

First Rail Wales & Western (FRW&W) 4th SA - Industry Consultation Responses

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From: @transportfocus.org.uk

Sent: 27 June 2025 11:23

To: @networkrail.co.uk

Subject: Re: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Dear

Thanks for this track access proposal, which we've noted.

The evidence shows that competition is good for passengers, along with additional journey options. But we would caveat that by adding that care is needed to ensure that new open access services don't not have negative impact on other passengers, such as through punctuality/reliability or network capacity constraints.

Best regards

Rail Technical Advisor

Transport Focus

From: @Londontravelwatch.org.uk

Sent: 04 July 2025 14:17

To: @networkrail.co.uk

Subject: RE: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Dear

Thank you for your e-mail.

Having reviewed the documentation, London TravelWatch welcomes the proposed additional services provided that their introduction would not be detrimental to existing services.

We are keen to know how the proposed services would be affected by the Old Oak Common blockades – is it anticipated that they would still run but divert to Euston, for instance?

We would also ask if there will be sufficient capacity at Paddington station and on the lines to/from the station when these additional services are proposed to start.

Many thanks

Kind regards

Policy and Advocacy Officer

London TravelWatch

From: @networkrail.co.uk

Sent: 25 July 2025 13:41

To: @Londontravelwatch.org.uk

Subject: Re: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Good afternoon

Hope you're well?

Please accept my sincerest apologies for not responding until now. I'm afraid I had not had received FRW&W's response until late yesterday evening. The response from FRW&W is as follows:

“Who runs services during the Old Oak Common blockades is a matter for NR, who will produce the appropriate Capacity Plan, outlining the services that will be run during the possession periods.

Given that our proposed services will only be 5 cars, it is unlikely that they will run through. They could possibly start and finish at Reading. Running to Euston is not feasible and if that is required, it is more likely that GWR would take up any spare capacity there.

FRW&W is working closely with NR Capacity Planning who have determined that the services can be platformed at Paddington and also accommodated on the lines to/from the terminus.”

Many thanks,

Customer Manager

Network Rail



Department for Transport

Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR
Email: @dft.gov.uk
5 August 2025

Customer Manager
by email: @networkrail.co.uk

Dear

FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Thank you for sharing the above track access application from First Rail Wales and Western (FRWW), and for providing the Department for Transport the opportunity to respond to this industry consultation.

The Secretary of State has been clear that Open Access will continue to play a role in the future GBR managed railway but that this must not come at the cost of performance of the network, better services for passengers or value for taxpayers.

In line with the Secretary of State's letter of 6 January, the Department expects ORR to consider the full range of its duties during the decision-making process and place weight accordingly. We note that this includes duties to; have regard to the funds available to the Secretary of State; to protect the interests of users of railway services; and to promote improvements in railway service performance (which is defined as including in particular, performance in securing (a) reliability (including punctuality), (b) avoidance or mitigation of passenger overcrowding, and (c) that journey times are as short as possible).

We would also reiterate the concerns highlighted in the letter of 20 June regarding conflicts of interest between Owning Groups' contracted operations and Open Access arms. These risks are heightened by applications such as this one, where a contracted operator and an Open Access operator under the same ownership would compete directly over a route.

DfT analysis suggests that the application would not pass the 'Not Primarily Abstractive' (NPA) test as outlined in ORR's guidance, with an NPA ratio of 0.25. This would represent a significant abstraction of funds from existing operators and poor value for money for taxpayers, who would be left to make up shortfalls. At a time when the industry is required to significantly reduce its subsidy requirement, the Department has serious concerns regarding the overall financial implications of this application and we would ask and expect that the regulator fully considers the impact to the funds available to the Secretary of State – including to subsidy requirements to contracted operators as a result of the proposed services.

FRWW's application also raises a number of concerns regarding the operational performance of the network. Rather than offering additional connectivity, FRWW's proposals largely duplicate existing services operated by Great Western Railway (GWR) and Transport for Wales, providing limited new benefits for passengers while consuming scarce capacity and adding to pathing/platforming pressures for existing services.

Great Western Main Line (GWML) capacity is already particularly constrained, especially between Didcot and Swindon, throughout the Thames Valley, and around Bristol where complex interactions between contracted intercity, regional and local services and freight exist. We also have concern over the availability of sufficient depot and stabling facilities to accommodate additional Open Access services on the GWML, and it is unclear where FRWW intend to maintain or stable trains. The addition of new Open Access services would therefore exacerbate these existing constraints and adversely impact the performance of existing services, leading to poor outcomes for passengers across the Great Western network and beyond.

