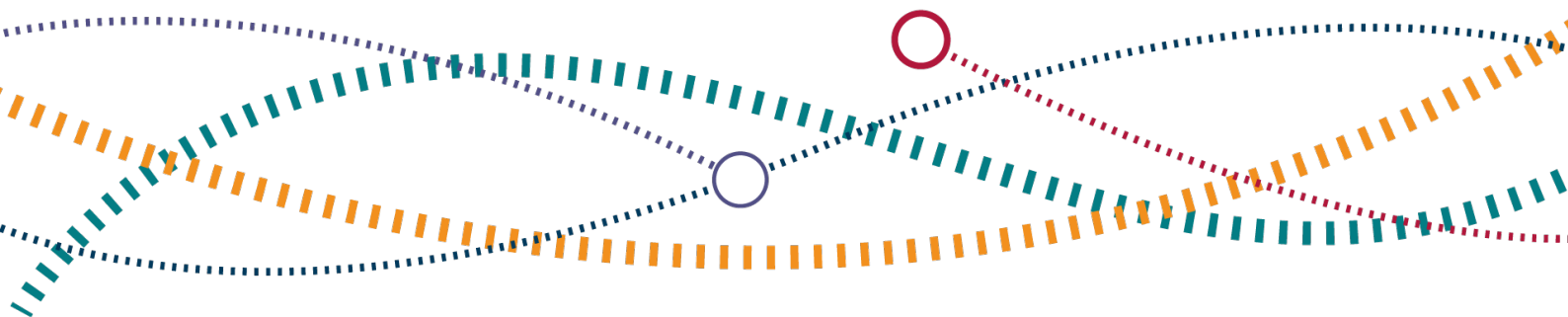




Rail industry compliance with timetable production milestones

**Final December 2024 timetable change data.
Current May and December 2025 timetable change
data**

10 April 2025



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Context for this release

ORR monitors industry compliance with timetable production timescales by gathering data from Network Rail and train operators on milestones in the [Network Code](#). Operators need contractual rights to access the network and to receive higher priority in the production of the timetable. Operators can “bid” in expectation of receiving new or amended contractual rights. This is explained in more detail in the [Regulatory Access Dashboard Factsheet](#).

This report highlights key findings from our analysis of final data from the December 2024 timetable change. It also takes an initial look at data for the May and December 2025 timetable change.

Analysis of data from the preceding timetables is available on [our website](#).

Network Rail and industry roles

Network Rail is responsible for creating timetables for passenger and freight services. Train operators (passenger and freight) make requests to Network Rail for ‘space’ in the timetable. For details on how the rail industry produces timetables, please see our report on the [timetable development process](#).

Note on Network Code milestones

As part of the periodic review 2023 (PR23), we set Network Rail a requirement to return the timetable process to Network Code compliance by December 2024: [PR23 final determination: settlement document for the System Operator](#).

December 2024 timetable change

In October 2023, ORR set Network Rail a requirement to return to the industry agreed timescales for producing the timetable by December 2024. This was because of the importance of effective timetabling to operators, customers and funders. The data in this report show Network Rail and industry returned to using the Network Code milestones.

The Regulatory Access Dashboard Factsheet (published April 2025) shows that a high number of operators did not have long or short-term access rights in place by the time Network Rail offered the timetable to industry (at D26). This translated into an equally high number of operators without access rights at the point the advance booking opened for tickets for passengers (12 weeks before the timetable implementation).

The data below is current as of 16 December 2024.

D-40 date – Timeliness of passenger and freight operator timetable bids to Network Rail

- All operators on Network Rail’s infrastructure submitted their proposed new timetables (“bid”) by the Network Code milestone 8 March 2024 (D-40).
- East Midlands Railway, Hull Trains, Lumo, TransPennine Express and Varamis submitted their “bids” before the D-40 date.
- Eurostar, which operates on the HS1 network, submitted its bid on 28 March 2024. This was before the date specified by the HS1 Network Code (5 April 2024, D-36).

D-26 date – Timeliness of Network Rail providing operators with the timetable

- Network Rail provided all operators with their draft timetables in line with the agreed Network Code milestone of 14 June 2024 (D-26).
- Govia Thameslink Railway submitted a revised bid on 19 April 2024 but still received its timetable from Network Rail on 14 June 2024.
- Revisions to a bid between the original bid date and provision of the timetable (revised access proposals) are an expected part of the timetable development process. The revision listed did not raise any concerns for Network Rail.

D 22 date – Appeals intention

- 22 operators indicated to Network Rail they intended to appeal the draft December 2024 timetable by the 12 July 2024 deadline.
- All types of operators indicated to Network Rail they had an intention to appeal (passenger operators with services specified by the Department for Transport and devolved administrations, open access operators with existing services and GB Railfreight).
- Only three operators submitted formal appeals on the New Working Timetable for 2025 to the Access Disputes Committee*. The fact there was not 22 submitted appeals reflects work done by Network Rail to address the matter for appeal or a change in an operators' position.

*This is based on data from the [ADC website](#) which lists its determinations.

Timetable appeals are referred to the independent [Access Dispute Committee](#) (ADC) in the first instance to resolve issues on behalf of industry. Once an ADC Hearing Chair has made his/her determination, parties may choose to appeal against that determination to ORR. For more information on timetable appeals (disputes) the ADC has produced a [historical report](#).

