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Network Rail Final Representations for the proposed 28th Supplemental Agreement to the Track Access Contract between Network Rail Infrastructure Limited and Freightliner Heavy Haul Limited dated 11 December 2016.

This letter provides a final representation from Network Rail for the 28th Supplemental agreement submitted under Section 22A of the Railways Act 1993 for the Track Access Application between Network Rail and Freightliner Heavy Haul Limited (FLHH) dated 11 December 2016.

This representation builds upon the representations submitted by Network Rail for this application on the 28 June 2024, and the 14 March 2025 General Representation on Complex and/or Competing Applications interacting on Location ECML Kings Cross - Edinburgh and Leeds.

The latter of these letters provided important information to support ORR when it comes to making decisions on applications in this geography including context on the work in developing the ECML Policy, ECML Industry Task Force, key performance information, as well as updates on power supply assessment. The annexes to that letter include relevant information including Timetable Performance Analysis and ECML Power Supply Modelling and where there is specific relevance to this application, reference will be made in this representation.

The purpose of this final representation is to provide ORR with Network Rail's final position on this application (and the specific access rights within it) and will do so by providing facts, data and evidence to support our position. Network Rail can confirm that based on the facts, data and evidence outlined in this representation and the ECML General Representation letter dated 14 March 2025, it is **not supportive of this application**.

Where there are a number of applications seeking capacity at the locations referred to in this letter, and as detailed in Annex A, the basis of our support of applications either in total, or in part (as can be determined by reading the relevant representations), may have a connection to our position on all other applications at that location. You may wish to wait for final representations on related applications and the information provided therein prior to making your decision.

There are paragraphs and / or Annexes in this letter which are commercially sensitive and would need to be redacted. Each such paragraph will have the words **“Commercially Sensitive – to be redacted”**, at the start of each relevant paragraph.

Background of the Application and Network Rail Representations

In line with ORR’s letter of 24 April 2024 to the industry on ‘Competing and/or complex track access applications for December 2024, May 2025 and December 2025 timetable changes’, FLHH submitted this application to the ORR on 19 May 2024 as a S22A application in line with ORR’s deadline.

As requested by ORR, Network Rail submitted a High-Level Plan in June 2024, and a further detailed plan was published on Network Rail’s website in August 2024 (and updated in January 2025). Network Rail made its initial representations on this application on 28 June 2024.

In its initial representation on 28 June 2024, Network Rail highlighted some items in the “Network Rail’s Initial Position on the Access Rights Sought prior to necessary assessments being completed in line with the plan” section of the letter. Where we have not had a response to the points highlighted we have noted this below for the Operator and/or ORR to address or take into consideration.

The points we would like to highlight from the original representation and the course of action we require, are as follows:

Potential Future Traffic

FLHH was expected to submit access proposals for both the May 25 and December 25 Working Timetables through the WTT process outlined in Part D of the Network Code.

FLHH did not do this but has provided information to enable Network Rail to undertake a timetable capacity assessment to understand the feasibility of being able to accommodate these access rights.

As an access proposal has not been submitted for these paths it means the application no longer relates to the purpose of the competing and/or complex applications workstream – to make decisions for the three timetables stipulated in ORR letter of 24 April 2024

As a general point of principle, Network Rail would normally only support access rights for future traffic where there is clear evidence of an operator’s prospects of winning business and requiring use of the capacity. Network Rail does not support access rights unless there is a clear intention and ability to use the capacity in question, in order to ensure capacity is not reserved for services with limited prospect of being operated. This aligns with ORR published guidance on the Use of Capacity.¹

We do not expect ORR to make a direction in support of these paths for the reasons we have outlined above (and more generally in this representation letter), however should it be minded to do so, we want to be clear that further discussion would be needed on network and terminal restrictions.

Other information which hasn’t been provided or assessed as a result included:

Commercially Sensitive – to be redacted

¹ ORR, 2022, Guidance on the Use of Capacity, available at:- <https://www.orr.gov.uk/sites/default/files/2022-07/guidance-on-the-use-of-capacity.pdf> accessed 07/04/25.