We would also note that the GWML is a key freight route carrying construction materials from the Mendips and automotive traffic to and from Southampton. In view of the Government's targets for housebuilding and major infrastructure projects, we anticipate there will be greater demand for rail freight along the route, which may not be able to be accommodated if FRWW's proposals were to be approved.

The application from FRWW would also impact the viability of other proposed services. This includes the current GWR trial of Bristol-Oxford services to assess the potential for permanent reinstatement of this route, which may be made unviable if capacity was awarded to Open Access services before the completion of trials. This would deny the contracted operator opportunity to deliver potentially revenue-generative services and mean that passengers may lose out on beneficial services even if trials are successful.

Finally, the Department has specific concerns regarding how FRWW's application would interact with the construction of HS2 which we feel must be fully considered during decision-making. Additional Open Access services on the GWML would further reduce capacity around Old Oak Common during HS2 construction work, increasing disruption for passengers and further complicating the process for track possessions for engineering work on the route. This would be particularly the case during times when the railway is reduced to two track working or during all line blocks into Paddington. A limited service will be able to operate during these times and it is unclear how the available track access would be allocated, with processes made more complicated if new services were approved before completion of works.

Access to normal depot locations will also be restricted during HS2 construction, with additional pressures being placed on remaining facilities and taxpayer-funded mitigations to enable temporary stabling of existing trains at alternative destinations across the Great Western network. Any new Open Access services would add to these issues and potentially make proposed mitigations unviable. Even post-construction, it is unclear whether additional paths can be accommodated as the impact of Old Oak Common station on track capacity and performance is still under review.

For the reasons listed above, the Department for Transport does not support this application from FRWW.

Please contact me if you wish to discuss this matter further.

Yours sincerely, **Deputy Director, Rail Reform**

From: @GTSR.co.uk

Sent: 09 July 2025 10:59

To: @networkrail.co.uk

Subject: Re: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Hi

GTS is unable to support this application as there is insufficient information to make an informed decision.

The Form P states that 'No detailed performance analysis has yet been carried out but as all paths are compliant and are not "forced", we anticipate minimal impact'. This appears to be a very objective view of performance.

There will inevitably be a reduction in overall performance as capacity utilisation is pushed even closer towards 100%. Reliance on paths being compliant (we assume with the Engineering Access Statement and Timetable Planning Rules) is meaningless in terms of overall performance justification and nothing short of a full performance modelling is required.

We also noted that the indicative schedules included stops at Reading, which we queried. We were advised that FRW&W has no intention of stopping at Reading, which leads us to question the quality of the indicative train paths.

Stabling is at a premium on the Western Route, especially in the London area. There is no assessment of the impact on stabling,.

There are considerable periods of weekend engineering works taking place between London and Reading over the next few years, including periods of 2-track railway operation, mostly linked to Old Oak Common station. There is no assessment of how the new services will impact on capacity and performance.

We have yet to see the infrastructure on Western Route stabilise, following the Project Brunel works.

We are also concerned about the cumulative impact of the many Open Access applications, including:

- FRWW Paddington - Paignton
- FRWW Paddington - Hereford
- GUT Paddington - Carmarthen
- GCR Newcastle - Brighton via Reading

Our concerns related to Open Access include:

- Train performance
- Overall capacity utilisation.
- Platform capacity at Paddington and Reading
- The relationship with future timetable changes (including the stage works at Old Oak Common station)
- Rolling stock stabling
- Rolling stock reliability and recovery arrangements

We believe that a more holistic approach is required.

These services are proposed to operate over the main Crossrail routes in the Ladbroke Grove area and on the diversionary routes (the Main Lines west of there). As such, we are concerned that Elizabeth line services will be indirectly affected by any performance issues on the ever more congested Main Lines including the impact from Restrictions of Use, including two-track timetable scenarios.

Thanks very much.

Head of Industry Coordination



Holborn Gate, 330 High Holborn, WC1V 7QH

From: @networkrail.co.uk

Sent: 29 July 2025 16:53

To: @GTSR.co.uk

Subject: Re: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Good afternoon

Please accept my apologies for the delay in a full response to your response on the consultation. I'm afraid that an answer wasn't received until Friday afternoon and afraid it sat in my inbox until now. Please find below the response from FRW&W.

"The use of capacity and timetabling overview of the GWML in future years is being overseen by NR Capacity Planning, who we have been working closely with. They are fully aware of other future operations and are taking these into account in respect of our plans. Currently they have determined, with some minor changes, that our proposed services could run.

