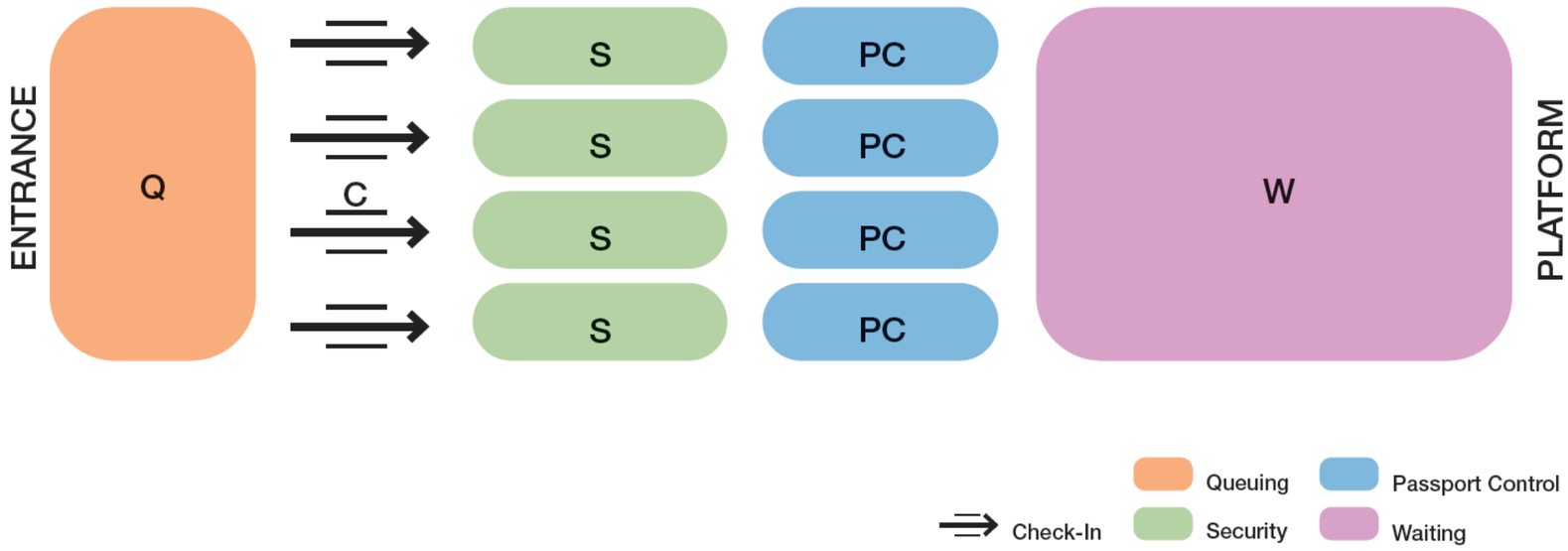
Passengers are processed through a series of segregated lanes, beginning with queuing before check-in. These lanes continue through security screening and passport control, after which passengers are held in a waiting lounge until their train is called. Once boarding is announced, all passengers proceed to the vertical transport to platforms at the same time.

Advantages

- Consolidates processing enabling efficient space-planning
- Single queue area split into lanes in one location

Disadvantages

- Encourages passengers to arrive early and wait after processing
- Requires large waiting areas post-check-in – not feasible within the existing footprint at Stratford
- Creates crowding at the vertical transport to platform



6.3 Option B - Alternative Queue

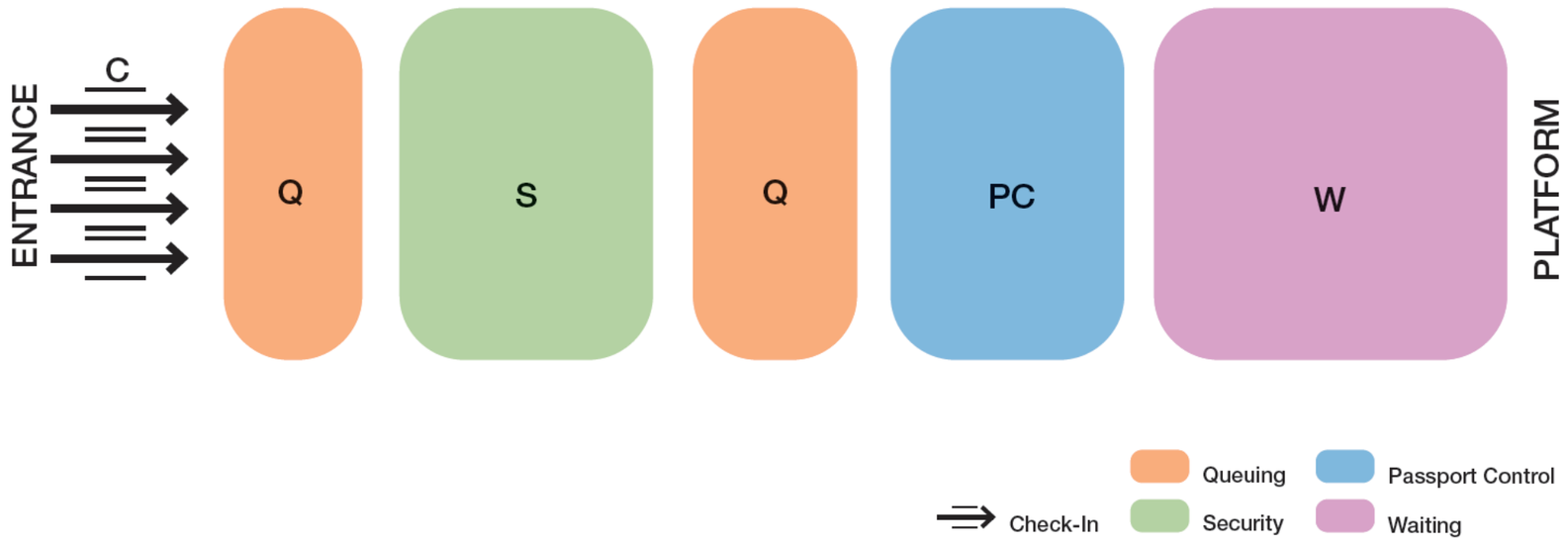
Check-in occurs through consolidated gates, followed by a queue for security and an additional queue for passport control. This separation of processes allows passengers the option to pause or wait between stages. After completing passport control, passengers are held in a waiting lounge until their train is called, at which point all passengers proceed to the Vertical transport.

Advantages

- Allows passengers more flexibility to choose when to progress through processing

Disadvantages

- Inefficient space-planning with processes spread out
- Requires large waiting areas post-check-in – not feasible within the existing footprint at Stratford
- Creates potential crowding at vertical transport to platform



6.4 Option C - European Airport

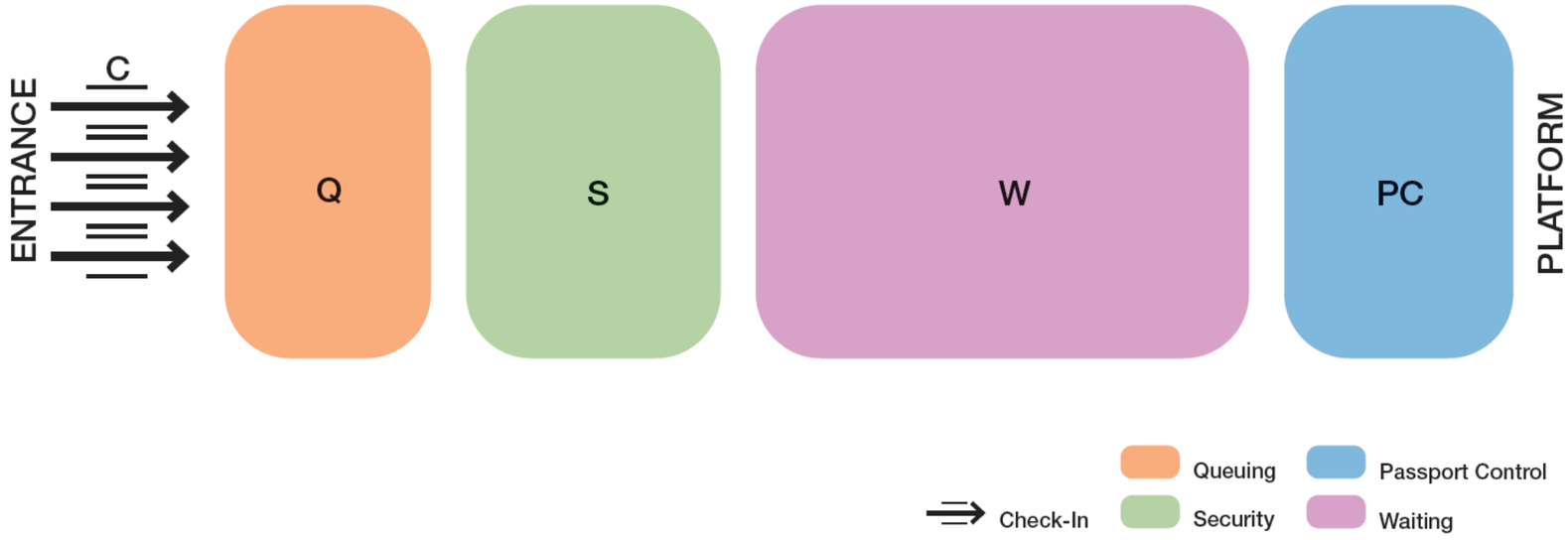
Check-in is handled through consolidated gates, followed by a queue for security. A waiting lounge is positioned between security and passport control, allowing passengers the opportunity to pause before proceeding. This staggered flow enables passengers to move through passport control at their own pace, helping to reduce peak demand and congestion at the vertical transport

Advantages

- Staggered passenger flow through passport control process can reduce crowding at Vertical transport to platform

Disadvantages

- Encourages passengers to arrive early and wait after processing
- Requires large waiting areas post-check-in – not feasible within the existing footprint at Stratford



6.5 Option D - European Highspeed

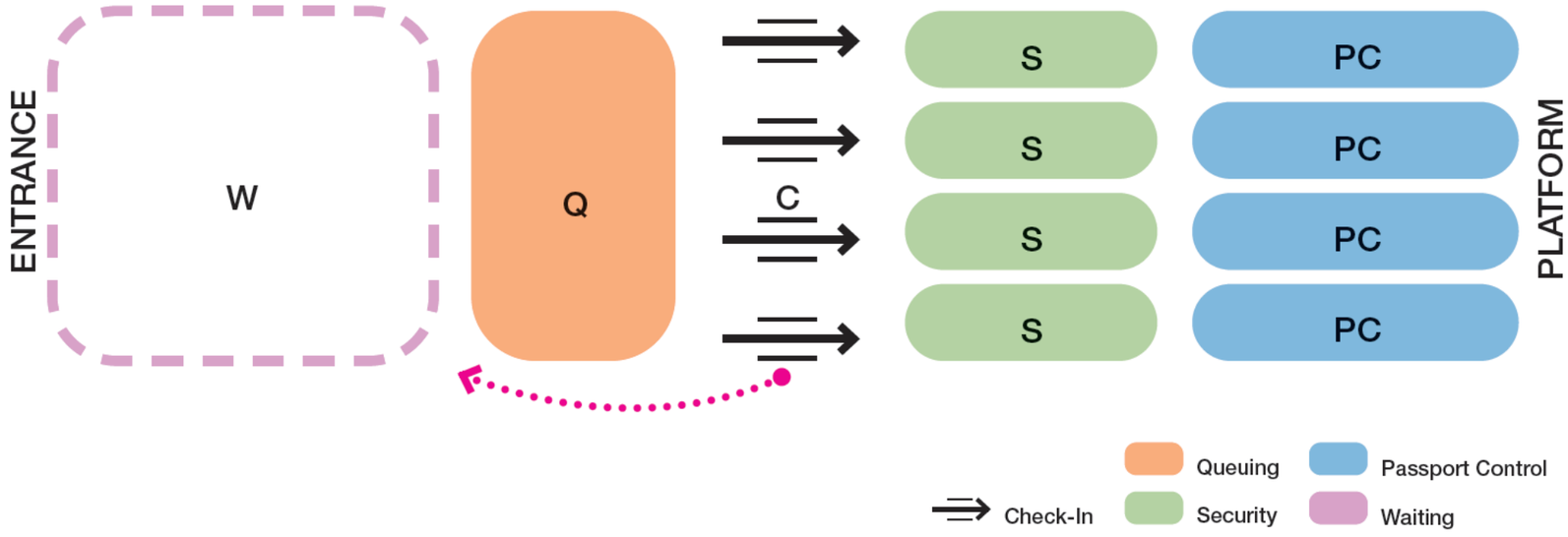
The waiting area is distributed within the surrounding public realm and nearby facilities, such as Westfield, rather than within the station itself. Passengers queue in segregated lanes before check-in and are only processed once their train is called. This approach allows for a steady, continuous flow of passengers through processing and onto the platform, reducing congestion and avoiding crowding on the vertical transport.

Advantages

- Security and passport control process can spread out passenger arrival at vertical transport and platform to reduce required throughput
- Minimises waiting and facility provision within the station and allows consolidation with domestic
- Efficient space-planning

Disadvantages

- Requires efficient and timely processing prior to train departure to prevent delays
- Potential extended passenger waits on train



6.6 Preferred - Option D

Gemini stated a preference for a ‘turn up and go’ model - minimising processing and waiting times within the station. Option D aligns with this, allowing passengers to move straight to the train and removing the need for large post-check-in waiting and retail provisions. There will still be a requirement for seating and toilet provisions post gateline as passengers move through the various processes.

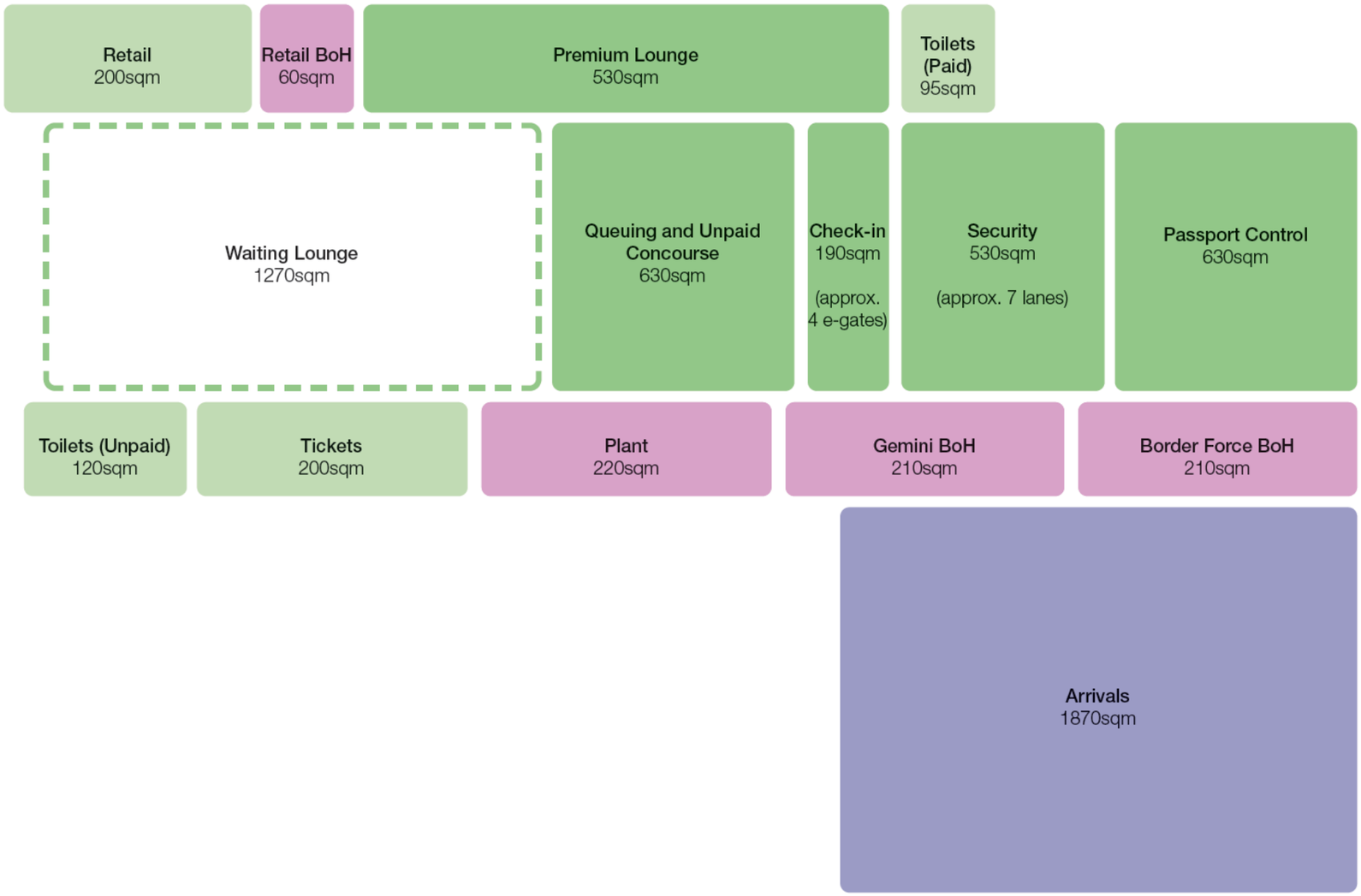
As passengers go straight to train, there is an opportunity to process premium passengers first and create the premium passenger experience on board the train.

6.7 Accommodation and Adjacencies

In line with the preferred operational model being Option D, the following assumptions were agreed with Gemini:

- Waiting space to be provided on unpaid side to align with 'turn up and go' model
- Some provision for Border Force BoH required adjacent to Passport Control for emergency checks
- Two locations for full arrivals passport checks could be explored at a later stage:
  - At Stratford subject to further engagement with UKBF and review of statutory requirements
  - Trains could continue to St.Pancras for passport checks. This has not been explored as this is outside the scope of this study

The diagram right illustrates the assumed areas used for the basis of design development, and their required adjacencies.



7. Vertical Transport Options

7.1 Introduction

Following the decision of a preferred operational model, vertical transport options were considered through discussions with Gemini at the *'Design Review Workshop'* on 05.06.25.

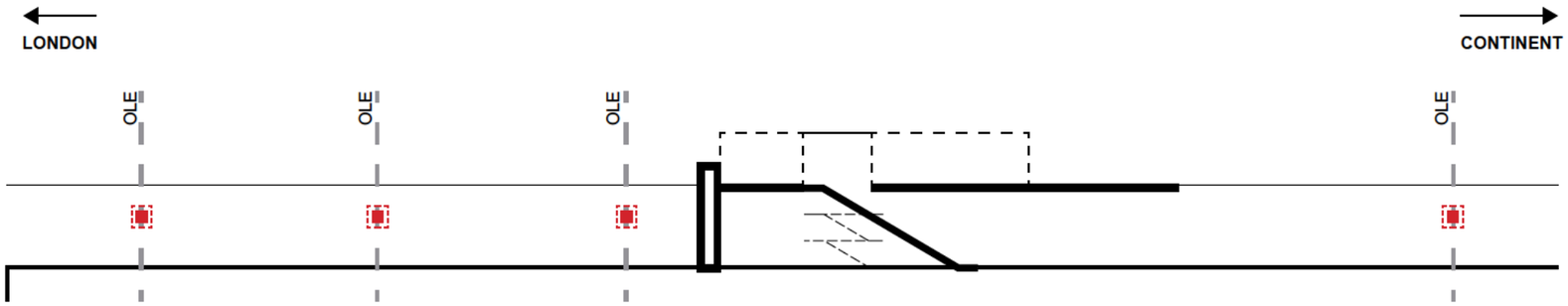
7.2 Existing Condition

There is a 12m level change between the platform and concourse, which presents a significant challenge for vertical transport design. The existing station currently provides one switchback stair and one escalator within the central void, as well as a lift (approx. 8-person capacity) located on the west façade. These provisions are the same on the arrival's platform.

