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By email only

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28 June 2024

Network Rail Representations for the proposed Section 17 application for proposed Track Access Contract between Network Rail Infrastructure Limited and Alliance Rail

As directed in your letter dated 30 May 2024, Network Rail is making its representations in respect of a Section 17 for a proposed track access contract between Network Rail Infrastructure Limited (we) and Alliance Rail.

In line with ORR's letter of April 24 2024 to the industry on 'Competing and/or complex track access applications for December 2024, May 2025 and December 2025 timetable changes', Alliance Rail submitted this application to the ORR on 17 May as a S.17.

Your letter made clear to industry that "We expect applications received by 20 May 2024 to be of sufficient quality, completeness, and certainty to enable Network Rail, industry and ORR to assess them. A prerequisite for achieving this is that applicants will have discussed their plans with, and sourced information from Network Rail before submission (in line with our guidance)."

It further "...requested that Network Rail produces a high-level plan by 05 June 2024 for ORR and industry. This will set out when it will produce its robust assessment for the applications submitted by 20 May 2024."

Network Rail fulfilled this request on the 05 June 2024 outlining the plan for undertaking capacity and performance assessments to inform both Network Rail and the ORR on the applications received.

That response should be considered alongside this Representation.

In particular, it should be noted as indicated therein that:

- due to the unprecedented scale of 83 unsupported applications received at one point in time, Capacity Planning plan to phase its analysis,
- assessments will initially focus on applications and geography which do not overlap with the ongoing ECML ESG Development work to mitigate the risk of redundant analysis,
- all ECML ESG related applications will be considered following decisions as to the implementation of the ESG Timetable,

As we set out in the High-Level Plan; “Only those rights which potentially interact, contain the required level of information to inform assessments, were discussed with Network Rail and are intended for the next three timetable changes will be considered by Network Rail.” and that “Applications consisting of rights for geography not impacted or for later timetable changes should be considered separately.”

These factors have shaped the anticipated plan for submission of evidence related to this and other applications.

Whilst Network Rail was made aware by Alliance Rail that they would be applying for the proposed access rights as requested in ORR’s letter, Network Rail has not yet had an opportunity to fully consider its position on this application and whether it can eventually support the proposed access rights.

ORR, in its invitation to NR to make written representations, expects that NR will:

- include all of the necessary information for ORR to take an informed decision; or
- to refer to all of the necessary analyses and the confirmed timelines Network Rail requires to reach its decision on the application. This should include the “5 June 2024 capacity analysis” and any other analysis Network Rail needs to complete;
- recognise which other applications within the published list of “20 May 2024 applications” could interact with each application.
- Confirm any interested persons name(s) or confirm there are no interested persons.

Network Rail can confirm that we will not be able to in this representation provide all the necessary information for ORR to make an informed decision at this point in time. However, in this representation we will address each of the points above as well as provide:

- provide an initial view of the application Form P and Track Access Contract.
- where applicable, highlight if Network Rail believes that some of the access rights sought are outside the scope of the ORR’s letter dated 24th April 2024;
- an indication of how Network Rail will be able to provide its final representations and any intermediate representations so that ORR will then have all relevant information from Network Rail to assist ORR in making an informed decision.

Interested Person(s)

Network Rail is not aware of any persons who would fall within the definition of “Interested Person” in paragraph 1 of Schedule 4 of the Railways Act 1993 in relation to the application made by Alliance Rail.

Keeping you informed

As stated in the letter to the ORR on the 05 June 2024 “The plan will need to be flexible and reviewed through the process to consider industry decisions in relation to the ECML ESG along with potentially other changing industry priorities and requirements. For example, recommendations from the East Coast Task Force may impact on industry resources, in particular timetabling resource. This could require changes to the remaining stages of the plan, including impacting when analysis can be completed.”

In the letter we also stated “We propose establishing a change control mechanism to track changes in the plan, when and where required, to retain transparency and clarity. This may also lead to consequential changes to anticipated dates of any resulting representations planned by our customer teams.” Where such changes in timeline occur, we will notify you of any impacts on expected content, volume or timing of forthcoming information.

Summary of Rights Sought

In their application and as a high-level summary Alliance Rail are seeking a Track Access Contract via a S.17 with the following access rights to commence from the December 2025 Timetable to the December 2032 timetable:

- Five trains per day in each direction between Cardiff Central and Edinburgh Waverley.
- The calling pattern is: Cardiff Central, Newport, Severn Tunnel Junction, Gloucester, Birmingham New Street, Derby, Sheffield, Doncaster, York, Newcastle, Edinburgh Waverley. The service is planned to operate via Chepstow to Gloucester
- With the aspiration of using Class 22x (either Class 221 or Class 222) Rolling Stock to operate the services

Industry Consultation for this application commenced on 13/10/2023 and concluded on 13/11/2023.

The High-Level Plan and Dependencies

The High-Level Plan submitted on June 5, and our additional engagement with Capacity Planning indicates that the following phases may be relevant for this application :

- Phase 1 - Collation and Scoping
- Phase 2 - Risk Identification for application
- Phase 3 - Production Development Period for SCD 2025 aspirations
- Phase 4a – ECML confirmation for December 2025
- Phase 4b – ECML confirmation for May 2025
- Phase 5 – December 2025 Production Period

This along with the interacting applications matrix in Annex B, should support Network Rail to in considering application and interacting location dependencies.