There is no assessment of stabling as this is a private matter for Hitachi Rail Europe. This proposed service requires one extra 5 car 80x unit and Hitachi have assured us that the unit can be accommodated at their North Pole depot.

It is up to NR to produce a capacity plan for the OOC works and we are anticipating that our services, being only 5 car, will not run to/from London to Reading during the 2 track possession periods.

We cannot comment on performance analysis as only NR will be able to undertake this work, given their sole knowledge of the overall train plan in future years."

Many thanks,
Customer Manager



From: @GTSR.co.uk

Sent: 30 July 2025 14:53

To: @networkrail.co.uk

Subject: Re: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Hi

Thanks very much for your update.

It does not address our concerns in full, so our position remains unchanged.

We cannot support this proposal.

Thanks very much

Head of Industry Coordination



Holborn Gate, 330 High Holborn, WC1V 7QH

REDACTED VERSION

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1 Milford Street
Swindon, SN1 1HL
GWR.com
T 0330 095 2000

Ref: TK0035 \GWR\NRC\DfT
Customer Manager
Wales and Borders
Network Rail Infrastructure Limited
copy to: @networkrail.co.uk>

9 July 2025

Dear

FIRST RAIL WALES AND WESTERN LIMITED (“FRWW” - FORMERLY GRAND UNIONS TRAINS NO 2 LIMITED) T/A LUMO – APPLICATION UNDER SECTION 22A SEEKING THE 4TH SUPPLEMENTAL AGREEMENT TO THE FRWW TRACK ACCESS AGREEMENT DATED 13 JUNE 2023 FOR SERVICES TO/FROM LONDON PADDINGTON AND HEREFORD VIA BRISTOL PARKWAY

1. We refer to the Section 22A application in respect of London Paddington – Hereford via Bristol Parkway services submitted by FRWW (the “**Application**”). Thank you for inviting GWR to submit a consultation response regarding the Application.

2. GWR has grounds for concern regarding the Application and objects to its approval. GWR’s concerns are set out in further detail in this response and include:

(a) **Performance:** The Great Western Main Line is fast approaching being completely congested throughout. Congestion is particularly acute in the Thames Valley area due to the works at Old Oak Common with resultant impacts (both during its delivery and in its final end state) on timetabling from reduced speed and increased station calls. FRWW has not yet undertaken detailed performance monitoring so **additional time** is required to fully assess the potential impact;

(b) **Capacity:** FRWW has not validated fully the paths required and the proposed changes conflict with strategic plans in place by Network Rail and sub-national transport bodies, as well as with other services that are proposed to make use of finite capacity;

(c) **Abstraction:** GWR’s initial analysis indicates a high level of abstraction at industry level, with the service unlikely to meet the ORR’s “Not Primarily Abstractive” test. In addition, it is likely that the absolute level of revenue abstraction will be too great to bear;

(d) **Operational Readiness and Viability:** FRWW’s maintenance and stabling plan is not viable and is likely to adversely impact GWR operations. The depots to be utilised by FRWW are those used by GWR and are at or nearing full capacity;

(e) **Financial Viability:** Whilst a direct service from locations such as Abergavenny, Pontypool and Cwmbran would benefit these local markets, it is likely a number of customers from these locations travelling east (or towards Bristol) will already be rail heading to stations such as Newport, Severn Tunnel Junction or Bristol Parkway. As such, the

services proposed under this Application can only be financially viable through substantial revenue abstraction from GWR services;

(f) the services proposed in the Application conflict with the requirements placed upon us by the Department for Transport in our National Rail Contract; and

(g) it is our opinion that the Application will not pass the relevant ORR tests. As emphasised in the letter dated 6th January 2025 from the Secretary of State to the ORR in respect of the consideration of Open Access applications and reiterated with greater factorisation in the letter dated 20th June from the Director-General for Rail Reform & Strategy at the Department to the ORR, there is a balance to be struck to ensure the benefits provided by Open Access operators outweigh the impacts they have on taxpayers and the ability to operate the network efficiently. Whilst the ORR will determine how much weight will be placed on each of its statutory duties when considering the Application, we believe the following considerations are particularly relevant to GWR:

i. promote improvements in railway service performance (which is defined as including in particular, performance in securing (a) reliability (including punctuality), (b) avoidance or mitigation of passenger overcrowding, and (c) that journey times are as short as possible). As already highlighted at paragraph 2(a) above, if the Application were to be successful, it is difficult to see how these services could be incorporated into the timetable without having a detrimental impact on performance; and

ii. enable persons providing railway services to plan the future of their businesses with reasonable assurance. GWR has committed to providing the service in accordance with its National Rail Contract and the introduction of the services set out in the Application would jeopardise GWR's ability to comply with its contractual obligations.

