

The Office of Rail and Road

By email: stationsanddepots@orr.gov.uk

18 September 2025

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

Dear Mr Biggar

Introduction

Thank you for the opportunity to provide comments on the submission filed by the current operator of the depot. To facilitate the reading of this letter, we have retained its original structure.

Please note that the present comments refer only to Eurostar's submission and exclude any others from other potential operators of the Temple Mills International Depot (TMI).

With respect to the letter issued by the Department for Transport, we have no further comments to add.

Regarding the letter from Kent County Council and the accompanying report, Evolyn is currently assessing the technical, economic, and operational feasibility of utilising one of the stations mentioned therein, Ashford. Therefore, there is no firm commitment at this stage, pending the completion of the full analysis and a more detailed understanding of the surrounding conditions. Nonetheless, we believe there are sufficient grounds to take into consideration the arguments presented in the report.

1) Availability of capacity

Firstly, the main argument we want to share is that Eurostar is evaluating the capacity of the depot based on the assumption of Eurostar future growth, while the report prepared by IPEX seeks to assess the current situation, without considering the possibility of future expansion by the incumbent operator.

We believe that Eurostar's future growth plans should not be considered in the ORR's decision, as they are based on forecasts which, like those of any other operator, depend on economic and technical issues that are not yet finalised.

The current objective is to secure a minimum level of maintenance capacity that would allow the entry of a second operator under reasonable conditions, without adversely affecting the incumbent's existing maintenance plans or compromising the quality of service offered to passengers. It is worth noting that each operator has its own growth plans (Evolyn included), and under assumptions of long-term expansion, TMI may prove insufficient for any operator in a longer-term future scenario.

Furthermore, in point 22, Eurostar states that it has *"clear and well communicated plans to grow the number of passengers across its network to 30 million by the 2030s."* It is important to clarify that these figures form part of an internal growth strategy and, in fact, pertain to the wider Eurostar Group following its merger with Thalys in 2022. This passenger forecast does not solely refer to direct routes between the UK and continental Europe but also includes international routes that do not connect directly with the UK. Additionally, in point 23, Eurostar notes that *"In 2024, Eurostar transported over 19.5 million passengers"*; however, as referenced in the footnote 18 and its link of Eurostar's submission, this figure includes the routes London–Paris (+280,000 passengers), London–Brussels (+250,000 passengers), Paris–Brussels (+160,000 passengers), and Paris–Netherlands (+140,000 passengers), and is therefore not limited to UK-exclusive services, as is also stated in point 132 b of Eurostar's submission, *"Eurostar transported in 2024 on cross channel routes (11.7m)"*. Our analysis of the data provided by Eurostar is consistent with data from the Eurotunnel Network Statement–OPEN ACCESS Statistical Declaration 2025, which shows that in 2019 the total number of passengers travelling through the tunnel was 11.05 million, and in 2023, 10.72 million—figures that refer exclusively to passengers with origin or destination in the UK, and not to the Eurostar Group as a whole. Consequently, when referencing fleet and service increase, such as those outlined in Phase 1, it would be appropriate to consider data that directly impacts cross-Channel passengers, given that TMI remains the only international depot currently operating within the UK and therefore has the potential to directly enhance service provision for UK users. It is also worth noting that Eurostar has reduced its route network since 2020, with the abolition of direct services to Marne-la-Vallée, Lyon and the South of France, and the French Alps, the closure of intermediate stations in the UK and France, thereby giving passengers less choice than before.

Eurostar appears to be sceptical about the data presented in the IPEX report, and does so by drawing on its years of experience in maintaining and operating at TMI. For instance, in point 33 it states: *"the available capacity is not contiguously available on a single road but instead is, by necessity, distributed across all roads,"* and *"this is hardly avoidable as not all roads have the same technical capabilities."* While this approach is valid, it may be somewhat unrealistic, as Eurostar has been, to date, the sole operator utilising the TMI facilities. As such, it has organised and distributed capacity according to its own convenience within a monopolistic environment, which may result in inefficiencies when compared to depots across Europe shared by multiple operators who optimise capacity collectively rather than individually due to limited spaces.