We are mindful that the High-Level Plan and its analysis, or other issues indicated, may identify dependencies, risks or changes in risk profiles that could require revision or further review of individual responses. We also note the 05 June plan does not guarantee that analysis will not have to continue beyond the timetable development process. Where this is the case we will communicate with the Operator and ORR.

As stated later in this letter, if interactions occur at different points in time, i.e. different Timetable Change Dates then this could have an impact on when Network Rail will be able to submit its position with regards to the application.

Common route / regional identified considerations / constraints

This request for rights covers a point in the network where it has been identified at a regional level that more than one application should be considered by ORR at the same time as any one decision would restrict the ability to accommodate other requests due to the items listed in Annex A. The other affected operators' applications are set out in Annex B.

Network Rails Review of Form P and associated documents

Network Rail has performed an initial assessment of the Form P and associated documents submitted with this application.

Network Rail would like to highlight the following:

Form P

Network Rail notes that Alliance's Form P mentions they are considering procuring bi-mode rolling stock in the future. Eastern Region is in the process of finalising a remit for power modelling on the East Coast Main Line (ECML), so we would like to include Alliance in our modelling if they wish to be involved.

Track Access Contract

Key findings from the submitted Track Access Contract which the ORR and the applicant need to take into consideration and are as follows:

- *Contract commencement vs Service Commencement*
 - We assume the applicant may plan to undertake driver training and testing before the services commence. However, there is no indication from the applicant when the Contract will need to commence from as a minimum, in order to allow this testing / training to be undertaken. The ORR may wish to seek assurances from the applicant as to whether the proposed commencement date of the services are realistic considering the rolling stock has not yet been confirmed, driver training / testing will need to commence by the end of this year and the necessary vehicle and route acceptance to be obtained in time.

- Conditions Precedent to Clause 5 to be added – a date of when the driver training and testing needs to be provided by the applicant.
- The Expiry Date and the Longstop Date would need to be added.
- *Schedule 5*
 - ‘Morning Peak’, ‘Evening Peak’ and ‘Off Peak Times’ references should be removed from Table 2.1.
 - A footnote should be added to table 2.1 for the Passenger Train slots to commence in the proposed timetable change.
 - Driver training and testing sub paragraphs should be added to paragraph 2.7 to allow for driver training and testing noting that the Firm Rights are dated to commence in the proposed timetable change.
 - In Specified Equipment 5.1, Network Rail would like the applicant to add a specific rolling stock class once they know what rolling stock they will be operating but prior to the Contract commencing.
- *Schedules 4 & 8*
 - We would like to propose the inclusion of a Schedule 11 which will be a ‘Relevant Schedule 4 and 8 Modifications’. This is to allow Network Rail and the applicant to capture the required data once the services commence and then undertake a Schedule 8 recalibration. Network Rail invites the applicant to agree a ‘Start Date’ and ‘Backstop Date’ as required in this schedule.

As stated, these are the high-level points made in the review of the Track Access Contract and therefore Network Rail invites ORR and the applicant to review and take into consideration this document as part of Network Rail’s representations.

The Specified Equipment

Alliance stated in their submitted documentation that they would like to use off-lease Class 22x rolling stock (diesel traction). The operation of diesel rolling stock does not have any detrimental impact on the current power supply constraints on the WCML.

We would ask Alliance to engage with us on commissioning works to deliver the required capability and to undertake the Route Clearance processes. Alliance should commission a full gauging study from a recognized gauging company for the complete route and then a complete compatibility analysis.

We request that Alliance include the correct Specified Equipment in the Track Access Contract, i.e.

either Class 221 or Class 222 (rather than Class 22x).

Investment Conditions

We note Alliance referenced “There will be significant investment in the passenger accommodation of the fleet, along with some overall enhancements and improvements to the stock for its ongoing operation”. We would be interested in understanding the specific investments being proposed by Alliance, the timescales involved and funding requirements.

Network Rail’s Initial Position on the Access Rights Sought prior to necessary assessments being completed in line with the plan

Network Rail has made every attempt in their initial assessment of the Application received to be able to inform the ORR of any early positions it might have on the access rights sought. Whilst, as outlined in this letter, Network Rail has a number of assessments and analysis that needs to be undertaken to inform a position whether Network Rail supports or not the Application that has been submitted by Alliance Rail (detailed later in the letter), we do have an initial view on the access rights sought by Alliance Rail.

Capacity

Joint analysis was undertaken for the proposed Alliance train services, including capacity for proposed service paths, examination of Cardiff, Birmingham New Street and Edinburgh platforming, and performance analysis at select locations. The proposed paths will pass through the geographic boundary of the not-yet implemented Wales and ECML Event Steering Group (ESG) timetables. As such, this analysis used both development timetables as a base for this assessment, with the June 2024 timetable used as a base for the region outside both areas.

