

Independent Reporter CP7 Performance Reset Stage 3 Final Report

Revision: 3

ORR / Network Rail

CP7 Performance Reset Independent Reporter





Independent Reporter CP7 Performance Reset Stage 3 Final Report

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Jacobs U.K. Limited

Cottons Centre
Cottons Lane
London SE1 2QG
United Kingdom

T +44 (0)203 980 2000
www.jacobs.com

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Executive summary

The Office of Rail and Road (ORR) is resetting passenger train performance measures and targets for Control Period 7 years 3-5 ("the reset") in England, Wales, and Scotland. Jacobs has been appointed as Independent Reporter (IR) to assess Network Rail's (NR) reset submissions, to advise on whether they are "ambitious yet realistic" as per the UK Government's High Level Output Specification.

Jacobs' role involves:

- Evaluating NR's approach to developing forecasts and trajectories;
- Assessing the clarity and consistency of NR's submission; and
- Determining if NR's proposed performance trajectories meet the "ambitious yet realistic" criteria.

The project is divided into three stages, with this report focusing on Stage 3. Stage 1 of our work completed in April 2025 and involved engaging with NR to understand the process for development of the NR performance submission and to provide recommendations on actions that NR could take prior to the initial submission. Stage 2 began with NR's submission to ORR of the proposed passenger performance trajectories on 09 May 2025. Our Stage 2 final report included our assessment of the submission made by NR in May 2025 and our recommendations to Network Rail of areas they should revise.

The objectives for this stage of our review are:

- Review how NR have addressed the findings and recommendations from Jacobs and subsequent areas identified by ORR during Stage 2;
- Review other changes NR have made since Stage 2, including incorporation of the views of other stakeholders;
- Consider any robust evidence from consultation responses; and
- Assessment of the NR forecasts against the "ambitious yet realistic" criteria.

The ORR requires NR to provide proposed target trajectories (referred to as "forecasts" or "trajectories" throughout this report) for specific success measures: Time to 3 (T-3), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel.

These measures are disaggregated by Region and National levels, with Network Rail/TOC breakdowns where applicable. Additionally, "On Time" is included as a supporting measure for comparison with PR23 Final Determination baseline trajectories. The Scotland Train Performance Measure is out of scope for the reset.

Approach

Our review focussed on the changes made by Network Rail compared to the May 2025 submission. We have:

- Reviewed the changes made to the submission documents;
- Reviewed the changes made to modelled scheme assumptions;
- Reviewed how the Regions have addressed the recommendations made during Stage 2;
- Engaged with the Regions to understand the changes that they have made and the rationale for where they do not consider changes are required in response to recommendations;
- Reviewed the consultation responses for robust evidence to be considered in the evaluation; and
- Provided our assessment of the forecast trajectories against the ambitious yet realistic criteria.

We have endeavoured to adopt an open and collaborative engagement process throughout this review. We would like to thank Network Rail and ORR for their assistance, and in particular the NR Regions for their open and honest conversations about the process and work undertaken to prepare their submissions.

Findings

Stage 2 Modelling Recommendations

Network Rail either directly addressed our recommendations or reviewed their approach and did not make changes either because Network Rail consider their approach to be accurate based upon their review and do not believe there is enough supporting information to change this, or they considered the impact of changing would not be material. Where NR decided not to make changes in response to a recommendation, they have set out their rationale either in the submission or in discussions with us.

Regions' submission assessment

The table below summarises the assessment outcome for each of the Regions and success measures. The assessment of T-3 and NR Delay per 1000 train miles is combined into a single assessment since they derive from the same trajectory modelling process. We have provided an assessment on a scale of 1 to 5 where a score of 1 is a trajectory considered more realistic/deliverable with relatively a low level of ambition (and hence there is a good likelihood of achieving the targets), a score of 3 is a reasonable balance between ambitious and realistic, and a score of 5 has a high level of ambition, and hence a low likelihood of achieving the targets. Our findings that underpin these assessments are detailed later in this report. Our assessment of the May 2025 submission is shown in brackets where this was different.

Table 1 : Forecast Trajectory Assessment Scores Summary

Time to 3/NR Delay	Realistic	Slightly Realistic	Balanced	Slightly Ambitious	Ambitious
Eastern		2			
North West & Central	(1)	2			
Southern		2			
Wales & Western			3		
Cancellations	Realistic	Slightly Realistic	Balanced	Slightly Ambitious	Ambitious
Eastern			3		
North West & Central	(1)	2			
Southern		2			
Wales & Western		(2)	3		
Scotland			3		

The key points for those Regions where we consider the forecast trajectory to be slightly more realistic than ambitious are:

- Punctuality/delays:
 - **Eastern** : We consider the year 5 position has a reasonable balance between being ambitious yet realistic. However, we consider that Eastern could have made more ambitious assumptions for depth

and duration of the “bathtub” risk profile for the performance deterioration resulting from the introduction of the December 2025 timetable. This impacts the punctuality forecast for year 3 and year 4 of CP7. We do, however, note the high degree of uncertainty for the potential impact of the December 2025 timetable on performance.

- **North West & Central and Southern:** There are some areas where we consider these Regions could have made more ambitious assumptions. However, although this results in our classification of slightly more realistic than ambitious, we do not think addressing these specific areas to achieve the balanced classification would have a material impact on the forecast trajectories.
- **Cancellations:**
 - **North West & Central :** The performance of West Midlands Trains, Northern and Merseyrail have improved significantly since the base period used for the forecast. The Region assumed improvement for these operators is less than being currently delivered. If the recent improvements in operator cancellations performance are maintained and were included in the assumptions, this would have a material impact on the forecast trajectory.
 - **Southern :** The Region have not assumed that traincrew performance at SWR would recover once training on the Arterio fleet is complete. However, although this results in the classification of slightly more realistic than ambitious, we do not think addressing this specific area to achieve the balanced classification would have a material impact on the forecast trajectory.

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Acronyms and abbreviations

Acronym	Definition
ATO	Automatic Train Operation
AWC	Avanti West Coast
DfT	Department for Transport
ECML	East Coast Main Line
EMR	East Midlands Railway
ETCS	European Train Control System
GA	Greater Anglia
GSM	Global System for Mobile Communications
GTR	Govia Thameslink Railways
GTS	Elizabeth Line Operator (Go-Ahead Group, Tokyo Metro and Sumitomo Corporation)
GWR	Great Western Railways
HLOS	High Level Output Statement
LNER	London Northeastern Railways
MAA	Moving Annual Average
NCL	Northern City Line
NR	Network Rail
NW&C	Northwest & Central
OLE	Overhead Line Equipment
ORR	Office of Rail and Road
PR23	2023 Periodic Review
PR23 FD	PR23 Final Determination
PRIMA	Proportionate Risk response to Implementing Mitigating speeds to Assets
RF6	Rolling Forecast as of Period 6
RMT	National Union of Rail, Maritime and Transport Workers
SAF	Service Affecting Failure
SRT	Sectional Running Times
STPM	Scotland Train Performance Measure
SWR	Southwestern Railways
T-3	Time-to-3
TOC	Train Operating Company
TOS	TOC on Self
TPE	TransPennine Trains trading as TransPennine Express
TRU	TransPennine Route Upgrade

Acronym	Definition
UK	United Kingdom
W&W	Wales & Western
WMT	West Midlands Trains

1. Introduction

1.1 Project Background

The Office of Rail and Road (ORR) is resetting passenger train performance measures and trajectories (targets) in England, Wales, and Scotland, excluding Scotland Train Performance Measure (STPM), for years 3-5 of Control Period 7 ("the reset"). This recognises the level of uncertainty in forecasting performance during the 2023 Period Review (PR23).

The ORR and Network Rail (NR) have appointed Jacobs as Independent Reporter for the reset to provide independent advice to both NR and ORR on NR's reset submissions. The advice will help determine whether the proposed train performance forecasts and trajectories are "ambitious yet realistic", as required in the UK Government's High Level Output Specification (HLOS).

As Independent Reporter, Jacobs will advise whether:

- NR has taken a reasonable approach to developing its forecasts and proposed target trajectories;
- NR's submission is clear and consistent; and
- NR's proposed performance trajectories are "ambitious yet realistic".

This report forms part of our assessment of the final submission made by Network Rail in September 2025.