In point 34, Eurostar also asserts that the potential available capacity would be absorbed by fleet expansion in the coming years, thereby implicitly admitting that surplus capacity of 1.6 roads, equivalent to 20% of the main shed, currently exists, specifically when Eurostar states that *“any capacity available now will be used”*. It would therefore seem illogical, from an open access perspective, for the incumbent operator to unilaterally manage the international depot’s capacity—particularly as it remains the only viable and available facility of its kind in the UK.

Finally, while it is evident that an increase in services requires additional capacity both during the day and at night, it must again be noted that the current operator makes no reference to its extensive maintenance capabilities for its existing and future fleet at facilities located outside the UK, such as Le Landy and Le Forest. Accordingly, this additional capacity requirement should not fall solely upon TMI.

2) Performance

As explained under section 1, when it is estimated that the entry of a new operator should not affect the service delivery capacity of the current operator (Eurostar), we are referring to current operations and conditions, without taking into account Eurostar future growth ambitions. Therefore, in the viability analysis, future-based assumptions such as theoretical growth or potential fleet expansions by Eurostar should be rejected, in order to promote an open access market and fair competitiveness at the only international depot located on British territory.

Although the marked contrast concept between increased mileage of an existing fleet and the introduction of new trains is valid in point 76, it is important to note that the basis of this comparison may be misinterpreted. Such technical modifications need not impact current operations, provided there is effective management and coordination among the relevant parties. Moreover, Eurostar itself is considering the acquisition of new rolling stock, and until such a purchase is confirmed, it should not be assumed that the new trains of a potential operator will differ from those currently in use. While this may indeed result in the contrast mentioned, it would not necessarily affect operational flexibility to the extent implied.

As Eurostar rightly points out in point 79, the arrival of a new fleet will require modifications to the depot. However, these should primarily be carried out on the 1.6 roads identified by IPEX as surplus capacity, and therefore, in theory, should not significantly impact the routine maintenance operations of the incumbent operator (assuming they continue to operate with their current fleet offering the current services).

As a general observation, Eurostar assesses the depot’s capacity based on a theoretical scenario of fleet and service expansion. We believe that the decision to allocate potentially surplus roads to a new operator should be made based on the scenario in place at the time of selection, without considering possible future developments of the incumbent operator.

3) Operational Readiness and Viability

The fact that Eurostar is investing or intends to invest in adaptations to both TMI and its potential new fleet only serves to reinforce the significant advantage it holds over new entrants. Access opportunities to the depot should not consider these arguments as valid, as they are discriminatory. Clearly, and by way of example, any operator that is potentially allocated the surplus capacity of the depot would also need to undertake improvements and investments to maintain its fleet. Therefore, the investments Eurostar refers to, as the sole current operator, should not prevent or limit in any way the entry of a new operator, as they do not preclude the investments that any new entrant may carry out once surplus capacity at TMI is allocated and a new fleet is acquired.

Everything Eurostar sets out in Section 3 of Operational Readiness and Viability has been drafted from a current and future monopolistic position, which runs counter to the principle of open access. In this section, they refer to advanced negotiations for the future purchase of 50 trains, along with various studies and assessments related to TMI facilities that are comparable to the current process undertaken by any other operator requesting access to TMI.

Furthermore, Eurostar explicitly acknowledges in point 115 that it can use other depots on the continent for light maintenance, which would reduce the capacity it requires on the shed roads at TMI. They also propose using TMI for heavy maintenance of the new fleet, involving transformation and expansion that affect other areas and roads of the depot for that purpose. We therefore reaffirm that these arguments, if taken into account, would result in restrictions on fair competition, limiting and preventing the entry of new operators due to Eurostar's actions and intentions within a monopolistic framework.

Eurostar has previously used maintenance facilities outside the UK, including Le Landy and Forest. Ignoring these external capacities could distort the assessment of the actual capacity available at Temple Mills for new operators, thus compromising the principle of open access. Eurostar is considering carrying out some heavy maintenance at Temple Mills, but this is not permitted at present (in a letter to the ORR on 4 September, Evolyn stated that this is not possible). We therefore request that the regulator base its decision solely on Temple Mills' current capacity and operational viability, without considering future plans.

4) Financial Viability

Evolyn's only statement on this matter is that, due to the lack of publicly available information, we are unaware of further details concerning the investors and the investment that each investor will be required to contribute to subsequent phases of the company development.