- Gauge clearance on all routes. FLHH are not at the stage to confirm vehicle type and therefore further assessment is unable to progress.
- Power supply assessment for any electric services (noting traction type needs to be confirmed by FLHH). FLHH are not at the stage to confirm vehicle type and therefore further assessment is unable to progress.
- Confirmation from FLHH that suitable access is agreed [REDACTED] FLHH are not at the stage to confirm.
- Impact on regular overnight Engineering Access. FLHH are not at the stage to provide detailed bid/routing information therefore further assessment unable to progress.
- [REDACTED]. FLHH are not at the stage to provide detailed bid/routing information therefore further assessment unable to progress.
- Clarity from FLHH on the Access Rights sought [REDACTED].

If FLHH want to discuss potential future traffic beyond the December 2025 Timetable we would be open to discuss these in a future separate application, in continuation of ongoing discussion and as part of established industry workstreams and processes that serve to identify capacity for future potential flows.

East Coast Mainline (ECML) General Representation Letter dated 14 March 2025

Network Rail can confirm that this application is seeking the proposed access rights at the interacting location ECML: Kings Cross – Edinburgh and Leeds and therefore the General Representation to ORR on the ECML dated 14 March 2025 is relevant to this application.

Whilst the entire letter is relevant to this application, we would like to highlight key points of that letter which are more pertinent to this application namely “Unused LNER Firm Directed Rights” and “Congested Infrastructure”.

Unused LNER Firm Directed Rights

The ECML ESG Timetable does not include the Unused LNER Firm Directed Rights as stated in paragraph 5 in Network Rail’s ECML General Representation letter to ORR dated 14 March 2025. The ECML Timetable planned for introduction in December 2025 does not include 8 LNER firm rights Monday to Saturday, 7 firm rights Sunday Only, between London King’s Cross and Leeds via Wakefield or Micklefield directed by ORR in 2016.

The specification for the LNER service to/from London King’s Cross had been reduced from 6.5 trains per hour (tph) to 6 tph with agreement from the DfT in 2021. This reduction retained the 0.5 tph London King’s Cross – Middlesbrough service, albeit as far as York, with the 0.5 tph London King’s Cross – Leeds service being descope. ECML Programme Board on 21st March 2021 noted the recommendation from East Coast Route to defer the 0.5 tph London King’s Cross – Leeds service, including the conditional outcome of journey time reduction between London Kings Cross and Leeds, to a post-ECML ESG [December 2025] future timetable change.

As of 14 March 2025 Network Rail have formally declared congested infrastructure on relevant routes between Huntingdon North Junction (Jn) and New England North Jn (Peterborough) and Doncaster Marshgate Jn and Leeds Copley Hill West Jn.

Work undertaken for the ESG has shown definitively that this 0.5 tph London King’s Cross – Leeds service uplift cannot be accommodated alongside the other ESG outputs. As such the service cannot run in this timetable or future timetables, alongside the other industry endorsed aspirations without

additional infrastructure and associated development activity, which is currently unfunded and uncommitted.

Congested Infrastructure

As stated in the ECML General Representation letter dated 14 March (paragraph 6) Network Rail has declared Congested Infrastructure for the December 2025 New Working Timetable for three lines of route on the ECML.

This application covers all three of those locations:-

- Between Huntingdon North Jn and New England North Jn (Peterborough)
- Between Northallerton Longlands Jn and Newcastle King Edward Bridge South via ECML
- Between Doncaster Marshgate Jn and Leeds Copley Hill West Jn

ECML Proposed December 2025 Timetable

As referred to in the ECML General representation letter dated 14 March 2025, in February 2024 the ESG closed following an ECML Programme Board endorsement on 17 January 2024 to deploy the new ECML Timetable in December 2024, subject to the outputs of the completed performance modelling.

At the point in time of ORR's letter to the Industry on 24 April 2024, the Department for Transport (DfT) had accepted a recommendation from the Industry Timetable Assurance Project Management Office (PMO) to funders that the ECML ESG Timetable should be deferred from the December 2024 timetable change.

An ECML Industry Task Force (herein referred to as "the Task Force") commenced in June 2024 as an independently led executive-level cross-industry meeting that provides strategic direction for the work programme. The Task Force develops solutions to the problems of the new ECML Timetable, drives consensus on the outcome(s), and delivers recommendations for industry funders and specifiers.

On 17 October 2024 the Independent Chair of the Task Force wrote to the DfT to advise that the Task Force met on 10 October 2024, reviewed the considerations, issues, and risks, and recommended proceeding with implementation of the new timetable for ECML in December 2025. This was on the basis that the timetable is deliverable and meets the Task Force objectives that were set. Concerns were noted from GB Railfreight (representing themselves and other Freight Operating Companies), ScotRail and Transport Scotland. The Task Force recommendation was accepted by the DfT and subsequently endorsed by the Secretary of State in December 2024.