Summary of Objections

3. The key grounds for GWR's objection include congestion (particularly in the Thames Valley and during/after works to build Old Oak Common with its resultant impacts on timetabling as a result of reduced speed and increased station calls), the likely detrimental effect on performance and extremely significant revenue loss from abstraction. We believe that the increased use of maintenance and stabling facilities identified in the Application for the nominated rolling stock would have an adverse effect on GWR's current operations.

4. GWR believes that there are no new markets served in this proposal that are not already sufficiently covered by existing Operators, including GWR. The Application – and the commercial intentions underpinning it – should, we believe, be seen in this light. Given the existing constraints on the Great Western Main Line, there are potential opportunity costs of approving a duplication of existing connectivity that could obstruct potential alternative uses of the network in the future that should also be considered.

5. At the outset we note that further detailed work will be required to test the assumptions within the Application, particularly regarding timetabling and the resultant operational and economic impacts on GWR. This will require the building of a timetable and performance model that has not been possible within the current consultation timescales. We assume that Network Rail have identified a similar need for more detailed and time-consuming work in order to more fully and appropriately respond. We have notional paths for new trains but no flexing to existing services, nor have we details of empty movements in Paddington and its throat during the peak.

6. Whilst we are firmly of the view that this modelling is required, this response sets out in more detail the principles for our objections, alongside identifying where further detail is needed from FRWW and where time for more rigorous testing is required on GWR's part.

Congestion: Pathing

7. The indicative timetables provided thus far indicate conflicts with existing GWR services. We understand that FRWW did not look at the flexing of other operator's services prior to their initial proposal but that this work is now taking place. Without such consideration being given, it is difficult to substantiate the assumption that FRWW have presented a viable train path between Hereford and London Paddington. As such, it is not possible to validate any claims with regard to performance or capacity in any detail at this stage. In order to more fully understand the impacts of the Application on the existing timetable, GWR will need to create a new base timetable with the proposed services included. This would then require services to be deconflicted to ensure that the Application can be accurately modelled from a revenue and performance perspective. This exercise will require more time than allowed by the consultation timescales but is something GWR believes is critical prior to any decision due to the potential cost impact to the taxpayer and to establish the true detriment of the Application, including declining performance and associated revenue depletion.

8. Capacity on the Great Western Main Line between Swindon and London Paddington is finite, and we know that there is limited scope for adding many more additional services. It is GWR's understanding that there is likely to be sufficient capacity for only one train per hour and that there are competing aspirations for this. This aligns with Network Rail's initial view to the ORR in response to GWR's application for further Bristol to Oxford services, noting that there is more work to be done. As such, any decision on the use of this finite capacity must take account of the opportunity cost from approving any one application at the expense of others that may be more operationally robust, as well as providing more and sooner benefit to customers and industry. This latest application is one of several aspirational services looking to make use of this finite capacity.

9. For example, we understand from initial information provided that the proposed changes are likely to conflict with the proposed introduction of a new hourly Bristol to Oxford service which is documented within strategic plans by various parties (including Network Rail and sub-national transport bodies), is a clear aspiration of stakeholders across our region and continues to be the subject of a successful ongoing trial of two round trips on winter Saturdays when resources are available. Consistent with DfT instruction, GWR has applied for track access right for this hourly service with initial industry consultation now complete.

10. We believe that this is one of a number of potential cases for better use of capacity and connectivity across the route, providing journeys between Oxford, Swindon, Bath and Bristol that are poorly served by rail at present and by other modes. It also has the potential, subject to the Secretary of State's instruction, to transform connectivity beyond Western, utilising East West Rail to open up new opportunities for direct services to places such as Milton Keynes, Bedford and Cambridge and population centres emanating from these points. These Bristol to Oxford services could use valuable and scarce existing capacity on Western Route without having a direct impact on the Thames Valley.

Calling Pattern

11. On an administrative point, GWR notes that, in the tables provided by FRWW, 1L84 (SO/SX) appears to make provision for a stop at Reading. With no reference made to serving Reading station within the Application as a whole, FRWW has confirmed in advice to us via Network Rail that there is no intention of calling at Reading.