1.2 Objectives and Scope of Review

The project is split into three stages. Stage 1 was completed in April 2025. During Stage 1 we engaged with NR to understand their forecast development process and to make recommendations. Stage 2 began with NR's submission to ORR of the proposed passenger performance trajectories on 09 May 2025. Our Stage 2 final report (<https://www.orr.gov.uk/sites/default/files/2025-07/independent-reporter-cp7-performance-reset-stage-2-report.pdf>) included our assessment of the submission made by NR in May 2025 and our recommendations to Network Rail of areas they should revise. This was issued alongside the ORR consultation on targets which was held between 10 July and 5 September 2025 (<https://www.orr.gov.uk/search-consultations/cp7-passenger-train-performance-reset-consultation-targets-2026-2029>). The ORR considered that the Network Rail forecast trajectories submitted in May 2025 were a suitable basis for consultation.

This report covers Stage 3 of our work which began once we had completed our Stage 2 report.

The objectives of this stage are to:

- Review of how Network Rail is addressing / has addressed the findings/recommendations from Jacobs and subsequent areas identified by ORR for review;
- Review of other changes Network Rail has made since the May 2025 submissions due to changes in circumstances / evolution of plans - are they reasonable?;
- Review how and to what extent Network Rail has incorporated the views of other stakeholders, particularly train operators, from draft to final plans;
- Consider any robust evidence from consultation responses which fundamentally challenges the Independent Reporter and/or ORR assessment of Network Rail plans; and
- Undertake an assessment of 'ambition vs. realism' of final Network Rail forecasts.

The ORR's requirements for NR's submission are to provide proposed trajectories for each success measure (excluding the Scotland Train Performance measure). These NR Regions' proposed trajectories for the success measures in scope for our review are set out in section 4.1.1 below:

Table 2 : ORR required forecast measures

<u>Tier</u>	<u>Measure</u>	<u>Disaggregation</u>
1: Success measures	Time to 3 (T-3)	Regions: Eastern, North West & Central (NW&C), Southern, Wales & Western (W&W) National: England & Wales Network Rail/TOC disaggregation
1: Success measures	Cancellations (by train services)	Regions: Eastern, NW&C, Southern, W&W, Scotland National: England & Wales, Great Britain Network Rail/TOC disaggregation
1: Success measures	Network Rail delay minutes per 1,000 miles train travel	Regions: Eastern, NW&C, Southern, W&W, Scotland National: England & Wales, Great Britain Assumed TOC delay
2: Supporting measures	On Time	Regions: Eastern, NW&C, Southern, W&W, Scotland National: England & Wales_

“On Time” is a supporting measure i.e. it provides a holistic view of performance that Network Rail will include in its forecasts and report against, but will not be a success measure for year 3 to 5 of CP7 as it has in years 1 and 2; in particular it is required by ORR to compare to the baseline trajectories set in the PR23 Final Determination.

The disaggregation of T-3 and Cancellations by attribution to NR or TOC and forecast TOC delay are not success measures. ORR requested NR include this information in its submission to inform its assessment.

For the Scotland Region, only the Cancellations success measure is in scope for the Independent Reporter review.

1.3 Stage 2 Findings and Recommendations

In our previous report we made recommendations that were aimed at supporting NR to improve its performance forecasting approach in the timeframe for the reset, including the updated submissions in September 2025.

These recommendations are described alongside our findings of how Network Rail have considered and addressed them in the findings sections of this report. Specifically, as they related to:

- General modelling consideration can be found in section 4.2;
- Eastern Region in section 4.3.2;
- North West and Central Region in section 4.4.2;
- Southern Region in section 4.5.2;
- Wales and Western Region in section 4.6.2; and
- Scotland Region in section 4.7.1.

2. Summary of Forecast Trajectories Assessment

The table below sets out our assessment scores for each of the Regions. Our methodology for categorisation of the submitted forecast trajectories is described in section 3 with the categories described in section 3.6. Our assessment of the May 2025 submission is shown in brackets where this was different. Below this we summarise the key factors informing our assessment. Section 4 sets out our findings for each Region and describes the basis of the assessment scores in more detail.

Table 3 : Forecast Trajectory Assessment Scores Summary

Time to 3/NR Delay	Realistic	Slightly Realistic	Balanced	Slightly Ambitious	Ambitious
Eastern		2			
North West & Central	(1)	2			
Southern		2			
Wales & Western			3		
Cancellations	Realistic	Slightly Realistic	Balanced	Slightly Ambitious	Ambitious
Eastern			3		
North West & Central	(1)	2			
Southern		2			
Wales & Western		(2)	3		
Scotland			3		

Punctuality and delays:

Eastern: Some schemes in the central model are modelled with a level of ambition, and the assumed year 2 exit position requires some improvement from current levels of performance (although this is less so than the May 2025 forecasts). However, this is offset by the approach to deriving the impact of the East Coast December 2025 timetable overlay. Eastern have addressed many of the recommendations that we made, and we consider that the year 5 forecast reflects an ambitious yet realistic position, therefore balanced. However, we consider the evidence for the scale and duration of the timetable bathtub introduction risk to be driven by factors outside the timetable changes NR selected as case studies (see 4.3.3.2), and these drive the depth and duration of the impact used in the forecast. We acknowledge there is significant uncertainty of the timetable impact and specific risks. However, given the preparation for this specific timetable change and our analysis suggesting several recent timetable changes have seen minimal observed bathtub curve impacts on punctuality, we consider Eastern could have a more ambitious forecast for years 3 and 4. The bathtub assumption has a greater impact on the year 3 and 4 forecast position than the factors impacting the assessment of the other Regions categorised as a slightly more realistic than ambitious.

North West & Central: The additional mitigation schemes and the changes that the Region made to address specific concerns that we raised during the previous stage has introduced more ambition into the forecast. However, they did not address the concern that the Region had a higher impact from weather events on delays in the baseline period than we might expect in a typical year. Although further assessment suggests this was not an extreme year, we might not expect the impacts of weather to be as high as this every year. The Region assumes greater levels of risk for asset performance than the other Regions, although this is less so in

the September 2025 submission with the inclusion of the additional mitigation scheme. Therefore, we consider the Region could reasonably have made a more ambitious forecast, however, we do not think addressing these specific areas to achieve the balanced classification would have a material impact on the forecast trajectories.

Southern: The Region has assumed a stable level of delays in Network Rail categories with changes in the delay and punctuality forecast trajectories being influenced by operator schemes, particularly the Arterio (new trains) introduction on South Western Railway (SWR). The forecast does not include schemes described in the Performance Restoration Plan that we might expect to deliver benefits. Therefore, we consider the Region could reasonably have made a more ambitious forecast. However, we would not expect that addressing the remaining concerns to achieve the balanced classification would have a material impact on the forecast.

Wales & Western: Wales and Western have forecast an improving trajectory across all years with net benefits assumed across all categories, particularly for NR assets performance. We have classified slightly more schemes as ambitious than contributing to a more deliverable forecast, although we do not consider that this quite reached the threshold of classification as slightly ambitious. The September 2025 update did have a slightly worse forecast than the May 2025 forecast for Network Rail attributed delays; this was primarily due to correction of model errors and so we do not consider this material enough to change our assessment.

Cancellations:

Eastern: The Eastern Region is one of only two Regions to assume a reduction in Externals (trespass and vandalism) cancellations. It has not applied risks that the operators stated were uncertain, and have not assumed an incremental cancellation risk from the December 2025 East Coast timetable. There are some potential additional TOC delivered benefits mentioned in their plan which are not modelled, but we do not consider these are likely to be material.

North West & Central: The Region has assumed reductions in cancellations from the "keeping trains safely moving" initiative. The base year had a greater impact from weather impacts than is typical and the Region did not adjust for this; the Region stated that this was a considered decision and the "keeping trains safely moving" scheme mitigates this. The recent improvements in cancellation performance at Northern, West Midlands Trains and Merseyrail already exceed the maximum improvement assumed by the forecast, but it is unknown whether improvements to date could be maintained. The impact of the assumptions on weather impacts would not be likely to have a material impact on the overall forecast. If the recent improvements in operator cancellations performance are maintained, we expect it would have a material impact on the forecast trajectory.

Southern: Southern has a lower level of impacts from weather than is typical in the base and assume this continues in future years. The forecast improves in years 3 and 4. The Region assumes that elevated levels of traincrew cancellations related to training on the new fleet at SWR will continue throughout the control period, even after the fleet introduction is complete. We have not been able to identify schemes that are consistent with their Performance Restoration Plan and the forecast does not achieve the levels targeted by the Performance Restoration Plan. We estimate that if these factors were considered the forecast trajectory could be of the order 0.1% to 0.2% lower than currently assumed in year 5.

