

FRS Rochdale - Industry Consultation Responses

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All Consultees
(by email only)

Andy Wylie
Head of Regulation & OA Contracts
First Rail

c.c. David Reed, ORR

6th January 2026

Dear Consultees,

First Rail Stirling Limited – Section 17 Application (Rochdale Services)

As many of you raised the same points in your comments, these are being dealt with in a composite response, except for the NR representations to the ORR, which have been dealt with separately.

Many thanks to those that have supported our application. We quite understand and expect the former franchised operators not to be supporting the application, on Competition Act grounds if nothing else. For the avoidance of doubt, we have not colluded with any other TOC/FOC in formulating these proposals.

Many of you mentioned abstraction. We are quite content for the ORR to apply its usual tests as part of the evaluation process. We would like to point out that if any of you are using MOIRA in coming to any abstractive conclusion, the algorithms within it will usually produce abstraction figures of between 74% and 91%, depending on the application. Reality is somewhat different.

FirstGroup has a long-standing aversion to “firebreaks” because we feel they are like applying a sticking plaster over a major wound. They are no substitution for a properly constructed timetable with robust published rules, adequate resourcing, and the appropriate contingency plans for times of perturbation (including “cut and run” policies).

We do recognise that space at Euston station is at a premium, but we are confident that appropriate space is available for these trains, providing existing operators do not seek to “pad out” platform occupancy. As these units will be battery/electric bi-modes, we anticipate that the use of battery power will be used in areas of poor power supply, thus easing the planned standing load for Network Rail.

In the Open Access world, we cannot accept poor or mediocre performance. It has a direct effect on our bottom line. The conflicts in paths that exist reflect the differing versions of the databases that we were using to look at these services but we aim to be compliant with the Rules (especially the restrictions listed in 5.2.2), but it must be

recognised that databases change rapidly over time and even the May 2026 timetable structure is likely to alter again before the commencement date for our services.

The points about the various taskforces and industry groups are recognised but these groups operate in a vacuum of their own and their behaviour can be exclusionary, as they seek only to accommodate their services (both current and future) and not leave space for others.

Clear choices will have to be made over the use of paths by different operators if capacity is at a premium. However, the existence of any plan that is to take place sometime in the future is not a basis for “reserving” capacity. We contend that reserving capacity without any application for rights is neither legal nor any basis for rejecting the aspirations of others.

We are anticipating that our train provider will be procuring maintenance on our behalf so details of exactly where they will be stabled will be up to them, all to become clearer as the contractual discussions take place. We will just drive them to the relevant depot/sidings. We are very familiar with Hitachi units and anticipate them being a very reliable unit with plenty of operational redundancy.

In response to the arrangements for passengers in times of engineering work south of Milton Keynes, we anticipate providing replacement coach services to take passengers as far south as is practicable. We recognise the limits on using Bedford as a road/rail interchange point.

The awarding of rights does not prevent those rights being terminated if a “better use” can be found for the section of railway concerned. This process is clearly set out in part J of the Network Code. So, the ORR awarding rights to First Rail Stirling does not prevent any strategic rail plan being implemented in the future.

Yours Sincerely

(signed)

Andy Wylie

From: Transport Focus
Sent: 14 November 2025 15:04
To: Network Rail
Subject: Re: Industry Consultation – First Rail Stirling, Section 17 Application, London Euston-Rochdale
Attachments: Outlook-1ap3vjjc

Dear Gian

Thanks for this proposed Track Access Contract amendment to allow for new open access services between London and Manchester Victoria and Rochdale.

We would support the additional journey options provided by these proposals, particularly the direct link between towns north of Manchester and London. The evidence also shows that competition provided through open access operators can be good for passengers. However, care is needed to ensure it does not have negative impact on other passengers, for example taking up additional capacity compromising service resilience.

Best regards

Martin

Martin Clarke
Rail technical advisor

Transport Focus
The independent transport user watchdog
Follow us on X, formerly known as Twitter [@transportfocus](#) – our chief executive tweets [@AlexRobertsonTF](#). You can also call our contact centre on 0300 123 2350 (open 8am - 8pm Monday - Friday and 8am - 4pm at weekends) or via www.transportfocus.org.uk/contact.

From: London TravelWatch
Sent: 18 November 2025 13:21
To: Gianmaria Cutrupi; Andy Wylie
Subject: RE: Industry Consultation – First Rail Stirling, Section 17 Application, London Euston-Rochdale

Dear Gian, Andy

Thank you for the e-mail for this consultation, which London TravelWatch has now reviewed.

London TravelWatch is very concerned about the capacity of Euston station and the lines to/from the station to manage these additional services. We would anticipate increased congestion on the routes that run into Euston, whether from freight train providers wanting more line access or the access to Euston which will be given to GWR during the blockades at Paddington.

While London TravelWatch generally supports increased services for passengers, this cannot be at the expense of reliability and safety. Despite some welcome improvements in Euston station, we remain unconvinced that appropriate consideration will be given to the capacity of the station itself, as it appears that consultations are based around line access. Therefore, we would like to better understand how it is envisaged that Euston can accommodate these additional services alongside the provision already in place.

We look forward to hearing from you.

Kind regards

Trevor

Trevor Rosenberg
Policy and Advocacy Officer

London TravelWatch, Europoint, 5-11 Lavington Street, London, SE1 ONZ

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**LONDON
TRAVELWATCH**





Gianmaria Cutrupi
Network Rail
By email only

27 November 2025

Dear Gianmaria,

Re: First Rail Stirling, Section 17 Application, London Euston - Rochdale

Thank you for providing West Midlands Trains (hereafter “WMT”) with the opportunity to comment on the Section 17 application submitted by First Rail Stirling (hereafter “FRS”) to introduce and operate services between Rochdale and London Euston.

WMT is the custodian of local, regional, and inter-regional train services between the West Midlands, West Coast and London, with a responsibility for 58.1 million passenger journeys a year and does so in close collaboration with parties including Avanti West Coast, CrossCountry, Chiltern Railways, Great Western Railway, Transport for Wales, Transport for West Midlands, Network Rail, and Freight Operators.

WMT is unable to support the proposal from FRS in its current form. Following our original rejection of this request in 2024, there are still some outstanding queries that have not been resolved, as well as further concerns in line with the timetable and capacity, operational performance, fleet, commercial risk, and revenue.