Congestion: Performance

12. The Application suggests that detailed performance modelling is yet to be undertaken. We believe that this is vital to understand the performance challenges arising from this Application and would wish to ensure an industry underwritten exercise is undertaken. As well as any Network Rail modelling, in particular GWR would be seeking to use our performance modelling software to understand performance implications arising from increased congestion in the Thames Valley (which we know has particularly acute performance challenges already) as well as Paddington platforming.

13. It is clear that the railway in the Thames Valley between London Paddington and Swindon is a particularly challenging part of the network – something that will be further exacerbated in the coming years because of work at Old Oak Common and the introduction of additional services to West Wales.

14. In recent years there has been a significant deterioration in infrastructure reliability in the Thames Valley resulting from previous uplifts in service, which in part led to ORR issuing an Improvement Notice to Network Rail. Whilst Network Rail's Project Brunel has started to produce the green shoots of recovery in terms of infrastructure reliability, there is still significant work to do to ensure that performance in this critical area reaches the levels our customers rightly need and expect.

15. The Paddington to Reading corridor already has a significantly worse primary reactionary (P:R) ratio

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how] vs the rest of the GWR network

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how] as shown in the diagram below.

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how]

16. Due to the limited headway, even small subthreshold delays can often knock onto multiple other services. Further increasing the volume of services between Paddington and Reading is likely to compound this issue and further worsen the P:R ratio in the Thames Valley, with increased reactionary delay spreading across the network. This further highlights the requirement for detailed performance modelling to understand if additional paths can be added without detriment to the existing performance of GWR, Heathrow Express and Elizabeth Line services (including knock-on performance impacts into the Central Operating Section).

17. [Redaction Reason 1: technical or financial information relating to an undertaking's know-how].

18. The tables below show lateness by hour for all GWR services in Up and Down directions between Reading and Paddington.

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how]

There is particular concern around the proposed 1B78DX 08:15 departure from Paddington. Adding an additional path into Paddington in the height of the morning peak is likely to compound the performance challenges outlined above. This service would depart just three

minutes ahead of 1B06DA GWR's 08:18 Paddington to Cardiff (9 car service) as such any delay to proposed 1B78 would likely impact the performance of the existing service. In addition, the incoming ECS is not yet timed.

Congestion: Old Oak Common calls

19. The construction of Old Oak Common station will present significant challenges to the operation of Western Route in the coming years, both during its delivery and in its final end state.

OOC Interim state

20. It is currently understood that, prior to the opening of Old Oak Common station, services through the area will be subject to a slower speed limit as a result of slewing the current track layout through the new station footprint. It is well established that this speed limit will have a significant performance impact in the Thames Valley. Network Rail has undertaken work to understand these impacts which, to date, has no cognisance of the additional challenges that FRWW services to/from Hereford would present. As a factual certainty, any assessment of the proposed services needs to be undertaken in recognition of these new permanent speed restrictions in order to reflect the likely capacity and performance impacts in the Thames Valley.

OOC End state

21. It is unclear from the proposal whether FRWW intends for their services to call at Old Oak Common once the station is in use. Whilst this omission may be on the grounds that the station is still under construction, it would be helpful to understand whether FRWW has future aspirations to stop there.

22. Discussions are still ongoing as to which services will stop at Old Oak Common but - especially in the peak - there is a view that if one service calls then all services may have to or otherwise be baulked outside. In its "Old Oak Common 2030 Performance Assessment", Network Rail showed the detrimental performance consequences of all trains stopping at Old Oak Common.

23. In addition, there are currently proposals under evaluation to ease conflicts within Paddington throat, where the opening of Old Oak Common station and the increase in Elizabeth Line services will make use of the high-numbered platforms more difficult (and Line 5 almost unusable). However, this work to look at Paddington platform optimisation as a mitigation is not committed within Network Rail's constrained CP7 financial settlement, and the industry has only just started a session to work through different options and outputs to which intervention is best.

Network Rail Engineering Access

24. Two-track operation in the Thames Valley as a result of Old Oak Common possessions will be a common occurrence in the coming years at weekends, late evenings and over many public holiday weekends as well as some weekday possessions. There is already a significant challenge in agreeing how to make best use of the 14.5tph limit that results from this today, with an inherent tension between providing a Metro and Long Distance service offer. We already know that the previously-approved Grand Union Trains (now FRWW) service to Carmarthen will need to be added to these considerations. GWR has reviewed its weekend offer to ensure we now use 9- or 10-car IETs on the limited number of paths and 12-car Class 387 EMUs also making their first appearance in weekend paths. To remove such a train and replace it with a 5-car service would not be a prudent use of capacity in line

with established industry decision criteria and could lead to passengers being left behind. Whilst the Network Code indicates optimum industry solution applies, it is known that Network Rail is taking the view over two track that pain must be felt by all parties (which is a slightly different approach). This increases the chance that the decision will be five car vice twelve, and it is known that industry dispute finds this attitude hard to change.