Wales & Western: Wales and Western already had reduced cancellations in 24/25 and the modelled schemes continue this trend in year 2, with assumed reductions related to the Project Brunel improvement plan and additional material improvements from updated Great Western Railway (GWR) assumptions in the September 2025 submission. We have classified more high impact schemes as ambitious than deliverable. The forecast does not achieve the level that is set out in the Performance Improvement Plan for the end of CP7.

Scotland: The Scotland Region has not updated its forecast in the September 2025 submission. We have, therefore, kept the same assessment as our Stage 2 report.

3. Methodology

3.1 Submission Review

The Network Rail submission in September 2025 consisted of an update to the plans submitted in May 2025. To maximise efficiency, our review of the submission focussed on the elements that have changed in the submissions including new evidence where applicable.

We have considered whether Network Rail have addressed the recommendations that we made in the Stage 2 Final report. This is based on the updates to the submission and engagement with Network Rail as described in section 3.3.

3.2 Schemes Review

The core forecasts for the England and Wales Regions are calculated by a model developed by the Network Rail System Operator. There is a central model into which all the Regions' assumptions for factors that can influence performance are loaded. Each set of factors modelled by the Regions is entered as a set of assumptions known as a scheme. All of the schemes are combined in a Monte Carlo analysis in the central model to provide the P50 forecasts of how performance will change in each year for the remainder of CP7 that form the basis of the Regions' submissions. Eastern and Southern Regions also apply additional overlays on top of this modelled forecast for factors which were deemed to require a special modelling approach, notably the introduction of the East Coast December 2025 timetable.

Following the May 2025 submission, we carried out a review of the schemes included in the Network Rail modelling by each Region. We categorised each scheme as one of Ambitious, Balanced or Deliverable:

Ambitious – We consider that the scheme assumptions result in providing a forecast that is more ambitious than the Region could have chosen to apply. For example, for a risk this might mean that they have chosen to assume levelling off a deteriorating trend rather than assuming the trend continues at the same rate or assumed a significant benefit with limited evidence of similar schemes delivering a similar scale of improvement.

Balanced – We consider that the Region has chosen reasonable assumptions for the scheme that lead to a good balance between an ambitious and deliverable forecast.

Deliverable - The Region has chosen assumptions for the scheme which leads to a more deliverable forecast than we consider could reasonably have been applied.

Note that this categorisation of the schemes only forms a part of the overall forecast assessment and categorisation against the ambitious yet realistic criteria described in section 3.6.

Network Rail supplied us with updated model outputs and scheme assumptions with the September 2025 submission. We carried out a comparison between the scheme assumptions to identify those which have been changed. We reassessed these schemes to identify if we should change the classification that we assigned to the May 2025 submission. We also considered those schemes where the modelled impact had materially changed due to the resolution of modelling errors identified during Stage 2.

We repeated our analysis of contribution of the schemes to TOC and Network Rail attributed performance and who is primarily responsible for delivery of those schemes. This allowed us to gain insight into how the changes impacted the forecast trajectories.

3.3 Region Engagement

We had meetings with each of the England and Wales Regions following the issue of our Stage 2 report and prior to them submitting their updated submissions in September 2025. These sessions allowed us to clarify

any points on our recommendations and for the Regions to set out the areas where they expected to make changes.

Following the submission in September 2025 we carried out our initial review and then we presented our emerging findings to ORR and Network Rail. Following this we had a call with each of the England and Wales Regions to allow clarification of our findings. A session was not held with the Scotland Region as it was not deemed necessary because they had not changed its forecasts in the September 2025 submission.

We had further engagement with the Eastern Region on the December 2025 timetable impact modelling, in particular the modelling of the implementation bathtub risk.

3.4 Model Review

Network Rail supplied an updated copy of the model's Python code. We carried out a comparison with the version of code shared in May 2025 to identify what changes had been made. For each of those changes we considered if the change was one that we expected based on the recommendations made during Stage 2 related to modelling issues, and if the amendments would address our concerns.

3.5 Consultation Responses Review

The ORR invited operators, funders, investors, local and regional government and passenger groups to respond to the consultation between July and September 2025. The forecasts that Network Rail prepared for their May 2025 submission to ORR were used as the basis for the consultation. ORR recognised that Network Rail's plans would continue to evolve and expected NR to review aspects of the plans as it updated its forecasts ahead of its September 2025 submission. Consultees were invited to respond to three questions:

- Q1: Do you agree with the proposed targets for the passenger train performance success measures in CP7 years 3 to 5 and do you consider they are 'ambitious yet realistic' in light of the evidence on current and expected factors affecting performance?
- Q2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?
- Q3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

We reviewed the consultation responses to identify specific points, especially those with supporting evidence. Any impact of this additional evidence was considered as part of our forecast trajectory assessment and classification.

3.6 Forecast Trajectory Assessment

For the overall forecast assessment as summarised in section 2, we have assigned a score on a scale of 1 to 5 for each Region and T-3 & Cancellations forecast where the score represents the following:

1. **realistic/deliverable:** We consider that there is not a high degree of ambition/challenge and hence there is a good likelihood of achieving the targets.
2. **slightly more realistic than ambitious:** The forecast displays a degree of ambition, but we consider the Region could reasonably make a more ambitious forecast trajectory that there is a reasonable opportunity for them to deliver.
3. **balanced:** We consider the forecast has a good balance between ambition and being realistic/deliverable. Network Rail and/or operators would need to deliver the mitigations and improvements set out in the plan to achieve the forecast.

4. **slightly more ambitious than realistic:** We consider that the forecast has a degree of ambition that will make it challenging to deliver and there is a reasonable likelihood that it would not be achieved in full.
5. **ambitious:** We consider that the forecast has a high degree of ambition and that there is a low probability of achieving the forecast.

The overall forecast assessment considered all the of the review activities undertaken including:

- Our assessment of the May 2025 submission described in our Stage 2 report.
- The review of the updated submissions as set out in 3.1, in particular how our recommendations from Stage 2 have been addressed.
- The impact of changes on the schemes review as set out in 3.2.
- Additional information provided during our engagement with the Regions described in 3.3.
- Additional evidence included in the consultation responses.

4. Assessment of Submitted Forecast Trajectories

This section describes our assessment of the T-3 and Cancellations forecasts for each Region. Note that, since the T-3 forecasts are based on the modelling of delays, we have not included a separate section in the report for the NR Delay per 1000 Train Miles forecasts. The contribution of the NR attributed delays is considered as part of the T-3 forecast assessment in the following sections.

A summary of our overall assessment of the Regions' forecast trajectories can be found in section 2.

4.1 Overview

The Network Rail September 2025 update to their submissions and forecast trajectories had the same structure as their May 2025 plans. Changes and additions to the documents were either to directly address recommendations or concerns that we identified in our previous review or because they consider factors have changed, such as performance factors in periods since their previous forecasts were prepared.

4.1.1 Summary of historical and forecast trajectories

The tables below show the historic actuals for CP6 and year 1 of CP7 (2024/25) alongside the Network Rail submission trajectories from May 2025 and September 2025.

Note that 2020/21 and 2021/22 were the years that were impacted by Covid restrictions and reduced ridership and services on the rail network. There were significant improvements in punctuality and delays during these years, with a decline in performance since this period. 2020/21 also saw improved cancellations performance due to reduced services with similar resource levels, but this position started to deteriorate in 2021/22 as training backlogs and staff absences increased and some of the services previously removed were reinstated.