Timetable and Capacity

WMT appreciate the additional information that has been sent in this proposal however, there are still some questions around the power supply requirement and whether it can be met throughout the network. One area of concern is Bushey, how have FRS satisfied themselves that there is sufficient power supply, and if not, how have they planned their operation without drawing power in this area?

In section 4.3 of the ‘Form P’, of FRS’s application, it is stated that ‘all paths are compliant and are not forced’ however, in section 4.2 it is stated that ‘Lumo will work with Network Rail (hereafter NR) to fully validate these paths, adjusting them as required’. These two phrases seem to contradict each other so as a result, WMT would need further assurance that the proposed train services could be implemented without any negative effect on WMTs train service.

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St Andrews House
20 St Andrew Street
London
EC4A 3AG

Registered number: 9860466
VAT number: 278 2688 49





WMT would also need clarification on how the proposed paths 'are compliant' if there is yet to be final confirmation from NR. It has been noted that some services have more than 20 minutes of pathing time which does not suggest optimal running and contradicts guidance in the Network Code that 'capacity on the network is shared in the most efficient and economical manner in the overall interest of current and prospective users and providers of railway services'.

WMT have analysed the train prints (F3s) received with the original request and have noted some considerable performance risks and Timetable Rule non-compliances within the proposed schedules. Firstly, there does not seem to be much consideration for station dwell times or platform workings at major stations such as Manchester Victoria or London Euston. In failing to fully validate these platform workings, FRS are not satisfactorily demonstrating there is sufficient capacity to accommodate their services. Furthermore, there are examples where FRS are planning dwells of up to 11 minutes at Manchester Victoria, which imparts considerable additional constraint on what is already a congested hub for through-services across the North of England. When compared against the May '26 base timetable, there are routine conflicts detectable between these services and Northern services between Clitheroe-Manchester Victoria, Blackburn-Headbolt Lane, Chester-Leeds and Manchester Victoria-Wigan North-Western; and TPE services between Liverpool-Hull and Newcastle-Liverpool.

WMT raised an initial concern at London Euston for the length of layovers. Upon reviewing this application, there are still outstanding concerns on how FRS have identified sufficient platforming capacity. One specific performance risk of note is in two weekday hours, FRS are proposing to occupy xx:36 paths north out of London Euston on the Fast Lines. It has regularly been communicated to us in recent years, by Network Rail, that this slot is seen as firebreak that effectively allows for some degree of performance recovery on the WCML South, noting that there are existing departures onto the Fast Lines at xx:30, xx:33, xx:40, xx:43 and xx:46 in most hours. Occupying those xx:36 paths would, therefore, undoubtedly have a detrimental impact on the right-time performance of other operators.

WMT would also like to understand what prior knowledge has been shared with other operators. Within WMT's analysis of the F3s, we have found repeatable conflicts between the proposed paths and Avanti London Euston-Liverpool Lime St/Chester services. WMT also raised in the original rejection the consideration of competing aspirations with Grand Union Trains and the December 2022 'Concept Train Plan' and how capacity did not exist for further open access operations, with only Grand Union Trains plans being accepted. Has any further consideration been taken on this remark?

In section 6.1 of the 'Form P' of the application, it states 'the major overlaps are with Avanti West Coast and Northern, who operate on parts of the route', which overlooks that the planned route significantly overlaps with our network as well. This is particularly evident in their proposed 1058 service from Rochdale (SX), which effectively operates in the same path between Weaver Junction and Hartford as our existing 11:33 service from Liverpool Lime Street to Birmingham; and in the same path as our existing 12:13 Crewe to London



Euston service, between Crewe and Colwich Junction. There are also conflicts found throughout the Trent Valley Route.

WMT still believe that granting rights beyond HS2 would be inappropriate at this time, and since this application is for 10 years this would fall into this bracket.

Operational Performance:

Lumo has provided only limited information on performance in the proposal, and a lack of evidence-based material in the application leaves several open questions. This is unacceptable to WMT, as we have been seeking to incrementally improve performance through targeted timetable and operational initiatives.

As stated by FRS in the 'Form P', 'no detailed performance analysis has yet to be carried out', WMT would need more detailed analysis and performance information to satisfy the concern of timetable performance throughout.

Following the performance risks highlighted in the Timetable and Capacity section above, WMT would need to see further timetable modelling to satisfy that adding trains will not negatively impact performance and that existing performance will be sustained throughout.

WMT also raised concerns in the original rejection in line with lack of detail and information that could be used to assess operational performance. This information is still widely outstanding and includes the following:

- Where will the traincrew be based, and how will this interact with service recovery?
- How long would the layover period be at London Euston?
- What are the passenger handling and service recovery arrangements should perturbation occur south of their first stop northbound at Warrington Bank Quay?

Fleet:

WMT are concerned about the fleet information provided in the proposal. Lumo states the intention to deploy new build battery electric trains. It is our understanding that this technology is still under development and therefore is untested. Is Lumo confident that the new build trains can be proven in concept, ordered, approved, delivered and staff trained in readiness for a 2028 start date? This could have a further impact on the contract duration as section 3.3 states '10 years on the basis of procuring new trains'.

A stage gate approach should be taken that demonstrates to the industry that the start date is realistic and deliverable. Otherwise, this application has the effect of suspending industry growth for the passenger - and taxpayer - when other operators may be able to deliver service enhancements sooner than Lumo. Given power supply constraints on the



southern end of the WCML at Bushey, has Lumo considered the feasibility of its timetable should autonomous power at the southern end of WCML be imposed upon its operations?

Would there be an implication for speed, noting that the Class 805 fleet has a maximum speed of 110mph when running on battery power? Does this speed restriction apply to the fleet that Lumo are procuring, and what is the impact on the delivery of the timetable?

Section 7.1 on Train Operator Performance states that ‘the new build trains are expected to provide reliable train performance, as seen with our 803 fleet on the ECML’. Whilst accepting the units themselves may provide a relatable level of reliability, overall operator performance on the ECML is arguably not an indicator of – nor should it be conflated with – likely performance on the WCML, which provides unique challenges in terms of infrastructure and timetable interactions, by comparison.

Commercial Risk:

WMT are keen to reduce the net subsidy requirement of operating the railway. We are concerned that by granting access to additional Open Access operations, the abstraction caused by those operators will increase and it will make reducing net subsidy significantly more challenging.