The existing lifts are undersized and restrict the integration of additional vertical transport in its current configuration. As such, it is expected they will be replaced. The escalators may also require replacement, subject to further technical review.

As outlined in the constraints section, the existing overhead line equipment (OLE) and its support structure pose a major constraint to vertical transport provision. Any new escalators, travelators, or stairs must be carefully designed to be placed between these elements while ensuring they remain safely separated from passengers.

While it may be technically feasible to retain the existing stairs, the design team has identified this as a potential risk. Given the 12m height difference and the likelihood of passengers carrying luggage, the current design options assume the stairs will be removed due to safety risks. However, the possibility of retaining it for resilience may be revisited during later design stages.



7.3 Assumptions

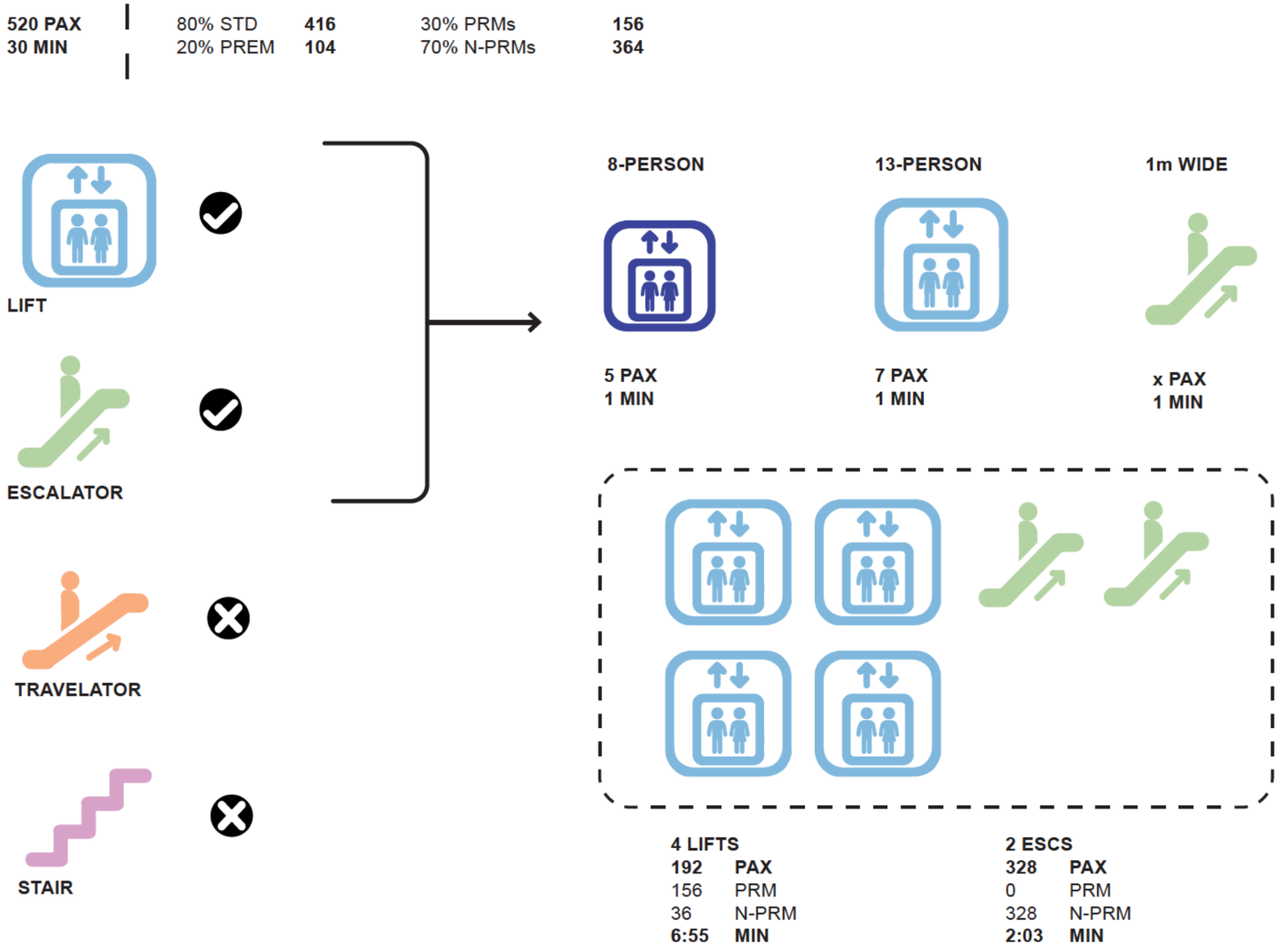
To develop vertical transport options appropriate for the project brief and requirements, several assumptions were adopted to inform the static passenger modelling:

- Processing 520 PAX every 30 mins.
- 80% (416) standard class and 20% (104) premium.
- 30% (156) PRMs and 70% (364) non-PRMs (Calculations used a higher % of PRMs to allow for increased lift usage due to large luggage)
- All lifts and escalators running at LoS C from NR standards to account for luggage and inefficient loading
- Generally, platform width is 5.4m reduced to 3.2m at escalator landing points (assuming a 600mm offset from the box wall) and 2.5m at the lifts.

The static calculations allowed the design team to determine a baseline vertical transport provision to test arrangements, detailed below:

- Two (13 person) lifts processing 192 PAX(156 PRM and 36 non-PRM) in 13:50 mins
- Two escalators processing the remaining 328 PAX in 2:03 mins
- If required an additional two lifts can be added to increase throughput reducing the processing time of 192 PAX from 13:50mins to 6:55mins.

This processing time assumes all passengers are at the vertical transport entry points and does not account for the intermittent entry from passport control. Considering arrivals, passengers will arrive at the vertical transport provision much more frequently than when departing. As such, to minimise crowding on the platforms it is important to provide high processing capacity.



7.4 Lifts

7.4.1 Lift Design Assumptions

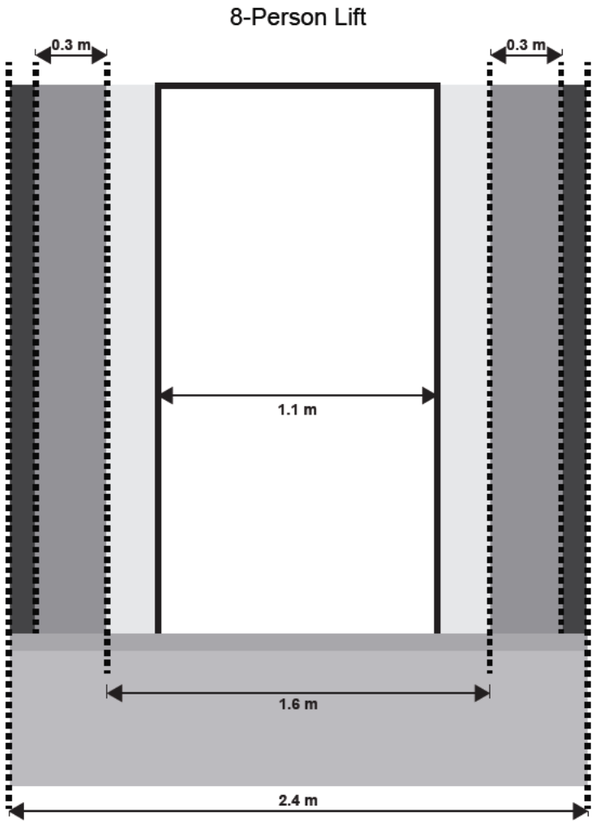
Lifts were explored initially as they create the fewest complications in relation to the existing structure and OLE constraints.

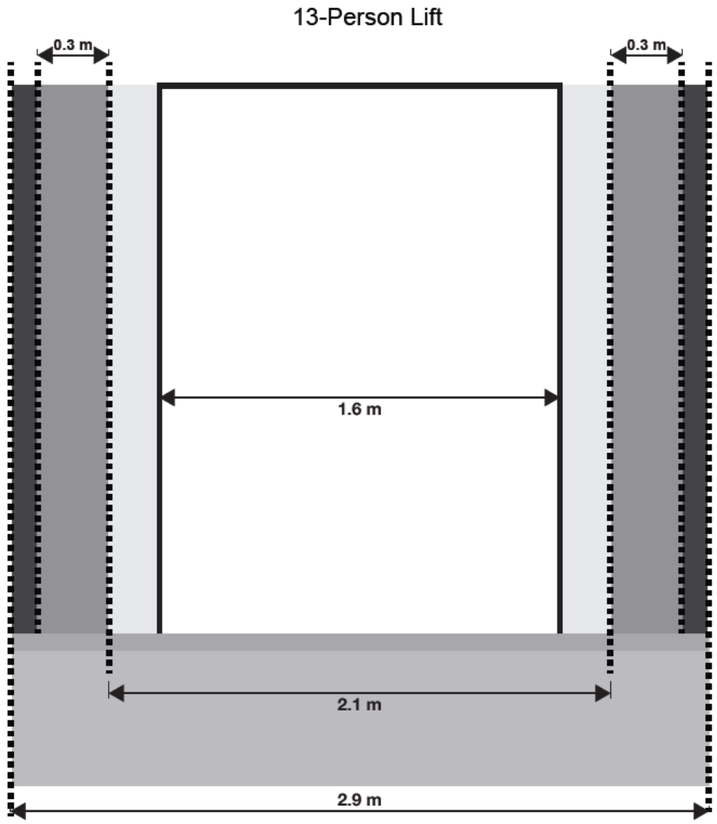
Two options for lifts were considered:

- 8-person through lift that is 2.4m wide retaining a 3m active platform
- 13-person through lift that is 2.9m wide retaining a 2.5m active platform width

These sizes were based off the KONE Mono Space 500 with lift shaft widths of 1.6m and 2.1m respectively. The design team assumed a 300mm structural zone, and 100m cladding zone on both sides based on prior project experience.

The static passenger modelling assumptions use the 13-person option and therefore this was taken as the preferred model primarily driven by the need to clear Platform 1 for alighting passengers arriving from the continent.

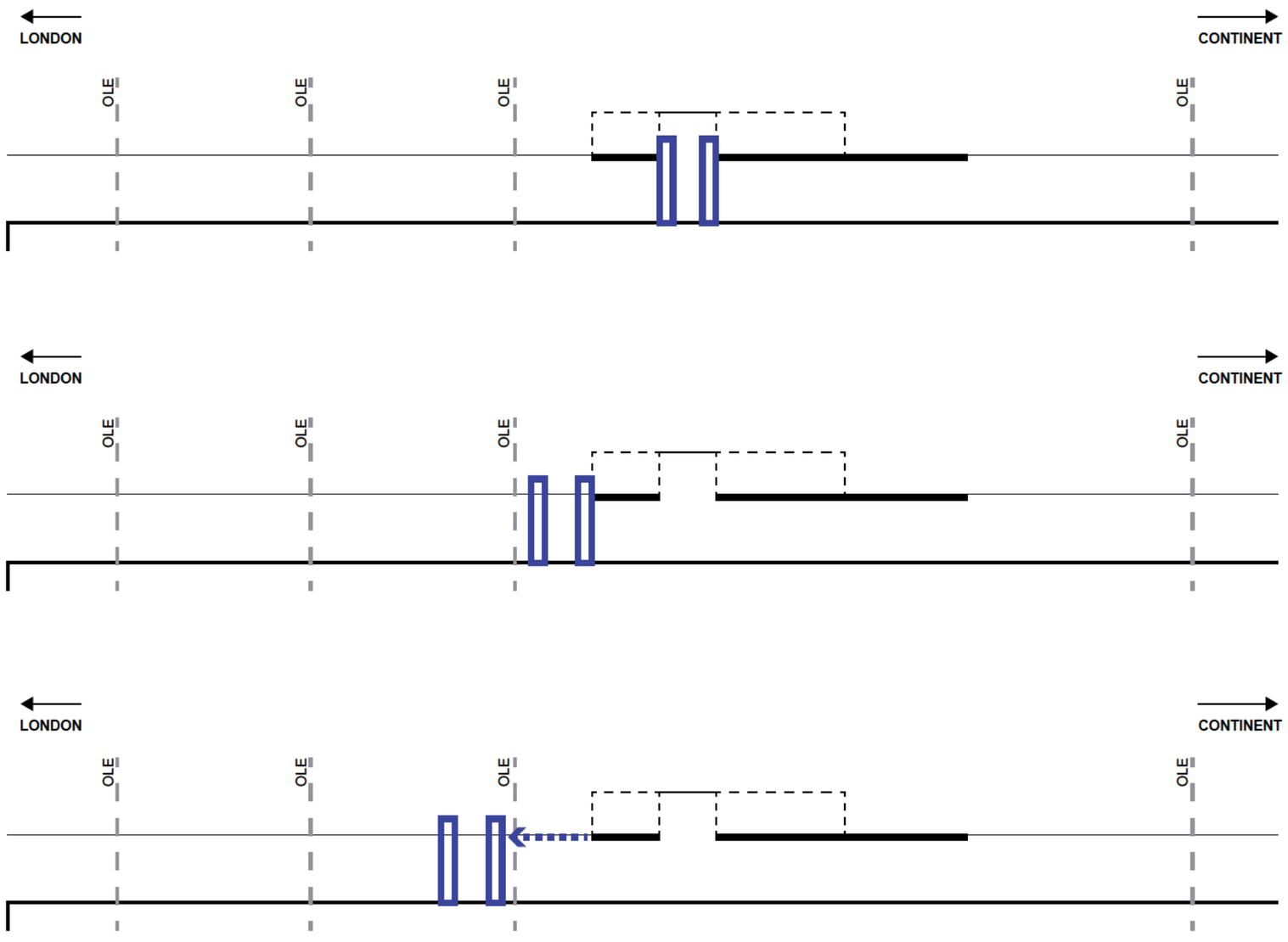




7.4.2 Lift Location Testing

Testing lift locations in isolation, it was found that:

- Two lifts can be accommodated in the existing void with a 4m run off zone between
- Two lifts can be provided to the west of the building before the first OLE structure with a 4m run off zone between
- Any number of lifts can be accommodated by offsetting lifts from the main concourse via an additional walkway structure above platform



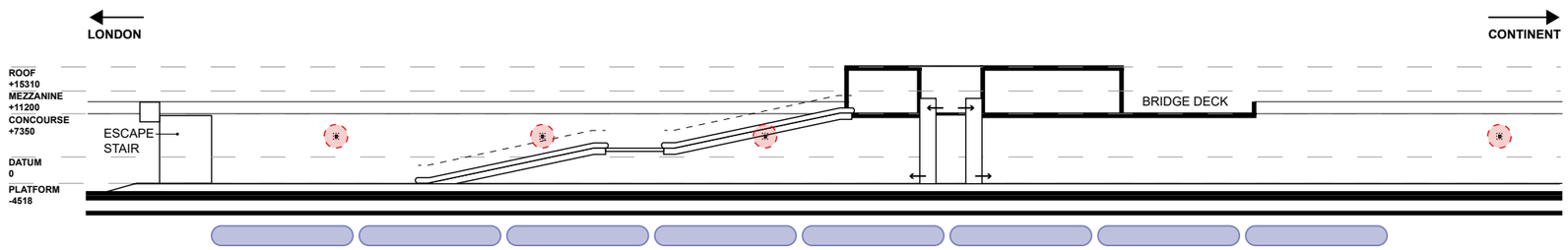
7.5 Travelators

7.6 Travelator Design Assumptions

If feasible, travelators would be the preferred method of vertical transport due to their high capacity, increased passenger safety and suitability for users carrying luggage. Additionally, travellators can be used more safely without power than escalators, especially when passengers have luggage.

The following assumptions were used to test travelator options:

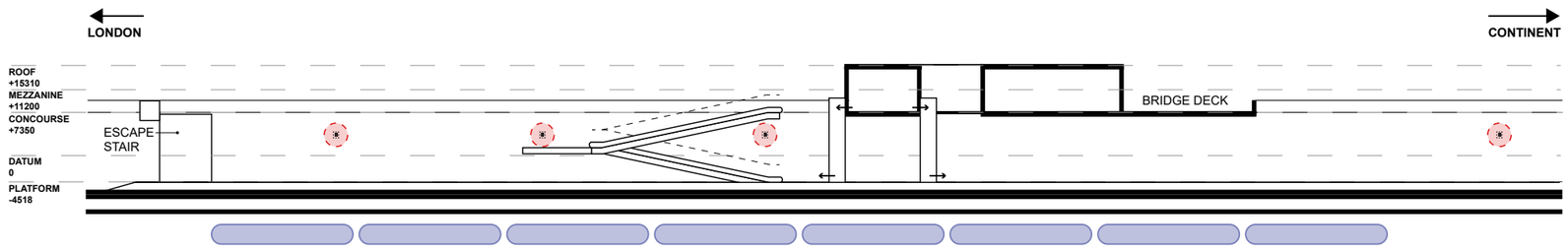
- Kone TravelMaster 115 used as baseline
- 12-degree incline
- Max travelator rise 7m
- Total travel height required 12m
- Two equal 6m runs with landing required due to maximum rise constraint



7.7 Travelator Location Testing

A single travelator combined with two lifts was tested to align with throughput assumptions outlined above.

- Travellators are not considered feasible at this stage due to OLE and structural clashes in all orientations. In addition, due to the building being centred on the platforms, the travel distance for travelators would be approx. 75m in each direction which is not desirable in terms of passenger travel distances and overall departures processing times.
- A switchback arrangement is also unfeasible, as it would require substantial support to carry the upper travelator. This would necessitate a mezzanine structure, which would likely clash with the OLE and be highly complex to construct adjacent to the tracks at high level.