Table 4 : Time to 3 historic values

Historic	2019/20	2020/21	2021/22	2022/23	2023/24
Eastern	84.7%	93.2%	90.2%	86.7%	85.7%
North West & Central	79.3%	92.0%	87.5%	82.8%	82.7%
Southern	85.2%	93.0%	90.1%	85.6%	86.2%
Wales & Western	81.6%	91.8%	85.0%	79.2%	76.1%

Table 5 : Time to 3 submission forecast trajectories and PR23 Final Determination trajectories (T-3 equivalent to On-Time)

Eastern	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	85.0%	84.5%	80.6%	82.0%	84.4%
NR May 2025 Submission	85.0%	85.5%	81.9%	82.3%	84.6%
PR23 Final Determination Trajectory	86.5%	86.5%	86.5%	86.5%	86.5%
North West & Central	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	82.5%	82.5%	82.4%	82.5%	82.5%
NR May 2025 Submission	82.5%	82.3%	82.2%	82.2%	82.2%
PR23 Final Determination Trajectory	82.0%	82.0%	82.2%	82.3%	82.3%

Southern	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	85.2%	85.1%	85.4%	85.1%	85.4%
NR May 2025 Submission	85.2%	85.0%	85.1%	85.2%	85.4%
PR23 Final Determination Trajectory	85.8%	85.9%	85.9%	85.9%	85.9%
Wales & Western	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	78.6%	79.1%	79.5%	79.7%	80.0%
NR May 2025 Submission	78.6%	79.1%	79.5%	79.9%	80.0%
PR23 Final Determination Trajectory	77.8%	77.8%	78.9%	78.9%	79.0%

Table 6 : Cancellations historic values

Historic	2019/20	2020/21	2021/22	2022/23	2023/24
Eastern	3.5%	2.0%	3.0%	3.5%	3.7%
NW&C	4.0%	1.9%	3.4%	4.2%	4.4%
Southern	3.5%	2.3%	3.9%	4.1%	3.4%
Wales & Western	2.6%	1.7%	3.1%	3.7%	4.9%
Scotland	2.6%	2.1%	2.8%	3.0%	2.5%

Table 7 : Cancellations submission forecast trajectories and PR23 Final Determination trajectories

Eastern	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	3.9%	3.6%	3.5%	3.4%	3.4%
NR May 2025 Submission	3.9%	3.6%	3.5%	3.4%	3.4%
PR23 Final Determination Trajectory	3.4%	3.3%	3.1%	2.9%	2.7%
North West & Central	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	5.1%	4.6%	4.5%	4.5%	4.5%
NR May 2025 Submission	5.1%	4.7%	4.8%	4.8%	4.7%
PR23 Final Determination Trajectory	3.7%	3.5%	3.3%	3.2%	3.0%
Southern	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	3.9%	3.9%	3.9%	3.7%	3.7%
NR May 2025 Submission	3.9%	4.0%	3.9%	3.8%	3.8%
PR23 Final Determination Trajectory	3.5%	3.5%	3.4%	3.2%	3.1%
Wales & Western	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	4.7%	4.1%	4.0%	3.9%	3.9%
NR May 2025 Submission	4.7%	4.4%	4.3%	4.3%	4.3%
PR23 Final Determination Trajectory	3.8%	3.8%	3.6%	3.5%	3.3%
Scotland	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	2.2%	2.3%	2.3%	2.3%	2.3%
NR May 2025 Submission	2.2%	2.3%	2.3%	2.3%	2.3%

PR23 Final Determination Trajectory	2.3%	2.3%	2.3%	2.3%	2.3%
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Table 8 : NR Delay per 1000 train miles historic values

Historic	2019/20	2020/21	2021/22	2022/23	2023/24
Eastern	26.2	16.3	19.8	26.8	28.8
North West & Central	32.5	18.2	22.2	29.4	31.2
Southern	41.8	22.6	29.4	42.6	40.3
Wales & Western	24.8	15.4	28.6	38.7	45.1

Table 9 : NR Delay per 1000 train miles submission forecast trajectories

Eastern	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	28.4	30.2	36.9	34.5	30.2
NR May 2025 Submission	28.4	28.5	35.3	34.6	30.3
North West & Central	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	32.2	33.3	33.6	33.3	33.3
NR May 2025 Submission	32.2	32.9	34.0	34.2	34.6
Southern	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	42.1	42.2	41.8	42.4	41.8
NR May 2025 Submission	42.1	42.5	42.3	42.1	41.8
Wales & Western	2024/25	2025/26	2026/27	2027/28	2028/29
NR September 2025 Submission	36.8	35.6	35.0	34.3	33.6
NR May 2025 Submission	36.7	35.9	34.6	33.8	33.3

4.1.2 Year 2 exit

Table 10 and Table 11 show the CP7 year 2 (2025/26) exit levels and how these have changed between the May 2025 and September 2025 submissions. The 25/26 P5 MAA is shown because this is the latest data available around the time the September 2025 submission was being finalised.

The most significant change for Time to 3 punctuality is the Eastern Region. As benefits from the Performance Improvement Plan have not been realised in the early periods of 2025/26, the assumed outturn has been reduced. This is discussed further in section 4.3.3.1.

North West and Central have changed their year 2 exit position to be based on their Regional rolling forecasting update (RF6) forecast. This is 0.1% better than the forecast suggested by the CP7 Performance Reset model outputs shared with us. This already reflected an improved delay position compared to the May 2025 submission, driven by more ambitious assumptions on mitigation of trespass & vandalism, reduced assumed risk due to Camp Hill services, and corrections to model errors.

The small change in Southern is primarily due to the correction of model errors.

Table 10 : T-3 CP7 Year 2 exit levels

T-3	25/26 P5 MAA	May 2025 Submission Year 2	September 2025 Submission Year 2	Year 2 Exit Delta
Eastern	84.6%	85.5%	84.5%	-1.0%
Southern	84.8%	85.0%	85.1%	0.1%
North West & Central	82.2%	82.3%	82.5%	0.2%
Scotland	88.6%	89.5%	89.5%	0.0%
Wales & Western	78.8%	79.1%	79.1%	0.0%

The North West and Central and Wales and Western Regions' improved cancellations positions are driven by more ambitious assumptions for traincrew cancellations on Northern and GWR respectively. North West and Central have switched to the RF6 forecast for their year 2 exit position for Cancellations; it is within 0.05% of the CP7 Performance Reset modelling for year 2.

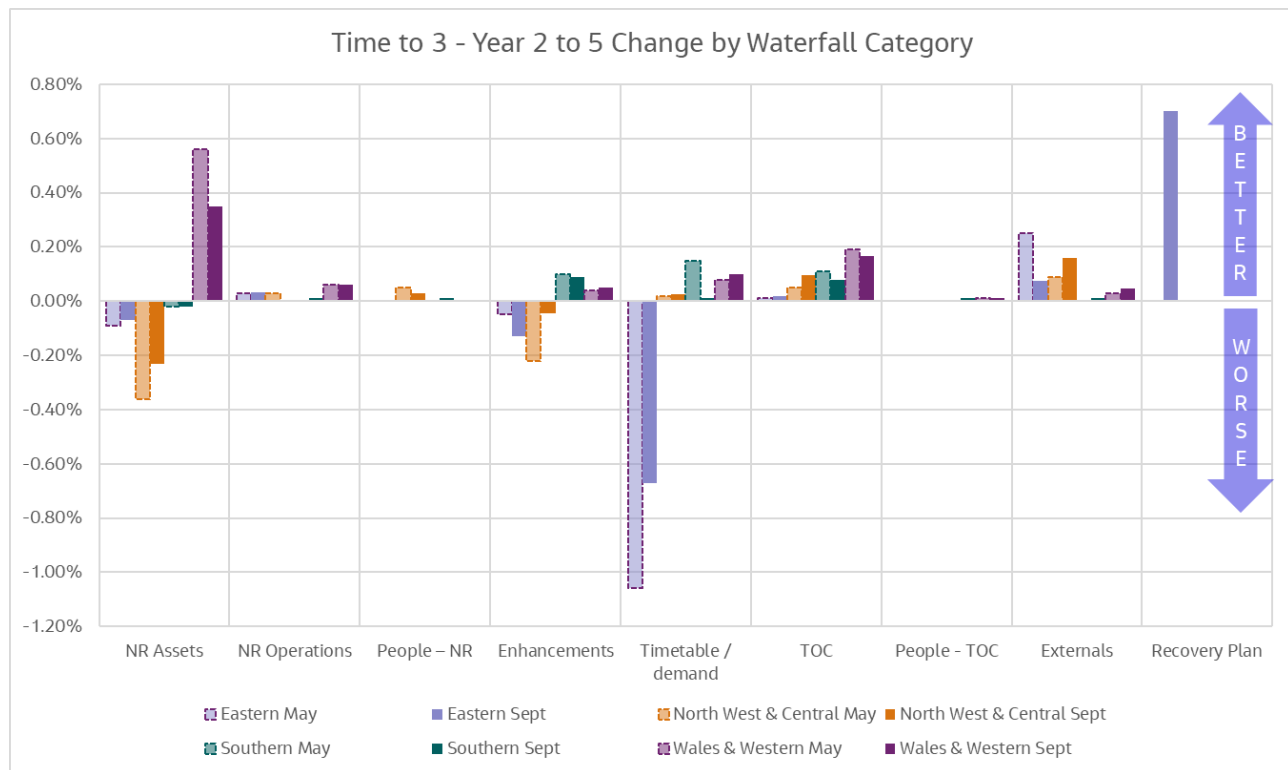
Table 11 : Cancellations CP7 Year 2 exit levels