By only calling in one direction there is no generation of a Milton Keynes to Rochdale/Manchester Victoria /Warrington Bank Quay/Newton Le Willows market, and it only serves to abstract revenue from both ourselves and Avanti between Euston and Milton Keynes. Do FSR have plans to subsequently bid for additional calls south of Warrington?

WMT and Transport for Wales/Northern Trains operate joint ticketing between London Euston and Manchester via a change at Crewe, and therefore this flow should be considered as part of revenue abstraction.

Conclusion

WMT would need to see more evidence that the introduction of these services would not impact the performance, revenue, and robustness of the pre-existing timetable, as well as future integration projects such as HS2.

Yours sincerely

Charlie Green
Track Access Contract Manager

Locomotive Services (TOC) Limited
Crewe Diesel Depot
Nantwich
Crewe
CW2 6GT

Andrew Wylie
First Rail

Gianmaria Cutrupi
Network Rail

28th November 2025

First Rail Stirling Limited (FRS) (Rochdale Services)

1. Locomotive Services (TOC) Limited's (LSL) registered office is 6th floor Capital Tower, 91 Waterloo Road, London SE1 8R. LSL is part of the Royal Scot and Locomotive General Trust, a registered charity, which is dedicated to the preservation and operation of steam locomotives on the mainline railways of Britain for the enjoyment and education of the general public. Following certification as a mainline passenger charter operator in 2017, LSL became only the third Train Operating Company in the United Kingdom to operate steam locomotives on the mainline.
2. In the calendar year to 31 December 2025 LSL will have operated 166 charters covering approximately 63000 miles involving a variety of traction.
3. LSL supports the application by FRS to provide a direct rail connection from Rochdale to London thereby giving 1.6 million people access to a convenient rail service for the first time since 2000. The service will replicate the economic impact that Hull Trains has had on Humberside. The proposed service will drive both growth and jobs particularly the growth of Atom Valley in the Rochdale area. The new route will serve Eccles and support further growth in an area already home to Media City UK via the nearby interchange with Metrolink.
4. FRS has identified sufficient space on the network to restore the proposed direct rail links to London. Four return Rochdale services on weekdays and Saturdays are proposed with three return Rochdale services on Sunday. Network Rail should work with FRS to confirm the availability of the routes identified by FRS.
5. FRS (as is the case with LSL) does not have identified slots in the working timetable. LSL submits that ORR has a statutory obligation to consider the FRS application on the basis of fairness with regard to the commercial aspirations of FRS so that they may plan their future with a reasonable degree of assurance.
6. ORR has an obligation to consider the FRS application on the basis that all Train Operators, and proposed Train Operators, are entitled to the statutory right for their commercial needs to be fairly and properly assessed although FRS does not have established paths in the working

timetable. ORR will be in significant error if, when considering the FRS application, undue weight is given to those Train Operators who have established paths in the working timetable.

7. In coming to a decision regarding the FRS application, ORR must have regard to the following statutory provisions and Guidance:
 - a. Section 4 of the Railways Act 1993 sets out the general duties of the Secretary of State and ORR, and includes:
 - i. To protect the interests of users of railway services;
 - ii. To promote efficiency and economy of railway services;
 - iii. To enable persons providing railway services to plan the future of their business with a reasonable degree of assurance;
 - iv. To contribute to the development of an integrated system of transport of passengers and goods.
 - b. The Network Code provides that the Access Parties shall, in exercising their respective rights and complying with their respective obligations under the Code (including when conducting any discussions or negotiations arising out of the application of this Code or exercising any discretion under it), at all times act in good faith.
 - c. The ORR's own Track Access Guidance states that ORR must ensure that passengers and freight companies have fair access to the rail network and that best use is made of capacity.
 - d. Competition Act 1998 provides that arrangements which are restrictive, or which distort competition may amount to an abuse of a dominant position. The ORR has a statutory duty to promote competition in the provision of railway services for the benefit of all users and to ensure that any ORR decision does not limit competition in the provision of rail services.
8. LSL submits that a proper and careful consideration of the matters mentioned in paragraph 7 (as FRS is entitled to expect from ORR) supports the current FRS application. To do otherwise would be an error and misdirection on the part of ORR.
9. The FRS application satisfies all the key objectives set out in the Railways Bill published by the Department of Transport on 5 November 2025. The FRS application satisfies the approach of the Department of Transport in its Policy Paper published on 5 November 2025, including 'open[ing] up new markets, increasing connectivity for passengers and driving innovation across the rail industry to deliver growth. At its best, open access has harnessed the risk appetite of the private sector to exploit new opportunities. ... And we recognise the benefits many communities have seen from this.'
10. The Policy Paper underlines the need for 'GBR to be offering services the public need and want'. The FRS application has general public support. This should be recognised by ORR and given sufficient weight in the determination of the application.

11. The FRS application fully satisfies the requirement demanded by the Department of Transport of adding value and supporting the growth of the rail network.

12. LSL supports the FRS application on the basis detailed in this Response.



Nick Gibbons

Head of Planning & Stakeholder Management

For and on behalf of Locomotive Services (TOC) Limited.

Dated this 28th of November 2025

To: Gianmaria Cutrupi
Aspirant Open Access Operators Manager
Freight & Customer
Network Rail

To: Andy Wylie

(By email only)

4th December 2025

Dear Gianmaria, Andy,

Re: First Rail Stirling Limited t/a Lumo (Rochdale Services): Section 17 Industry Consultation for a new track access contract to operate London Euston - Rochdale service

This letter sets out East Midlands Railway's (EMR's) response to Lumo's Section 17 industry consultation for a new track access contract to operate a new service between London Euston and Rochdale from December 2028. EMR has concerns about the proposal in the following areas:

- It is not clear to EMR how there is sufficient capacity on the West Coast Main Line. The line of route 'West Coast Main Line South Fast Lines (Camden South Junction to Ledburn Junction Inclusive)' is designated as congested infrastructure with effect from 11 May 2020, and there appears to be no sign of any major infrastructure changes to increase capacity. We do not believe the application has provided any evidence to demonstrate that capacity exists.
- Lumo has not mentioned capacity between Warrington Bank Quay and Rochdale, only the West Coast Main Line. We do not believe the application has provided any evidence to demonstrate existence of paths on this route section.
- We believe that should these paths be granted, it would cause reactionary delay to other services in the Manchester area and then transfer delay to the Castlefield Corridor. This has the potential to cause significant performance issues on the EMR Liverpool to Norwich route, which already performs lower than the EMR average. We would expect a comprehensive performance modelling to be carried out to understand the impact of these proposed services.
- Engineering works can lead to EMR services being diverted via the Chat Moss Line. It is not clear if the proposal would still leave reliable capacity for EMR services to be diverted. Retaining some network capacity on this route is essential for both planned and unplanned diversions to meet existing long-distance demand. EMR requires Lumo to demonstrate existing flows can be accommodated alongside their proposed services during disruption.