7.8 Escalators

7.8.1 Escalator Design Assumptions

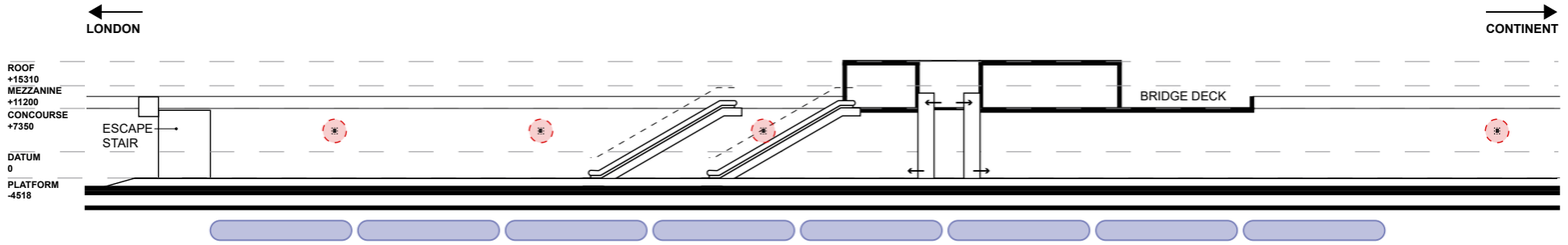
The following assumptions were used to test escalator feasibility:

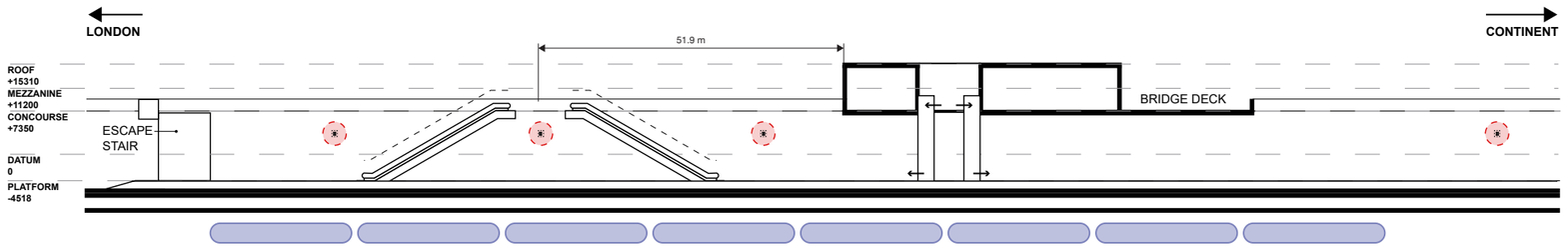
- Kone TravelMaster 110 used as baseline
- Existing escalator gradient retained – 30 degrees
- Single run from platform to concourse
- Single escalator only in each location to maximise platform width

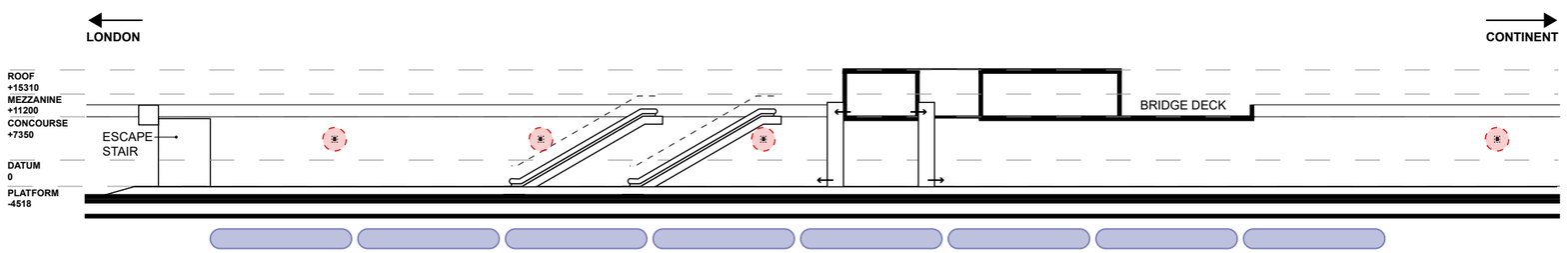
7.8.2 Escalator Location Testing

Escalator options were considered alongside two lifts to align with the throughput assumptions.

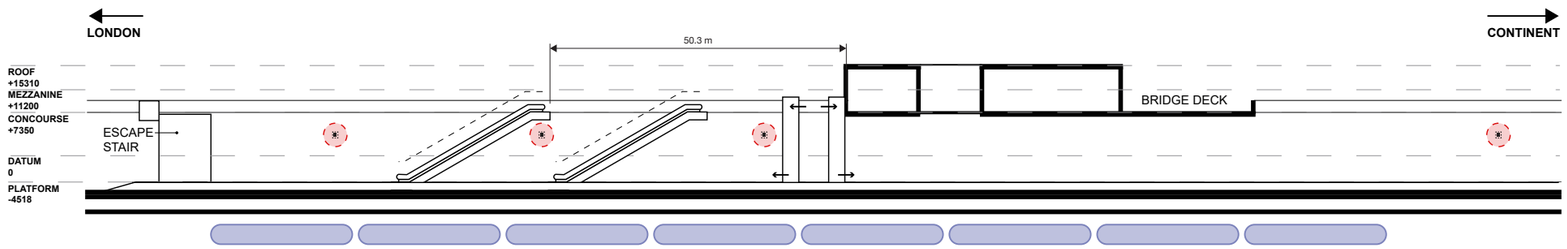
- Parallel escalators can be accommodated by offsetting them from the building to avoid clashes with the OLE. This configuration also allows for two 13-person lifts within the void, providing sufficient passenger throughput and effective platform distribution.
- Split escalators can be accommodated by offsetting them from the building to avoid clashes with the OLE. This arrangement also allows for two 13-person lifts within the void, providing adequate passenger throughput and effective platform distribution. However, this increases travel distances from the concourse.
- Escalator options with external lifts can be accommodated by offsetting the escalators to avoid clashes with the OLE. These configurations also allow for an additional lift to be installed in the void at a later stage, if required.

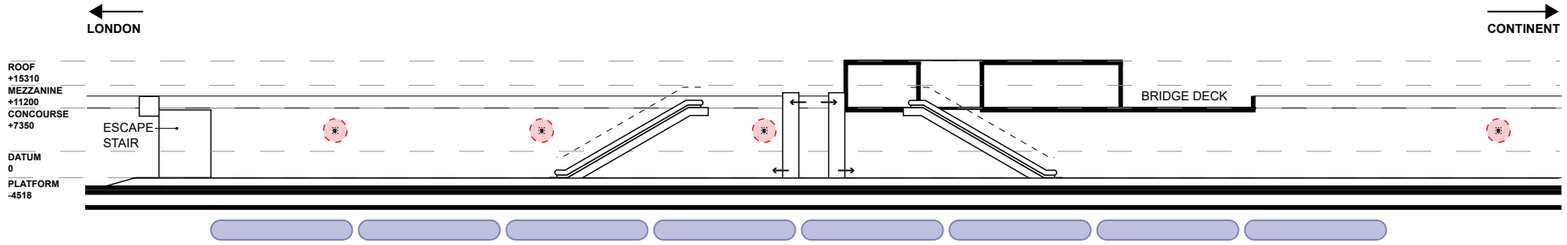






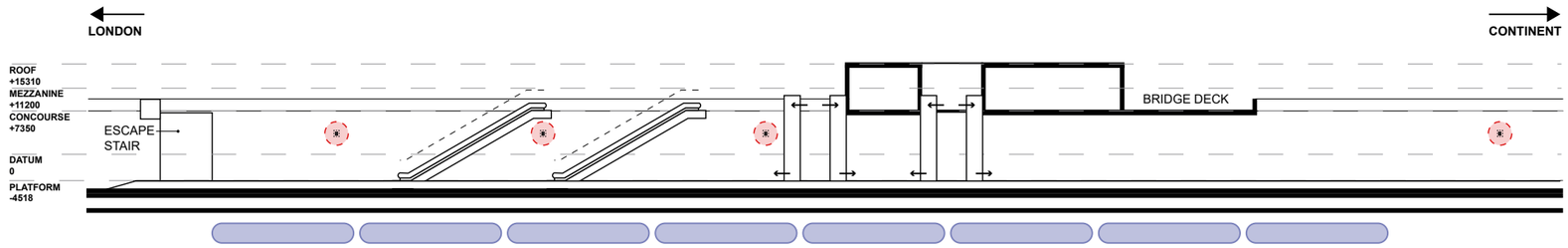
- Escalator options with offset lifts can be accommodated by shifting the escalators further to avoid clashes with the OLE. While these configurations change the platform distribution compared to the previous options, they provide flexibility to add additional lifts at later stages.
- Splitting the escalators with lifts positioned between them improves platform distribution but reduces the potential to add additional lifts in the future.

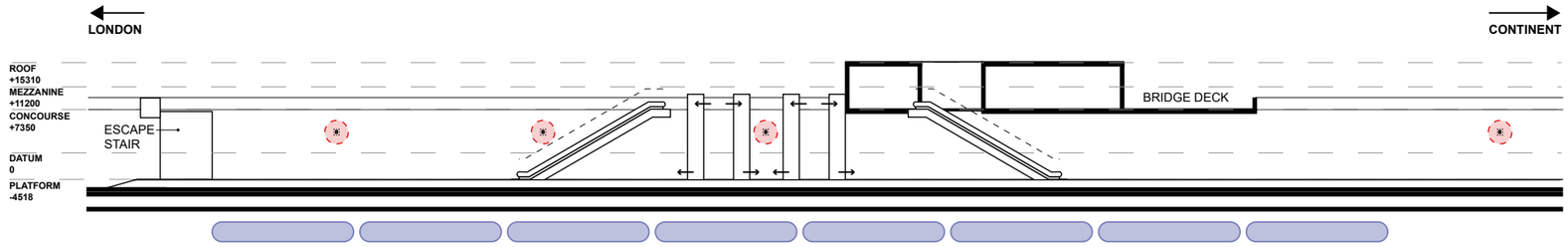




7.9 Additional Lifts

If four 13-person lifts are required to meet passenger throughput, further offsetting the escalators will allow these additional lifts to be accommodated adjacent to the building. This arrangement provides short travel distances for PRMs.



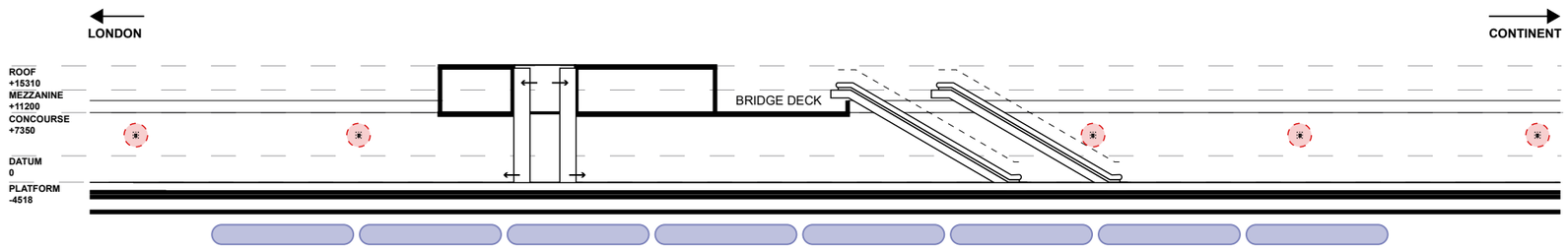


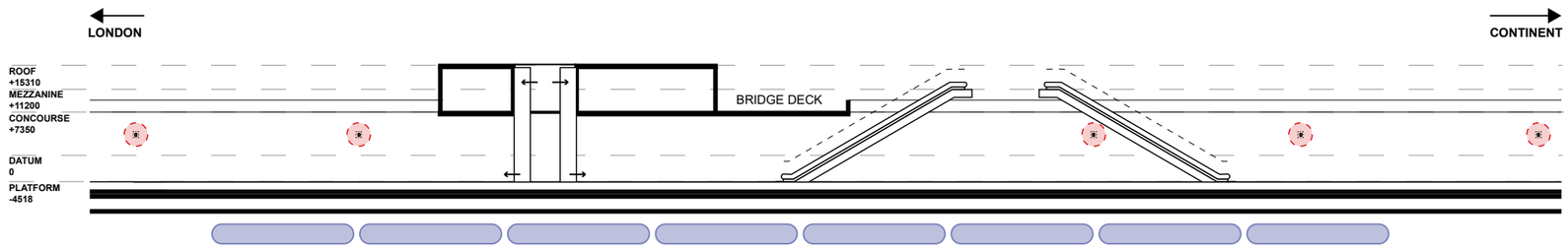
7.10 East Options

An alternative option was considered that makes use of the under-utilised eastern edge of the deck to provide more even distribution of vertical transport along the length of the existing 400m platform. This option would:

- Require significant alterations to the building to bring passengers over to the other side of the bridge while maintaining the unpaid route over the crossing
- Elongate already long vertical transport from platform as passengers would be at a mezzanine level after security

This design was also considered from a layout perspective, detailed in Chapter 9: Layout Options, to assess overall feasibility.





7.11 Recommendations

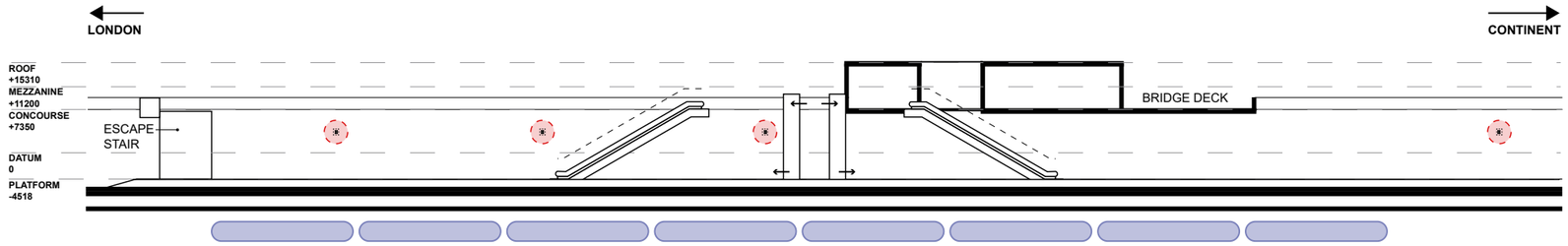
Following a series of workshop sessions with Gemini, two preferred vertical transport configurations were agreed:

- The recommended two-lift, two-escalator option places both lifts on the west side of the building, with escalators split either side. This configuration helps to evenly distribute passengers along the train length and reduces walking distances when compared to a parallel escalator arrangement.
- An alternative four-lift option was also recommended, placing two lifts on either side of the OLE on the west side of the building, with escalators similarly split. This option maintains even passenger distribution while significantly increasing capacity compared to the two-lift configuration.

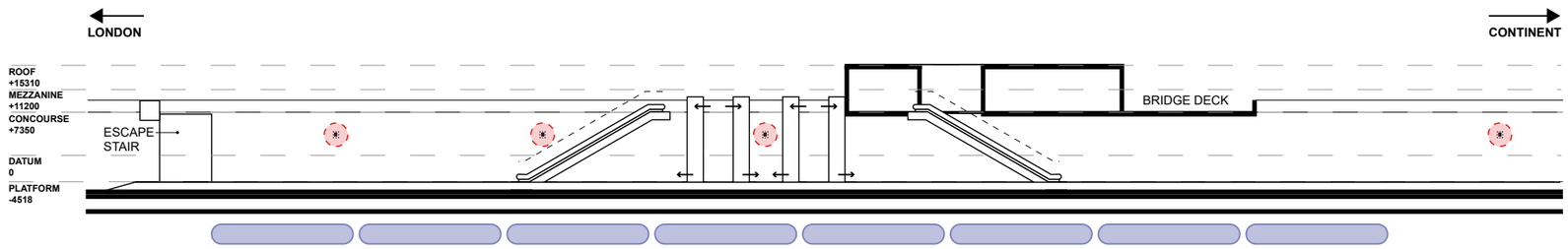
It is assumed that the offset vertical transport will be accessed via a walkway supported from the side of the box. On the north side, it may be feasible to provide this connection adjacent to the station box. However, due to the existing road and taxi rank on the south side, this arrangement is not achievable on the arrivals side. The structural design of this walkway will require further development at future design stages.

To minimise congestion on the platform, wayfinding and signage at concourse level could be designed to direct passengers to the correct vertical transport for their assigned carriage. As a result, once through passport control, passengers should not need to walk along the platform past other vertical transport locations, thereby avoiding the reduced platform width. However, on the arrivals platform the layout of the lifts and queuing systems will need to be carefully considered to avoid crowding in this central zone

2 LIFTS		2 ESCS	
192	**PAX**	**328**	**PAX**
156	PRM	0	PRM
36	N-PRM	328	N-PRM
13:50	**MIN**	**2:03**	**MIN**



4 LIFTS		2 ESCS	
192	**PAX**	**328**	**PAX**
156	PRM	0	PRM
36	N-PRM	328	N-PRM
6:55	**MIN**	**2:03**	**MIN**



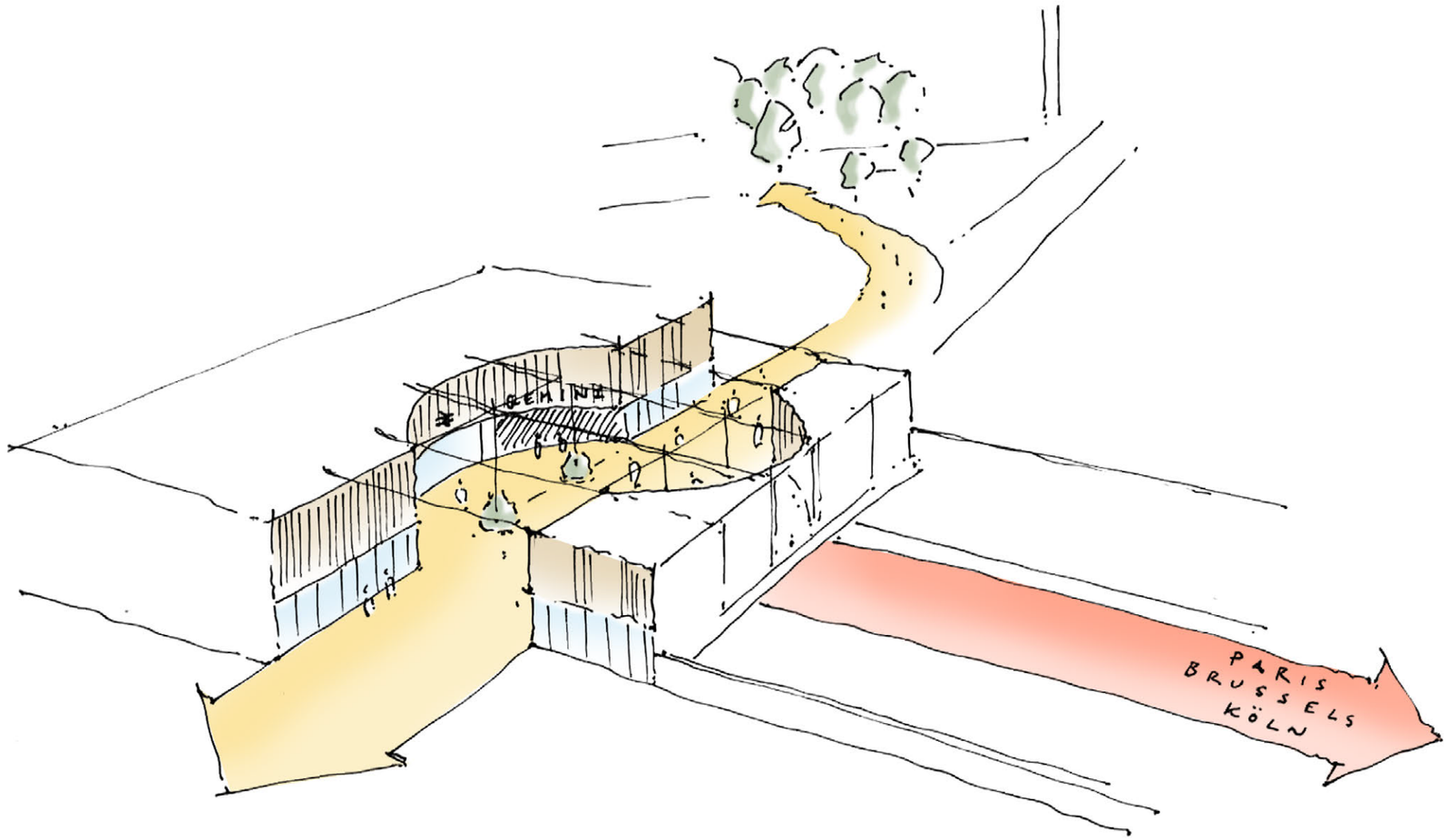
8. Vision

8.1 Concept

The overarching vision for the station is: ‘A Local, International Station’. It will be a station that provides a destination and asset for the community while creating a key connection to the continent through the running of international services.

The project aims to enhance the local area, giving back to the community through public realm improvements and additional amenities alongside transport connections.

A core aspect of the concept is the retention of the existing structural grid, which underpins the projects’ sustainability goals by minimising embodied carbon and construction waste.