Cancellations	25/26 P5 MAA	May 2025 Submission Year 2	September 2025 Submission Year 2	Year 2 Exit Delta
Eastern	3.8%	3.6%	3.6%	0.0%
Southern	4.1%	4.0%	3.9 %	0.0%
North West & Central	4.6%	4.7%	4.6%	-0.1%
Scotland	2.2%	2.3%	2.3%	0.0%
Wales & Western	4.4%	4.4%	4.1%	-0.3%

4.1.3 Summary of year 2 to year 5 change by category

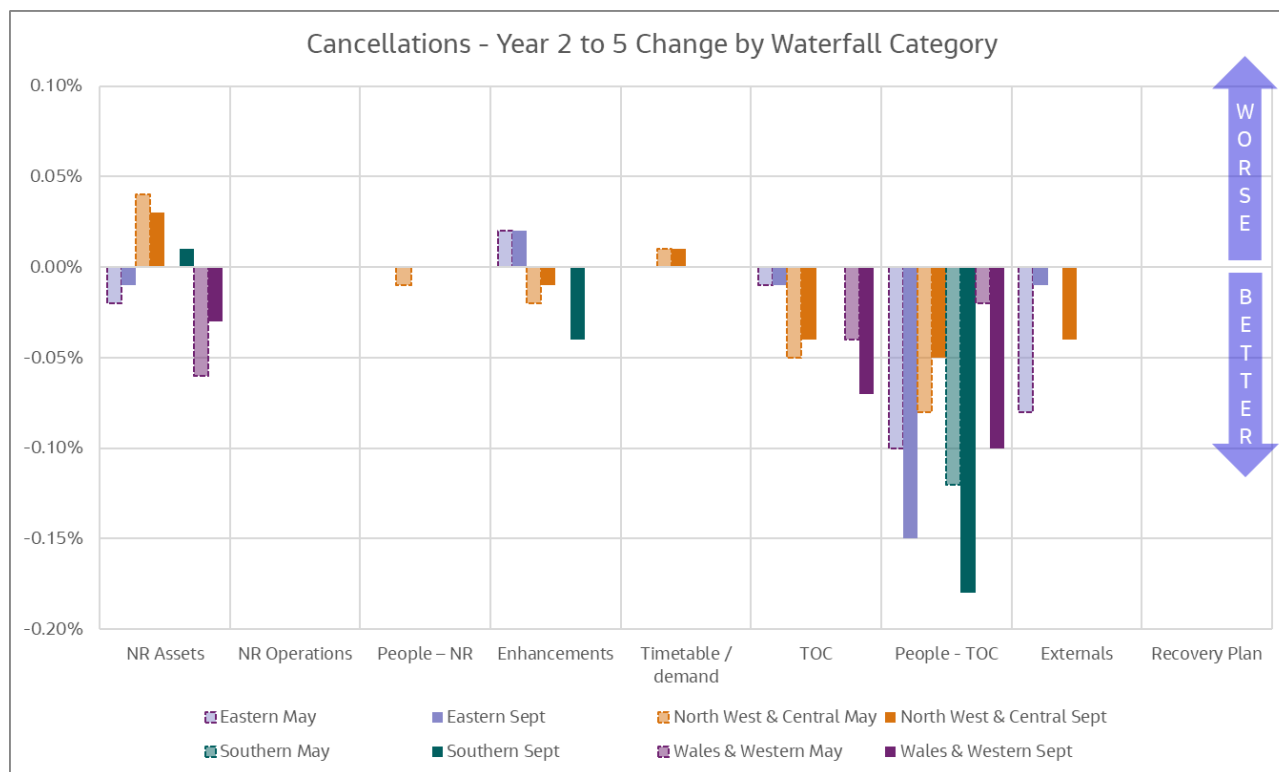
The charts below illustrate the total change in each waterfall category (as selected by the Regions on the scheme input sheets) for Time to 3 (T-3) and Cancellations between year 2 exit position and year 5 as indicated on the waterfall charts in the submission. The values from the May 2025 submission are shown in a paler colour with the dashed outline, while the updated values are shown in the darker shades. Note, this is to the final position in year 5. Year 3 and year 4 could have changes of different scale (and direction). Changes below 0.01% are not shown because the values were read from charts. Scotland do not include an equivalent waterfall chart in their submission.

Figure 4-1 : Time to 3 - Year 2 to 5 Change by Waterfall Category



For T-3 the main drivers of the change in the September 2025 submission compared to May 2025 are:

- **Eastern:** The reduced assumed net impact of introducing the December 25 timetable in year 5 (see 4.3.3.2) is driving the lower negative impact in the Timetable/demand category in the September 2025 submission compared to May 2025. Note that in years 3 and 4 there is a much greater impact of the timetable assumed based on the "bathtub" risk profile; this is discussed in section 4.3.3.2.2. Reduced benefits of externals and assets schemes are because of the correction of scheme assumption entry errors. The "Recovery Plan" is the benefits from the Performance Recovery Plan (see 4.3.3.1); some of these are deferred from current schemes and some to be planned.
- **North West and Central:** The reduced negative impact of asset, enhancement and external risks in the September 2025 submission are due to the combined effect of correction to model errors and additional schemes to mitigate risks.
- **Southern:** Reduced assumed net negative impact from demand is now completely offset by assumed benefit of Wessex timetable in year 5, resulting in the reduced improvement in the timetable/demand category.
- **Wales and Western:** The lower benefits from NR Assets and TOC are driven by the model correction to stop overstating the impact of schemes entered as delay minutes. The project Brunel and Service Affecting Failures (SAF) risks schemes partially offset the impact.

Figure 4-2 : Cancellations - Year 2 to 5 Change by Waterfall Category

For Cancellations the main drivers of the change in the September 2025 submission compared to May 2025 are:

- **Eastern:** Reduced benefits from NR Assets and External are driven by corrections to the scheme assumptions to apply to correct categories. The improved TOC cancellations are due to increased benefits of GTR scheme modelled by Southern which benefits Eastern as well.
- **North West and Central:** NR Assets and Externals have additional mitigation schemes. There is a smaller change in TOC categories in the September 2025 submission compared to May 2025 because of a higher assumed benefit in year 2 from Northern traincrew; The overall benefit of this scheme is greater but, because it is assumed to impact year 2 more, the year 3 to year 5 delta is smaller.
- **Southern:** The change in NR Assets category is due to a rounding difference in Monte Carlo model outputs. Enhancements are driven by Victoria Phase 5 scheme; this is now assumed to benefit all categories across the whole Kent region. The increased TOC benefits are driven by the correction to GTR Project 94 scheme.
- **Wales and Western:** The change in NR assets comes from rephasing of OLE risks; this removes the previously assumed improvement. The updated GWR Guards and Drivers recovery plan assumed benefits lead to TOC improvements.

4.2 Stage 2 Modelling Recommendations

The findings for how recommendations have been addressed specifically for each of the Regions can be found in the sections 4.3.2, 4.4.2, 4.5.2 and 4.6.2. Network Rail either directly addressed our recommendations or reviewed their approach and did not make changes either because Network Rail consider their approach to be accurate based upon their review and do not believe there is enough supporting information to change this, or they considered the impact of changing would not be material. Where they have not made changes in response to a recommendation, they have set out why either in the submission or in discussions with us.

The table below sets out our findings for how our recommendations related to modelling calculations and approach have been addressed by the central modelling team. These relate to the model used by the England and Wales Regions for forecasting T-3 and Cancellations. The Assessment column is an indication of whether Jacobs consider the recommendation has been addressed to the extent that we are satisfied that the concern has been resolved. Network Rail have reviewed all recommendations and taken action where they consider it was appropriate. As such they have addressed all of the recommendations in their September 2025 submission.