- EMR would seek clarity on Lumo's proposed plan when the line between London Euston - Milton Keynes Central is blocked, whether you propose to run rail replacement buses across to Bedford to connect onto EMR services? If so, has Lumo done sufficient due diligence with EMR & GTR to understand whether there is capacity to do so?

In conclusion, EMR formally objects to this application until sufficient information is provided to properly assess the timetable and all our concerns have been adequately resolved.

Yours sincerely,

Lanita Masi
Network Regulatory Access Manager
East Midlands Railway



Gianmaria Cutrupi
Aspirant Open Access Operations Manager
System Operator
Network Rail

Northern Trains Limited
George Stephenson House
York
YO1 6JT

(By email only)

04th December 2025

Dear Gian,

**Northern Trains Limited (NTL) formal response to First Stirling Rail (Lumo) WCML
Section 17 Application – Euston to Rochdale**

With reference to the above application shared by Network Rail on 04th November 2025, this letter constitutes NTL's formal response to the consultation.

NTL are still unable to support this application. This application is not consistent with the industry Manchester Taskforce (MTF), nor has it been factored into any timetable development work for MTF Configuration State 2 or Configuration State 3. NTL have concerns about how the supplied paths will work at Rochdale. The application appears to be abstractive from existing operators. Each of these points will now be explored in further detail.

Background to the MTF

The Manchester Recovery Task Force (MRTF) was set up in January 2020 to address the unacceptable levels of train performance in the North West of England. Performance fell sharply following poor implementation of the May 2018 timetable. The timetable was poorly executed, but the additional trains it added to central Manchester meant that performance levels recovered only marginally, indicating structural issues with the timetable.

There has been some important investment in the region over the last ten years, including the Ordsall Chord (linking Manchester Victoria to Deansgate), the redevelopment of Victoria station, electrification of lines and the introduction of new rolling stock. In addition, there have been increases in train service frequency and connectivity secured through the franchising process. Although very welcome, this has put greater demands on the whole network, particularly the congested 2-track railway which runs through Manchester Piccadilly and Deansgate via Manchester Oxford Road, known as the Castlefield Corridor. This has consequently pushed the railway beyond the point at which it can operate reliably – with the Castlefield Corridor being declared as 'Congested Infrastructure' by Network Rail in 2019.

The cross-industry Manchester Recovery Task Force delivered a revised timetable structure in December 2022 that, alongside other interventions, enabled improved reliability. This involved a significant recalibration and re-timing of services across the Manchester area, as well as a reduction in frequency on key routes in central Manchester, and as a result of these

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structural changes there is now little spare capacity without threatening the improved performance so critical to the objectives of the Task Force.

Following on from the December 2022 timetable, the Task Force continues to support DfT, Network Rail and train operators on the business case for an on-going programme of infrastructure and train service improvements, which are intended to allow further train services to operate, but only once sufficient additional infrastructure capability is delivered to ensure this can be done reliably. This is demonstrated by the announcement of £72m for Configuration State 2 (CS2) infrastructure in May 2023. CS2 is planned to deliver electrification and reliability improvements on the north side of Manchester, currently scheduled for 2026.

A further Configuration State 3 (CS3) is planned to deliver infrastructure improvements at Manchester Oxford Road and Manchester Airport. CS3 is designed to provide additional infrastructure to support TRU services, additional regional services to Manchester Airport and additional local services on the Warrington Central line. Capacity for further services to operate reliably (whether Open Access or others) has not been included in the specification.

NTL do not support applications that do not align with the MTF and the subsequent timetable Configuration States. This application needs to be assessed against Configuration State 3, which is what MTF has been funded and remitted to deliver by the Department for Transport and Rail North Partnership. The timetable change that occurred in December 2022, whereby services were reduced through the Castlefield Corridor, was the output of cross-industry agreement at the MTF Board to ensure a more reliable timetable and in response to a declaration of congested infrastructure. This application also needs to be assessed against the new station at Golborne and the associated all day service which will be in place by December 2028.

Timetable Planning and Performance Considerations

Concerns remain about how this proposal will work from a timetabling perspective at Rochdale. NTL do not believe that the proposed use of the turnback siding at Rochdale can be accommodated as we do not believe that it is long enough for 5 cars. Additionally, NTL is aware of a Transport for Greater Manchester (TfGM) Tram-Train Pathfinder scheme which proposes to use the turnback siding to connect the Metrolink line with the mainline at Rochdale.

Furthermore, the train prints provided with this proposal conflict with current and future timetables within the Manchester area as well as current diverted freight and TPT services via the Calder Valley owing to ongoing TRU work. There are several clashes with train slots in the current timetable structure. For example, SX Down direction paths 1N01 and 1N02 each clash with 3 services in platform 5 at Manchester Victoria (some of which may be possible to solve by replatforming, but with an increased performance risk due to the need for services in opposite directions to reoccupy platform 6 on minimum margins), and clash with the following train having terminated Rochdale (6E26 in the case of 1N01, and 2I23 in the case of 1N02).

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Company No. 03076444

1N01 also clashes at Ordsall Lane Junction with 1N67. For the SX Up direction paths, 1N50 has below TPR value platform reoccupations at Manchester Victoria both ahead of and behind its call, and clashes at Ordsall Lane Junction with 1M80. The path shown for 1N51 is run through by 9M09 between Ordsall Lane Junction and Newton-le-Willows, and clashes with 1P16 between Miles Platting and Manchester Victoria. 1N53 clashes arriving at Manchester Victoria with 1J26 departing.

