Chief Executive Officer

BY EMAIL ONLY

Ian Biggar

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Office of Rail and Road

By email only to:
stationsanddepots@orr.gov.uk

17/09/2025

Dear Mr. Biggar,

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

Thank you for your letter dated 15 August 2025 inviting a reply from Trenitalia France ("**TF**") following the publication on the Office of Rail and Road's (ORR) website of the further information, clarification and representations regarding the use of capacity at Temple Mills International depot ("**TMI**") submitted by the applicants, by Eurostar International Limited (Eurostar) and by interested persons/parties.

TF is pleased to provide the following comments, which pick up on and respond to a number of themes raised in Eurostar's representations (as well as others, where indicated):

1. The high speed connection project between London and Paris, developed by TF and detailed in its application dated 28/03/2025 (together with the further information, clarification and representations from TF dated 17/07/2025), with potential intermediate stops in the UK and France in a second phase, as well as possible new destinations across Europe, appears to stand out among the other applicants' proposals when assessed against the criteria outlined in the annex to your letter dated 12 June 2025.

   Among all the applicants, TF is the only one that already:
   - operates high speed trains;
   - manages cross-border services;
   - performs complex maintenance activities (albeit, to be clear, TF recognises the scope of the directions the ORR is permitted to issue under section 17 of the Railways Act 1993);
   - has a consolidated and successful presence in both the UK and France;
   - is part of a Group entirely owned by a European State;
   - is backed by a well-established, large-scale operational structure, solid financial capacity, and decades of experience in the railway sector across multiple European countries;
   - has a concrete opportunity to connect London with new destinations across Europe by leveraging its existing services in France and Italy, as well as the FS Group's presence in the UK and in other countries such as Germany and the Netherlands;
   - intends to use the available capacity at TMI as part of the FS Group's broader railway vision, the "European high speed metro".

   In this respect, we note the introductory comments relating to its track record, serving multiple countries and infrastructure systems, as set out by Eurostar in its letter of representations. TF also has a proven track record, delivering international services across multiple infrastructure systems and the services proposed in its application will promote the use of the railway network in Great Britain for the carriage of passengers, promote efficiency and economy on the part of persons providing railway services and promote competition in the provision of railway services. Competition in the rail services market has been shown to drive real benefits for users of services for the carriage of passengers by railway in respect of the prices charged for travel and the quality of the service provided, as well as grow the overall market.

Approval of TF's application will deliver these benefits, backed by a proven track record of delivering new international railway services within Europe. It could be argued that the other applicants rely on very recent track records and private financing which, given the current unstable geopolitical and macroeconomic context, may jeopardize the implementation of their projects.

2. The application submitted by TF, supported by the FS Group's extensive expertise in railway operations, infrastructure management and maintenance, positions the company to offer best-in-class solutions in terms of reliability, robustness, maturity, operational readiness, financial sustainability, capacity optimization at TMI, minimization of financial impact on existing operators, and the ability to deliver tangible benefits to both British and European customers in the shortest possible timeframe.

3. TF is also the only applicant holding both a train operating licence and a valid safety certificate to operate passenger services in France, making it uniquely positioned to simplify and accelerate project implementation in several key areas compared to the other applicants (and therefore bringing the benefits of on-rail competition to the customer more quickly, with the prospect of further international destination and connectivity choices in future):

   a) Extending the scope of the existing safety certificate to include the Channel Tunnel and obtaining the necessary approvals to operate in the UK, by leveraging FS Group's and Trenitalia UK's established presence, market experience, and in-depth knowledge of authorisation processes and regulatory requirements.

   b) Facilitating a smoother and faster rolling stock homologation process. The high-speed fleet for which TF has requested capacity at TMI shares the same design, particularly in terms of signalling and other core systems, as the *Frecciarossa 1000* already operating in France. As such, the *Frecciarossa 1000* is well positioned to be the first train homologated for the Paris-London route among those proposed by the other applicants.

   c) Effectively addressing potential challenges in cross-border rail operations, as TF is the only applicant with direct experience in managing such services, most notably the Paris-Milan route.

TF's plan presents lower risks related to authorisation issues and delays, as well as to the potential underestimation of the complexity of approval processes and safety certification. This is due to TF already being a high speed operator and part of a large group with extensive experience in entering and operating railway markets across several European countries (including the UK, France, Spain, Germany, the Netherlands, and Greece), as well as in managing railway infrastructure in Italy.

4. TF’s application is fully compliant with Section 17 of the Railways Act 1993 for access to TMI. TF has recognized at all times that the scope of Section 17 relates to permission to use TMI for the purpose of obtaining light maintenance services from Eurostar (or another, if Eurostar secures the provision of those services from such other). The FS Group already has an established organization for heavy maintenance in Italy and has also applied for use of a maintenance facility in Paris. TF’s proposals, and its Section 17 application, have been developed with these constraints in mind.

5. TF reiterates its support for and confidence in the findings of the independent report commissioned by the ORR from Ipex, which confirms there is available capacity at Temple Mills depot, capacity that TF considers sufficient for the initial phase of its business plan.