These three different bases were not integrated before the start of this work and it was not part of this work to resolve mismatched schedules between them, therefore there was some ambiguity about how significant mismatches will be resolved for future timetables. This was most significant for mismatched services in the Birmingham-Derby corridor between the June 2024 timetable and the ECML ESG development timetable.¹

There were also differences between schedules in the Wales ESG development timetable and the June 24 timetable, mostly in the Cheltenham and Gloucester area. Where a choice was required between them, the version of paths held in the Wales ESG development timetable was used because this is in line with expected future timetables.

Alliance and the Advanced Timetable Team (ATT) worked collaboratively as part of the analysis. Initially ATT identified 124 conflicts with the proposed schedules, and 167 potential solutions to reduce them, in the form of changes to other schedules in the timetable bases. This position improved to a reduced number of conflicts at a 110, with potential solutions increasing to 218.

The analysis found that during the remitted assessment timeline, timetable capacity for Alliance Rail’s current proposed paths does not exist because they are not conflict-free against the base

¹ Network Rail, *Alliance Rail, Edinburgh to Cardiff*, p. 21, 09 May 2024.

timetables.

It is important to note that the above work that was undertaken included the ECML ESG TT as it was originally planned for December 2024 prior to the decision to not proceed in December 2024. Therefore any decision by the ECML Taskforce and any changes to the ECML ESG TT used as a baseline in this work would alter the potential conflicts and solutions. In addition the interacting applications could also add to the number of conflicts.

Performance

Due to the absence of conflict-free Alliance paths, a 'key-location' based performance intelligence approach was previously taken.

This provides a useful output for assessing the broad scale risks and to help inform future timetabling work by providing a view on current performance at these locations, as well as specific issues where services are close to proposed timings.

These locations are: Cardiff Central, Gloucester, Birmingham New Street, Sheffield, Edinburgh.

Key locations used by the proposed route perform poorly in existing timetables and there were unresolved conflicts between the base timetables and the proposed Alliance paths.²

Possible Interactions with Other Applications from 20th May 2024

As requested in ORR's invitation for NR to make written representations to this application, Annex B to this letter shows where this application could interact with each of the "20 May 2024 Applications" at the previously identified locations.

Please note if the interactions occur at different points in time, i.e. different Timetable Change Dates, then this will have an impact on the dates that Network Rail will be able to submit its position with regards to the application. I.e. if the application submitted for Operator A is to commence December 2024 and there are no concerns or conflicts that does not mean that when Operator B's aspirations are considered which start in May 2025 that both will be able to be accommodated and therefore Network Rail will have to see the outputs of the capacity assessments for the May 2025 Timetable for Operator B before they can give a final position on Operator A's application.

As the ORR is aware the members of the Industry PMO agreed in March 2024 that the ECML ESG Timetable which was planned for December 2024, would be deferred pending further development work. Considering this, we are reviewing the requirement for continuation of our previous approach to access rights on the ECML. We expect to be able to communicate further with the industry and the ORR in the near future of our position on this.

In addition, any new or amended rights (which change capacity parameters) whether contingent or firm which are being sought in those 20 May 2024 Applications on the ECML, as stated previously and in line with the 05 June 2024 letter from Network Rail to the ORR, Network Rail will not be able to make decisions on this until decisions on ECML are made following consideration by the industry ECML

² Network Rail, *Alliance Rail, Edinburgh to Cardiff*, p. 23, 09 May 2024.

Task Force. It is recognised for those operators who have bid for paths on the ECML for the December 2024 Timetable and they have been offered back to the Operator at D-26 Network Rail will have to consider the support of access rights in the interim only.

NR will only be in a position to assess this application post a decision on ECML ESG implementation and ECML Taskforce recommendations as to what Timetable the ECML ESG will be implemented.

Allowing business continuity while preserving freedom of action for ORR in taking its decision

Our letter of 05 June 2024 stated that in this interim period Network Rail will have to balance the need for business continuity, so that current services may continue to operate and timetable changes can be made when there is low risk of negative outcomes for passengers and freight users, with the need to avoid prejudicial decisions that could unduly favour one party where aspirations interact.

We note that some operators have split their applications across different timetable periods, which already provides ORR with the ability to deal specifically with the nearer-term applications now, whereas others have combined different timetable periods in a single application.

Should ORR wish to make a single decision on each application it has received, without breaking that application into parts, then, where a single application has been made relating to multiple timetable periods, there is a risk that rights might not be available in time for an operator to commence services as early as it would like, given the need for all of the information set out in our plans to be available in order for decisions to be made relating to those future timetables.

Where paths associated with some of the quantum rights in this application are included in a New Working Timetable issued under the Network Code Part D process, then Network Rail proposes to work with the applicant on these elements of the application. Our aim, subject to normal governance processes, would be to potentially agree a new s22 application for contingent, time-limited rights for that timetable period with no presumption of continuity – in line with the approach that ORR has supported for applications on the East Coast Main Line in recent years.

This would enable you to reserve your position on future capacity choices, allowing decisions that relate to a later timetable period to be made simultaneously, while making effective use of the railway network in the earlier timetable periods.