Rolling Stock Maintenance and Stabling

[Paragraphs 25 to 28: Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 5: technical or financial information relating to an undertaking's supply sources.]

25.

26.

27.

28.

Rolling Stock type and Automatic Train Protection

29. As with previous applications of this nature, it is important that the rolling stock that is proposed to be used meets the exact safety, speed and configuration etc. to fit into the timetable and meet the needs of the network. In addition, any service operating at high speed on the Great Western Main Line is required to be fitted with GW Automatic Train Protection. This is a legacy system and even with the limited rolling stock currently operating with it installed, it is becoming increasingly difficult to support the on-going maintenance of the system due to limited component availability and support from the OEM (Alstom).

30. We note that FRWW is proposing to use Cl.802s, which would likely meet all of these criteria. However, such is our experience of rolling stock procurement and delivery, GWR recognises that these units may not be in traffic in time for the proposed commencement of the requested Track Access Rights in December 2027. We would have significant concerns if this proposal was to be changed and an alternative traction type put forward as either an interim or long-term solution for the operation of the proposed services. Any alternative rolling stock would be older than a Class 802, with the potential to import greater performance risk as a result (especially noting the acceleration performance of the IETs). Older, heavier rolling stock is also likely to have greater wear and tear on Network Rail's track assets. Whilst such stock will have a Variable Access Charge appropriate to the class, noting the Secretary of State's position on public finances, this could mean that the applicant is paying less for Access whilst having a disproportionately high impact on infrastructure that would necessitate increased maintenance spend as a result.

Revenue Abstraction from GWR

[Paragraphs 31 to 34: Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 2: technical or financial information relating to an undertaking's business plan; Redaction Reason 3: technical or financial information relating to an undertaking's cost structures; Redaction Reason 4: technical or financial information relating to an undertaking's marketing and pricing strategies. We have included timetable and product offer in this category; and Redaction Reason 6: technical or financial information relating to an undertaking's market shares.]

31.

32.

33.

34.

Increased cost of GWR operation

35. The Application is short of detail in a number of areas that are likely to have a material impact on GWR's cost base.

36. To make a full impact assessment of the proposed services, GWR would require the full list of changes to GWR's services that are needed and would apply in practice. Without this level of granularity, our initial assessment is that the proposal is likely to create additional turnarounds, impacting GWR diagrams and potentially necessitating increased resourcing costs which would be passed on to the taxpayer. For example, as a result of the additional congestion in Paddington throat - coupled to the impact of Old Oak Common station - we could expect further timetable impacts and delays in this area for all services which would then require additional resources

37. GWR has put significant effort and resource into the recruitment, selection and training of drivers in order to meet our own service needs following COVID. We would be concerned if a new operator was to seek to then recruit these drivers, who would then need to be backfilled at increased expense to the taxpayer. As a result, GWR would like to understand FRWW's plans for recruitment and training of traincrew for these new services.

38. In terms of station operations, GWR has seen a marked increase in the number of customer assists in the previous year, with a 23% increase in Assistance Requests in Periods 1-3 2025/26 compared to the equivalent timeframe in the previous year. Given the additional pressure that the proposed services are likely to place on stations – particularly where they may be targeted at the leisure market - it would be helpful to understand what consideration FRWW has given to resourcing in this respect.

39. Finally, it is unclear what is being proposed in terms of Personal Needs Break (PNB) locations for train crew, or where those train crew will be based. GWR would like to understand these proposals in order to assess any potential impact on our own arrangements, particularly at Paddington.

Conclusion

40. In conclusion, GWR believes that significant additional work and analysis is required in order to fully understand the impact of the proposed services on the economics and operability of our own business. Only through detailed timetable modelling can we fully understand those implications.

41. However – as detailed in this response – we expect this analysis would support our initial view that these services would have a significant abstractive effect on GWR's revenue returns to the Secretary of State's funds, import additional operating costs and introduce significant performance risks into the Thames Valley at a critical time. More clarity is required around the rolling stock maintenance and stabling strategy in order to understand the impact that this could have on the operation of [Redaction Reason 5: technical or financial information relating to an undertaking's supply sources.] GWR services as a result.