8.2 Key Design Principles

8.2.1 Selectively Expand

Selective expansion of the grid will allow for the integration of new vertical transport and additional passenger functions where needed.

8.2.2 Street and Station Square

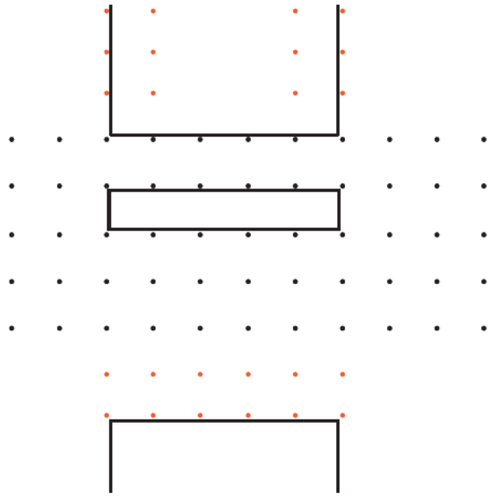
Proposals include an upgraded public realm around the station entrance and bridge deck, creating generous and attractive waiting spaces for departing passengers and enhancing the arrival experience from the continent. These interventions also improve the existing pedestrian route from Westfield to the DLR and onward to the Olympic Village, offering lasting value to the wider community.

8.2.3 Slide in New Components

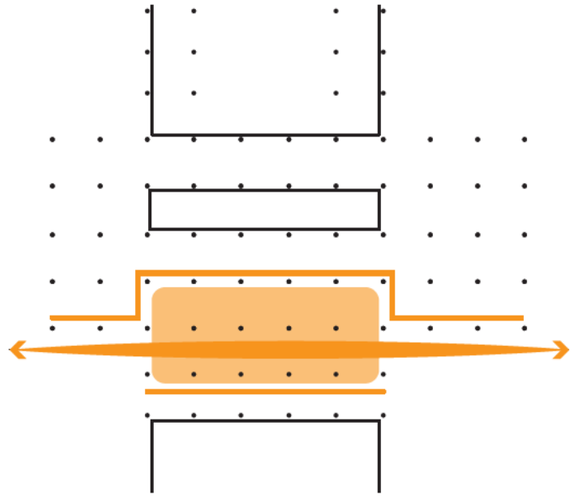
The design should maximise the use of prefabricated components to reduce on-site construction time, minimise disruption to rail services and the public, and mitigate buildability risks. These new elements will be designed to integrate seamlessly into the expanded grid.

8.2.4 Re-Wrap the Frame

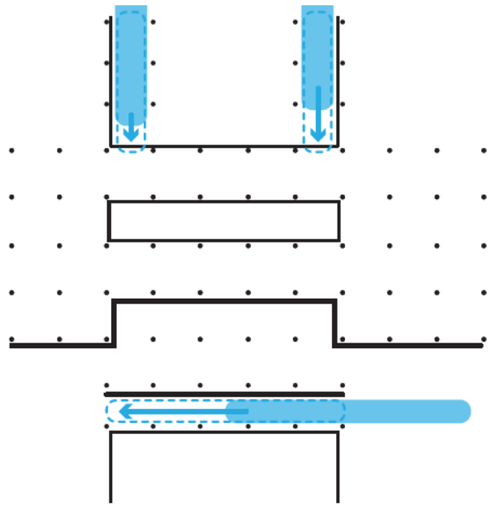
The current building envelope does not reflect the desired passenger experience for an international gateway. The proposal includes re-wrapping the structure with a new façade focused on sustainability, comfort, and identity. This offers an opportunity to improve thermal performance, manage solar gains, and introduce natural ventilation strategies, enhancing both sustainability and user experience.



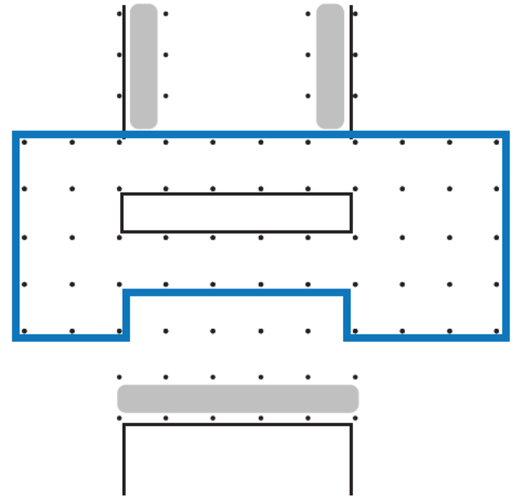
SELECTIVELY EXPAND



STREET AND STATION SQUARE



SLIDE IN NEW COMPONENTS



RE-WRAP THE FRAME

9. Layout Options

9.1 Throughput Assumptions

The throughputs were initially based on the current St. Pancras times but assumed that UK exit desks would no longer be required.

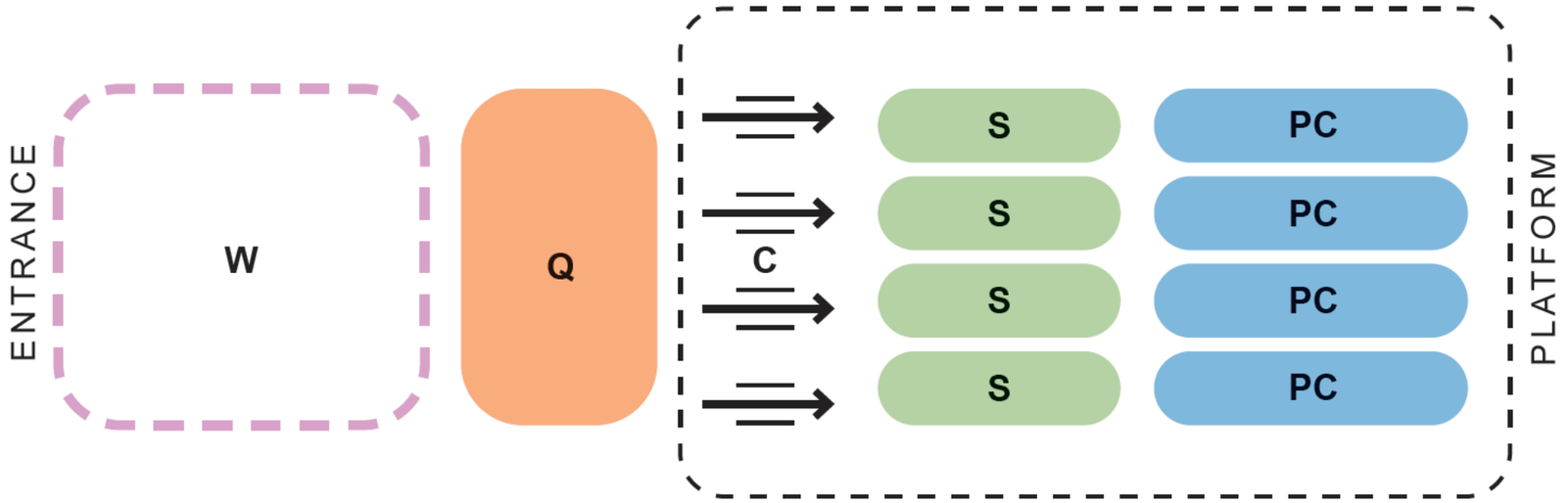
Initial outputs from the static passenger modelling suggested that the following would be sufficient to process 520 PAX in 30 mins:

- 4 check-in gates (3 STD, 1 PREM)
- 8 security lanes (6 STD, 2 PREM)
- 4 manned PC booths (3 STD, 1 PREM)
- 11 e-gates (8 STD, 3 PREM)

520 PAX
30 MIN

80% STD **416**
20% PREM **104**

30% PRMs **156**
70% N-PRMs **364**



CHECK-IN GATES

4 GATES
3 STD
1 PREM

SECURITY LANES

S

8 LANES
6 STD
2 PREM

PASSPORT CONTROL

MANNED

PC

4 BOOTHS
3 STD
1 PREM

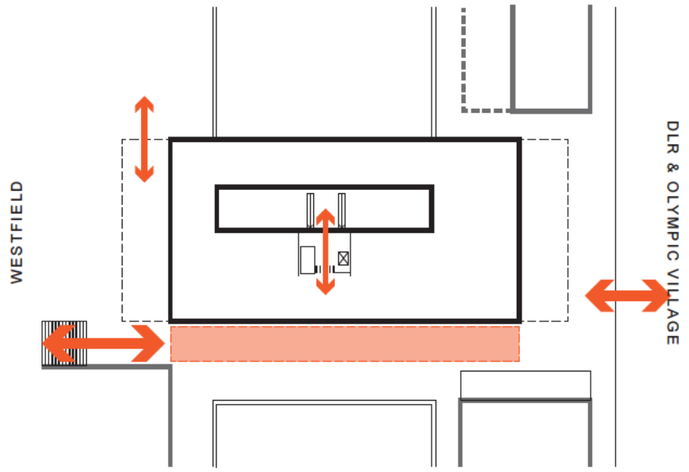
E-GATES

11 GATES
8 STD
3 PREM

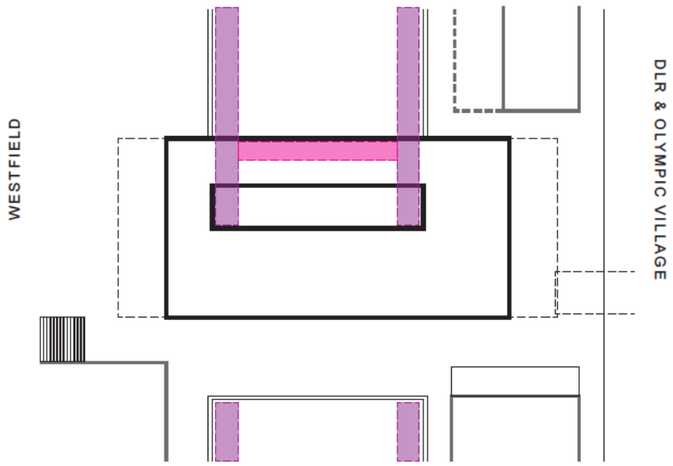
9.2 Constraints and Existing Condition

In addition to the fixed constraints highlighted in Chapter 4: Constraints & Opportunities, the following were used as a starting point for development, dictating the initial layout of the processes:

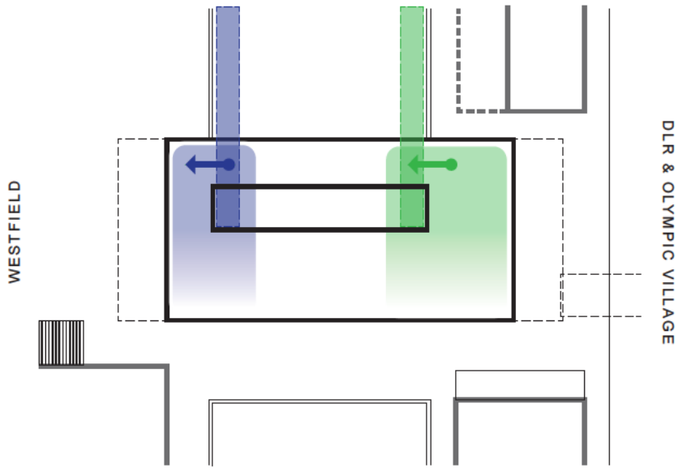
- Passengers will primarily arrive either from the south (from Stratford Station, Westfield or the taxi ranks, or from the north, from Stratford Internation DLR station or the Olympic Village. As such the existing unpaid route will remain the optimum station entrance location.
- Proposed vertical transport and associated walkways dictate where the passenger functions are positioned, ensuring a logical and efficient flow from passport control through to platform level.
- The platform locations, which designates the north platform for departing international services and the south platform for arriving services, establishes a natural spatial separation between departures and arrivals areas at concourse level. This informed the overall zoning of functions within the station.



PASSENGER APPROACH AND ENTRANCES



VERTICAL TRANSPORT POSITION



ARRIVALS AND DEPARTURES PLATFORM LOCATION

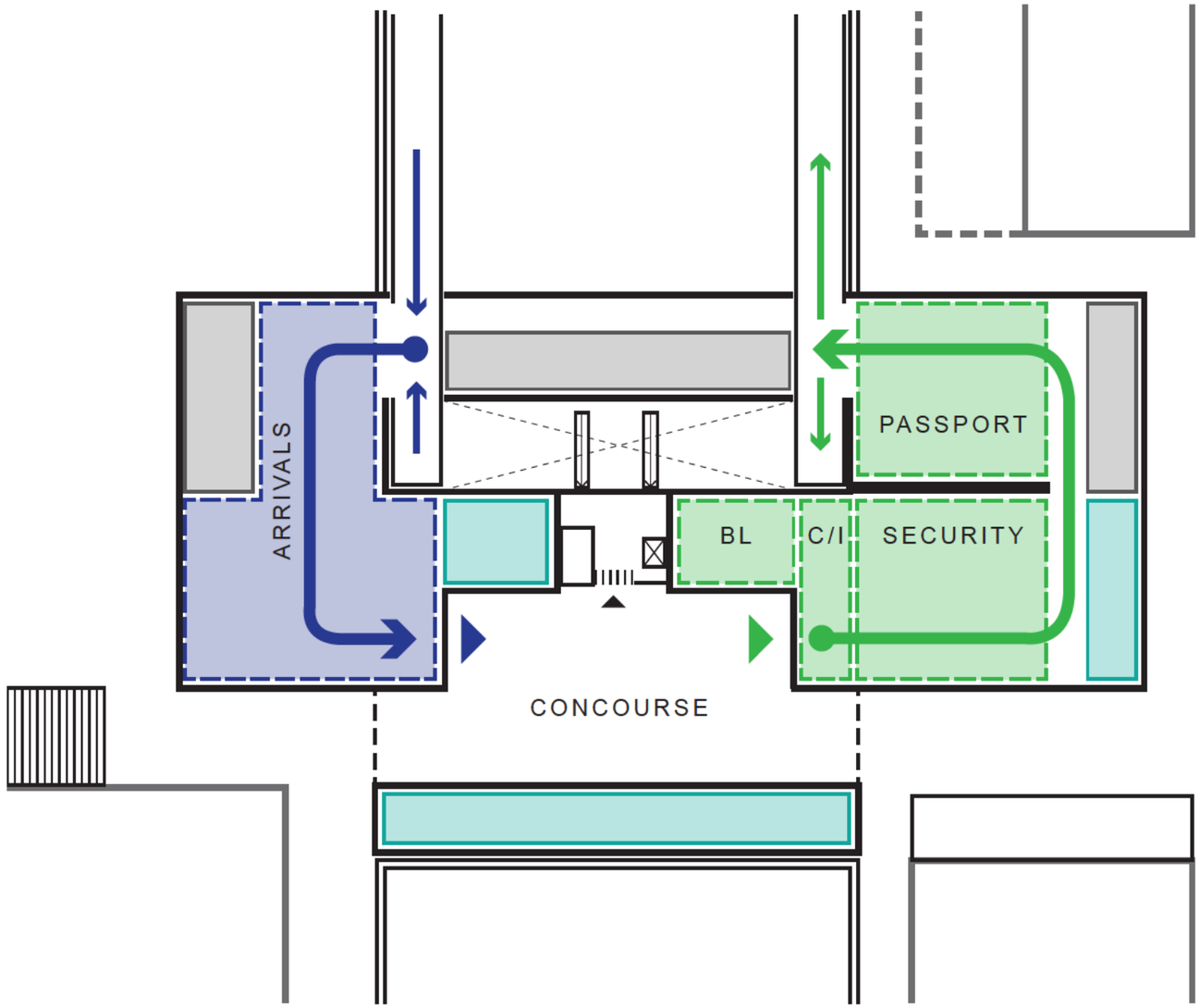
9.3 Diagrammatic Options

Four high-level diagrammatic options were evaluated in relation to their passenger experience, compliance with the assumed requirements, and vertical transport alignment. A preferred option was then highlighted and taken forward for detailed analysis.

9.3.1 Option D1 – Minimised Footprint

This option extends the building envelope into the existing north and south porticos and expands the concourse onto the bridge deck to accommodate additional passenger amenities. The premium lounge is accessed directly from the concourse, with extra space provided at first-floor level. The check-in queue is used to distribute passengers into security lanes, followed by passenger amenities after security.

A central spine wall aids in orienting passengers through the space, with a double-height departures hall enhancing the experience. Passengers proceed directly to the vertical transport immediately after passport control, and a connecting corridor links departures and arrivals vertical transport to allow for operational flexibility. The arrivals zone is located on the south side of the building, with exits leading to the concourse. Back-of-house spaces are assumed to be located at first floor level, accessible from the northwest and southwest corners.



Advantages:

- Minimised changes to existing footprint
- Intuitive arrangement
- Minimised passenger travel distances (assuming lifts in void)
- Capacity to provide separate business class lane from lounge to Vertical transport

Disadvantages:

- Security and passport control likely operating at minimum space requirements compromising passenger experience and limiting equipment options
- Turning passengers through 180º likely to cause passenger movement conflicts

9.3.2 Option D2 – NW Extension

This option proposes extending the building envelope into the safeguarded site to the northwest, allowing for a larger overall footprint. The concourse is extended onto the bridge deck to accommodate additional passenger amenities. The premium lounge is accessed directly from the concourse, with expanded space at first floor level.

The check-in queue manages the distribution of passengers into security lanes, with amenities located adjacent to security to enhance the pre-processing experience. A double-height departures hall creates a sense of openness, and passengers proceed directly to vertical transport located in the new northwest extension immediately after passport control. A bridge at concourse level provides flexibility in platform usage by linking departures and arrivals Vertical transport.

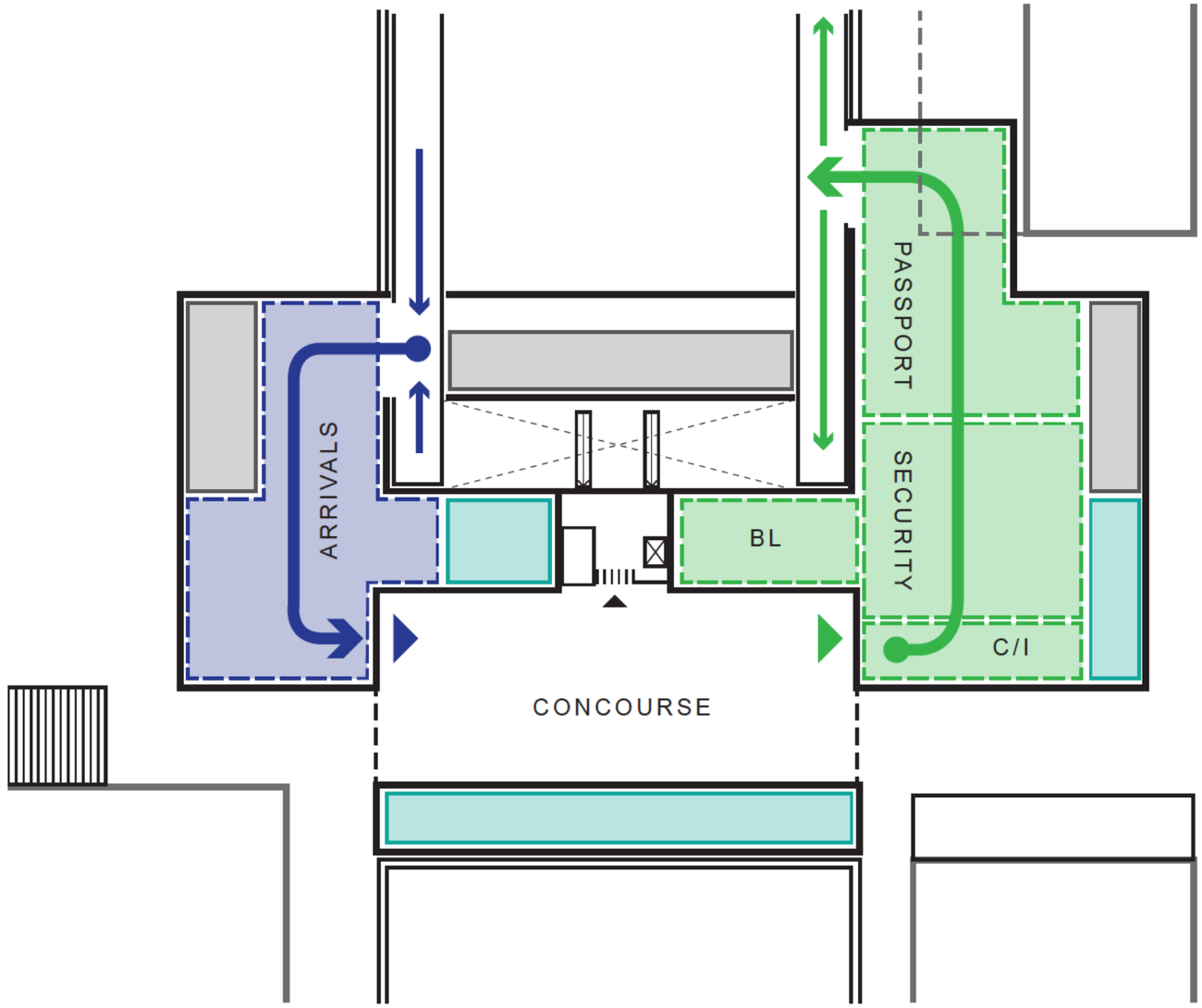
The arrivals zone remains on the south side of the building, with exits feeding into the concourse. Back-of-house areas are assumed at first floor level, with access provided from both the northwest and southwest corners.