Conclusion

Network Rail is aware that this representation letter does not contain all the information needed for this application for the ORR to make a decision.

As explained in our letter of 05 June 2024, these representations letters were mostly expected to reserve our position pending the outcome of the capacity and performance assessments. We are also mindful that the plan and its analysis may identify dependencies, risks or changes in risk profiles that could require revision or further review of this response. However, we hope that the plans we provided give you the reassurance that we will assess this application to inform Network Rail's position in a later representation in line with the plan and letter. In addition, Network Rail wants to give the ORR the confidence that we have made every effort in this letter to give any initial views where we can.

Network Rail asks that while we carry out our assessments, ORR progresses with its own assessments wherever possible to assist in making early decisions / descoping the scale of applications requiring

assessment from Network Rail. Additionally, where we have deemed an application for December 2024 or May 2025 to be unready in the initial representations in this letter, we ask that this be descope from the analysis requirements as quickly as possible.

Network Rail will continue to keep ORR sighted on the progress of the plan for this application.

Yours sincerely,

Gianmaria Cutrupi

Aspirant Open Access Operators Manager

Network Rail

Annex A – Plan for Information / Analysis / Assessment

Details of Information / Analysis / Assessment	NOTES	
<i>High Level Phases from 5th June Plan</i>		
Phase 1 Collation & Scoping	Please see the June 5 Letter for details.	
Phase 2 Risk Identification for May 2025	Please see the June 5 Letter for details.	
Phase 3 May 2025 Production Development Period	Please see the June 5 Letter for details.	
Phase 4a - (ECML confirmed for December 2025) – focusing on December 2025	Please see the June 5 Letter for details.	
Phase 4b - (ECML confirmed for May 2025) – focusing on December 2025	Please see the June 5 Letter for details.	
Phase 5 – December 2025 Production Period	Please see the June 5 Letter for details.	
<i>Further Route / Function Analysis / Assessments / Information</i>		
Freight & Customer Considerations		Further details of assessment to be carried out found in Appendix A
North West & Central Region Considerations	Informed by Regional / Route plans	Further details of assessment to be carried out found in Appendix B
Scotland Region Considerations	Informed by Regional / Route plans	Further details of assessment to be carried out found in Appendix C
Wales & Western Region Considerations	Informed by Regional / Route plans	Further details of assessment to be carried out found in Appendix D
Capacity Planning Considerations	Informed by Capacity Planning plans	Further details of assessment to be carried out found in Appendix E

Appendices for Annex A

Appendix A: Freight & Customer Assessment

<i>Assessment</i>	<i>Detail</i>
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Review of Aspirational paths	This proposed Track Access Contract contains a number of Access Rights for aspirational capacity. Where this is the case, we are working through the detail to understand the impact on the network from a safety and operational point of view. In line with CP7 freight growth targets, we are committed to securing capacity in the timetable for future use. Where capacity and suitable capability can be identified, we will consider applications for the Sale of Access Rights.
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Appendix B: North West & Central Region Considerations

North West and Central (NW&C) Region has several large enhancement projects taking place including TransPennine Route Upgrade, HS2 and Midlands Rail Hub impacting long term capacity utilisation for which we will give consideration to when reviewing this application once all the necessary assessments have been completed and Network Rail is able to collectively assess the risks and impact this application may have.

In addition to the key interacting locations specified in ORR’s letter of 24 April 2024, Network Rail is also aware of other locations for which there are potentially interacting aspirations and capacity constraints. This includes but is not limited to Manchester and the surrounding area, Crewe, and the Wolverhampton corridor. During our assessment of the applications we will be paying particular attention to both the locations identified in ORR’s letter and those named above.

As ORR is aware Birmingham and surrounding area is one of the key interacting locations highlighted in ORR’s letter of 24th April 2024. This application is one of a number of applications seeking additional rights in Birmingham and surrounding areas. It is our intention to develop a strategic plan for passenger services in the West Midlands area in order to optimise capacity in the medium and long term, taking cognisance of the Midlands Rail Hub project in order to realise the investment benefits of this project. We will do this in consultation with all affected operators and stakeholders.

Due to the time required to undertake an industry review and strategic plan and the assessment plan for this application not aligning, whilst considerations and any views will be highlighted when we provided our outputs of the plan, timescales do not allow the opportunity to provide a long term strategic capacity utilisation assessment.

In preparation of the December 2022 timetable, Network Rail formed industry workstreams to undertake a strategic review of capacity utilisation on both the West Coast Mainline South and Manchester area including the Castlefield corridor and Manchester Victoria. A separate industry working group (managed under the governance of the Grand Rail Collaboration) assessed options for the service structure on the Wolverhampton – Coventry route through Birmingham New Street. The timetable today still reflects this structure, and the outputs produced for December 2022, which were supported by the industry, remains the strategic plan for capacity utilisation and will help us in assessing this and the other applications.