42. Crucially, it is our view that these proposals duplicate existing connectivity to a significant extent and obstruct potential near-term opportunities to make better use of limited capacity in linking up parts of the network that would not directly impact performance in the Thames Valley.

43. Therefore, GWR objects to the Application on the following grounds:

- (a) It would be very strongly primarily abstractive in nature;
- (b) It would have an adverse impact on GWR's finances;
- (c) It has untested and unverified assumptions on timetable and operability;
- (d) The adverse performance impact the Application (if indeed viable) will import to this part of the network;
- (e) It being unclear on the wider benefits that such a service would provide; and
- (f) FRWW's services not being able to be accommodated alongside GWR and other operator's including freight.

In view of the above GWR is not content for the Application to be Approved.

Yours sincerely
Managing Director

From: @networkrail.co.uk

Sent: 8 August 2025 14:31

To: @gwr.com

Subject: Re: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Good afternoon

Please find below the response from FRW&W in relation to your response, previously attached:

“Thank you for your response to the above consultation.

The paths have been modified in conjunction with NR Strategic Planning, using the December 2025 Timetable as the base and there are paths available for the four trains concerned. NR have provided this information to the ORR.

We are very keen that neither the TfW plan for additional services between Cardiff and Bristol nor the plan for additional Oxford-Bristol services is affected by these small number of additional trains and, we will be working with NR, as the plan details become available, to ensure this does not happen.

The financial viability of this service and the level of abstraction will be judged by the ORR as part of its normal processes, and we are not going to comment further here. The issue of performance is also something that will be opined on by others, namely NR, and their initial assessment has already been provided to the ORR.

The question of access during the Old Oak Common work will be resolved by the usual Capacity Plan process for the disruptive possessions and line blocks.

Hitachi Rail Europe has informed us that there is space at North Pole for maintaining and stabling the one additional unit this service requires, and it is intended this unit (in common with the Carmarthen fleet) will be fitted with both ETCS and ATP.

There is no intention to use anything but class 80x units on these services and the use of older stock can be discounted.”

Many thanks,
Customer Manager



Wales and
Borders

From: @heathrow.com
Sent: 04 July 2025 14:34
To: @networkrail.co.uk
Subject: FW: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Good afternoon

Thank you for sending the attached TAC to us at Heathrow Express.

We have reviewed the document and have several queries and observations:

1. While we can analyse these paths, the May 25 WTT doesn't include the already proposed paths for services to and from Carmarthen & Paignton. How are we assured that these proposed paths don't clash with the other two service groups?
2. Note in Appendix 7c that it is planned to run all these services with 5 cars; yet, this new proposal and the Carmarthen service share approximately 123 miles of the same route. Would a more efficient use of the network be to run these as combined services and split or join en route?
3. The Thames Valley route is already poorly performing and operating near full capacity. Has any performance modelling, including platform utilisation at Paddington, been undertaken to demonstrate that these additional services will not have a detrimental impact on performance?
4. There is no indication of where these services will be maintained, serviced, or stabled, especially in the London area.
5. Looking at the platform graph, there is no platform available at 08:15.
6. 1B86 appears to be non-headway compliant with 1C19 Ladbroke Grove / Acton W.
7. 1L00 appears to be non-headway compliant with 1L90 from Slough to Airport Junction.
8. 1L84 appears to be non-compliant with headway requirements between 1A82 Airport Jn to PAD.

We would appreciate your help with our concerns and explanation of our observations.

Many thanks

Regards
Planning & Performance Manager
heathrowexpress.com



From: @networkrail.co.uk

Sent: 25 July 2025 13:36

To: @heathrow.com

Subject: Re: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Good afternoon

Hope you're well?

Apologies, we have only just received sight of FRW&W's response to these queries. The response is as follows:

"These proposed paths are additional to the Carmarthen and Paignton paths and do not conflict with them. These Hereford paths are just indicative and FRW&W is working with NR Strategic Planning to revise and refine them. They have determined that a platform is available at Paddington at 0815 and the conflicts that have been outlined here are able to be resolved.

The maintenance location is Hitachi North Pole and Hitachi has stated that sufficient capacity exists to maintain this extra 5 car set.

Splitting and joining 80x sets is a surprisingly long process and would import performance risk onto the GWML, even if it could be carried out at the required intermediate station. It really is to be avoided.