Advantages:

- Intuitive arrangement with check-in, security and passport control in single line with line of sight for passengers
- Subject to vertical transport arrangement passengers would enter vertical transport zone equidistant from vertical transport options
- Increased concourse space
- Improved capacity to provide separate business class lane from lounge to vertical transport

Disadvantages:

- Extension beyond existing fabric into constrained worksite to the north-west
- Could increase travel distances for PRMs depending on lift positions



9.3.3 Option D3 – Existing Envelope

In this option, the building envelope is extended into the existing north and south porticos, allowing for modest expansion within the current site boundaries. The concourse is extended onto the bridge deck, providing space for additional passenger amenities. The premium lounge is accessed directly from the concourse, with extra space provided at first floor level.

Security space is widened to accommodate increased lane capacity, improving throughput and operational flexibility. Passenger amenities are positioned beyond both security and passport control to support passengers in the final stages before boarding. The departures hall features a double-height volume, enhancing the sense of space and wayfinding clarity.

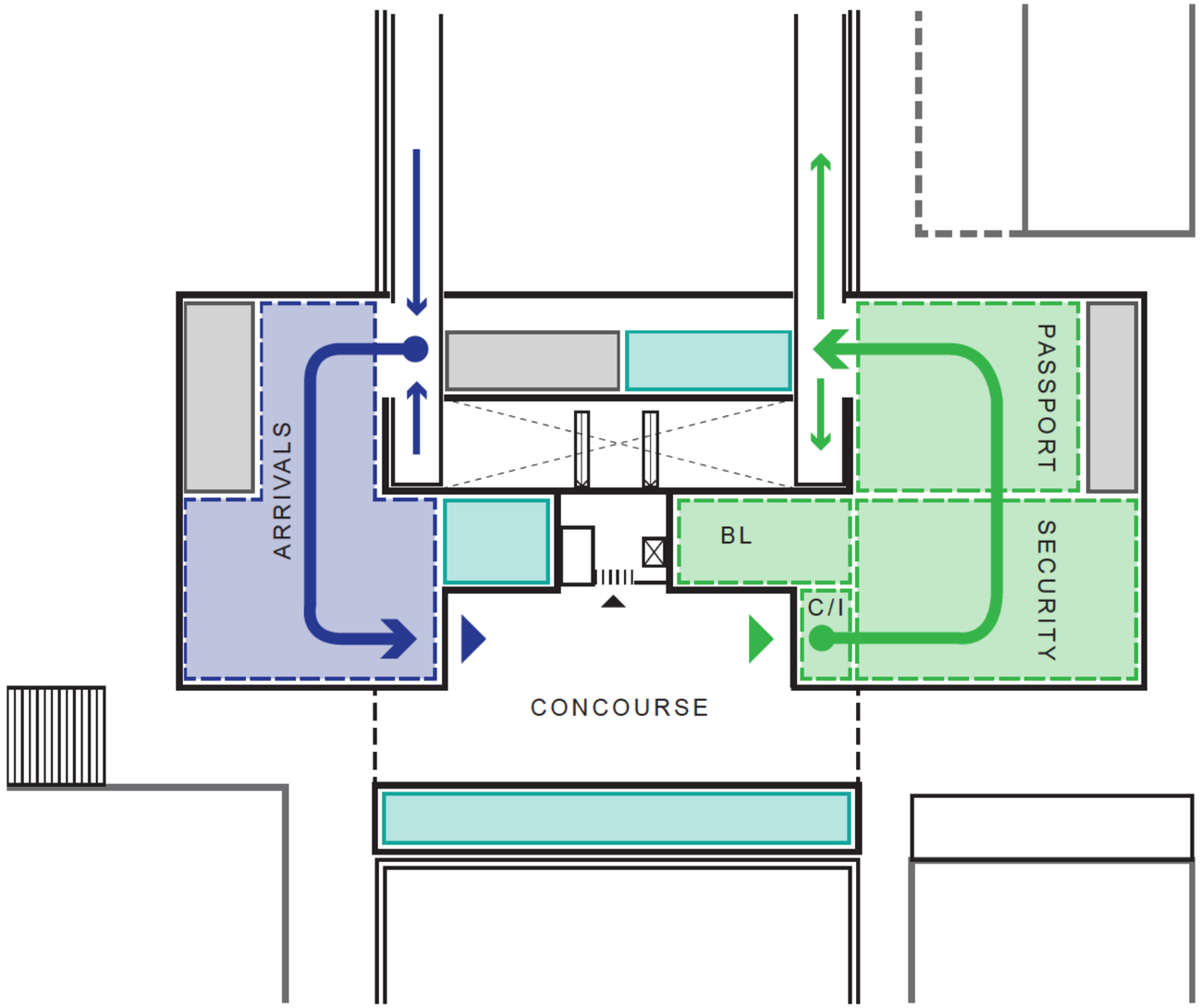
Passengers are directed to vertical transport immediately after passport control, with a connecting corridor providing access between departures and arrivals vertical transport for platform flexibility. The arrivals zone is located on the south side of the building, with direct exits onto the concourse. Back-of-house areas are assumed at first floor level, with access from the northwest and southwest corners of the building.

Advantages:

- Minimised changes to existing footprint
- Intuitive arrangement - straight line through security lanes and passport control
- Minimised passenger travel distances (assuming lifts in void)
- Capacity to provide separate business class lane from lounge to Vertical transport
- Passenger changes in direction managed through queue locations

Disadvantages:

- Passenger amenity location sub-optimal
- Smaller concourse space



9.3.4 Option D4 – ‘Up and over’ East Extension

In this option, the building envelope is extended over the bridge deck at mezzanine level, increasing space available for processing. The premium lounge is located past the gateline at concourse level.

Security is located at concourse level and expanded to occupy a larger area, increasing capacity and operational efficiency. Passport control is positioned at mezzanine level, allowing for the distribution of passengers directly to vertical transport immediately after processing. A corridor at mezzanine level connects the departures and arrivals vertical transport, offering flexibility in platform usage.

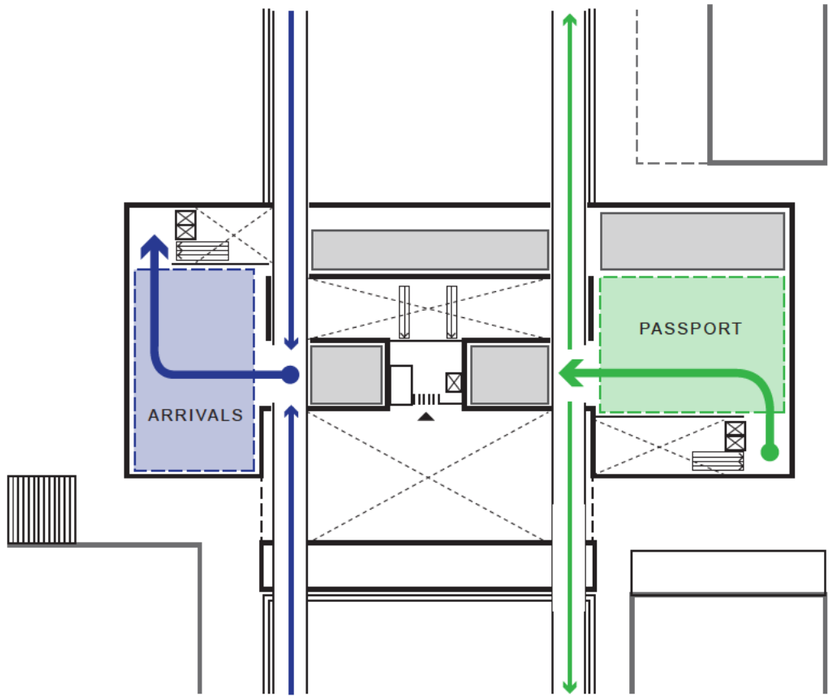
The arrivals zone is split across both ground and mezzanine levels on the south side of the building, with direct exits to the concourse. Back-of-house spaces are assumed at both concourse and mezzanine levels, with access points located at the northwest and southwest corners.

Advantages:

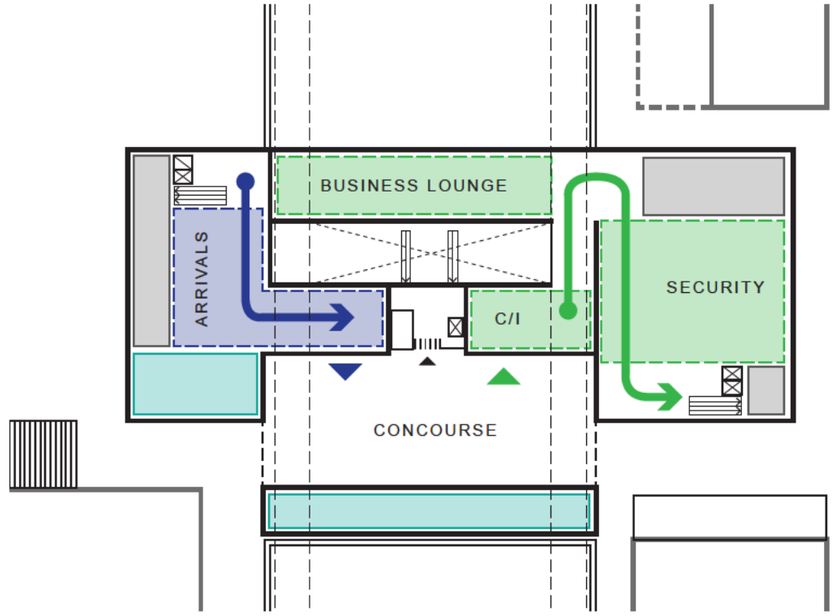
- Improved platform distribution for 400m trains
- Improved space provision for processing - greater capacity for improved passengers experience
- Improved business class lounge provision
- Improved concourse size and arrangement with domestic, departures and arrivals aligned to one side

Disadvantages:

- Significant increase in built form
- Complex passenger journey - less intuitive with increased travel distances (including vertical level changes)
- Additional vertical transport required within building with potential structural implications e.g providing lift pits within the deck structure.
- Back of house spaces dispersed through the building



First Floor



Ground Floor

9.4 Comparison and Recommendations

The four options were discussed during workshops with Gemini and a preferred option was selected to progress into detailed design.

Option D1 - Minimised Footprint

Discounted at this stage due to limitations in spatial capacity for the required number of security lanes, which would compromise passenger experience and operational efficiency

Option D2 - NW Extension

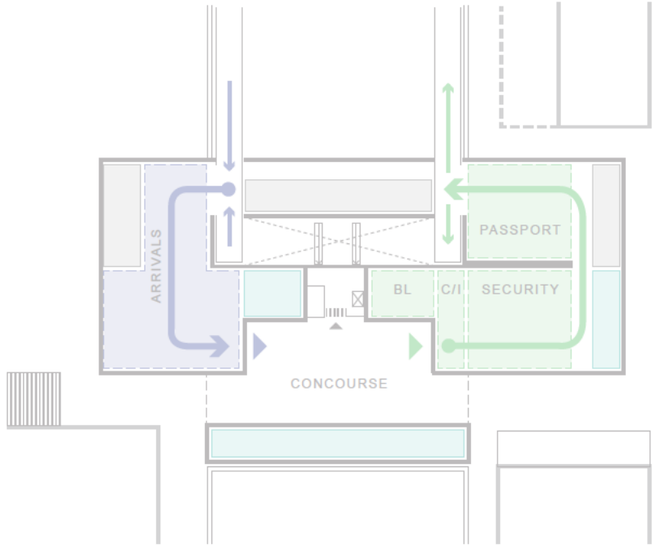
Paused at this stage as the available extension area to the northwest is too narrow to comfortably accommodate passport control functions. While the option does not currently offer sufficient benefit to progress, it may be reconsidered at future stages if there is a need to accommodate additional passenger amenities or back-of-house functions, such as French Customs, in close proximity to processing zones.

Option D3 - Existing Envelope

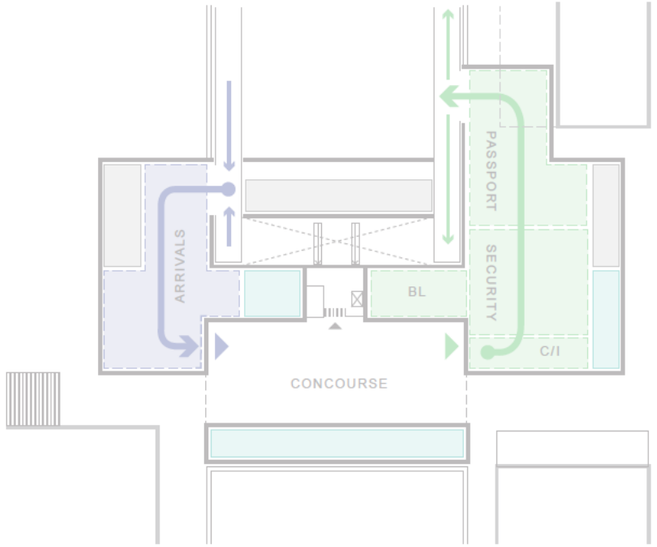
Taken forward for further testing as it offers the most effective arrangement for managing passengers flows whilst minimising extension to the existing building.

Option D4 - 'Up and Over' East Extension

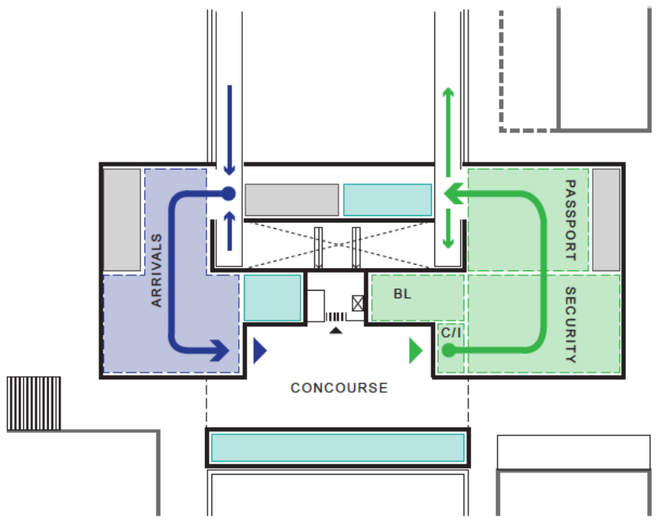
Discounted due to a lack of significant functional or operational benefit, combined with high associated costs and construction-related disruption.



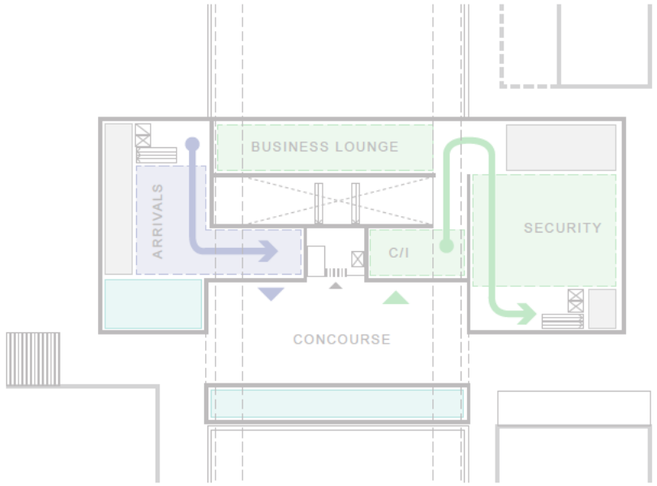
Option D1 - Minimised Footprint



Option D2 - NW Extension



Option D3 - Existing Envelope



Option D4 - 'Up and Over' East Extension

9.5 Detailed Options

9.5.1 D3 8-Lane Option

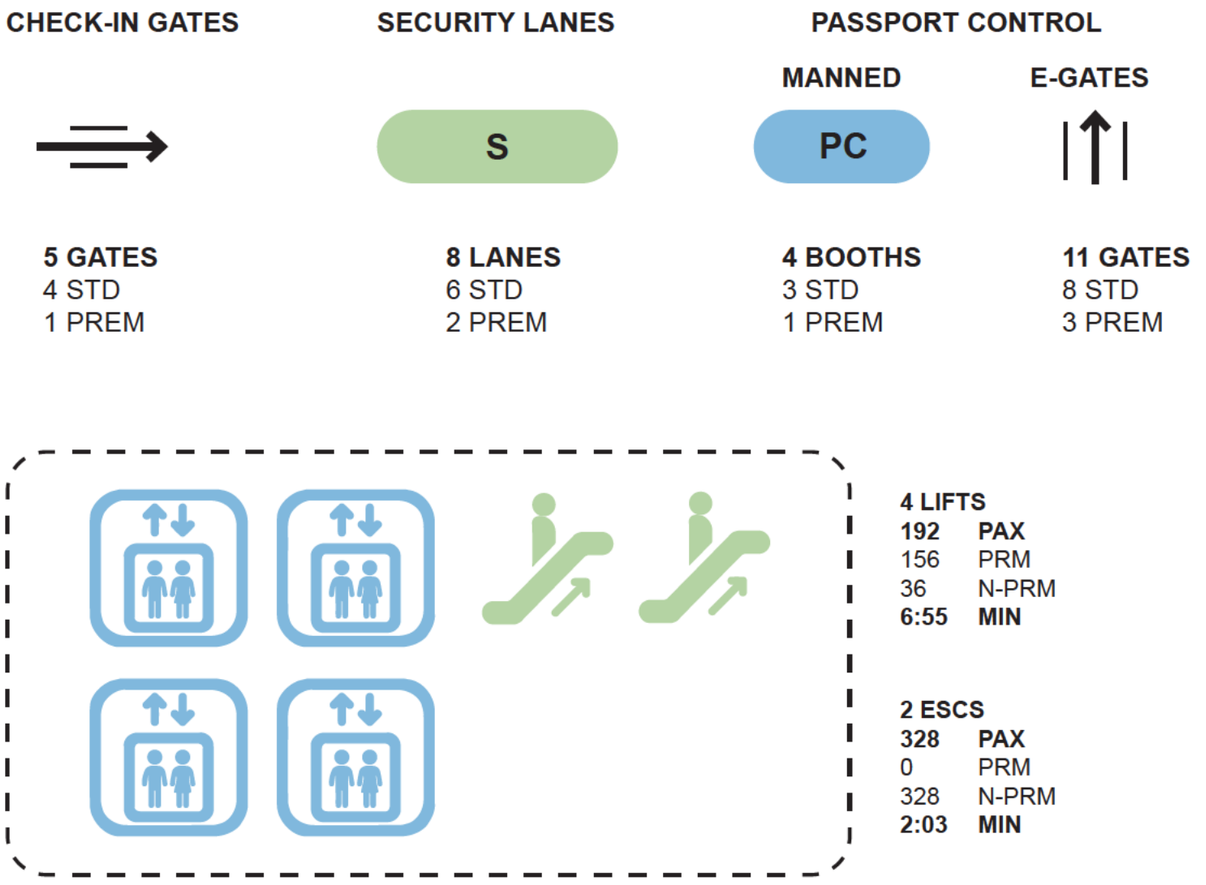
The 8-lane detailed option is based on the vertical transport and passenger modelling baselines outlined in the previous Chapters 7.3 and 9.1 respectively.