5) Economic and societal benefits

The passenger and macroeconomic benefits described by Eurostar at this point are essentially the same as those that could be presented by any other high-speed operator with a similarly long-standing presence on the line. These include the general advantages of rail transport over other

modes, as well as those inherent to an operator with established operational experience. The same applies to the environmental improvements cited.

The key difference lies in the fact that the entry of a new operator, and therefore the introduction of actual competition on the line, would likely result in more competitive pricing, increased value for passengers and increased service frequency from London to other destinations across the continent. In countries where high-speed rail competition is well established, it has been shown that demand increases exponentially while prices decrease significantly, which is one of the most tangible benefits for passengers.

Furthermore, the economic benefits in the London area would likely be greater with the arrival of a new operator, as this would entail the creation of a new company and, consequently, increased staffing requirements. This would lead to greater job creation in the region, in contrast to an existing company that would simply expand its current workforce, resulting in fewer new hires due to reliance on existing personnel for certain activities.

In relation to points 159 and 161, Eurostar once again challenges the plans of any potential new entrant from a monopolistic standpoint, asserting its own capabilities, which are comparable to those of any experienced international high-speed operator, and seeking to limit the prospects of new entrants by casting doubt on the data presented in the IPEX report, as well as the maintenance assessments and technical information regarding new rolling stock. This approach is essentially discriminatory.

6) Views of stakeholders

At Evolyn, we maintain, as stated in previous letters, that the report submitted by IPEX is appropriate, particularly in its identification of 1.6 roads or 20% of the shed as surplus capacity at TMI. With more efficient utilisation and crucial investment, this capacity could be further expanded. As expected, the assessment focuses solely on the current operational status of the incumbent operator, without accounting for its future growth ambitions, nor does consider the possibility of maintaining its existing or future fleet at other continental depots to which Eurostar currently has access, such as Le Landy and Forest.

Clearly, the introduction of competition compels the incumbent operator to substantially revise its *modus operandi*. This has occurred in numerous instances and will continue to do so in any market facing such a challenge. Nevertheless, and as has been reiterated on several occasions, the benefits for passengers, in terms of service frequency, pricing, and overall service quality, have consistently proven to be positive.

7) Any other information, clarification and/or representations

If Eurostar intends to compete for this growth alongside other operators, certain arguments presented in the submission appear to suggest the contrary, particularly in relation to access and use of TMI, which would not allow a transition from the current monopolistic market to a multi-operator one.

If the goal is to facilitate competition and open access, thereby enhancing macroeconomic benefits and improving passenger services, it would be more appropriate not to restrict short-term access to TMI for new entrants, as requested by Evolyn. Instead, for example, after the entry of a second operator, a collaborative approach among all stakeholders could be pursued to develop a long-term, system-wide solution as indicated.

Key Points for ORR Consideration:

- Fleet Availability: Eurostar has stated it will have additional rolling stock available for its Phase 2 expansion during the 2030s. This timeline aligns precisely with Evolyn's own fleet deployment plans, reinforcing the argument for equitable access.
- Use of Temple Mills International Depot: While Eurostar outlines its future growth intentions, we believe the ORR should focus on the incumbent operator's current operational status. The IPEX report very clearly confirms surplus capacity at TMI, indicating that 1.6 maintenance roads can be made available. We believe this is sufficient to accommodate maintenance for both Eurostar's existing fleet and Evolyn's planned fleet of 12 trains. It is also worth noting that Eurostar retains additional options for diversifying and carrying out maintenance activities, as outlined in its submission, specifically through facilities such as Le Landy and Forest.
- Competition: Eurostar has expressed its desire to see growth in the international passenger rail market and to compete for that growth with other operators. As the sole operator currently active, it is reasonable to expect that its operational practices will evolve in response to new market dynamics. This is a natural consequence of liberalisation in any sector and should ultimately serve to improve service quality and deliver greater benefits to passengers and the region.
- Expansion plans: Evolyn is considering expansion plans for the different phases of the project that bear significant similarities to those presented by Eurostar. In this regard, and as with the incumbent, the start dates will depend on the delivery of the fleet to be used and its technical characteristics. In this regard, Evolyn's train fleet is highly compatible with the continental infrastructure and, due to the high number of seats that will be offered per 200-metre train, it offers excellent financial viability that will enable a sustainable business for all participants (IM's and operator) and very high quality for passengers at competitive prices.

Please, do not hesitate to contact me for any further information or clarification.