6. While TF acknowledges Eurostar’s experience at TMI, it would like to emphasize that TF, along with other railway companies within the FS Group, also possesses significant expertise in efficiently managing railway maintenance facilities, including the heavy maintenance depot in Milan.

7. Eurostar’s concerns about potential difficulties in co-managing depots with different operators and rolling stock do not align with the views and experience of TF and the FS Group. In fact, this practice is quite common across Europe. Over the years, TF and the FS Group have successfully carried out maintenance activities in facilities shared with other operators, ensuring full compliance with safety procedures while servicing various types of rolling stock. In France, TF has extensive experience in managing shared maintenance depots within an SNCF-V system, in coordination with SNCF’s work on its TGVs. TF notes that the SNCF group is also the majority shareholder in Eurostar. In addition, as Eurostar itself notes, it has existing

experience of introducing a new fleet of trains into TMI, which can be usefully deployed to assist TF (if successful). Similarly, in Spain, the FS Group operates within a maintenance facility managed by Renfe, alongside Renfe's own activities on other fleets. The FS Group and its subsidiaries also benefit from teams with many years of experience in railway maintenance across various European contexts. This represents a strategic asset, demonstrating both the ability to become operational quickly, the flexibility to adapt to specific requirements, the ability to work collaboratively with other operators and users of a maintenance facility (even where they are competitors) and a solid understanding of railway regulations.

8. Regarding Eurostar's plan, TF's letter dated 17/07/2025 demonstrates that a competitive landscape with multiple operators is a key driver for significant growth in the high-speed rail market. In this regard, TF greatly appreciates the submission from the Department for Transport, reflecting the UK Government's commitment to fostering competition in the international rail passenger service market. This approach has proven to be the most effective way to deliver tangible benefits to passengers and fully leverage existing infrastructure by encouraging a modal shift towards rail services.

9. TF also welcomes the letter from Kent County Council. While TF plans to operate direct services between London and Paris during the initial phase of its project, evaluations are already underway for potential intermediate stops, such as Ashford in the UK, in a subsequent phase, aimed at expanding the catchment area and enhancing connectivity for local communities. TF sincerely thanks Kent County Council for sharing the reports that clearly highlight the importance of railway connections in supporting economic activities and promoting tourism in Kent. TF is committed to carefully reviewing these documents, which provide valuable data and insights that will undoubtedly be essential in developing a dedicated business plan focused on the strengths and challenges of planning intermediate stops in the region. Additionally, TF is actively exploring options that combine direct London-Paris services with selected stops at Ashford.

10. As described in its application dated 17/07/2025, TF plans in a second phase of the project also to extend the services to other destinations in France and Italy, such as Lille and other cities already served by TF (e.g. Lyon, Marseilles

and Milan). In this regard, TF has already initiated discussions with the relevant infrastructure managers.

11. Concerning the “European High Speed Metro” project mentioned in point 1 above, TF’s use of TMI represents a crucial step in advancing the FS Group’s ambition to connect major European capitals and cities. In this context, the FS Group has signed an agreement with DB and ÖBB to launch direct high speed services between Italy, Austria, and Germany in 2026. It has also been actively engaging for several years with various European infrastructure managers to develop preliminary studies and business cases for high speed connections between the UK, Belgium, and the Netherlands, as well as between the Netherlands and Germany.
12. Based on the elements provided in TF’s application dated 17/07/2025 and the points outlined above, TF’s use of TMI would address the recommendations set out by the Department for Transport in its letter of the same date. The comprehensive plan for potential railway connections envisaged by TF and by the FS Group, together with their proven experience and strong commitment to safety and sustainability in the rail sector, could deliver a more substantial contribution than other applicants, particularly in terms of protecting the interests of rail users, promoting the use of the railway network in Great Britain, and fostering competition. British and, more broadly, European passengers, stand to benefit from a truly European railway approach, something TF and the FS Group are uniquely positioned to deliver.
13. For TF, as well as for other potential new entrants, it is absolutely essential to receive a final ORR decision on capacity allocation at TMI within the expected timeline. This is necessary to allow sufficient time to ensure the new trains can be built, delivered, and are ready to start operations before 2029. Based on its ongoing discussions with the rolling stock manufacturer, as documented in Annex 8 of the materials submitted to the ORR on 17 July 2025, and the financial capacity demonstrated in its application, TF is ready to formalize the order for the specified trains, after being allocated the requested capacity at TMI. Any delays would negatively impact the opening of competition, market growth, and the benefits for customers, which are considered the core drivers of the entire process.

Separately, TF has provided the information requested by the ORR in its request for data dated 15 August 2025. Thank you for confirming that such information is for the assessment purposes of ORR only and will not be shared externally. With the exception thereof, TF confirms it is comfortable with the entirety of this letter being published in an unredacted form.

TF remains fully available to provide any further details you may require.

Thank you for your cooperation.

Best regards.

[redacted]