Table 12 : Recommendations Review Findings - Modelling

No.	Recommendation	Findings	Assessment
1	We recommend that Network Rail change the model to address the issues identified :		
1a	Entering impact as absolute minutes - causes double counting of reactionary impacts	Module updated to keep reactionary factor as 1 if "All Delay" and "Number" selected as assumption types	<i>Resolved</i>
1b	Gaps in scheme impact years	Validation routine added to warn if this situation is identified	<i>Resolved</i>
1c	Schemes with no impact modelled - We would recommend that the model raise a warning if a scheme impact fails to match any rows	Validation routine added to warn if this situation is identified	<i>Resolved</i>
1d	Scheme impact applied to incorrect geographies/categories - caused by NR reverting to previous version of code	Code to derive impact ID modified to ensure applied to correct categories	<i>Resolved</i>
1e	Mean instead of P50 for waterfalls and Delay per 1000 train miles	Submissions have been updated to note that waterfalls are on average basis. However, the Delay forecasts do not have similar note. We note NR rationale for using average and that using P50 at different aggregations will also have small inconsistencies with the overall forecasts. We consider the differences not likely to be material and this is not a major concern.	<i>Resolved</i>
2	We recommend that Network Rail consider the use of a source control system to manage the model code and consider automated testing	The submission notes NR "will explore further controls for use in future modelling for CP8 planning."	<i>Noted, further monitoring required</i>

4.3 Eastern

4.3.1 Summary of changes

Eastern made the following changes in their September 2025 submission:

- Revised approach to the ECML Dec 25 timetable (see 4.3.3.2);
- Revised their Year 2 (rail year 2025/26) forecast exit position (see 4.3.3.1);

- Added “Eastern Recovery” overlay in Years 3-5 (see 4.3.3.1); and
- Updated assumptions for Anglia Non-Track/Track and Externals (see 4.3.3.4),

They’ve also responded to but have not made changes to the following:

- Review of TOC schemes; and
- Review of “Deliverable” schemes

4.3.2 Recommendations Review – Eastern

The table below shows the Stage 2 recommendations that relate to the Eastern Region, and a summary of our findings of how these have been addressed in the September 2025 submission. The Assessment column is an indication of whether Jacobs consider the recommendation has been addressed such that we are satisfied that the concern has been addressed. Network Rail have reviewed all recommendations and taken action where they consider it was appropriate. As such they have addressed all of the recommendations in their September 2025 submission.

Table 13 : Recommendations Review Findings - Eastern

No.	Recommendation	Findings	Assessment
3	For those Regions where the overall assessment is a more deliverable than ambitious trajectory, review the assumptions for schemes that we have classified as Deliverable where alternative assumptions are likely to have a material impact on the trajectory	Eastern have stated that they have reviewed the assumptions for relevant schemes and do not believe that changes would have a material impact on the overall forecast trajectory.	Resolved
4	For those Regions where there is a Performance Improvement Plan in place and the full benefits of the plan have not been included in the modelled trajectory, consider adding assumptions to reflect the committed schemes in full.	Eastern have updated their Year 2 exit position to be worse than the previous round. This is based on year to date and expected rest of year performance. The on-time forecast is no longer the mid-point of the performance improvement plan range, but is above the lower end of the range (see 4.3.3.1)	Superseded - alternative approach taken
5	Update the Anglia Non-Track/Track and Externals scheme input sheets to correct for the error where the impact is applied to all cause categories	Eastern have updated these and they are now applying to the correct cause categories.	Resolved
6	Revise the assumptions and approach for the ECML Dec 25 timetable where we have assessed these to be contributing to more realistic trajectories including adding Good and Average day impacts, weighting the bathtub impact by the proportion of the Region affected and the duration of the bathtub. Also consider carrying out the analysis directly using T-3 instead of On Time as	Eastern have taken on most of the recommendations from Stage 2 and revised their approach to the ECML Dec 25 timetable which results in a better end point but worse intermediate years. There are still, however, some areas of concern that have not been addressed (see 4.3.3.2)	Partially Resolved

No.	Recommendation	Findings	Assessment
	this may provide a slightly optimistic view.		
7	Consider the potential contribution from committed TOC schemes to cancellations where they are not currently modelled	Eastern have stated they believe all relevant TOC schemes are included. Additional potential benefits we identified in Stage 2 have not been included, but we do not have evidence that these have the same level of commitment as schemes included by the Region.	Resolved

4.3.3 Time to 3

4.3.3.1 Performance improvement plan / Year 2 Exit

Eastern reduced their T-3 punctuality forecast for end of year 2 (the current year 2025/26) by 1 percentage point compared to the May 2025 submission. This is because the Eastern Performance Improvement Plan has not driven the previously assumed benefits in the year to date. Therefore, the May 2025 submission value is no longer considered to be achievable. Eastern based the revised position on their performance up to May 2025.

Our View is that the Network Rail position for year 2 exit is still ambitious. To achieve the assumed position at the end of year 2 will require the Region to halt the current declining trend and achieve their period targets, including the benefits of their recovery plan, in the remaining periods of the year.

The Region has applied an overlay to the subsequent years of 0.2% T-3 improvement in each of year 3 and 4 and 0.3% in year 5 of CP7. They set out that this will be delivered by deferred benefits from the Eastern Performance Plan and additional performance improvement activity.

4.3.3.2 East Coast Main Line December 2025 Timetable

There are 2 core aspects of the modelled impact of the December 2025 timetable changes:

- The long-term impact which reflects the expected end performance that Network Rail expect the new timetable to deliver.
- The shorter-term introductory risks, where Network Rail have assumed an additional “bathtub” curve impact on years 3 and 4.

The changes that Network Rail have made in these areas are discussed in the following sections.

4.3.3.2.1 December 2025 Timetable – Long Term Impact

Table 14 : December 2025 Timetable Long Term Impact Recommendations Review

Our Recommendation for Changes at Stage 2	Network Rail Changes in September 2025 Submission
Consider carrying out the analysis directly using T-3 instead of On Time, as this may provide a slightly optimistic view in the May submission.	Network Rail have changed their analysis of RailSys to directly use the T-3 metric. They now describe this component as the “new baseline”
<i>Jacob’s view: Although this gives a slightly worse forecast impact, it better represents the evidence from RailSys modelling. This addresses our recommendation.</i>	
Revise the approach for “average day” where we considered the 2 different factors being used in the	Network Rail have revised the impact for what they now describe as the “incident provision”. This is now based only on

Our Recommendation for Changes at Stage 2	Network Rail Changes in September 2025 Submission
May submission overstated the impact based on the evidence provided.	the factor informed by the daily train service to delay regression. They have also revised this factor "to better represent the impact on both weekdays and weekends"
<i>Jacob's view: This has addressed our concern. The factor now better reflects the evidence provided to us during the previous phase.</i>	
Revise the approach of adding the "good day" and "average day" impacts.	Network Rail's approach still adds the components now described as "new baseline" and "incident provision"
<i>Jacob's view: There is still some risk of double counting. However, we are more comfortable that the risk of overstating the punctuality impacts of the timetable is low. This is based on the changes to the "incident provision" factor and consideration that few days in the year have performance as good as the level of perturbation that was used in the RailSys modelling. No weekdays in 24/25 in the North and East and East Coast Routes had levels of disruption impacting punctuality as low; Only 7% of days had performance as good in the RailSys modelled area of the Anglia Route; Around a quarter of days do have performance as good on the East Midlands Route, but this is a small proportion of the modelled area.</i>	

The Network Rail position for the long-term impact of the timetable change is supported by the evidence available.

We note concerns about RailSys analysis being based on a historic version of the timetable that will be different to that implemented, although having fundamentally the same level of train service. The RailSys modelling was based on the Advanced ECML Dec 25 modelled Option compared with December 2023 Base; this timetable was before the Prior Working Timetable issued to operators at the end of January 2025, against which operators confirm their proposed changes. Subsequent changes are likely to have both positive impacts, such as resolving specific conflicts identified by the RailSys modelling, and negative impacts, such as the introduction of additional EMR paths; we cannot be certain how these factors will impact the performance outcome.

We consider that the risk of overstating negative impacts due to double counting when adding "incident provision" to "new baseline" is minimal, probably balanced out by areas where the NR analysis makes more optimistic assumptions and where uncertainty, especially considering the limitations of the scope of the RailSys modelling, remains. Overall, we consider the NR approach for the long-term impact to be reasonable, as well as being ambitious yet realistic.