NTL does not believe that the performance impact has been sufficiently modelled and there remains concerns that this proposal will be detrimental to performance and not compatible with the performance and timetabling workstreams for Manchester.

Lumo still have not provided any details as to their expectations of stabling, therefore NTL are unable to assess the impact on existing stabling locations and facilities. It should be noted that there is little to no spare capacity, especially for electric trains within the North West region. Please can Lumo provide details of their stabling assumptions?

What work has been undertaken to provide assurances to the industry that this proposal does not present any power supply issues? Noting that since this application was first consulted, Network Rail have declared congested infrastructure on various parts of the WCML including areas which this proposal will traverse.

Please can Lumo demonstrate what considerations have been given to any risks associated with the use of battery technology to and from Rochdale and subsequent power changeover at Manchester Victoria?

Abstraction from existing operators

The proposals appear to be very abstractive from existing operators in the areas where Lumo are proposing to operate. NTL suggests that the Not Primarily Abstractive (NPA) Test is carried out as part of the assessment process for this application.

In summary, NTL are unable to support this application. The application appears to be incompatible with known industry agreed MTF workstreams, the application does not work within the current timetable structure and therefore risks jeopardising the work done to improve performance within the North West. Additionally, there is insufficient capacity on the WCML and ancillary routes to support the number of applications with near identical proposals. The application does not contain sufficient particulars, especially surrounding station operations and expected stabling. This application should also be subject to the NPA test owing to the abstractive nature of the proposal.

If you require any further information, please do not hesitate to contact me.

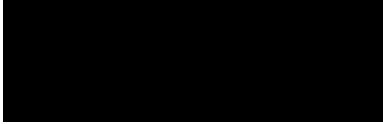
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Company No. 03076444

Yours Sincerely,



Kate Oldroyd
Track Access Manager

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Company No. 03076444

Gianmaria Cutrupi
Aspirant Open Access Operations Manager
System Operator
Network Rail

Cc: Andy Wylie
Head of Regulation and Open Access Contracts
First Rail

04 December 2025

Dear Gian,

First Trenitalia West Coast Rail Limited response to Industry Consultation: First Rail Stirling Limited's application to introduce a new route between London Euston and Rochdale.

Note: Background on FTWCRL can be found in the appendix of this letter.

1) Disclosure & Transparency:

For openness & transparency, we believe it prudent to highlight that whilst FTWCRL is an affiliate company of First Rail Stirling (LUMO) through parent FirstGroup, this response has been compiled independently by FTWCRL colleagues without any influence from either those parties.

FTWCRL's response to LUMO is assessed as if it were any other Open Access Application to ensure consistency and compliance with both the Network Code and competition legislation.

2) Context:

Thank you for the opportunity to respond to this new application for First Rail Stirling Limited's proposed expansion of services, with an aspirant new operation between London Euston and Rochdale.

FTWCRL has assessed LUMO's proposal objectively and consistently with other Open Access applications submitted in recent years, giving due consideration to the commencement of High-Speed (HS2) services on the West Coast Main Line (WCML), Network Capacity and Infrastructure, Performance and Revenue.

Regrettably, we cannot at this time offer our support to this application and require further information to make a fully informed assessment. This is for the following reasons:

3) HS2 Implications of Open Access Applications.

As the ORR set out in 2018 [\[Link\]](#), there is significant investment being made by the Secretary of State for Transport into the railway infrastructure through the HS2 programme, inclusive of the new infrastructure and the Conventional Rail Network (CRN). A dedicated Train Service Specification is being developed to utilise the infrastructure available across both.

West Coast Partnership Development (WCPD), part of West Coast Partnership, is the Shadow Operator for Integrated Services on the HS2 and CRN (WCML); made up of the High Speed and Intercity Services that are due to operate to and from London from the 2030s once the HS2 infrastructure is complete. Part of WCPD's role is to provide advice to the Secretary of State through the Department for Transport on the optimised Train Service Specification for the applicable routes, which will in turn lead to the specification for future train services, enabling an economic and financial return on the substantial investment.

Advice from the industry was provided to the Department for Transport following the Network North announcement setting out the available capacity on the WCML and an outline Train Service Specification for that capacity. This baseline is now being optimised by WCPD for the Secretary of State in conjunction with HS2 Ltd and Network Rail and has identified several options for use of the capacity across the route.

These paths would be predominately High-Speed Services, effectively replacing several long-distance services currently operated by Avanti West Coast on the WCML south of Colwich. Options for the use of the capacity that is freed up south of Colwich are the subject of a separate assessment by WCPD for H.M. Government.

In April 2018, the ORR responded to a letter from the Department for Transport which stated that open access proposals which directly extend into the timeframe of when High-Speed services are operating would need to be looked at explicitly, inclusive of an assessment of impact. Whilst dates surrounding HS2 services have changed since the letter was published, this guidance remains relevant and should still apply.

This would mean that any new services introduced now from London to new destinations, may, if only granted rights until the HS2 programme is completed, need to be time bound. This could have consequences for those communities served by these new services.

LUMO's application seeks to gain access to the network during a period in which High-Speed services will be operating.

We believe that, in the context of the ORR's 2018 regulatory statement on the future operation of HS2 [\[Link\]](#) in respect of Open Access and the start of High-Speed services on the conventional network, LUMO's application should be reconsidered for operation beyond the start of HS2 operations on the West Coast Mainline. At paragraph 38 of its 2018 regulatory statement, ORR states that its focus will particularly be on Open Access applications that extend into the period of HS2 services, and in particular the impact that those applications have on the HS2 operations.

4) Network Capacity & Performance Challenges.

i. Network Capacity

FTWCRL notes that this application seeks to gain additional rights on the West Coast Main-Line, where the ORR have recently declined to approve several applications citing performance challenges and the need for a firebreak in the timetable; this includes FTWCRL's own aspirations. We would be concerned with any outcome that allowed the operation of these services utilising the xx36 path from London Euston given our previous unsuccessful application for one additional daily train in a different hour between London Euston and Blackpool North using the same path.

FTWCRL notes that many of the proposed paths seek to utilise vacant 'QJ' postal paths, as well as conflicting with the future aspirational paths of other operators, including FTWCRL.