This encompasses:

- 4no. 13-person lifts
- 2no. escalators
- 5no. check in gates (4 standard and 1 premium)
- 8no. security lanes (6 standard and 2 premium)
- 4no. booths (3 standard and 1 premium)
- 11no. passport e-gates (8 standard and 3 premium)

It is assumed that once all premium passengers have cleared security, the premium lanes can be made available to standard passengers, enhancing capacity and reducing processing times.

520 PAX	80% STD	**416**	30% PRMs	**156**
30 MIN	20% PREM	**104**	70% N-PRMs	**364**



Option Overview

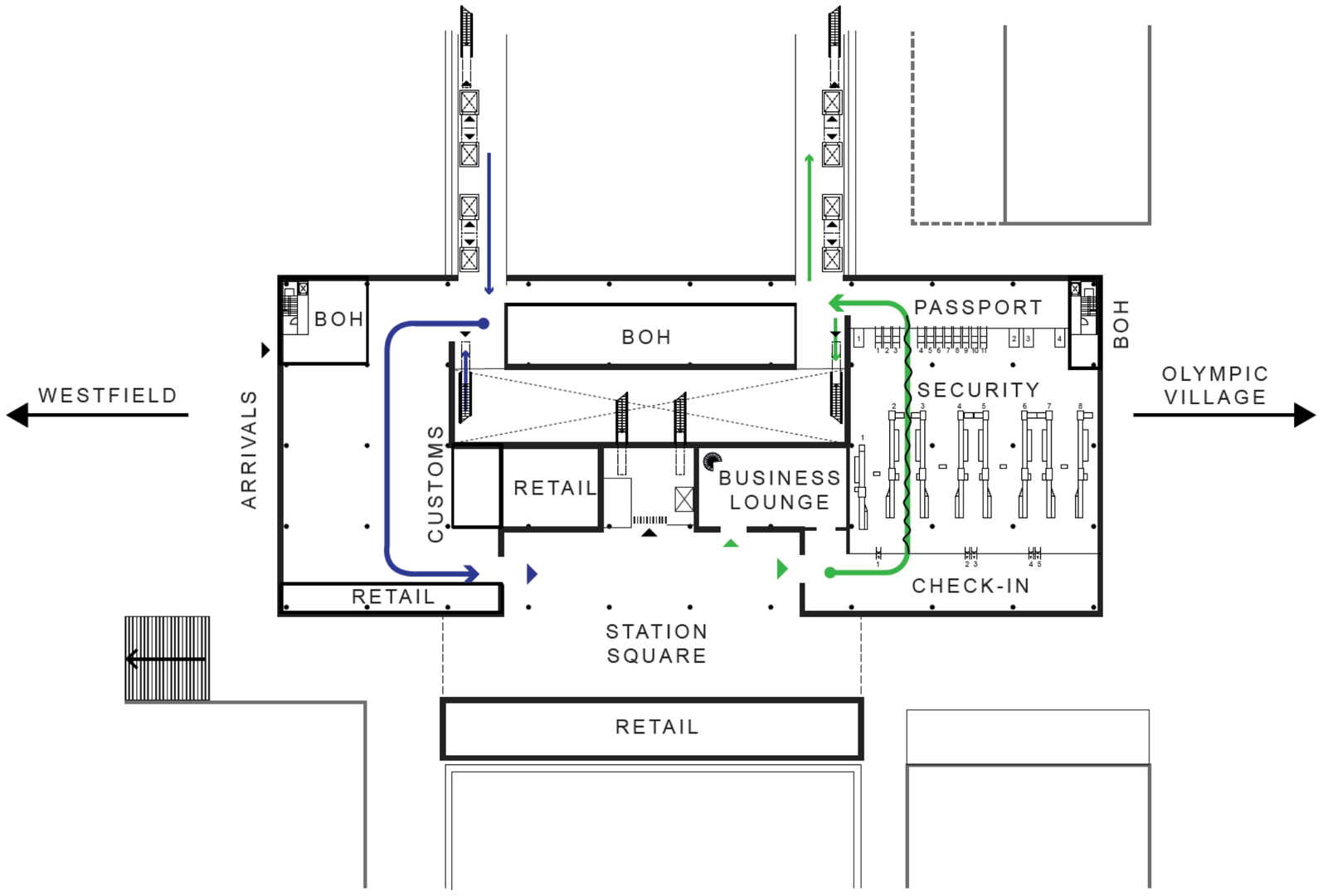
This option is developed from the preferred diagrammatic layout D3 with minor modifications informed by detailed investigation.

The check in gates were shifted from a consolidated arrangement to a distributed layout along the security lanes. This change aligns with the preferred operational model and helps to reduce queuing post gateline.

Due to the critical dimensions of the security lanes, the ground floor back of house at the northwest and southwest corners of the building were reduced to cores with the assumption that the displaced back of house functions can be accommodated at mezzanine level.

The premium lounge is arranged over two floors and is directly accessed from the concourse. Premium passengers are processed through segregated security lanes and dedicated passport control facilities.

The preferred four lift vertical transport arrangement is adopted which distributes passengers evenly along the length of the train.

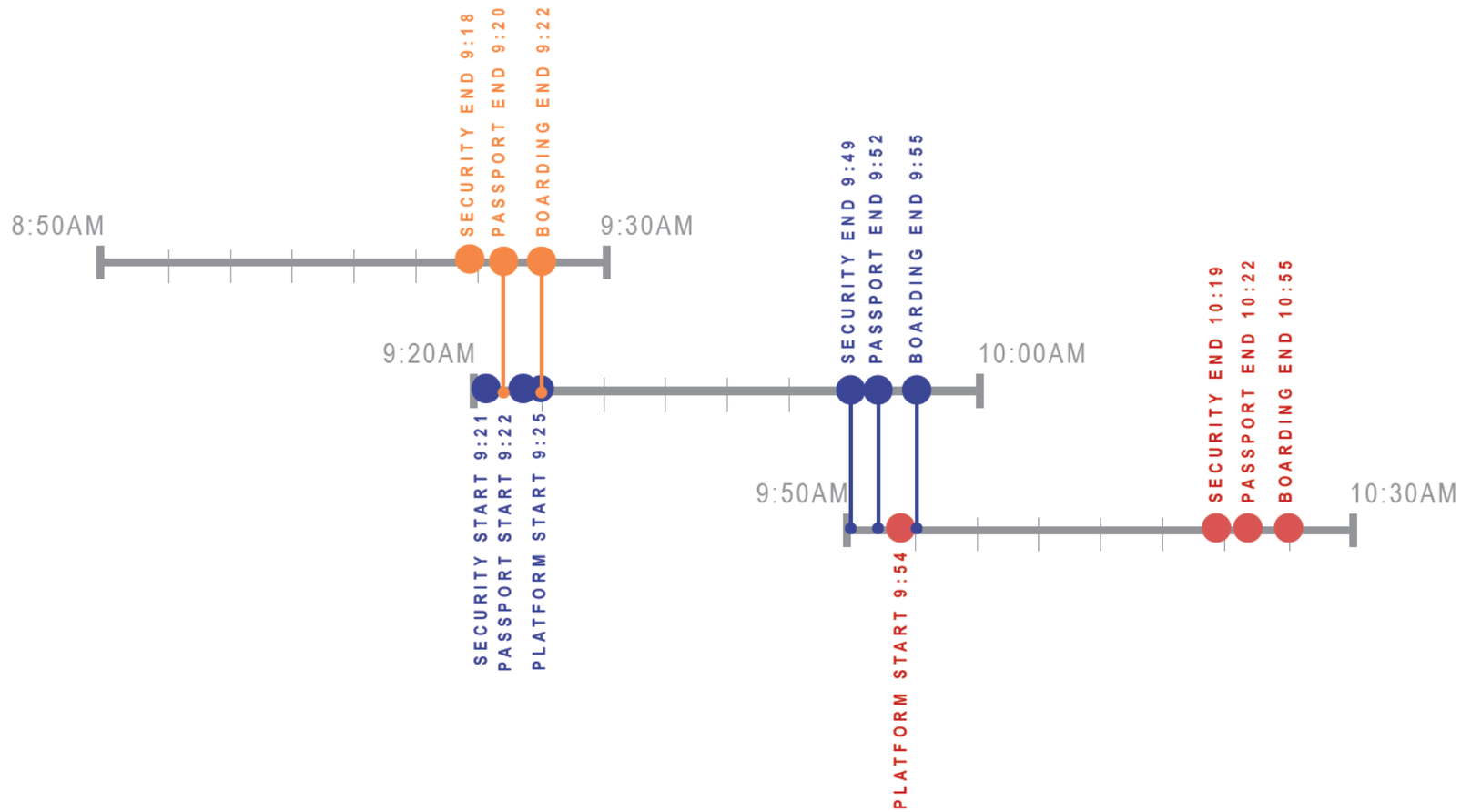


Static Modelling

Static modelling was carried out on this option using the following assumptions:

- The existing throughput capacity at St. Pancras of 24s/PAX/lane
- A worst-case scenario of three trains departing within 90 mins, requiring a full trainload (520 PAX) to be processed every 30 minutes
- Full train capacity for each service

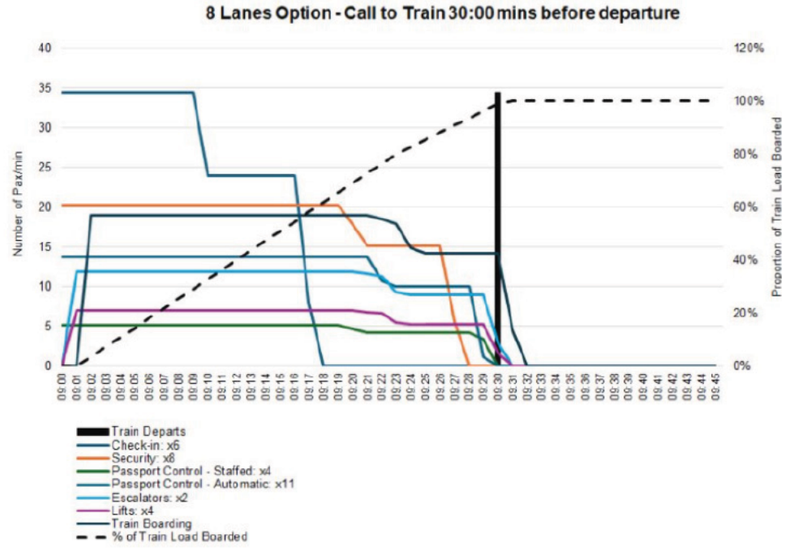
The model shows, with the current provision and flow rates, it would take longer than 30 minutes to process a full trainload of passengers. As a result, boarding would need to be called at least 35 minutes prior to departure. This means an overlap between passengers on consecutive departing services (see diagram right). Passengers from the first train would still be in the passport control area when check-in begins for the second train. Similarly, passengers for the second train begin to arrive on the platform before the first train has departed. While this could be managed, there is little to no margin for disruption or delays in processing.

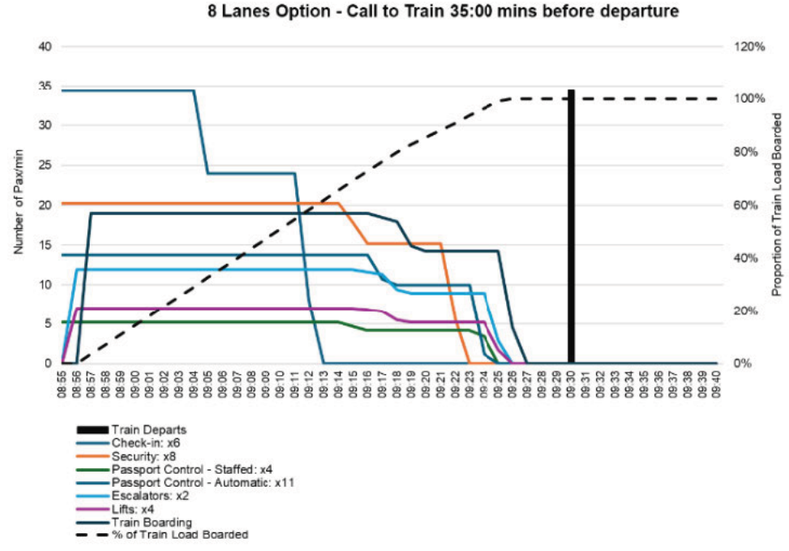


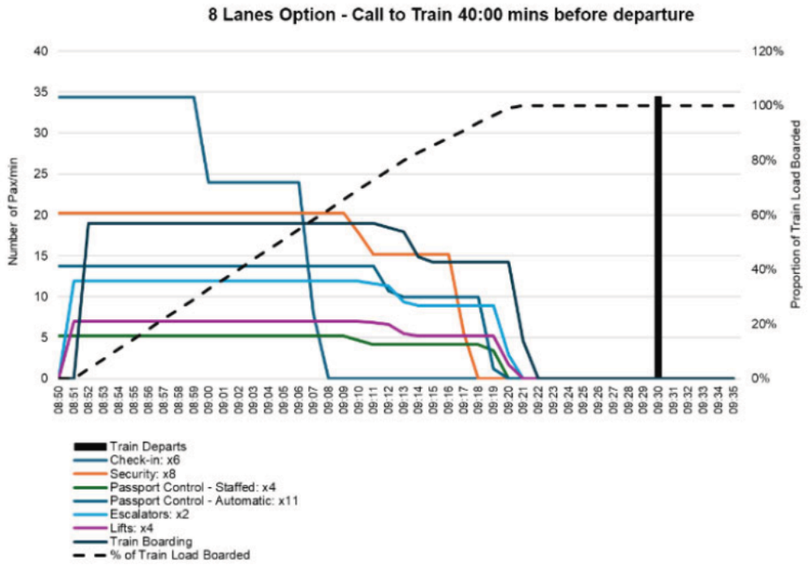
Two boarding call scenarios were tested (illustrated right):

- A 35 minute call to departure results in the final passengers arriving at platform approximately 3 minutes prior to train departure
- A 40 minute call to departure results in the final passengers arriving at platform approximately 8 minutes prior to departure

In both scenarios, passenger overlap for different train services at key locations would remain.





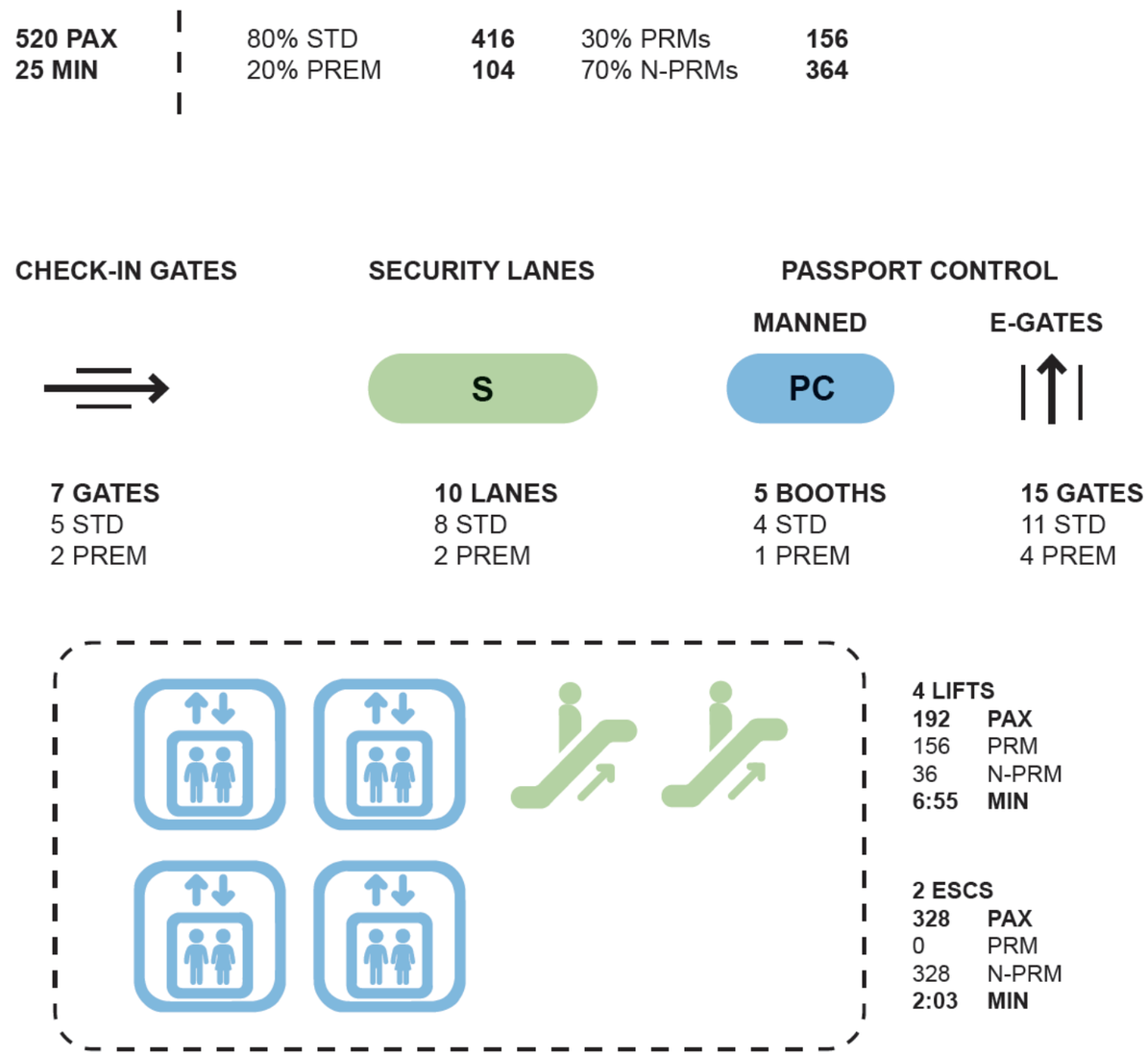


9.5.2 10-Lane Option

In response to the static modelling on the 8-lane option, which highlighted passenger overlap and the need to increase security capacity, a 10-lane option was explored to assess the impact of adding two additional security lanes on overall passenger processing times.

To align with the increased security capacity, the number of check-in gates, passport booths and e-gates was also increased.