Performance modelling is a matter for NR, who are more aware of what the likely GWML train service is going to be in 2027/8"

Please do let me know if there is anything further.

Many thanks,
Customer Manager



From: @heathrow.com
Sent: 29 July 2025 15:00
To: @networkrail.co.uk
Subject: FW: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Hi

Thank you for your response.

HEOC remains concerned about the current proposal, as we believe the information provided by FRW&W is insufficient and does not offer the necessary assurance that HEOC's performance or capacity at Paddington will remain unaffected.

We request that the relevant information be made available as soon as possible, along with the performance modelling work carried out by Network Rail.

Thank you

Planning & Performance Manager
heathrowexpress.com



Customer Manager, Wales Route
Network Rail Infrastructure Limited

By email only: @networkrail.co.uk

9 June 2025

Dear

Transport for Wales Rail's response to Network Rail's consultation on First Rail Wales & Western's proposed 4th Supplemental Agreement

Thank you for consulting Transport for Wales Rail Ltd (TfW Rail) on this application. TfW Rail notes that the application offers potential benefits to passengers of additional direct trains between stations on the Marches line and London. However we have some reservations about the proposals that we wish to highlight.

Capacity and operational impacts

Compared to other recent Open Access applications we have seen, these proposals lack some detail. For example, 1B86 (Weekdays) arrives Hereford at 17:39 but there is no indication of what the train does until 19:25. Also, the weekend journeys will require ECS moves but these have not been provided.

There are no major conflicts with TfW Rail's existing services, although that does not mean they are entirely free of conflicts with TfW Rail's services. Examples are a potential conflict with 2G56 at Maindee West Jn, and a potential with one of our proposed Bristol services as sent to Network Rail (2Z06 0916 Bristol Temple Meads to Fishguard Harbour).

FRW&W's proposed 1L84 has, in our view, a risky path crossing to the Relief line at Maindee East Junction and back across at Severn Tunnel Junction, to allow an existing GWR service to overtake. This move is clearly not robust for performance.

Turning to TfW Rail's future plans, this application should be considered alongside our commitment to serve Bristol with trains from West Wales, which initially will be one train every 2 hours. This is an important step towards a more regular service between West Wales and Bristol and the expected opening of new stations on the South Wales Main Line that TfW Rail will serve.

We particularly wish to draw attention to the proposals (as recommended by the Burns report) to provide new stations on the South Wales Main Line to allow new services to connect communities between Cardiff and Bristol. The Burns services were supported under the recent Comprehensive Spending Review announcement and both it and the West Wales to Bristol services are joint Welsh Government-UK Government priorities. FRW&W's proposals potentially conflict with this stated policy ambition and could put public funds for these services at risk.

The paths proposed by FRW&W would conflict with our May 2026 Bristol plans if the trains ran in the same hours. Therefore, an increase of this service to 1 train per hour as part of

these stated ambitions would certainly be more challenging if these additional Hereford to London access rights were to be approved.

Revenue impact and effect on public subsidy

While the proposal appears to generate new revenues to the industry by offering additional journey opportunities for some passengers, most of this benefit naturally goes to FRW&W and it is inevitable that the services will abstract existing revenue from TfW Rail.

Our calculations using MOIRA and LENNON suggest that the overall revenue impact on TfW Rail will be in the region of £0.5m per annum. While not significant compared to FRW&W's expected overall abstraction of our revenues from its committed services between West Wales and London, it nevertheless represents a further shortfall that would need to be offset by Welsh Government through additional subsidy to continue to provide the same level of public services.

Yours sincerely

Head of Access Planning

From: @firstrail.com
Sent: 25 July 2025 14:45
To: @tfwrail.wales, @networkrail.co.uk
Subject: FW: FRW&W 04th SA - Proposed Application under Section 22a between Network Rail Infrastructure Ltd and First Rail Wales and Western Ltd, December 2027 - December 2037, 11/06/25-09/07/25

Thank you for your response to the consultation.

We agree that it is important that our proposed service does not prohibit the running of your new service to Bristol and we are working with NR Strategic Planning to ensure we do not do so. An early sight of your proposed paths would be helpful as NR are already having to make changes to our indicative paths because of other interventions and we want to ensure that we fit in with your plans.

At Hereford we anticipate having to shunt away from the platforms on arrival, stable nearby and then re-platform later.

The depot strategy is built around Hitachi Rail Europe's existing depots at North Pole and Stoke Gifford. SX we should only need to use North Pole and we have been assured that they have space for maintaining the extra 5 car 80x set needed for this service.

Regards,