A key consideration included in the plan within Annex A is regarding power supply on NW&C. As previously informed, NW&C has several areas of concern with regards to power supply. For any application utilising electric traction, it is our intention to model the outputs of the capacity assessment to understand the power supply risk both during normal working and in N-1 conditions. In carrying out traction power modelling, NW&C region adheres to the requirements stipulated in NR/L1/ELP/27000 “Policy Requirements for Electrical Power Assets”. This policy states that the electrical power supply system shall have sufficient redundancy to support the peak timetable with

one key piece of equipment out of service (known as N-1). In addition to fulfilling Network Rail policy requirements, maintaining the required N-1 redundancy levels in the traction power network supports adherence to contractual, performance and safety targets.

In order to accurately assess power supply it is key that we understand any Empty Coaching Stock moves. We will be requesting this information separately from operators if it was not previously supplied as part of the 20 May applications.

We will undertake internal consultation of the application following our usual business practices however as a result of ORR letter of 24 April 2024 NW&C has 55 applications which it must consider. Therefore our internal consultation will be over a longer period of time, and this has been allowed for in the plan.

Power supply and route performance assessments require additional subject matter support from third party organisations and therefore whilst we have included anticipated timescales within the plan these are currently subject to confirmation.

We are mindful that the High-Level Plan and its analysis, or other issues indicated, may identify dependencies, risks or changes in risk profiles that could require revision or further review of individual responses.

The current number of new applications received at this point in time is unprecedented, with 83 new applications received. Of these, 55 are seeking capacity on NW&C Region. This volume of simultaneous applications on NW&C Region, with this number of interactions to analyse, involves a level of complexity not previously experienced. As we move through the complexities of assessing the applications the plan may necessarily need to be reviewed and revised.

As stated later in this letter, if interactions occur at different points in time, i.e. different Timetable Change Dates then this will have an impact on the dates that Network Rail will be able to submit its position with regards to the application.

As stated in our letter of 5 June 2024 to the ORR “Throughout the rights assessment work phases Network Rail intends to communicate with ORR on progress and provide collated information against individual applications as they are assessed through the plan. The intention is to enable decisions during the process, where possible, rather than await a fully completed package of work considering all in-scope applications.”

We also recognised in our letter of 5 June 2024 that “this approach will have to balance the need for business continuity, so that current services may continue to operate and timetable changes can be made when there is low risk of negative outcomes for passengers and freight users, with the need to avoid prejudicial decisions that could unduly favour one party where aspirations interact.”

TASK	ASSIGNED TO	
Capacity Assessment		
High Level Plan provided 05 June 2024		
Collating & Scoping	System Operator - CP	Please see June 5 letter for details
Phase 2 Timetable Risk Identification May'25	System Operator - CP	Please see June 5 letter for details
Phase 3 May'2025 Production Development Period	System Operator - CP	Please see June 5 letter for details
Phase 4a ECML confirmed Dec'25 Dec'25 assessment against May'25	System Operator - CP	Please see June 5 letter for details
Phase 4b Dec'25 assessment ECML confirmed May;25	System Operator - CP	Please see June 5 letter for details
Phase 5 december 2025 Production period	System Operator- CP	Please see June 5 letter for details
Other Capacity assessment		
2022 Strategic plan capacity assesment	Regional Timetable Team	
Risk Identification		
May'25 TP-Hazid passenger applications	Regional Timetable Team	
TP-Hazid Upto and including May'25 freight applications	Regional Timetable Team	
May'25 TP RAM - all applications	Regional Timetable Team	
Dec'25 TP Hazid - all applications	Regional Timetable Team	
Dec'25 TP -RAM - all applications	Regional Timetable Team	
Internal consultation of applications	F&A Team	
Planned Assessments		
Ped flow assessment of Euston Station	Station Capacity Team	
Level Crossing assessment		
Mapping of number of services to each ELR	Regional Timetable/F&A team	
ALCRM modelling/assessment	LCM	
ALCRM modelling/assessment - May'25	LCM	
ALCRM modelling/assessment - Dec'25	LCM	
Power Supply Modelling		
Phase 1: Build baseline model		
Phase 2: Navitas provide modelling for baseline model	Asset Management	
Phase 3: Assess baseline + Proposed services	Asset Management	
Phase 4: May'25 Production Development Timetable	Asset Management	
Phase 5:N-1 assessment	Asset Management	
Phase 6: Impact assessment + mitigation assessment	Asset Management	
Phase 6: Re-create modelling CIF file based on Dec'24 actuals	Asset Management	
Phase 7: Dec'25 Production Development Timetable	Asset Management	
Phase 8:N-1 assessment	Asset Management	
Phase 9: Impact assessment + mitigation assessment	Asset Management	
Performance Analysis		
Phase 1: Internal review of existing data	Route performance teams	
Phase 2: Performance assessment of May'25 decisions	Route performance teams	
Phase 3: Performance assessment of Dec'25 decisions	Route performance teams	
Governance		
Potential representations for Dec'24		
Draft Letter	F&A team	
Internal Review	F&A Team	
SOAR review and approval	F&A Team	
Submit to ORR	F&A Team	
Final representations:		
Draft letter	F&A team	
Internal Review	F&A team	
Internal Consultation	F&A team	
SOAR review and approval	F&A team	
Submit to ORR	F&A team	

TASK	ASSIGNED TO	PROGRESS	START	END
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Appendix C: Scotland Region Considerations

Scotland Route will be informed by the outputs of ATT High Level Plan outputs and further assessments included in the Regional Plan to follow and associated dependencies from other Regional Plans. However, note that future switch to electric only traction will have to be carefully managed for Power Draw and included in any modelling.