The Task Force had worked collaboratively up to 31 January 2025 to further de-risk the transition of the ECML ESG timetable from development to timetable production.

Advanced work completed by Network Rail Capacity Planning, to inform the December 2025 timetable risk, involved aligning cross boundary paths in the ECML ESG developed timetable with the latest developments in the wider National Working Timetable (WTT) and associated Rolling Spot Bids (RSB). This process has highlighted that, despite previous timetable development work, the national freight and passenger timetable has evolved and this work has been necessary to reduce the risk that capacity decisions may need to be made during the timetable production period between D-40 to D-26.

Therefore, where in this letter and in the ECML General Representation letter we have referred to the proposed ECML December 2025 Timetable, we are referring to the timetable work above namely, either full or in part, the:

- Timetable which was developed by the ECML ESG and later deferred in April 2024;
- Timetable where solutions were developed to the problems of the ECML Timetable as part of the Task Force;
- Advanced Timetable Work (undertaken between April and October 2024) to de-risk the transition of the ECML ESG timetable from development to timetable production; and
- Advanced work to inform timetable risk including aligning cross boundary paths in the ECML ESG developed timetable with the latest developments in the wider National Working Timetable and associated Rolling Spot Bids.

So where Network Rail highlight in this representation and the ECML General Representation letter (in the relevant annexes to that letter) whether the access rights sought on ECML in each application are as Network Rail expects in the proposed ECML December 2025 Timetable, we are referring to whether the access rights align to the above Timetable work which makes up the proposed ECML December 2025 Timetable.

Summary of Rights Sought

Commercially Sensitive – to be redacted

In their application and as a high-level summary FLHH is seeking:-

40 Firm Access Rights with 1 hour windows to commence on approval until PCD 2026.

■

Assurance / Assessments / Updates

Commercially Sensitive – to be redacted

The following section will address specific areas of consideration, opportunity and risk relevant to the application or where applicable to specific access rights in the application. Where the outputs relate to specific access rights instead of the application as a whole, this will be highlighted in the relevant section.

The majority of the Rights sought pass at least one of the locations listed by ORR in its 24 April 2024 letter to industry. These are as follows:-

1. East Coast Main Line (ECML) – ■
2. West Coast Main Line (WCML) South – ■
3. Birmingham area – ■
4. Birmingham to Derby – ■
5. Derby to Sheffield – ■
6. Sheffield area – ■
7. Gloucester – ■
8. Cardiff – 3 aspirations

■

Industry Consultation for this application commenced on 24 May 2024, and concluded on 24 June 2024. Due to the redaction of the Schedule 5 Rights Table and Form F for commercial sensitivity, a

number of consultees queries could not be addressed, resulting in insufficient information for consultees to properly evaluate the supplemental.

East Coast Main Line

Please refer to text earlier in this letter.

West Coast Mainline (WCML) South

Please refer to the Network Rail letter to ORR “Network Rail representations for applications affecting the West Coast Main Line (South)” dated 7 February 2025.

Cardiff Central

Network Rail identified a piece of work on Cardiff Central as a priority strategic planning workstream for Control Period (CP) 6 due to the large number of commitments and aspirations from different stakeholders for the immediate Cardiff area and we wanted to have a holistic view of the impact of these. Freightliner did not declare their Cardiff related aspirations within this forum.

The Sprint Phase was an addition to help support some of the immediate concerns around performance at Cardiff and paves the way for the medium- and long-term review.

We continue to work with a wide range of stakeholders which does include Train Operating Companies (TOCs), Freight Operating Companies (FOCs), Local Authorities and Welsh Government and varying aspirations, all at various stages in the funding lifecycle. These will be used to test capacity trade-offs in several Indicative Train Service Specifications (ITSS) in the second and third phases of the study. As part of the preparatory work for these phases, a number of meetings have already been held with operators.

A stakeholder session was arranged for 05 February 2025 with a vast range of stakeholders invited (c. 50) and an update will be provided on some of the short-term performance assessments as well as an overview of each ITSS to be tested. The outputs of the Sprint Phase identified some of the most prominent existing challenges impacting performance at Cardiff Central and proposes changes that can make improvements to the current state of play. The outputs are in the process of being shared with stakeholders.