4.3.3.2.2 December 2025 Timetable - Short Term Impact (bathtub)

Table 15 : December 2025 Timetable Short Term Impact (bathtub) Recommendations Review

Our Recommendation for Changes at Stage 2	Network Rail Changes in September 2025 Submission
Weighting the bathtub impact by the proportion of the Region	Network Rail have changed the calculations to use Region level T-3 MAA. This is based on 3 regions: North West and Central and Eastern from 2017/18_P10 (considering the December 2017 Timetable change at EMR and LNER) and Southern from 2015/16_P02 (Feb 2016 although the submission discusses May 2015 timetable change). The revised analysis suggests a greater impact on year 3 than in the May 2025 submission.
<i>Jacob's view: Network Rail has not addressed the concern. Network Rail's updated analysis at the Region level is dominated by performance deterioration at operators other than those related to the timetable changes being considered. Rather than analyse the impact of the operators subject to the timetable change at the Regional level, they have looked at total Regional performance without normalising for performance of operators not impacted by the</i>	

Our Recommendation for Changes at Stage 2	Network Rail Changes in September 2025 Submission
<i>timetable change. The outcome is driven primarily by deterioration in performance at West Midlands Trains and Northern, which were not related to the timetable changes stated. The Southern Region period considered is dominated by the Thameslink programme impacts, which we do not consider is reflective of a normal timetable change, due to the specific other challenges faced during this period.</i>	
Duration of the bathtub should not impact beyond year 3	Network Rail still assume the bathtub impacts both years 3 and 4, although the updated analysis does have slightly (0.1%) lower impact on the outcome in year 4; the May 2025 submission assumed performance would be 2% worse in year 4 than year 5 due to the bathtub, and now this is 1.9%.
<i>Jacob's view: the NR analysis shared with us explicitly states there is insufficient evidence at 39 periods; data is required at 3 full years to use the approach developed by NR to calculate the bathtub relative to the end state performance level. Other than the Southern region impacts from the Thameslink programme, which had considerable challenges other than just the timetable change, we do not see strong evidence of an introductory bathtub risk beyond the first year following timetable introduction. For several more recent timetable changes we have examined, which were not included in the Network Rail analysis, we have not been able to see a clear bathtub pattern and where there is it does not impact more than 2 years after timetable introduction.</i>	

We have specific concerns with the analysis that has been used to derive the scale and duration of the assumed "bathtub" curve in the submission.

- The scale of the impact modelled is not driven by the timetable changes referenced in the submission, but primarily by the poor performance of other operators in the same Regions at those timetable changes.
- The timetable changes selected by Network Rail have specific issues at the operator level that means we do not consider them to be good case studies. The East Midlands Railway (EMR) December 2017 timetable change did not have any material changes to train paths, only reductions in total journey time, which we would expect to have a negative impact on punctuality. In May 2018 there were more material changes to the EMR timetable which would have the effect of making the duration of any bathtub effect (if present) appear longer. The LNER timetable change in December 2017 similarly had minimal changes to train paths; the deterioration in performance at LNER during this period was primarily due to fleet issues. The Southern timetable changes were associated with the Thameslink programme which had further complexity and resourcing issues, which we believe makes the impacts greater in scale and duration than we might typically expect from a single timetable change. In addition, the Network Rail analysis considers the wrong period for the Southern region to align with the initial timetable change in January 2015.
- We do not consider that there is strong evidence for introductory risk extending into the second year following the new timetable. In the evidence provided by NR, the majority of the case studies presented reach a peak level of performance within 26 periods of the timetable introduction. We consider this to indicate that we can expect performance to reach the level of performance that can be delivered by the timetable by the second year following introduction. The only case studies that show a continued bathtub curve profile into year 3 relate to the Thameslink programme.
- We examined the trend following several timetable introductions not included in the NR analysis. We looked at T-3 Moving Annual Average (MAA) trends following the GTR May 2018, Northern May 2018, EMR May 2021, WMT May 2023 and Chiltern May 2023 timetable changes. The Northern May 2018 timetable change did show some additional negative impact relative to the final performance level achieved before performance started to deteriorate again. This caused a decline in the MAA for the first 9 months and had T-3 at the end of the first year about 1.5% below the end state achieved at around 15 months after the timetable change. Note, although the Northern May 2018 timetable change was not

aligned with the start period used by NR in their analysis, the timetable change was mentioned in their submission and the performance of Northern would have impacted the North West and Central and Eastern data used in their analysis from about 6 months after the start period they used. We do not consider that the others showed a material “bathtub” impact on punctuality. We do note that of these only the EMR May 2021 and Northern May 2018 timetables had a net negative impact on punctuality and so may be of limited use in estimating potential scale of impact of timetable change risk. They do, however, demonstrate that it is not intrinsic that a timetable change will have an introduction risk beyond the overall impact on punctuality of the timetable change.

In conclusion we do not consider the Network Rail analysis used to inform the bathtub provides strong evidence for the scale or duration of a bathtub risk.

Network Rail raise specific risks for the December 2025 East Coast timetable change including:

- Certain sections of the route (notably the 2 line section between Grantham and Colton Junction) have a proportional increase in services of up to 22%. Other sections with a greater mix of services, such as the sections shared with GTR, Northern and TPE, typically have uplifts of between 6% and 9%.
- The dwells for LNER services are reduced, with a reduction in stops with dwells above 150 seconds and increase in the stops with 1½ and 2 minute dwells. Other operators only have minor changes to dwell times.
- Existing challenges for meeting Sectional Running Times (SRT) for some sections of the East Coast Main Line. Some of the sections provided as examples in material shared with us overlap with the sections with greatest proportional increase in services.
- Mitigation of minor issues can be achieved in shorter timescales, such as by staff familiarisation and learning. Any structural issues with the timetable would be constrained by industry timescales, with the earliest opportunity for substantial changes being May 2027.
- The soft launch of the December 2025 timetable, with some staged introduction of additional services, along with the disruption due to engineering works will delay the full impact of the timetable. This may mean that it will take longer to identify and resolve any issues that arise.

We acknowledge that there are specific concerns for the East Coast timetable and a high degree of uncertainty of the impact on performance following introduction. The information shared by NR suggests particular risks for LNER performance. Some timetable introductions have also been followed by an impact on punctuality which has later recovered. Therefore, we consider that some allowance in the forecast for additional risk in the year following introduction of the timetable is appropriate.

However, bearing in mind the efforts to mitigate the risks of the December 2025 timetable and our concerns with the specific analysis used to inform the scale and duration, we consider the bathtub overlay for the timetable introduction does not provide the right balance between ambitious and realistic and Eastern could have forecast more ambitious position for year 3 and year 4. The bathtub overlay assumption has a material negative impact on the year 3 and year 4 of the Eastern punctuality and delay forecasts.

4.3.3.3 East Coast Digital

LNER raised concerns in their consultation response about Eastern Region’s approach to modelling ETCS digital signalling. The modelling is based on scaling the impact observed on the Northern City Line (NCL). LNER’s concerns include:

- Unique technical characteristics of the NCL (circuit switched vs. packet switched GSM-R)
- Long tunnel sections on NCL are not present on rest of ECML
- “Start of mission” errors will be mitigated in later versions of the ETCS Baseline
- Outdated programme assumptions

LNER cite valid concerns about extrapolating from part of the Region. When taking this approach there is always a risk that the differences are not accounted for, however it is unlikely that modelling of the type expected by LNER can be produced in the timescales NR / ORR are working to and it is not clear that more detailed modelling would be any more robust. LNER acknowledged this in their supplementary response in October 2025 and indicated they were comfortable that the impact was not material.

As part of Stage 2 we examined the approach that Eastern used to extrapolate the impacts from the NCL to the geography on the East Coast Main Line; we considered this to be reasonable. We do not believe that a refined approach is likely to have a material impact on the overall forecast.

4.3.3.4 Scheme review

Eastern updated the Anglia Track/Non-Track and Asset schemes to correct an error where the impact was applied to all cause categories. This has reduced the modelled benefit of these schemes to now reflect their intent. Other changes to modelled scheme assumptions were minor.

Eastern reviewed the schemes identified by us as deliverable in Stage 2 but have not made any changes to the forecast trajectories resulting from this.

The result of the updates means there are slightly fewer punctuality schemes that we classify as ambitious compared to the May 2025 submission. Overall, there are more schemes that we classify as deliverable than ambitious. However, more of the ambitious schemes have a high impact on the punctuality, whereas more of the schemes classified as deliverable have medium or low impact. Therefore, we consider that the schemes as modelled by the Eastern do strike a balance between ambitious and deliverable.