SCOTLAND ACTIVITIES

Route Plan for Further Assessment of Interacting Applications:	Dependencies:	Notes:
May '25:		
Advanced Notice of Timetable Change - all Operators		
Train Plan Assessment (TP-RAM) - all applications	High Level Plan/Advanced Notice of Timetable Change (all Operators)	Activities in subject matter experts' diaries.
SO ATT High Level Plan Phase 2		
Power expert opinion - 22As	High Level Plan	This will include looking at previous modelling exercises to see if specific applications have been included.
Route led Performance Intelligence - 22As	High Level Plan	
Priority Date Notification and Bid - all Operators (D40)		
Timetable Production Start		
Access Rights Compliance Check (ScotRail only)		Normal SoAR process will follow - not shown here.
Train Plan Evaluation (TP-REP)	Priority Date Notification and Bid - all Operators (D40)	Activities in subject matter experts diaries.
Operational Risk Assessment - all applications	Priority Date Notification and Bid - all Operators	e.g. Level Crossing ALCRM, SPAD Risk
Operations Risk - all applications	Priority Date Notification and Bid - all Operators	e.g. Signaller Workload
Infrastructure Risk - all applications	Priority Date Notification and Bid - all Operators	e.g. Maintenance Access, Asset reliability
Route led Performance Intelligence - all applications	Priority Date Notification and Bid - all Operators (D40)	Including Platform Docking at Edinburgh Waverley.
Power Modelling	New Working Timetable - all Operators.	
Regular updates with Regulatory Reform, ORR and Route stakeholders		
Timetable Go Live		
Dec '25:		
Train Plan Risk Identification (TP-HAZID) - all applications	Information from Operators and Capacity Planning (Timetable Production Workpackage spreadsheet)	Meeting will be held as per governing standard
Advanced Notice of Timetable Change - all Operators		
Train Plan Assessment (TP-RAM) - all applications	High Level Plan/Advanced Notice of Timetable Change (all Operators)	Meeting will be held as per governing standard
SO ATT High Level Plan Phase 3		
Power expert opinion - 22As	High Level Plan	This will include looking at previous modelling exercises to see if specific applications have been included.
Route led Performance Intelligence - 22As	High Level Plan	
Priority Date Notification and Bid - all Operators (D40)		Calendar of Milestone Dates not published.
Timetable Production Start		Calendar of Milestone Dates not published.
Access Rights Compliance Check (ScotRail only)		Normal SoAR process will follow - not shown here.
Train Plan Evaluation (TP-REP)	Priority Date Notification & Bid - all Operators (D40)	Meeting will be held as per governing standard
Operational Risk Assessment - all applications	Priority Date Notification & Bid - all Operators	e.g. Level Crossing ALCRM, SPAD Risk
Operations Risk - all applications	Priority Date Notification & Bid - all Operators	e.g. Signaller Workload
Infrastructure Risk - all applications	Priority Date Notification & Bid - all Operators	e.g. Maintenance Access, Asset reliability
Route led Performance Intelligence - all applications	Priority Date Notification & Bid - all Operators (D40)	Including Platform Docking at Edinburgh Waverley.
Power Modelling	New Working Timetable - all Operators.	
Regular updates with Regulatory Reform, ORR and Route stakeholders		
Timetable Go Live		

Appendix D: Wales & Western Region Considerations

Wales and Western Region will consider any additional access right applications for the region in the context of current performance levels, our ongoing recovery plans, all other known and emerging

future service aspirations, and our asset condition and maintenance requirements. Furthermore, we will consider the risks associated with planned enhancement projects, including Old Oak Common, East West Rail, South Wales Metro, MetroWest and others.

The Gloucester area is highly constrained, and any application for this area also needs consideration of services via Cheltenham which bypass it but interact with the wider Gloucester area. Service levels are limited by the complex interacting crossing movements at Gloucester Yard Junction, Gloucester Barnwood Junction, Gloucester station area and the shunt moves required at Cheltenham for services terminating there. The long-distance nature of many of the passenger and freight services in this area further restrict flexibility due to the need to align with paths through Bristol, South Wales and the West Midlands.

Frequency increases affecting Gloucester are envisaged by the promoters of both the MetroWest and the South Wales Metro projects. We published our Greater Bristol rail strategic study in February 2023, with recommendations for this interacting major nearby area, including consideration of the Bristol to Gloucester route. We plan to commence the Cardiff Area Capacity Study late this summer, including considering Cardiff to Gloucester route.

There is a major level crossing located close to Gloucester station (Horton Road Level Crossing). Network Rail will assess the impact of operator’s application in line with the Western route plan. We expect to highlight Network Rail concerns around level crossing barrier downtime at this location. Similarly there are multiple level crossings on the Lydney route which would require upgrades to support additional train services on this line.