The Economic Analysis remit is currently being finalised and analysis of each ITSS will take place following the completion of the ATT analysis for each ITSS. The analysis will vary depending on which ITSS is being tested and how much development the individual aspirations have had.

The next steps are as follows (all dates are indicative):

- Develop ITSS phases: complete – agreed during stakeholder forum on 05 February. For context, there are five phases as part of the ITSS featuring infrastructure changes and service enhancements from across the industry, ranging from committed through to aspirant.
- Summary Report (Short-term work): Being shared with stakeholders
- Capacity analysis of ITSS all phases completed: July 2025
- Final Report: January 2026
- Further stakeholder forums to be arranged in mid-2025 and end of 2025.

Gloucester

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.

To assist in informing on capacity, Network Rail have assessed the number of conflicting moves between the December 2024 timetable and the assessment database being used to complete timetable capacity analysis to support the Complex/Competing Rights workstream. The exercise demonstrates:

- A slight increase in potentially conflicting moves at Gloucester Yard Junction
- More significant increase of 11 % at Barnwood Junction and 7 % at Horton Road Junction
- Increase in movements across Horton Road level crossing would also be a concern (currently c.330 per day)

Comparison of Gloucester area conflicting movements

	December 2024	With IR applications
Barnwood Jn Down Main towards Gloucester	91	101
Gloucester Yard Jn Up Main from Gloucester	60	61
Horton Road Jn from Barnwood Jn and towards Gloucester Yard Jn	151	162

In addition to the conflicting routings referred above, there are many other constraints in the Gloucester area:-

1. Restricted routing of services at the east end of the station results in conflicts when platform 1 is occupied (Figure 1). This can constrain the availability of paths for example from the Barnwood Jn direction towards Severn Tunnel Jn when a route via platform 1 is not available.
 - Platform length limitations affect platforming of longer Intercity Express Train (IET) formations. This restricts the ability to flex passenger services to facilitate paths for additional freight services.
 - Services terminating and shunting at Cheltenham Spa restrict capacity to / from the West Midlands for both passenger and freight services.
 - Severn Tunnel Junction layout also impacts on availability of paths towards Gloucester for both passenger and freight services.

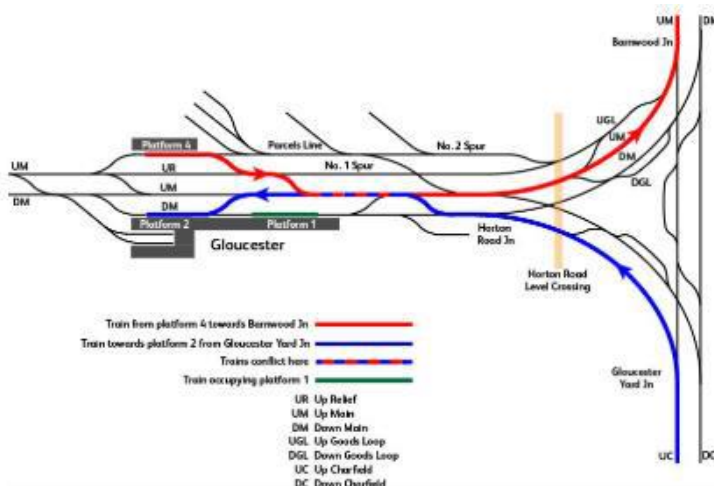


Figure 1 – routing constraints when platform 1 is occupied

2. 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.
3. At Manually Controlled Barrier (MCB) type crossings, the barrier down time per train is often in the 3-minute area, as opposed to Automatic Crossings which are often around the

30 second area. This provides a different risk to consider. Essentially there is a collision risk and convenience risk. Due to the length of barrier down time at MCB type crossings, an additional train can end up more than doubling the time a user waits at the crossing a the train may fit in a slot where the barriers were previously raised for a few minutes, affecting road commuter’s plans. The anticipated sporadic running frequency and overnight service operation described in this application mean less collision risk is introduced and significantly less convenience risk than a regular passenger service uplift. Therefore, minor additional quantum freight trains traversing Horton Road Level Crossing and corresponding additional nighttime barrier downtime is less intrusive than a new regular passenger service which drops the barriers at frequent times.