We have undertaken analysis of the proposed paths supplied as part of this application against the May 2026 timetable offer and are very concerned that the overwhelming majority of these are demonstrably non-compliant. There are serious clashes with the established freight and passenger trains of several operators at various locations along the route, contrary to LUMO's assertion that "all paths are compliant and are not forced". This includes several instances of existing Class 1 passenger services being 'run through'; FTWCRL would therefore need to see some compliant proposed paths before further considering support for this proposal.

The most significant area of concern is Milton Keynes Central, whereby it's proposed that the xx36 path will be routed into platform 5 to enable FTWCRLs xx.40 to overtake. This is then followed by the xx.43 making it's Milton Keynes call in platform 6 and overtaking LUMO's proposed path. All of this is being done on minimum headway or margins as low as 90 seconds, which FTWCRL believe are non-compliant according to the latest edition of the Timetable Planning Rules. The increased use of Milton Keynes Central platform 5 to 'loop' trains is also a concern, as occupying this platform for an extended period reduces operational flexibility.

Another significant area of apprehension is that many proposed trains pass through Crewe at a time when there are a high number of movements reliant on minimum junction margins. This includes TfW's Manchester-Cardiff service which is one of the most significant constraints on pathing through the station. This is demonstrated by the numerous occasions where compliant junction margins remain elusive to these proposed trains.

Furthermore, FTWCRL notes the inconsistent use of different timing loads between Rochdale and Manchester Victoria on different days of the week. Whilst not on the FTWCRL network, this raises a concern that this may be disguising pathing issues that would affect the proposed trains through the constrained areas of the network mentioned above.

We therefore do not believe that we are able to support this application on the grounds that we do not believe there to be sufficient network capacity.

ii. Performance

FTWCRL feel unable to support this application due to the significant performance risks associated with the introduction of more trains to the West Coast Main Line when the operator is unable to provide evidence of any kind relating to performance.

The December 2022 timetable went through rigorous performance modelling to understand the impact of the timetable re-write and identify any improvements. This included several sensitivity tests for additional Avanti (FTWCRL) Liverpool services, Grand Union services (now First Rail Stirling – LUMO), and East West Rail services. FTWCRL would expect NR to require this application to be fully performance modelled as per NR's policy on our own applications; and that this service would not be supported unless the modelling showed no notable performance detriment.

Noting that LUMO's separate Stirling service has yet to commence operation, it is not yet known how these this operator's trains will perform. It therefore seems premature that another similar service can be considered until LUMO's services are established and shown to be consistently performing in a satisfactory manner with similar traction to this proposal.

In respect of this specific proposal, we note the aspirant services link together several constrained areas of the network, e.g. WCML South, Crewe-Weaver Jn, Winwick Jn and Salford Central, with limited scope to hold trains or build resilience into the timetable to help link these highly constrained areas together in a robust way. Any late or out of course running would therefore have a significant impact on these bottlenecks, further compounding existing performance challenges. The addition of these trains would create very large flights of up to 8 trains on minimum margins, extinguishing any hope of service recovery or resilience in hours where these run.

FTWCRL would like to understand what mitigations LUMO would propose to support protecting performance on this key critical part of the network for all rail users. We also have concerns over platform capacity at Euston, particularly as we expect HS2 works to reduce platform capacity during the proposed period of operation. We would like to understand how LUMO would look to adapt its operation in the event of reduced station capacity.

In summary, FTWCRL is unable to support this application on performance grounds due to the combination of the existing and commonly understood performance concerns for the WCML, a lack of suitable performance analysis, capacity resilience challenges at Milton Keynes Central (identified in *Network Capacity*), and the noted positions of congested infrastructure.

Furthermore, the ORR have recently rejected FTWCRL's applications for additional trains on performance grounds and we therefore expect the regulator to apply similar considerations against its decision criteria in this regard.

iii. Impact to Network Capacity in relation to the Proposed Equipment

FTWCRL notes that LUMO's proposal includes new build Class 80x units, however it is not clear from the application what configuration these will be; pure electric, bi-mode electric and diesel or battery. We understand that LUMO may propose the use of bi-mode stock on these trains, however there is no evidence in the proposed paths of timing load changes or other SRT mitigations, therefore FTWCRL considers these trains as electric traction until such mitigations can be demonstrated.

Further to this, we are also concerned about the use of the electric 80x-E timing load between Crewe and Weaver Jn through an area of constrained power supply capacity. FTWCRL's own use of rights been impacted by this constraint, and as such we cannot consider supporting any rights applications for electric paths before our own existing Contingent rights have been accommodated. As a result, our concerns recently shared in respect of the proposals to extend rights and introduce new traction on the separate Stirling route remain pertinent, as below.

Whilst noting that current estimates for resolution of the traction power issues at Bushey & Acton Lane, and between Crewe & Weaver Junction are due to be resolved by the proposed commencement of this new operation, we remain concerned that should these enhancements not take place within the timeframe that there could be an additional burden for existing operators to contend with.

FTWCRL has extensive experience of WCML power supply considerations, having worked collaboratively with Network Rail in recent years through the restoration of service levels after the pandemic. This has included replacement of diesel trains on Anglo-Scottish services, and towards the recent introduction to service of class 805 bi-mode units and class 807 EMUs on other routes.

FTWCRL note Network Rail's NW&C Power Supply Annual Statement 2024 v05 including its Red/Amber/Green categorisation in support of our comments on power supply. Further to this, we note the Early Indicator warnings received in July 2024 for Willenhall, Washwood Heath, Crewe and Weaver Jn feeder areas, and the subsequent Notice of Congested Infrastructure for the Weaver Jn Feeding area in November 2025. Further Early Indicator of Congested Infrastructure notices were also issued for the Crewe station area and south thereof.

In the light of our experience with the Class 805 and Class 807 trains (which are very closely related to LUMO's existing Class 803 product), and our 2020 study into non-diesel operation options including batteries, we believe that Network Rail should, notwithstanding path availability, raise power supply issues with LUMO that may preclude their access to the WCML, particularly;

1. The power supply adequacy for operation of additional electric services through the Network Rail “RED” power supply zone in the Acton Lane feeder station area of supply. This extends from Euston to North Wembley Neutral Section in both directions and is already at the current limits of electrical supply standards such that in degraded N-1 conditions an operational mitigation is agreed for use which restricts train power consumption. This would impact all LUMO’s proposed services on arrival and departure at London Euston if operated via electric traction power.
2. The power supply adequacy for operation of additional electric services through the Network Rail “RED” power supply zone in the Weaver Junction feeder station area of supply. This extends from Weaver Junction to Crewe (Crewe North Neutral Section) in both directions and is at the voltage limits of electrical supply standards, with no operational mitigation to date agreed for use. This would impact LUMO’s proposed service between Crewe & Warrington Bank Quay.
3. There are known weaknesses in WCML diversionary power supply adequacy in the Willenhall (RED) and Washwood Heath (AMBER) feeder station areas and the capability of the Lumo trains to operate over appropriate diversionary routes, including these, in degraded operations would need to be proven.