As with elsewhere, applications for this area will need to be assessed by Network Rail through detailed assessment in line with the Western plan, including demonstrating acceptable impacts on our asset condition and maintainability, and performance.

As ORR is aware, Cardiff Central and the surrounding area is one of the interacting locations highlighted in ORR’s letter of 24 April 2024. This application is one of several applications seeking additional rights in Cardiff Central and surrounding areas. It is our intention to develop a strategic plan for passenger services in the Cardiff Central area to optimise capacity in the short, medium, and long term. We will do this in consultation with all affected operators and stakeholders.

The plan for the Cardiff Area Capacity Study is to commence late summer and this will initially look to assess all live and aspirational proposals impacting on capacity through Cardiff Central; identify the gaps in analysis that has been done; then if it’s deemed necessary, carry out some further analysis to bring it all together, assess different potential service scenarios. We have started to do some preliminary exploration now to consider what the scope and study remit is likely to look like and will have a workshop in late September to review and discuss. The draft provisional timescales are to be agreed at a later date with the strategic planning team.

Western

TASK	ASSIGNED TO
Capacity Assessment	
Collating & Scoping	System Operator - CP
Phase 2 Timetable Risk Identification May'25	System Operator - CP
Phase 3 May'2025 Production Development Period	System Operator - CP
Phase 4a ECML confirmed Dec'25 Dec'25 assessment against May'25	System Operator - CP
Phase 4b Dec'25 assessment ECML confirmed May;25	System Operator - CP
Phase 5 december 2025 Production period	System Operator- CP

Risk Identification	
May'25 TP-Hazid passenger applications (Known at the time)	Timetable Project Manager
May'25 TP RAM - all applications	Timetable Project Manager
Dec'25 TP Hazid - all applications	Timetable Project Manager
Dec'25 TP -RAM - all applications	Timetable Project Manager
Internal consultation of applications	Customer team
Internal consultation Dec'24 applications not previously consulted	Customer team
Internal consultations May'25 applications	Customer team
Internal consultation Dec'25 applications	Customer team

Planned Assessments	
Level Crossing assessment	
ALCRM modelling/assessment	LCM
ALCRM modelling/assessment - May'25	LCM
ALCRM modelling/assessment - Dec'25	LCM
Performance Analysis	
Phase 1: Internal review of existing data	Route performance teams
Phase 2: Performance assessment of May'25 decisions	Route performance teams
Phase 3: Performance assessment of Dec'25 decisions	Route performance teams
Engineerring Access Assessment	Access Planning/Maintenance
Cardiff Central Capacity study workshop	Wales route
Cardiff Central Capacity Study	Wales route

Governance	
Potential representations for Dec'24	
Draft Letter	Customer team
Internal Review	Customer team
SOAR review and approval	Customer team
Submit to ORR	Customer team
Final representation:	
Draft letter	Customer team
Internal Review	Customer team

Internal Consultation	Customer team
SOAR review and approval	Customer team
Submit to ORR	Customer team

Wales

TASK

Capacity Assessment
Collating & Scoping
Phase 2 Timetable Risk Identification May'25
Phase 3 May'25 Production Development Period
Phase 4a ECML confirmed Dec'25 assessment against May'25
Phase 4b Dec'25 assessment ECML confirmed May'25
Phase 5 December 2025 Production period

Risk Identification
Network Rail Interacting Access Rights - Risks Meeting
Dec'24 TCrag Process
May'25 TCrag Process
Dec'25 TCrag Process
Internal consultation of applications
Internal consultations Dec'24 applications
Internal consultations May'25 applications
Internal consultations Dec'25 applications

Planned Assessments
Level Crossing assessment
ALCRM modelling/assessment
ALCRM modelling/assessment - May'25
ALCRM modelling/assessment - Dec'25
Performance Analysis
Phase 1: Internal review of existing data
Phase 2: Performance assessment of May'25 decisions
Phase 3: Performance assessment of Dec'25 decisions
Engineering Access Assessment
Signaller Workload Assessment Dec'24
Signaller Workload Assessment May'25
Signaller Workload Assessment Dec'25
Cardiff Central Capacity study workshop
Cardiff Central Capacity remit to be agreed and resources identified
Cardiff Central Capacity review
Cardiff Central Capacity study publication

Governance
Potential representations for Dec'24/May'25/Dec'25

Draft Letter

Internal Review

SOAR review and approval

Submit to ORR

Final representation:

Draft letter

Internal Review

Internal Consultation

SOAR review and approval

Submit to ORR

Appendix E: Eastern Region Considerations

Eastern Region has reviewed this application through its initial assurance sessions and is taking forward the relevant actions that will be tracked through the Regional High-Level Plan.

Eastern will be utilising all relevant intelligence gathered as part of the ECML ESG workstream to assist with its ongoing assessment and assurance activities.

Where an application has any additional rolling stock requirements, these will need to be fully assessed as part of the Eastern Region power modelling workstream and align with cross-route power modelling in other Network Rail regions.

As previously highlighted through this representations letter and the 05 June letter to the ORR, we may as we progress, identify dependencies, risks or changes that could result in a change to the plans or activities identified.

