

Date: ## July 2024

**Gianmaria Cutrupi**

Aspirant Open Access Operators  
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**By Email**

**David Hoggarth**

Transport for the North  
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Dear Gianmaria,

**Track Access Consultations – Virgin and Lumo Open Access Services**

I write on behalf of Transport for the North (TfN) with specific reference to Section 17 Track Access applications submitted in May 2024 by Virgin and East Coast Trains Limited, and Open Access application in general.

TfN is the Secretary of State's statutory partner in advising on strategic investment priorities for the North. It is also jointly responsible with the DfT, through the Rail North Agreement, with the specification and oversight of the Northern and TransPennine Trains (TPT) contracts.

Our Strategic Transport Plan<sup>1</sup> sets out the vision that by 2050 the North of England will have become a thriving, socially inclusive region. Our communities, businesses and places will all benefit from sustainable economic growth, improved health and wellbeing and access to opportunities for all. This will be achieved through a transformed, near zero-emission, integrated, safe, affordable, and sustainable transport system, which will enhance connectivity, support mode shift and resilience and improve journey times for all users.

The Strategic Transport Plan is under-pinned by a comprehensive evidence base and was handed over to the Secretary of State as statutory advice in March 2024. It provides the overarching policy framework for the development of the North's rail system in the period to 2050.

We understand that Virgin is applying for four new open access services between London Euston and:

- Preston/Rochdale (14 daily services Monday - Sunday), via Nuneaton, Stoke-on-Trent, Stockport, and Manchester Piccadilly, and then via:
  - Bolton, Horwich Parkway, Chorley to Preston
  - Manchester Victoria to Rochdale.
- Liverpool Lime Street (30 daily services Monday to Sunday) via Tamworth, Lichfield Trent Valley, Runcorn, and Liverpool South Parkway;

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<sup>1</sup> [Strategic Transport Plan - Transforming the North | Transport for the North, 2024 - Transport for the North - Transport for the North](#)

- Birmingham New Street (16 daily services Monday to Sunday) via Coventry and Birmingham International; and,
- Glasgow Central (8 daily services Monday to Sunday), via a future station at Golborne, Preston, Carlisle, Motherwell, and Lockerbie.

The application from Virgin is to operate from December 2025 to 2035.

We understand East Coast Trains Limited (North West Services) is applying for six return journeys a day between Rochdale and London via Manchester Victoria, Eccles, Newton-le-Willows, and Warrington Bank Quay, to operate from 2027 to 2037.

### **Overview of our Response**

TfN recognises that there has been industry research that demonstrates that, in general, open access services have been beneficial to the overall rail market through driving growth through competition and being able to develop direct services to new destinations. Observation of Hull Trains, Grand Central and Lumo on the East Coast Mainline (ECML) suggest that Open Access services do have the ability to grow the market and improve the customer offer.

However, performance on the West Coast Main Line has been extremely challenging and lacked operational resilience for an extended period, and it is noticeable that infrastructure failures on the southern end of the West Coast Main Line are increasingly frequent leading to unacceptable levels of service for both passenger and freight operators. Whilst on the East Coast Main Line, the need to postpone the proposed December 2024 timetable change reflects the fact that demand for paths bid for through the industry processes outstrips available capacity. As things stand there is not enough clarity that the additional direct services to London under consideration can be accommodated without detrimental impact on performance and/or realisation of benefits of existing programmes of investment. In addition, the use of capacity on the network to support additional services to/from London makes it harder to improve pan-regional services in the way set out in the Strategic Transport Plan.

Given this strategic context TfN recommends that the applications are put on hold until issues detailed below are resolved.

Our view is based on a number of factors including:

- The North suffers from continued issues of poorer rail performance in relation to other parts of the country, driven in part by significant bottlenecks and congested infrastructure (including Central Manchester, the West Coast Main Line more generally, Leeds Station, and the East Coast Main Line).
- There are specific Task Forces leading work to tackle congestion and develop future timetables in Central Manchester and East Coast Main Line. They must be allowed to complete their advice and establish a baseline for future services before further Open Access is considered.
- In the case of services across Manchester, TfN has reluctantly accepted a short-term reduction in services ahead of additional infrastructure being delivered and the priority must be the restoration of lost services ahead of new open access services.
- The government is investing £11.5bn in the TransPennine Route Upgrade (TRU) scheme as an enabler for more significant investment in Northern

Powerhouse Rail. A concept timetable is under development that seeks to maximise the benefits of this investment and it's important that this work is completed to determine what, if any, further paths are available.

- There are examples where incumbent operators do not have firm track access rights for services that are established and form part of the baseline for future service enhancements. It is important that these issues are resolved ahead of the consideration of further Open Access.

These applications serve to highlight shortfalls in the process for allocating track capacity and planning timetables – an example of which would be the recent postponement of a new timetable for the East Coast Main Line which has been many years in the preparation. A significant contributory factor in this regard is that the objectives used by the Office of Rail and Road (ORR) to consider access requests are not necessarily aligned with the evidence-based outcomes set out in the Strategic Transport Plan. TfN recommends that reform of this process is essential as part of the overall rail reform programme.

For both applications we would ask for further detailed timetabling and performance modelling to be undertaken to ensure that the proposed service will work alongside the intended end-state service levels for both TRU and Manchester Task Force, for both passenger and freight services, before any further consideration is given.

TfN is happy to discuss in more detail the concerns set out in this letter as part of Network Rail's consideration of the applications. In addition, we have provided a copy of this letter to the Office of Rail and Road.

Yours sincerely

David Hoggarth  
Head of Strategic Rail  
**Transport for the North**