Manchester Oxford Road

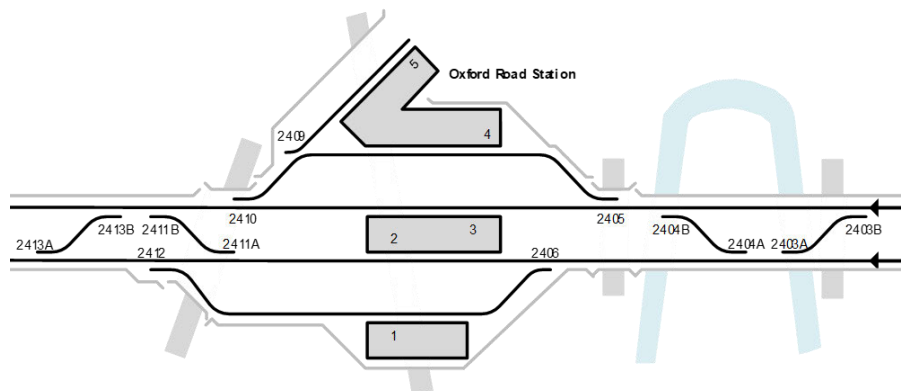
A review of platform capacity between the hours of 1200 – 1600 at Manchester Oxford Road was carried out [REDACTED]

As a result the following restrictions have been identified:

- The Train Planning Rules (TPRs) state “Platforms 2, 3 and 4 should not be used to terminate turnback services except by special arrangement.” [REDACTED]
- [REDACTED]

A service blocking a platform at Manchester Oxford Road for any extended period would cause a severe performance risk, in particular for services running via the Castlefield Corridor. As it would significantly reduce operational flexibility and negate the ability to recover if delayed services need to be recessed at Manchester Oxford Road or overtaken.

Current Manchester Oxford Road Layout



ECML Power Supply Modelling

Network Rail can confirm that this application directly relates to paragraph 11 of Network Rail’s General Representation to ORR on the ECML dated 14 March 2025 and is included in the power modelling report which is an Annex (Annex M) to the 14 March 2025 General Representation.

The services associated with the access rights in this application have not been included in the power supply modelling, so cannot be supported. Network Rail wish to collaborate with FLHH on any necessary power mitigations until such point future power upgrades alleviate the risk.

WCML Power Supply Modelling

The services associated with the access rights in this application have not been included in the power supply modelling, so cannot be supported from an electric traction perspective.

Capacity

Network Rail has contacted FLHH to understand whether these aspirations are still required. No response has been received. Annex B lists all the services that Network Rail is not supportive of at this time. In addition to this, all 40 services initially provided by FLHH for assessment were missing mandatory allowances for adjustment and engineering time throughout their journeys. A review of these found that when adding them in, before seeking to resolve conflicts, it would not be possible for the following 4 of the 40 services to meet the operating windows submitted by FLHH.

Commercially Sensitive – to be redacted



Proximations are also very high across almost all of the locations specified in the ORR's letter of 24 April 2024 and in particular on the WCML South & Birmingham.

These highlight the interactions at ORR locations between services that are within 6 minutes of each other, demonstrating what services or applications could impact others if capacity for those services was altered or if they were delayed even if by only a few minutes during operation. Given there are a high amount of proximations relevant to FLHHs 28th application, the combination of these presents a risk to performance of services in this application and other unsupported applications running through the same locations. See annex D for more detail.

The ECML December 2025 specification developed by the ECML ESG and subsequent ECML Industry Task Force took a holistic view of capacity and performance whilst considering service specifications, service aspirations and journey time outputs from ECML ESG and Task Force members.

If ORR does direct this application, then it will impact on the capacity available to other Operators' applications, or elements of applications, on the ECML, both for those included in the proposed December 2025 ECML and those that have capacity requests additional to the proposed timetable. It would also change the assumptions on which the proposed ECML December 2025 Timetable, as developed, modelled and recommended for progression into the development period. Consequentially, this could have an impact on the forecast operation and performance of the Timetable.

Performance

As these trains are not yet in the timetable, there is no performance data to assess. However:

- These services would be above the proposed ECML December 2025 timetable, unless ORR decided to direct against the proposed TT, and therefore would increase the risk to performance and likely result in further detriment.
- The services would change the assumption on which the proposed ECML December 2025 Timetable was developed, modelled, and recommended to progression into the development period. They would likely have an impact on the forecast operation and performance of the timetable.
- Due to the cross-route nature of these rights, this would also increase the chances of transporting delay across the network.
- These services are not compliant within multiple timetable bases, and therefore would have a high risk of importing delay into the timetable.