Train Operator Variation Requests (TOVRs)

Train and freight operators can request a variation to the base timetable after it is published at 26 weeks before the timetable starts (D-26). This is called a Train Operator Variation request, or 'TOVR'. Network Rail will either accept, reject or modify the request.

Freight operators will often identify space in the timetable and use TOVRs to demonstrate their services can operate without undermining network performance, before applying for contractual rights.

TOVRs are an important part of the timetable production process and can allow capacity to be used effectively. TOVRs provide flexibility in the timetable production process by allowing additional or amended services from passenger and freight operators to be included in the timetable after the base timetable is published.

However, having a high number of TOVRs (passenger or freight) can create instability. TOVRs made within 12 weeks of the timetable entering operation can impact on the release of final timetables to train and freight operators and subsequently passengers.

We are currently collecting data on the total number of TOVRs made by operators. A higher number of TOVRs might suggest more work would be required to finalise the draft timetable. However, as it does not take into account the complexity of each TOVR or the number of services affected, the data is limited in what it can tell us about the impact of TOVRs on timetable production and information to passengers. We plan to develop our analysis further in future.

- A total of 1,572 Train Operator Variation Requests (TOVRs) were made in the 26 weeks before the December 2024 timetable came into operation, compared to 1,935 for June 2024 and 1,189 for December 2023.
- 81% (1272) of TOVRs for December 2024 were requested by freight operators. Most freight operator TOVRs were made less than 12 weeks prior to the timetable going live.
- We (and industry) expect freight operators to have a high number of TOVRs because of their business model, which relies on identifying and bidding for unused capacity in the base timetable. Nonetheless, TOVRs can introduce complexity in finalising the timetable.

- Of the passenger operators, TransPennine Express and ScotRail had the highest number of TOVRs for the December 2024 timetable change. These operators also had more TOVRs than other passenger operators in the June 2024 and December 2023 timetable changes.
- Passenger operators continue to make a significant proportion of their TOVRs in the last 12 weeks before the timetable change:
 - For December 2024, 151 passenger operator TOVRs were made within 12 weeks of the timetable change (53% of the passenger total)
 - For June 2024, 165 passenger operator TOVRs were made within 12 weeks of the timetable change (68% of the total).
 - For December 2023, 127 passenger operator TOVRs were made within 12 weeks of the timetable change (77% of the total).

May 2025 timetable change

The data referenced below is current as of 24 March 2025.

D-40 date – Timeliness of passenger and freight operator timetable bids to Network Rail

- The D-40 date specified by the Network Code was 9 August 2024.
- All operators submitted bids for the May 2025 timetable change on or before 9 August 2024.
- An aspirant open access operator, Wrexham Shropshire & Midlands Railway placed a bid by 9 August 2024 date for the May 2025 timetable change. It applied for access rights in May 2024. As Network Rail had not provided its position on the application it submitted a timetable bid in anticipation of securing rights.

D-26 date – Timeliness of Network Rail providing operators with the timetable

- Network Rail provided all operators with their draft timetables in line with the agreed Network Code milestone of 15 November 2024 (D-26).
- The May 2025 timetable had a higher number of revised access proposals between D40 and D26. The revised access proposals came from 15 different operators (publicly controlled, freight and open access).
- The number of freight revised access proposals was much higher than for passenger.
- Revisions to a bid between the original bid date and provision of the timetable (revised access proposals) are an expected part of the timetable development process.

D 22 date – Appeals intention

- 7 operators indicated they intended to appeal aspects of the draft May 2025 timetable by the 13 December deadline. This is fifteen fewer than the number of operators who indicated to Network Rail they might appeal the December 2024 timetable.
- Operators with services specified by the Department for Transport, Welsh Government and Rail for London and GB Railfreight told Network Rail they might appeal elements of the May timetable.
- Four operators actually submitted appeals related to the May 2025 timetable to the Access Disputes Committee*. These were Govia Thameslink Railway, XC Trains (CrossCountry), Transport for Wales and GB Railfreight. The fact there was not 7 appeals submitted reflects work done by Network Rail to address the matter or a change in an operators' position.

*This is based on data from the [ADC website](#) which lists its determinations.

December 2025 timetable change

The data referenced below is current as of 28 March 2025.

D-40 date – Timeliness of passenger and freight operator timetable bids to Network Rail

- The D-40 date specified by the Network Code was 7 March 2025.
- All operators submitted bids by 7 March except for Devon and Cornwall Railways, who submitted a bid 3 days later.
- Two aspirant open access operators, who are waiting on a decision on their access applications for use of the network submitted bids: Wrexham Shropshire & Midlands Railway and Virgin Trains. These operators submitted timetable bids in anticipation of securing rights.
- Another open access operator, First Rail Stirling (formerly Grand Union Trains Stirling), also submitted its timetable bid. This followed [ORR's consideration of its application](#) and decision to approve access.

Next publication date

Final data for the May 2025 timetable change will be published [on the ORR website](#) summer 2025, along with an updated view of data for the December 2025 timetable change.

Updated data tables and charts will also be available.



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