Whilst FTWCRL is generally supportive of the utilisation of electric traction due to its environmental sustainability credentials when compared with diesel traction, we are concerned that this application would increase power draw at key locations which will, at the time of proposed operations commencing, be operating alongside FTWCRL’s full 10tph service provision.

We therefore ask for confirmation of the following points from both Network Rail and LUMO:

From Network Rail, in that it can demonstrate that it has a high enough degree of confidence that it’s power supply upgrades are deliverable within the currently understood timeframe, and that it either does or doesn’t have the capacity to support additional trains operating on electric power through all affected areas.

From LUMO, in that if there is not enough power supply, or that further congested infrastructure is declared, that there will be an agreement to implement a power change-over for the duration of the affected area operating on either diesel or battery electric power.

5) Other Infrastructure

Noting the potential bi-modal capabilities of the new trains being proposed for this operation, are LUMO able to confirm whether there will be any changes to existing infrastructure in respect of balises, which may or may not have an impact on FTWCRL’s and other operators’ fleets?

6) Rolling Stock Characteristics and Maintenance:

i. Viability of Rolling Stock to meet the SRT

FTWCRL has no further comments on the ability for the rolling stock to match the sectional running times.

ii. Train Maintenance Facilities

It is not clear from the LUMO application where it's trains would be maintained. Given the geographical overlap, FTWCRL would anticipate that this would utilise existing space on depots already used for FTWCRL services.

FTWCRL understand several Light Maintenance Depots (LMDs) on or near the WCML are at capacity; if there were to be any overlap, we would be seeking confirmation from the Depot Facility Owner's that the additional proposed services would not be to the detriment of provisions for FTWCRL services. Depot capacity is of equal concern as Network capacity in this regard.

We are concerned that this application would lead to an increased pressure on available depot facilities and maintenance slots required for FTWCRL's fleets. FTWCRL would like to understand how LUMO would intend to utilise depot capacity, including slots onto & off depots, and where these would be located, demonstrating how it would not be detrimental to the performance and maintenance of existing train fleets from other operators, inclusive of us and others already utilising those depots.

iii. Sustainability & Environmental factors

FTWCRL has no specific objections to the proposed fleet on either sustainability or environmental factors.

7) Demand and Revenue – Current and Future:

FTWCRL remain concerned with the level of abstraction that LUMO are likely to draw from its services. Given the previous modelling completed by the ORR for the prior application saw a forecast abstraction of £3.4 Million from FTWCRL [\[Link\]](#), we can continue to infer that the introduction of these services would see a seven figure number.

FTWCRL is operating on a National Rail Contract as directed by the Secretary of State; we believe LUMO needs to provide more consideration in this regard, given the potential cross-over with High-Speed services which are due to commence operations on the conventional network prior to the end of the proposed dates in LUMO's application.

In this respect, we ask that the ORR weighs heavily it's duties under **Section 4.5(c)** of the Railways Act 1993 in considering the funds available to the Secretary of State both now and under the future operating environment for High-Speed services.

8) Conclusion:

FTWCRL has assessed LUMO's proposal objectively and consistently with other Open Access applications submitted over the past few years, giving due consideration to the commencement of High-Speed (HS2) services on the WCML, Network capacity, Infrastructure and Revenue.

FTWCRL believes that further consideration is required, especially respective of the start of High-Speed services on the conventional network & subsequent network capacity, in addition to power supply constraints on the WCML. Further to this, we remain concerned about the existing capacity of the network to accommodate these trains, the potential risk to systemic performance on the WCML.

We also ask that the ORR considers its duties under Section 4.5(c) in respect of the funds available to the Secretary of State, and Section 4.(1)(zb) in respect of railway service performance when making its decision.

Following our assessment of LUMO's application to operate new services between London Euston and Rochdale, and whilst recognising the importance of healthy competition on the network for the benefit of the passenger, FTWCRL are opposed to this application.

Should concerns regarding these issues be addressed, we would be happy to re-assess this application in the future.

Please get in touch with any questions in the meantime.

Yours sincerely,

Andy Doyle

Andy Doyle

Head of Operational Readiness

Avanti West Coast

From: GBRailfreight
Sent: 04 December 2025 16:12
To: Gianmaria Cutrupi; Andy Wylie
Subject: RE: Industry Consultation – First Rail Stirling, Section 17 Application, London Euston-Rochdale

Dear All,

Thank you for the opportunity to respond to this Section 17 application.

GB Railfreight (GBRf) has been very much involved in the detailed issues of timetabling associated with several West Coast Main Line (WCML) timetable changes over recent years. Coupled with the current timetable and other recently approved firm access rights, GBRf is not able to adequately assess how these proposed rights, if approved, affect available capacity for current and future freight demand. The response in Section 4.1 of the Form F *Benefits*, does not state the impact of this application on freight operators therefore important aspects of how these rights might interact with already established rights and current expectation of firm rights applications is not known.

From GB Railfreight's own long-standing experience of timetabling on this route, we have real concerns that there is not adequate, robust capacity at Brinklow (where Down services go from four tracks to three), Colwich-Milford & Brocton/Whitehouse Junction (four tracks to two), Crewe-Weaver Junction (which is already constrained for capacity) and several other parts of the WCML that affect Anglo-Scottish freight, especially over the Northern Fells and into Scotland.

Taking this into account, GB Railfreight is currently unable to support this supplemental application.