Conclusion

In this representation letter we have confirmed that we do not support the access rights sought in this application. Given that these trains have not been bid into the May 2025 nor December 2025 Working Timetables over any infrastructure, and considering the number of conflicts identified, Network Rail is not supportive of this application at the current time, as we do not believe it is an appropriate use of capacity.

Network Rail considers that this final representation letter contains all the information needed for this application to enable the ORR to make a direction. We do not expect ORR to make a direction in support of these paths for the reasons we have outlined, but should it do so, we want to be clear that further discussion would be needed on network and terminal restrictions.

If operators want to discuss future aspirations beyond the December 2025 Timetable, we would be open to discussing these in a future separate application.

Yours sincerely

Robert Neep
Customer Relationships Executive Manager

Annex A - Interacting Locations matrix

Operator/Application/Type	Status of Application	WCM L south	Birmingham	BHM - Derby	Derby- Sheffield	Sheffield	ECML&Leeds	Oxford	Gloucester	Cardiff
Alliance Rail Cardiff - Edinburgh 17	Withdrawn		x	x	x	x	x		x	x
Avanti 3rd SA 22a	Live	x	x							
Avanti 11th SA 22A	Withdrawn	x	x							
Avanti 14th SA 22A	Withdrawn	x	x							
Avanti 17th SA 22a	Live	x	x							
Avanti 18th SA 22a	Live	x								
Caledonian Sleeper 9th SA 17	Live	x	x				x			
Colas 10th SA 22a	Live			x	x	x	x			x
CrossCountry 38th SA 22a	Live		x	x	x	x	x	x	x	x
DBC 72nd SA 22a	Live				x	x	x			
DBC 73rd SA 22a	Live					x	x			
DBC 79th SA 22a	Live			x			x	x		x
DBC 81st SA 22a	Live		x	x	x	x	x	x	x	x
DBC 86th SA 22a	Live					x	x			
DBC 87th SA 22a	Live		x	x	x	x	x		x	x
DBC 88th SA 22a	Live				x	x	x			
DBC 83rd SA 22a	Live	x								
DBC 84th SA 22a	Live							x		
DBC 85th SA 22a	Live									
DBC 91st SA 22a	Withdrawn	x								
DBC 92nd SA 22a	Live									x
DCR 2nd SA 22a	Live	x	x	x	x		x	x		
DRS 17th SA 22A	Live	x	x	x	x	x	x		x	x
EMR 19th SA 22A	Live						x			
EMR 20th SA 22A	Live				x	x	x			
EMR 21st SA 22A	Live				x	x	x			
FLHH 24th SA 22A	Live	x						x		
FLHH 25th SA 22A	Live	x	x	x	x	x	x	x	x	
FLHH 26th SA 22A	Live				x	x	x			
FLHH 27th SA 22A	Live	x	x	x	x	x	x	x	x	x
FLHH 28th SA 22A	Live	x	x	x	x	x	x	x	x	x
FLIM 21st SA 22A	Live		x	x	x	x	x	x		
FLIM 22nd SA 22A	Live		x	x	x	x	x	x		
FLIM 23rd SA 22A	Live	x	x							
FLIM 24th SA 22A	Live	x	x	x	x	x	x	x		
FLIM 25th SA 22A	Live	x	x	x		x	x	x		x
FLIM 26th SA 22A	Live	x			x	x	x	x		x
GBRF 25th SA 22a	Live	x	x	x	x	x	x	x		
GBRF 34th SA 22a	Live	x	x	x	x	x	x	x	x	x
GBRF 41st SA 22A	Live						x			
Govia Thames Railway 62nd SA 22A	Live						x			
Govia Thames Railway 63rd SA 22A	Live						x			