Appendix F: Capacity Planning Assessment

This application contains services in the Dec 2025 timetable which will form part of the interacting rights assessments.

Annex B – Interacting Applications Matrix

Operator/Application/Type				A - WCML south	B - Birmingham	C - BHM-Derby	D - Derby-Sheffield	E - Sheffield	F - ECML&Leeds	G - Oxford	H - Gloucester	I - Cardiff
	Dec-24	May-25	Dec-25									
Colas 10th SA 22a	X	X	X			X	X	X	X			X
DBC 72nd SA 22a	X	X	X				X	X	X			
DBC 73rd SA 22a	X	X	X					X	X			
DBC 79th SA 22a	X	X	X			X			X	X		X
DBC 81st SA 22a	X	X	X		X	X	X	X	X	X	X	X
DBC 86th SA 22a	X	X	X					X	X			
DBC 87th SA 22a	X	X	X		X	X	X	X	X		X	X
DBC 88th SA 22a	X	X	X				X	X	X			
DBC 92nd SA 22a	X	X	X									X
DBC 70th SA 22	X	X	X		X	X	X	X	X	X		
DCR 2nd SA 22a	X	X	X	X	X		X			X		
GBRf 34th SA 22a	X	X	X	X	X	X	X		X	X	X	
GBRf 25th SA 22a	X	X	X	X	X	X	X	X	X	X		
GBRf 28th SA 22	X	X	X	X					X			
GBRF 41st SA 22A	X	X	X						X			
Varamis 2nd SA 22a	X	X	X	X	X				X			
WMT 32nd (29th) SA 22A	X	X	X	X	X							
TfW 32nd SA 22a	X	X	X									X
CrossCountry UC, Hydra, Stansted 17	X	X	X		X	X	X	X	X	X	X	X
FLIM 25th SA 22A	X	X	X	X	X	X		X	X	X		
DRS 17th SA 22A	X	X	X	X	X	X	X	X	X		X	X
Avanti 11th SA 22A	X			X	X							
Avanti 14th SA 22A	X	X	X	X	X							
EMR 21st SA 22A	X	X	X				X	X	X			
FLHH 24th SA 22A	X	X	X		X					X	X	
FLHH 25th SA 22A	X	X	X	X	X	X	X	X	X	X	X	
FLHH 26th SA 22A	X	X	X				X	X	X			
FLHH 27th SA 22A	X	X	X		X	X	X	X	X	X	X	X
FLHH 28th SA 22A	X	X	X	X	X	X	X	X	X		X	X
FLIM 21st SA 22A	X	X	X		X	X	X	X		X		
FLIM 23rd SA 22A	X	X	X	X	X							
FLIM 24th SA 22A	X	X	X	X	X	X			X			
FLIM 26th SA 22A	X	X	X	X			X	X	X	X		
Govia Thames Railway 62nd SA 22A	X	X	X						X			

Grand Central 24th SA 22A	x	x	x							x			
GWR 201st SA 22a	x	x	x								x	x	
Hull Trains 28th SA 22A	x	x	x							x			
Hull Trains 29th SA 22A	x	x	x							x			
LNER 37th SA 22A	x	x	x							x			
LNER 38th SA 22A	x	x	x							x			
Lumo 11th SA 22A	x	x	x							x			
Northern 57th SA 22	x	x	x					x	x				
Scotrail 49th SA 22a	x	x	x							x			
TfW 28th SA 22a	x	x	x									x	x
TPT 58th SA 22a	x	x	x					x	x				
WMT 22nd SA 22A	x	x	x		x								
WMT 28th SA 22A	x	x	x		x								
Avanti 3rd SA 22a		x	x	x	x								
Avanti 17th SA 22a		x	x	x	x								
Caledonian Sleeper 9th SA 17		x	x	x	x								
Govia Thames Railway 63rd SA 22A		x	x							x			
Grand Central 28th SA 22A		x	x							x			
Hull Trains 27th SA 22A		x	x					x	x				
LNER 34th SA 22A		x	x							x			
LNER 36th SA 22A		x	x							x			
Lumo 12th SA 22A		x	x							x			
Northern 59th SA 22a		x	x					x	x				
Northern 60th SA 22a		x	x					x	x				
Scotrail 50th SA 22a		x	x							x			
Super Tram 11th SA 22a		x	x					x					
TfW 31st SA 22a		x	x									x	x
TPT 62nd SA 22a		x	x							x			
TPT 63rd SA 22a		x	x							x			
WMT 30th SA 22A		x	x		x								
WMT 31st SA 22A		x	x		x								
WSMR New Contract 17		x	x	x	x								
Alliance Rail Cardiff - Edinburgh 17			x		x	x	x	x	x			x	x
EMR 20th SA 22A			x				x	x					
EMR 19th SA 22A			x							x			
GWR 202nd SA 22a			x									x	
LIS 2nd SA 22a			x							x			
Scotrail 51st SA 22a			x							x			
TPT 64th SA 22a			x					x	x				
TPT 65th SA 22a			x							x			
Virgin New Contract 17			x	x	x								
LNER 35th SA 22A May '28										x			