Regards,

GB Railfreight

Ian Kapur | Head of Strategic Access Planning

5th Floor, 62-64 Cornhill | London | EC3V 3NH

GB Railfreight Limited | Registered in England number 03707899
Registered Office: 5th Floor, 62-64 Cornhill, London, EC3V 3NH

From: Chris Dellard
Sent: 04 December 2025 16:22
To: Gianmaria Cutrupi; Andy Wylie
Subject: RE: Industry Consultation – First Rail Stirling, Section 17 Application, London Euston-Rochdale

Hi both,

Thank you for consulting TfW Rail. We note that this proposal is for fewer services than the original proposal, but the concerns that we raised in response to the original consultation remain. In particular, we are concerned with the potential impact on capacity utilisation and resulting performance in the Crewe area and also on the Chat Moss route between Warrington, Newton-le-Willows and Manchester which would likely have interactions with our own existing services.

We would expect to see assurance from Network Rail that this proposal can be robustly pathed without adverse consequence on the timing of TfW Rail's services and that the additional quantum of journeys will not adversely affect performance at these key nodes.

We would expect ORR to take cognisance of the work undertaken by the Manchester Task Force, as the outputs have had a clearly positive impact on performance in the wider Manchester area. We would want ORR to test carefully the case for additional new services through the area that could undo these successes.

Because of these uncertainties and the risks to the still recent changes made to support the important work of the Manchester Task Force, TfW Rail does not support this proposal as it stands.

Regards,

Chris

[TfW Rail]



Tel: [REDACTED]

Email [REDACTED]

10 December 2025

Gianmaria Cutrupi, Aspirant Open Access Operators Manager
by email: [REDACTED]

Dear Gianmaria,

First Rail Stirling, Section 17 Application, London Euston-Rochdale

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

The Government's view is that Open Access can provide benefits such as improved connectivity and choice for passengers but can also increase costs to taxpayers and create additional performance pressures. Open Access services must genuinely add value for customers and the overall rail system and not inhibit the efficient operation of the network or divert significant revenue from existing operators – all of which are currently supported by the taxpayer in some form. The Secretary of State was clear on the importance of this in her 6 January letter to the Office of Rail and Road (ORR), and this remains the case.

In addition, we would ask and expect that ORR be mindful of the reforms set out in the Railways Bill now in Parliament, particularly the future role of Great British Railways (GBR) to be a directing mind with responsibility for deciding the best use of network capacity. ORR will of course need to consider any access decisions, including extensions to existing contracts, before the formal stand-up of GBR very carefully and in line with its existing legal duties. In particular we would expect ORR to give full consideration to any extensions of a longer duration against these wider government policy positions.

We note that the regulator was clear in its letter of 3 July 2025 regarding three other applications from Open Access operators to operate services on the West Coast Main Line (WCML) that capacity on the southern section of the WCML is severely constrained. In rejecting these earlier applications – including an earlier application from FirstGroup to operate between London Euston and Rochdale – the ORR stated clear agreement with Network Rail's 2020 *WCML South Congested Infrastructure Report* that no significant additional capacity could be used between Camden South and Ledburn Junction without harming performance. Further, ORR explicitly stated that the nine empty 'firebreak' paths currently left in the WCML timetable are frequently used and play an important role in delivering a robust and resilient timetable. It is unclear how this new First Rail Stirling application would overcome these fundamental issues relating to lack of available capacity on the WCML, and the issues previously highlighted by both the ORR and Network Rail therefore remain valid with regard to this application.

DfT analysis suggests that this application would meet the indicative 0.3 'Not Primarily Abstractive' (NPA) Test threshold once the Infrastructure Cost Charge (ICC) is paid in full after 5 years of operation. We predict approximately £4m of revenue would be abstracted from other operators – most notably from Avanti West Coast, with Milton Keynes-London flows most impacted – per annum by this application with just £600k of new revenue generated, representing a 0.15 NPA ratio before the ICC is phased in.

Beyond consideration of abstraction and performance, we acknowledge the potential benefits that additional direct services between London and Rochdale could contribute. These include improved regional connectivity and economic growth due to access to jobs and housing; of particular note would be improved connectivity to the Atom Valley mayoral development zone, where significant investment in development is currently being made.

There remain, however, a number of critical operational and performance concerns that we would highlight – many of which have been raised in consultations regarding other previous applications seeking capacity on the WCML and on to Manchester and Rochdale.

This application from First Rail Stirling does not take into account the work of the Manchester Task Force, which is planning future service patterns throughout the Manchester area in collaboration with Transport for Greater Manchester and Transport for the North.

We also note that the proposed end date of this access contract, 2038, would be after the proposed introduction of HS2 services, meaning that approval of this application could have knock-on impacts to the ability to implement HS2 services as intended. This should be considered both as an issue on the WCML northern section, where HS2 trains will join the existing line from new HS2 infrastructure, as well as the southern section, where additional services could limit the opportunity to take advantage of capacity freed up by the transfer of Inter-City services from the southern WCML to new HS2 infrastructure. The capacity that HS2 will free-up on the southern end of the WCML could be used to deliver the objective of increasing the amount of rail freight, as well as improving more local connectivity.

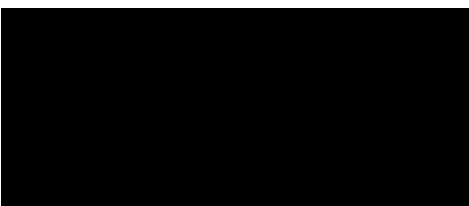
Power supply on the WCML is already a significant issue with systems currently operating at very near capacity. Network Rail have stated that they are unable to accommodate short-term committed electric traction uplifts on the WCML without compromising performance. In the longer-term, further interventions would be necessary to support the growth of electric traction. While this application intends to make use of new-build battery rolling stock rather than conventional electric traction, the impacts of sporadic and enhanced power draw when charging batteries must be fully considered and pose significant performance risks. This is particularly the case at the southern extremity of the WCML at Euston, where power constraints are especially acute.

While this application from First Rail Stirling has the potential to contribute positively towards improved regional connectivity and growth, in this instance these benefits clearly do not outweigh the significant detrimental impact that new Open Access services would have upon performance on the WCML and in turn across the network more broadly. Further it is not clear how this application seeks to overcome the regulator's previous statements regarding lack of capacity to accommodate additional services on the WCML.

Therefore, due to the capacity and performance reasons explained above, **the Department for Transport does not support this application.**

Please do not hesitate to get in touch if you have any questions about the Department's response or the points raised.

Yours sincerely,



Alex Szyjanowicz
Deputy Director, Rail Reform