Vertical transport capacity remains unchanged from the 8-lane option as the static modelling did not highlight any issues at this stage of the passenger journey.



Option Overview

This option retains the same operational model for the standard passengers with an additional two security lanes to increase processing capacity.

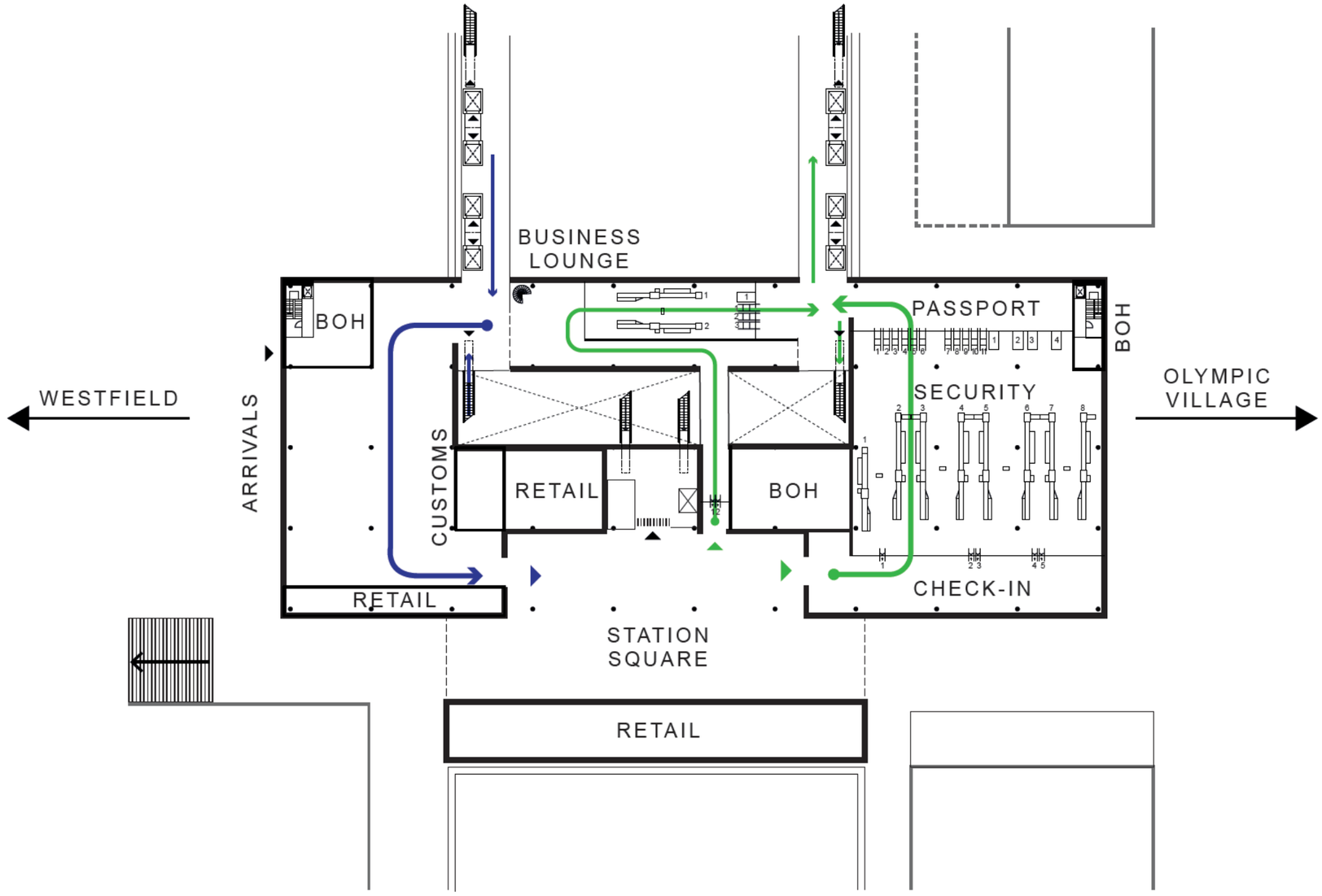
A new offline premium lounge is added, accessed via a bridge spanning the central void. This provides segregated processing for premium passengers. Premium and standard class passengers clear passport control separately and converge at the top of the Vertical transport to platform.

Advantages

- Increased throughput, reducing processing time
- Dedicated and segregated premium experience

Disadvantages

- Removes the option to switch platforms at concourse level - however this could be accommodated in a new bridge link adjacent to the business lounge
- Increased complexity due to the bridge construction over the void
- Potential for crowding where premium and standard class passengers approach from two different directions to access the vertical transport

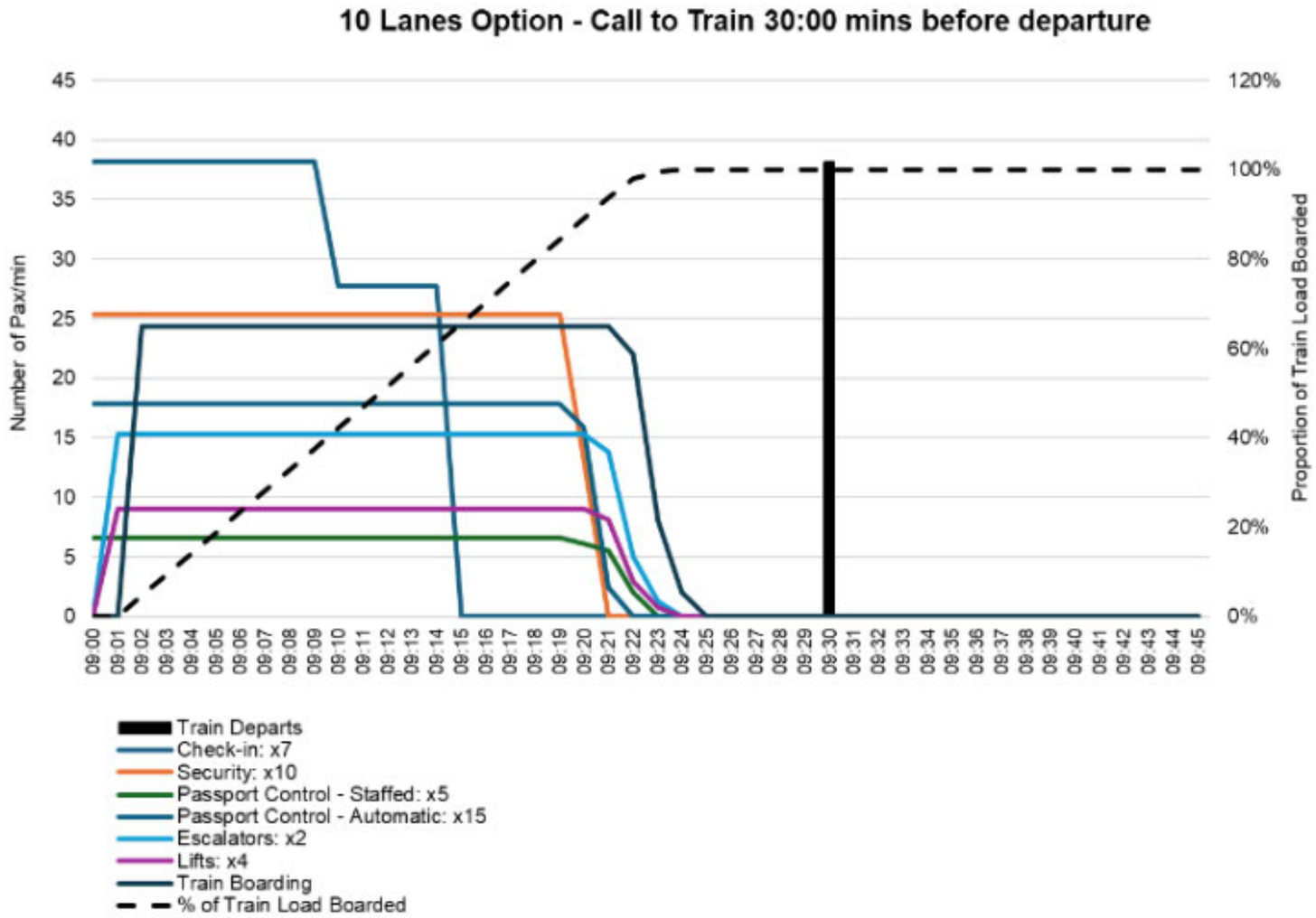


Static Modelling

Static modelling for this option indicates that the addition of two security lanes significantly reduces overall processing time, enabling all passengers to board within 25 minutes. This eliminates the overlap of passengers between trains in the worst case scenario of three departures within a 90min window.

However, following the development of this option and the running of the static modelling, Gemini confirmed that French customs require a shared passport control process for all passenger classes. While it is permissible to separate check-in and security for premium and standard classes, all passengers must be processed together at passport control.

As a result, this option was discounted, at this stage, due to the inability to merge premium and standard class passengers at passport control using this layout.



10. Preferred Option

10.1 Considerations

Following workshops with Gemini and feedback regarding the requirement for a shared passport control process, the 8-lane option was confirmed as the preferred design solution. This option was developed further in response to Gemini's comments and supported by updated passenger modelling.

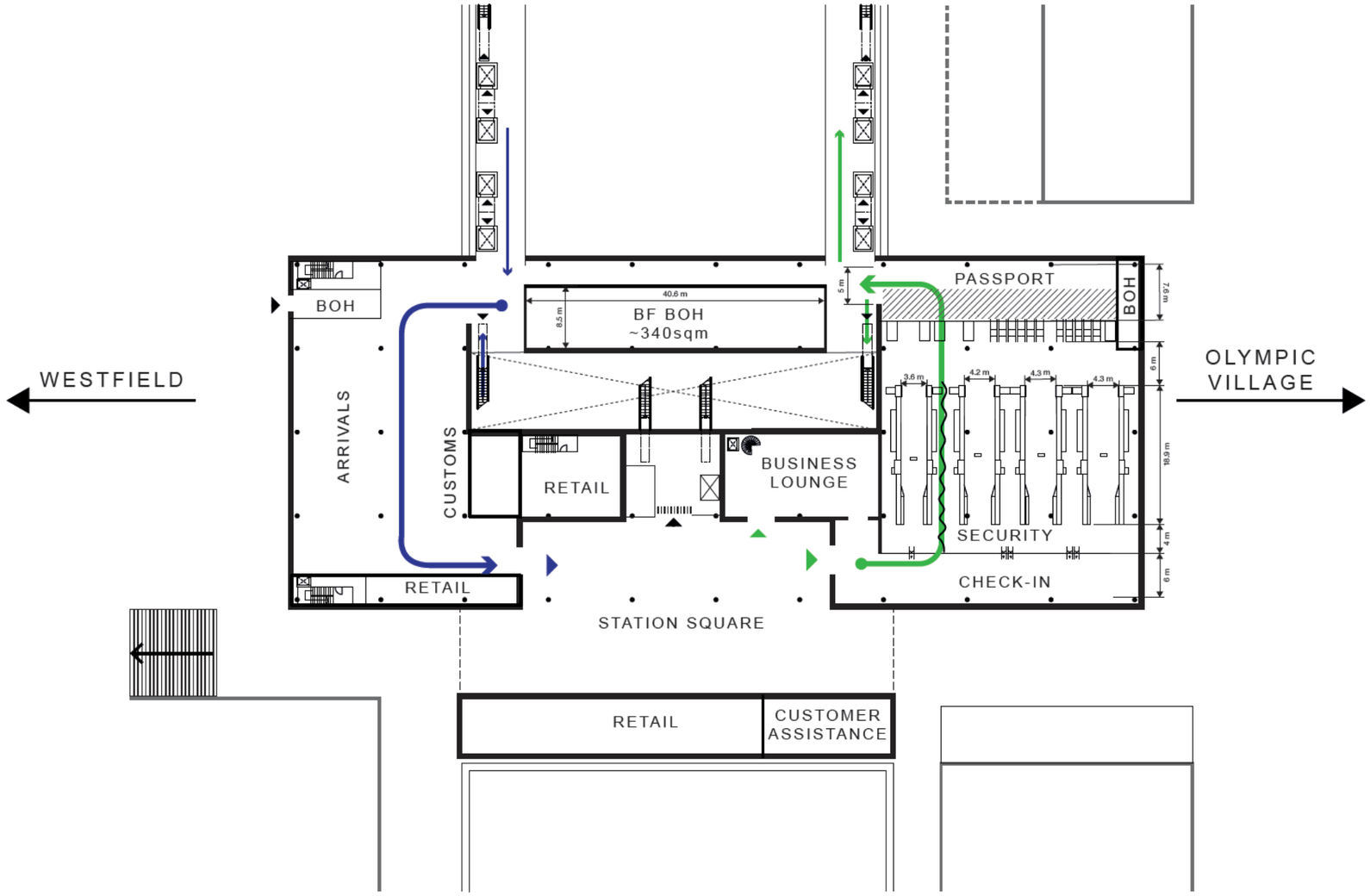
The design aligns with the preferred operational model and Vertical transport arrangement, while also retaining flexibility at platform level, allowing passengers to switch between platforms at concourse level if required.

10.2 Option Description

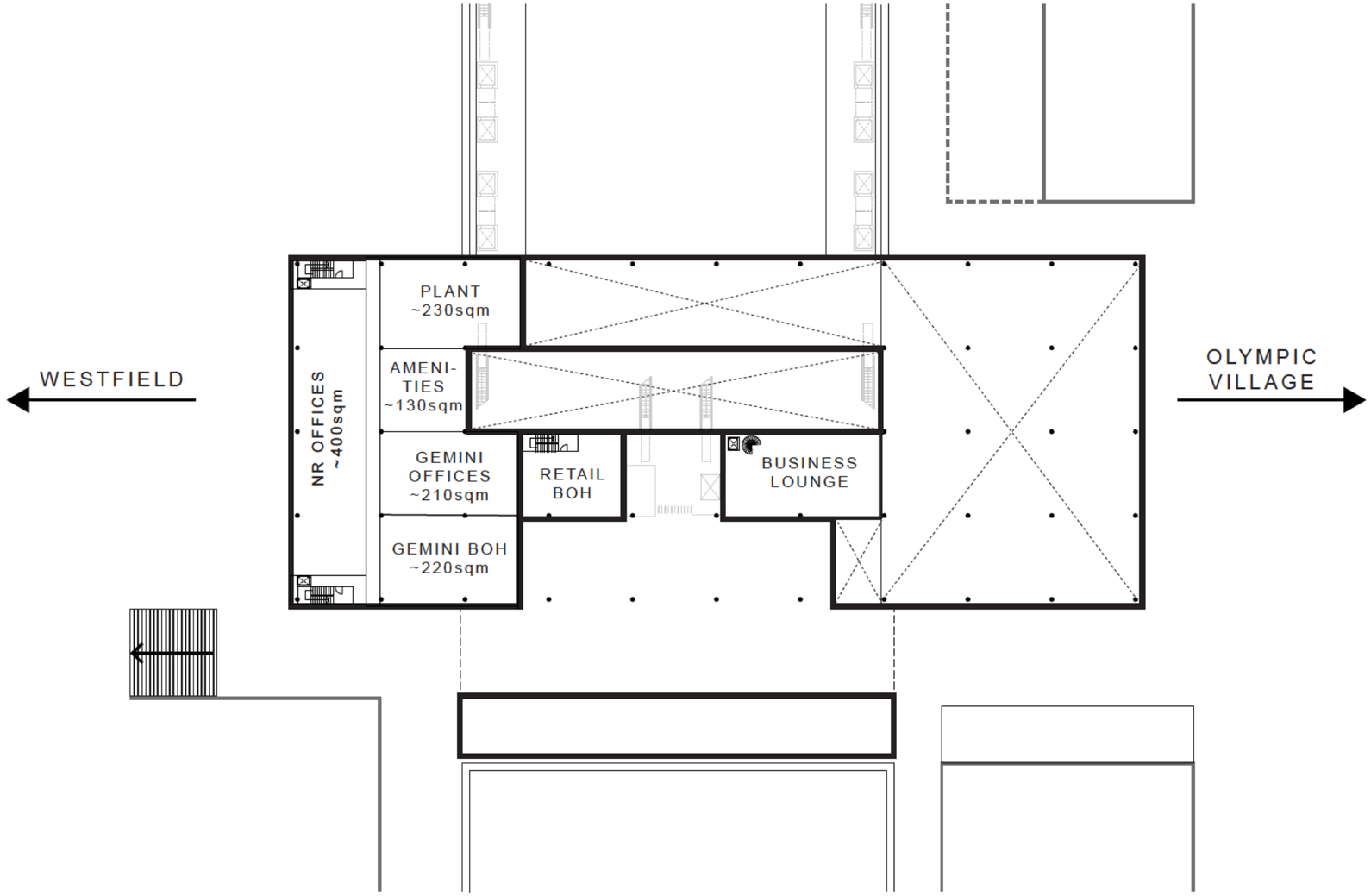
This iteration incorporates several updates from the previous version:

- Passport control is combined for all passengers in line with PAF requirements
- A zone is included beyond passport control to allow for French Customs checks
- An e-gate operator booth is incorporated
- The security lane length has been increased from 15m to 19m, enhancing throughput capacity and further reducing the risk of overlapping passengers

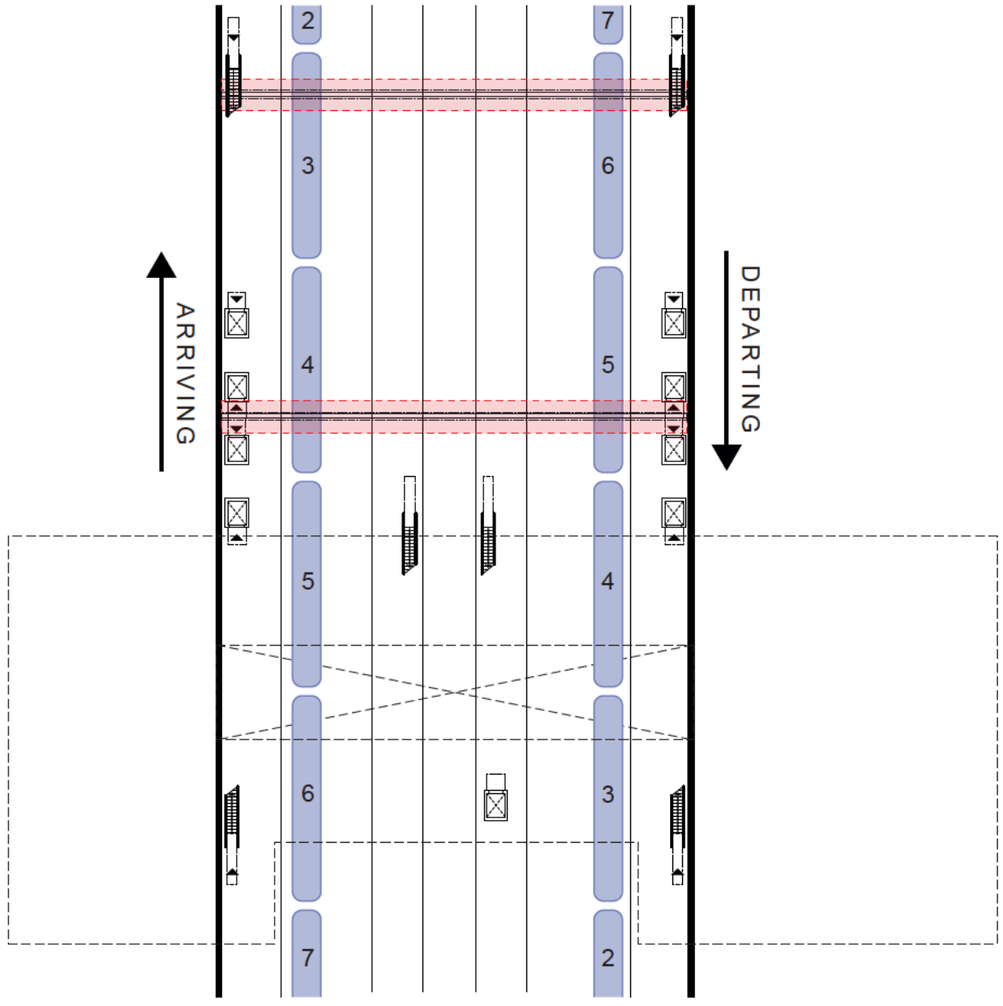
A servicing provision has been retained at Stratford in line with the requirements detailed in Chapter 3.3.4. It is assumed that one of the passenger lifts can be used for servicing purposes when necessary. This would require careful scheduling to ensure servicing does not occur during critical passenger flow times.