OFFICIAL

Grand Central 24th SA 22A	Directed by ORR							x			
Grand Central 28th SA 22A	Live							x			
GWR 201st SA 22a	Live								x	x	
GWR 202nd SA 22a	Live									x	
Hull Trains 27th SA 22A	Live					x		x			
Hull Trains 28th SA 22A	Directed by ORR							x			
Hull Trains 29th SA 22A	Live							x			
LIS 2nd SA 22a	Live							x			
LNER 34th SA 22A	Live							x			
LNER 35th SA 22A May '28	Live							x			
LNER 36th SA 22A	Live							x			
LNER 37th SA 22A	Rights were being sought until Dec 2025 so not included in analysis							x			
LNER 38th SA 22A	Live							x			
Lumo 11th SA 22A	Live							x			
Lumo 12th SA 22A	Live							x			
Lumo London-Rochdale New Contract S17	Live	x									
Northern 57th SA 22	Directed by ORR (some of the access rights in this application were withdrawn before direction and added to the Northern 60thSA)					x	x	x			
Northern 59th SA 22a	Live						x	x			
Northern 60th SA 22a	Live						x	x			
Scotrail 49th SA 22a	Withdrawn							x			
Scotrail 50th SA 22a	Live							x			
Scotrail 51st SA 22a	Live							x			
Super Tram 11th SA 22a	Live						x				
TfW 28th SA 22a	Live		x	x						x	x
TfW 31st SA 22a	Live									x	x
TfW 32nd SA 22a	Live										x
TPT 58th SA 22a	Live							x	x		
TPT 62nd SA 22a	Rights were being sought until Dec 2025 so not included in analysis								x		
TPT 63rd SA 22a	Live								x		
TPT 64th SA 22a	Live						x	x			
TPT 65th SA 22a	Live							x			
Varamis 2nd SA 22a	Live	x	x					x			
Virgin New Contract 17	Live	x	x								
WMT 22nd SA 22A	Live		x	x							
WMT 28th SA 22A	Live		x	x							
WMT 30th SA 22A	Withdrawn		x	x							
WMT 31st SA 22A	Withdrawn		x								
WMT 32nd (29th) SA 22A	Live	x	x	x							
WSMR New Contract 17	Live	x	x	x							

Annex B – Commercially Sensitive – to be redactedAnnex C – Commercially Sensitive – to be redacted**Annex D - Proximations**

6-Minute Proximation

- A 6-minute proximation consists between two application schedules.
- Where two services: from different applications only, (not application vs base timetable) utilise the same section of track either 6-minutes before, or after, one another.
- 6-minutes is approx. double headway* to draw out how proximity could affect the running of another service.
- This is limited to Wednesday, Saturday and Sunday only. ECML is not included.

*Not all headways are 3 minutes, this figure has been agreed due to the restrictions of Attune conflict reporting

WCML_South	Count of Proximations			
	Wed	Sat	Sun	Tot
Runs in Proximity with				
FLHH 28th EXTRA	28	0	0	28
DRS 17th BASE	23	0	0	23
Virgin S17 EXTRA	21	0	0	21
GBRf 34th BASE	20	0	0	20
Avanti 17th BASE	11	0	0	11
Lumo S17 EXTRA	11	0	0	11
WMT 32nd BASE	10	0	0	10
FLIM 24th BASE	9	0	0	9
GBRf 25th BASE	7	0	0	7
DBC 83rd BASE	6	0	0	6
FLIM 26th EXTRA	6	0	0	6
DBC 72nd BASE,REL	5	0	0	5
Avanti 3rd BASE	4	0	0	4
FLIM 25th BASE	4	0	0	4
Caledonian Sleeper 9th EXTRA	3	0	0	3
FLHH 25th BASE	3	0	0	3
GBRf 34th EXTRA	1	0	2	3
Varamis 2nd BASE	3	0	0	3
CrossCountry 38th BASE	2	0	0	2
GBRf 28th BASE	1	0	0	1

Birmingham				
Runs in Proximity with	Count of Proximations			
	Wed	Sat	Sun	Tot
CrossCountry 38th BASE	54	0	0	54
WMT 30th BASE	52	0	0	52
WMT 22nd BASE	18	0	0	18
TFW 28th BASE	16	0	0	16
WMT 28th BASE	13	0	0	13
FLHH 28th EXTRA	10	0	0	10
Virgin S17 EXTRA	8	0	0	8
Caledonian Sleeper 9th EXTRA	3	0	0	3
FLHH 27th EXTRA	3	0	0	3
CrossCountry 38th EXTRA	2	0	0	2
FLIM 24th BASE	2	0	0	2
DRS 17th BASE	1	0	0	1
GBRf 34th BASE	1	0	0	1