The majority of the back of house functions are arranged at mezzanine level to free the concourse space for passenger functions. The feasibility of this and the required space provision will require further validation at future stages.



The recommended vertical transport is distributed evenly along the train at platform, which means passengers should not need to move through the narrower zones adjacent to the lifts. The train stopping positions remain flexible due to the long platforms and will be determined by the final vertical transport arrangement and signalling.



10.3 Dynamic Modelling

The dynamic modelling was based on the following assumptions:

- Occupant walking speed is a normal distribution- Min 0.6m/s, Max 1.2m/s, Mean 0.8m/s, SD 0.15m/s.
- Increased security throughput of 19s/PAX/lane to reflect expected 20% improvement over St.Pancras due to technology improvements and lengthening of security lanes - principle agreed with Gemini in workshop on 16/06/25.

The dynamic modelling shows a minor improvment on the static analysis conclusions:

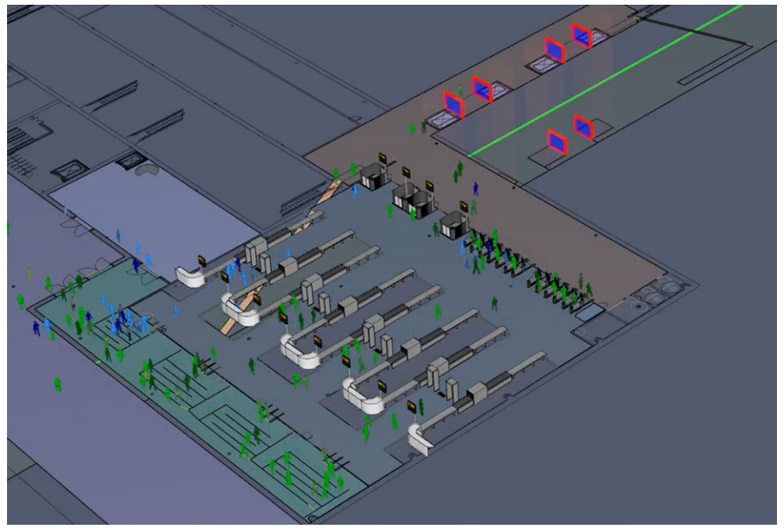
- The security provision of 8 lanes is not sufficient to process passengers in approx. 32 minutes.
- Increasing the security throughput increases the demand and queuing for passport control. This is to an acceptable level but constrains the overall time saving improving security throughput can create. There are limited opportunities in the current layout to increase passport control proportionately, however with small layout adjustments, 2no. additional e-gates could be provided.
- The provision of departures vertical transport is sufficient.

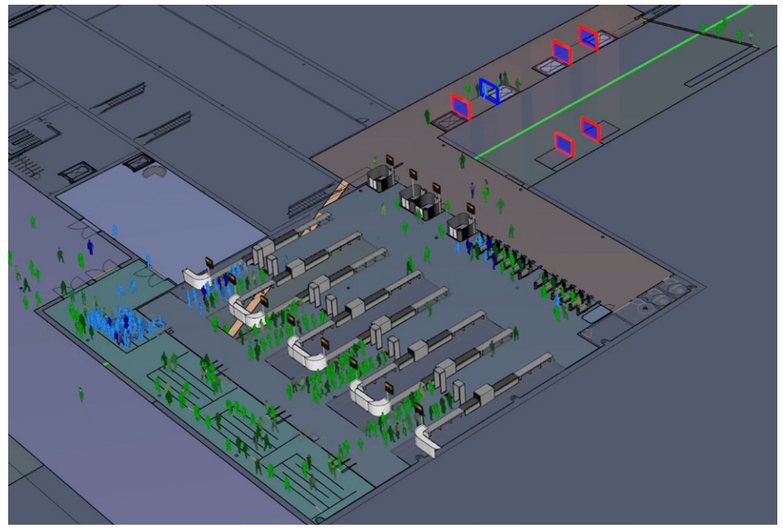
The dynamic modelling has also highlighted other areas of the layout which may require further investigation and refinement:

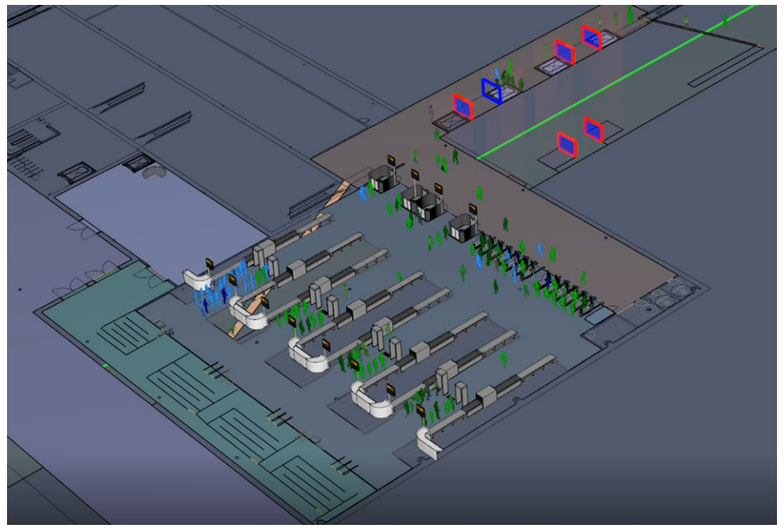
- Queuing demonstrated between check-in and security. This could be mitigated by managed check-in gates that control the rate of passengers moving through to security.
- Crossovers of passengers between security and passport control accessing the e-gates and passport booths. This could be mitigated by splitting up the booths and e-gates to create a distribution more aligned with the security lanes.

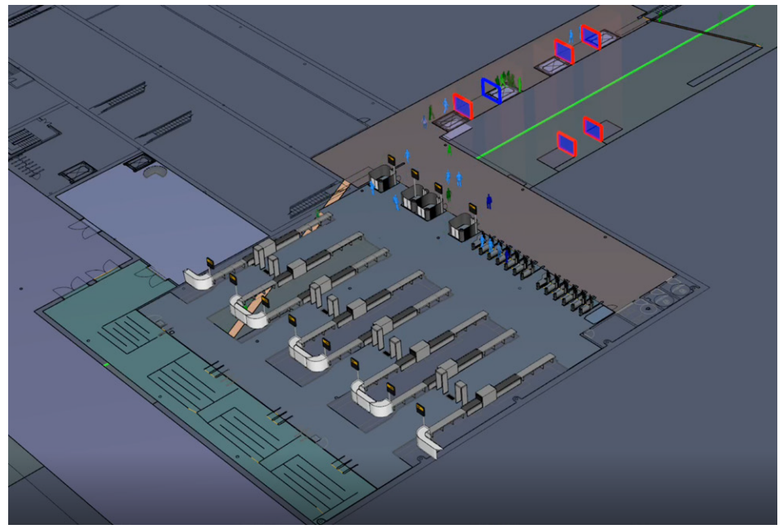
Recommendations

Refer to next steps for potential ways to reduce processing times.



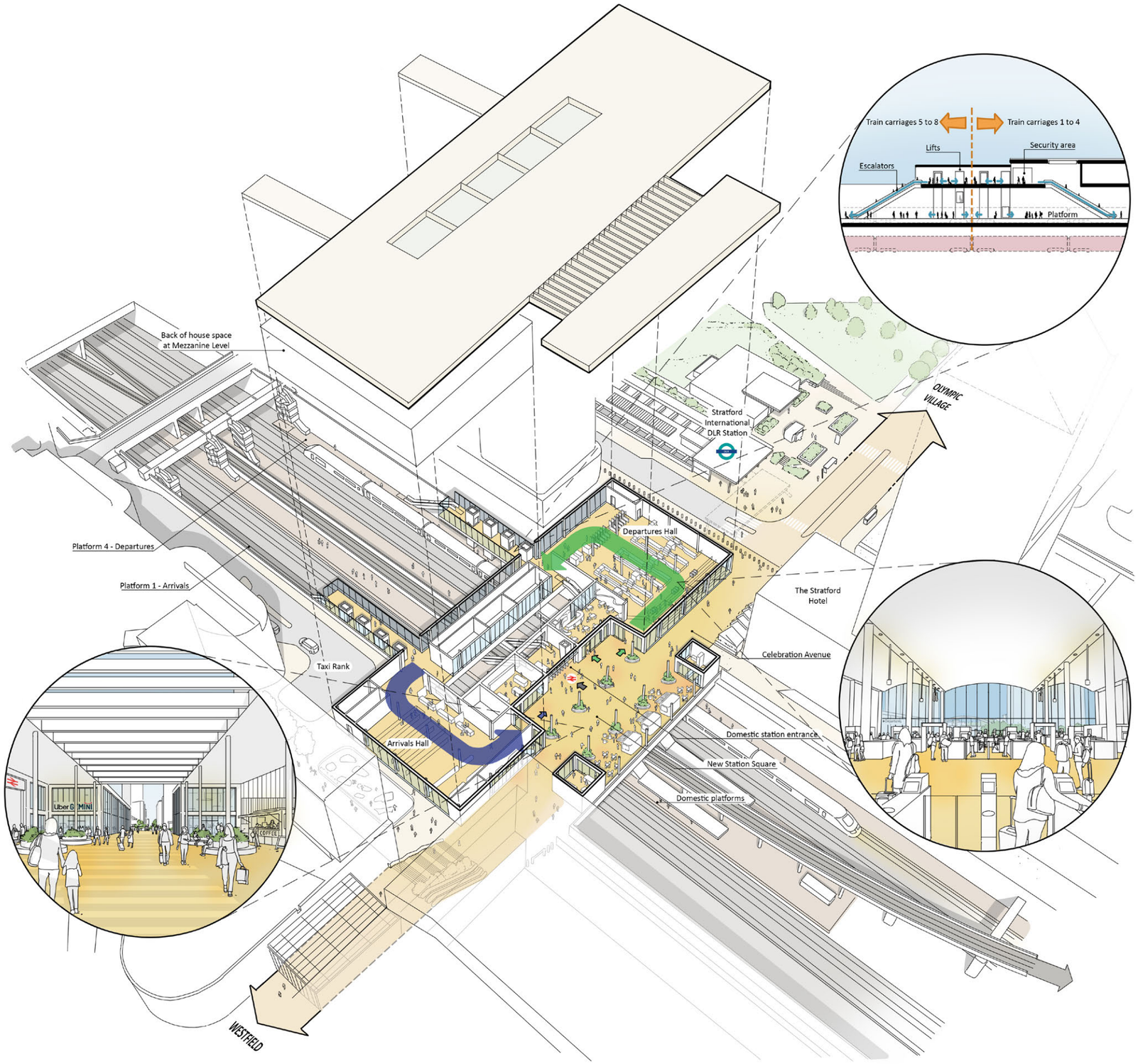






10.4 Architectural Illustration

The illustration right shows the proposed design at the conclusion of the study



11. Future Considerations

11.1 Opportunities and Risks

11.1.1 Dynamic Ped Flow Outcomes

The dynamic model produced is not a full model and will require further detailing at future stages.

Train Capacity

- There is potential that train capacity may increase to 560, compared to the current assumption of 520 passengers which will require further ped flow modelling to assess feasbiility

Processing Capacity

- Security is the slowest part of the passenger journey but there is no more space to add security lanes in the same location. Potential mitigations:
  - Improve throughput rates via advanced screening technology and review passport control layout efficiency to add additional e-gates
  - Relocate premium lounge to paid side, allowing premium passengers to arrive earlier and reduce crowding at peak times.
  - Explore discounted 10-lane option and separation of premium processing, including passport control, with PAF.
  - Consider separating passengers by PRM status or luggage size in future stages if layout benefits emerge.
- Check-in is required 35 minutes prior to departure, leaving no margin for cross-over of passenger flows. This may result in extended train or platform waiting. Opportunities include:
  - Enhancements to platform environments should be considered to improve comfort.
  - Limiting ticket sales for Stratford boarding (assumes others can board at Ebbsfleet or Ashford International) to reduce required processing volume.
- No testing yet conducted for platform switching and its effect on travel time and boarding efficiency. This will need to be carried out at future stages to assess viability and potential mitigation strategies.

Vertical Transport Arrangement

- Dynamic modelling indicates only two of the four lifts are required for departures. This presents an opportunity to:
  - Reduce the number of lifts to two, and by doing so,
  - Relocate escalators closer to the concourse, thereby shortening travel distances and minimising construction over platforms.
- Dynamic modelling on the arrivals was not carried out and will need to be assessed at a later stage. Assumptions are that:
  - The arrivals platform is still likely to require four lifts due to the surge of passengers alighting and the need to accommodate large luggage.
  - There may be potential crowding at lifts on narrow parts of platform. This risk could be mitigated by spreading the lifts out and separating waiting areas rather than combining them.

11.1.2 Events and Perturbation Management

- Significant passenger surges during event periods will require crowd management.
- The proposed station square can serve as a queuing area, with zoned management to maintain access for other users and Gemini passengers.
- Queuing areas will be covered/protected from rain.

11.1.3 OLE

- Construction near active lines and the OLE (Overhead Line Equipment) presents major risks:
  - Design assumes OLE relocation is not required, but no surveys have been completed to confirm height/location.
  - Risks remain for space-proofing, safety during construction, and operational safety.
  - OLE switch-off during works could significantly impact Eurostar and South Eastern services.

11.1.4 Box Constraints and Vertical Transport (Vertical transport) Integration

- Structural feasibility of fixing walkways or new structures into the box wall or edge remains unknown.
- There is restricted space at ground level to southern edge of the box due to existing road and taxi drop-off.
- The structure to support the vertical transport walkways is likely to be complex. They will need to be either fixed down to platform (restricted by platform width restrictions), supported off the edge of box (uncertain feasibility), or suspended from the edge of box (complex and uncertain feasibility).

11.1.5 Constructability

Restricted Worksites:

- Worksites on the southern side would require closure of taxi ranks
- On the northern side, access is restricted to the safe-guarded zone by the new development

Construction Phasing/Disruption:

- Complexity in reducing disruption to functional lines:
- Proximity to OLE during construction
- Costs associated with impacts to Eurostar/domestic services (high speed and standard)
- Building around domestic entrance and maintaining unpaid route

Other:

- Concourse to platform level change, narrow platform width, and interface between platforms/box
- Suitability of existing deck to accommodate additional load

11.1.6 UK Border Force

- Full-train checks on arrival have not yet been tested and may impact capacity.
- Engagement required with UK Border Force, PAF, French and UK Customs on evolving operational requirements.

11.2 Assumptions and Exclusions

- No survey or CAD data; drawings scaled from PDFs with an associated margin of error that may affect feasibilty of space-proofing
- No engineering input provided, including but not limited to:
  - Structure
  - Servicing
  - Fire strategy
  - Signalling
- No stakeholder engagement undertaken, including but not limited to:
  - UK Border Force
  - PAF
  - French Customs
  - UK Customs
  - London St.Pancras High Speed (formerly HS1)
- Security throughput assumptions based on St. Pancras without supplier confirmation
- Required operational rooms not defined; Eurostar provision at St. Pancras used in lieu of detailed requirements.

11.3 Next Steps

11.3.1 Undertake Detailed Pedestrian Flow Modelling

- Update dynamic modelling to a full study to incorporate the following:
  - Distribution of durations of passengers moving through departures processes
  - Groups of passengers
  - Impact of luggage on movement (this was considered for lift occupancy in the dynamic model but not for passenger movement)
- Reflect increased train capacity (up to 560 pax) and assess platform switching impacts.
- Model arrival platform dynamics, including lift demand and crowding risk.
- Confirm viability of reducing to two lifts for departures and relocating escalators.
- Engage with suppliers to confirm processing throughputs for security lanes.
- Explore design options for premium passenger separation and lane efficiency.

11.3.2 Engage Technical Input

- Commission surveys to verify OLE location and deck/box conditions.
- Commission full site survey and update drawings using detailed CAD data
- Investigate constructability impacts near live rail, restricted sites, and existing infrastructure.
- Complete engineering and servicing feasibility studies.
- Confirm fire strategy, servicing access, and accommodation requirements.
- Investigate signalling impacts on train stopping positions.

11.3.3 Initiate Stakeholder Engagement

- Begin consultations with UK Border Force, PAF, French and UK Customs regarding operational requirements

London, UK

12 Valentine Place
Southwark, SE1 8QH
T: +44 (0)20 7401 8877

Manchester, UK

1 St Peter's Square,
Manchester, M2 3DE
T: +44 (0)20 7401 8877

Melbourne, Australia

Level 1
137 Flinders lane
Melbourne VIC 3000
T: +61 (0) 3 8639 9005

Sydney, Australia

Suite 4, Level 1
2-12 Foveaux Street
Surry Hills, NSW 2010
T: +61(0) 2 9211 1263

Toronto, Canada

120 Adelaide Street West
Suite 2500
Toronto, Ontario
M5H 1T1, Canada

www.westonwilliamson.com

E team@westonwilliamson.com

egis GROUP

WW+P

HOUSE OF COMMONS
LONDON, SW1A 0AA

Mr Adrian Quine
Chief Executive, Gemini TOC Ltd
3rd Floor, Great Titchfield House
14-18 Great Titchfield Street
London W1W 8BD

Sent via email only

21 July 2025

Dear Adrian,

Re: Support for Gemini Trains' International Rail Proposal via Stratford and Ebbsfleet

I am writing to express my strong support for the proposal by Gemini Trains, in partnership with Uber, to launch new international rail services connecting Stratford International and Ebbsfleet International with Paris and Brussels via the Channel Tunnel.

This initiative represents a transformative opportunity for Kent and the wider region. The reintroduction of international services at Ebbsfleet, dormant since the pandemic, and the innovative inclusion of Stratford International as a new departure point attracting additional ridership from the northern part of the Thames Estuary will significantly enhance connectivity for residents, businesses, and visitors alike. It will also relieve pressure on central London terminals and offer an additional more sustainable alternative to short-haul air travel. Resumption of the service helps support key infrastructure developments including Ebbsfleet Garden City, the Elizabeth line and Bluewater Shopping Centre.

Gemini Trains' commitment to delivering high-quality, competitively priced, and frequent services using newly designed rolling stock is commendable. The integration of Uber's digital platform for seamless ticketing and journey planning further demonstrates the forward-thinking nature of this proposal.

The economic, environmental, and social benefits of restoring and expanding international rail links from Kent and East London are substantial. These include:

- **Improving accessibility** for communities underserved by current international rail infrastructure.
- **Boosting local economies** through increased tourism and business travel.
- **Reducing carbon emissions** by further shifting demand from air to rail.

I urge all relevant authorities and stakeholders to support this bold and necessary step toward a more connected and sustainable future for UK-European travel.

Yours sincerely,

Jim

[redacted]

Jim Dickson MP

Member of Parliament for Dartford