4.3.3.5 Overall assessment

We view the proposed T-3 forecast for Eastern region to be **slightly more realistic than ambitious**.

This assessment is primarily driven by the bathtub overlay assumed by Network Rail. Because of the factors discussed in section 4.3.3.2.2, we consider that Network Rail could have made a more ambitious assumption for years 3 and 4. The year 5 forecast level has a better balance between ambitious and realistic.

Other factors that suggest a more ambitious forecast include:

- The assumed deferred benefits from the Eastern Performance Plan.
- Year 2 exit: although the exit position has been reduced compared to the May 2025 submission, it will still be challenging for Eastern to achieve and they have the additional overlay of the Eastern Performance Plan deferred benefits to accrue in the following years of CP7, not all of which is fully scoped; and
- TOCs: Eastern have been consistent in not applying operators risks which are not committed as with opportunities e.g. Greater Anglia (GA) risk of required service strengthening to address crowding and c2c's ageing Class 357 fleet.

Whereas areas that are considered more realistic are:

- TOCs: small benefit from new EMR bi-modes (which has deterioration modelled in year 3 & year 4) but not for any other TOCs. EMR note their T-3 programme and Dec 25 regional recast which may offer punctuality improvements. Also, no punctuality benefit has been assumed for the GTR additional Traincrew which we might expect given the potential for improved recovery from incidents;
- ECML December 2025 timetable: As described above, there are reasons to view this as contributing to a more realistic forecast in years 3 and 4; and
- Weather: The Region has plans to tackle both weather risks and impacts and remains positive that it can continue to become more resilient to these factors yet overall assume a net neutral position.

4.3.4 Cancellations

4.3.4.1 Scheme review

Eastern updated the Anglia Track/Non-Track Asset and External schemes to correct an error where the impact was applied to all cause categories. This has reduced the modelled benefit of these schemes to now reflect their intent.

The Eastern Region benefits from reduced forecast TOC cancellations from Northern and GTR operators in the September 2025 submission. This is due to changes made by the North West and Central and Southern Regions' assumptions respectively, which impact cross Region operators.

Overall there are more cancellations schemes that we have classified as deliverable than ambitious for the Eastern Region. However, these predominantly have a low impact on the forecast and are not likely to be material to the overall Region forecast.

4.3.4.2 Overall assessment

We view the proposed Cancellations forecast for Eastern region to be **balanced**. Cancellations are predicted to decrease in all years.

Factors that suggest a more ambitious forecast include:

- Externals: One of only two Regions to assume any improvement in Externals category in year 3 to 5, although noting this is not as great as in the May 2025 submission following the correction of the scheme entry errors. They also assume a net improvement in impact of assets performance on cancellations;
- Operations and Timetable: Excluding the ECML timetable there are small net improvements modelled for incremental operations and timetable refinement in year 3 to year 5;
- ECML December 25 Timetable: There is no assumed deterioration in cancellations due to the Dec 25 timetable; and
- TOCs: Eastern have been consistent in not applying operator's risks or opportunities which are not committed e.g. GA risk of required service strengthening to address crowding and c2c's ageing fleet.

Areas that suggest a more realistic forecast include:

- Scheme review: There are more cancellations schemes that we have classified as deliverable than ambitious for the Eastern Region. These predominantly have a low impact on the forecast; and
- TOCs: There are other potential opportunities mentioned in the TOC submissions which are not included (e.g. LNER fleet schemes); Eastern have indicated that they consider that all committed TOC schemes have been included in the modelling. The reduction in cancellations of 10% from Northern's performance stabilisation plan, described in North West and Central's submission, has now been modelled in a scheme prepared by the North West and Central Region to apply to all relevant regions, including Eastern.

4.4 North West and Central

4.4.1 Summary of changes

The following changes were made in the NW&C September 2025 submission:

- Added mitigation schemes for Trespass & Vandalism and Assets in years 3-5;
- Revised the assumptions for "Keeping Trains Safely Moving" delay impact;
- Amended/corrected assumptions on Merseyrail fleet and Avanti West Coast (AWC) traincrew (punctuality only) schemes;

- Minor corrections to small number of other schemes; and
- Changed to use their in-year regional rolling forecast (RF6) as year 2 exit position instead of the one produced by the central model.

However, the following were responded to, but no changes were made:

- Asset risks (with exception of additional mitigation scheme);
- Weather impacts in the base year;
- TransPennine Route Upgrade (TRU) risks; and
- AWC traincrew cancellations (responded to punctuality only)

4.4.2 Recommendations Review – North West and Central

The table below shows the Stage 2 recommendations that relate to the North West and Central Region, and a summary of our findings of how these have been addressed in the September 2025 submission. The Assessment column is an indication of whether Jacobs consider the recommendation has been addressed such that we are satisfied that the concern has been resolved. Network Rail have reviewed all recommendations and taken action where they consider it was appropriate. As such they have addressed all of the recommendations in their September 2025 submission.

Table 16 : Recommendations Review Findings - North West and Central

No.	Recommendation	Findings	Assessment
3	For those Regions where the overall assessment is a more deliverable than ambitious trajectory, review the assumptions for schemes that we have classified as Deliverable where alternative assumptions are likely to have a material impact on the trajectory	NW&C have adjusted assumptions on one of the delay schemes that had greatest impact (Keep trains safely moving) and made some adjustments to a subset of other schemes including correction of assumptions.	<i>Resolved</i>
8	Consider whether the base position should be adjusted to account for worse than typical delays/cancellations in the base period, particularly for the weather category	NW&C have not made any adjustments as they do not consider the base year was abnormal.	<i>Not Resolved</i>
9	Consider the inclusion of schemes not currently modelled that could make a material contribution to mitigating punctuality risks, in particular for Externals and Asset related causes	NW&C have added mitigation schemes for assets and externals.	<i>Resolved</i>
10	Ensure that assumed benefits from committed TOC schemes are fully reflected and are consistent with the latest proposals.	NW&C have corrected input assumptions for Northern and AWC schemes.	<i>Resolved</i>

4.4.3 Time to 3

4.4.3.1 Base Year

North West and Central have not made any changes in response to our recommendation to consider adjusting for the higher than typical weather impacts on the base year. This is because North West and Central do not consider the base year to be abnormal. We carried out further analysis of the performance

data. The base year did have higher than typical weather impacts, however, we would not consider them to be abnormally high. We might expect the impact of weather on performance in the NW&C Region to be at the levels seen in the base year for one year in three. Therefore, it is likely that one of the years in CP7 year 3 to year 5 will have weather impacts on performance as bad as that experienced in the base year.

4.4.3.2 Year 2 Exit

North West and Central have changed to use a year 2 (2025/26) exit position based on their regular regional forecasting (known as RF6) instead of that produced by the CP7 performance reset model. For punctuality this is 0.1% better than their forecast. The central forecast already reflected an improved punctuality position than the May 2025 submission, driven by more ambitious assumptions on mitigation of trespass and vandalism, reduced assumed risk due to Camp Hill services, and corrections to the modelling.

4.4.3.3 Scheme review

North West and Central Region added a scheme to provide longer term mitigation in years 3 to 5 for Externals. We considered this to have a degree of ambition to reverse the increasing trend.

We updated the classifications of the "Keep trains safely moving", HS2 materials by rail, Northern traincrew and Merseyrail fleet schemes that NW&C have updated from deliverable classification, based on the May 2025 submission, to be "balanced".

Overall, there is a better balance between schemes that we consider to drive a more deliverable forecast and those that contribute to greater ambition. However, there are still slightly more schemes in the deliverable categorisation.

The changes that North West and Central have made to the schemes results in the forecast increase in Network Rail caused delays in the May 2025 submission to now be forecast to be fairly constant for the remainder of the control period. This is primarily due to the changes to the Keep Trains Safely Moving scheme assumed impact on reactionary delays, and the new schemes to mitigate Externals and Assets incidents, but also in part due to the corrections to modelling errors reducing the assumed impact of ageing assets.

4.4.3.4 Overall assessment

We consider the NW&C punctuality forecast to be **slightly more realistic than ambitious**. NW&C has a stable performance from Y3 onwards. The changes made for their September 2025 submission result in a more ambitious forecast and hence the change of our previous assessment of realistic. We do not think addressing some of the points discussed below to achieve the balanced assessment would have a material impact on the forecast trajectory.

Factors that suggest a more ambitious forecast include:

- Inclusion of Trespass and Vandalism and assets mitigations for Years 3-5.
- Maintaining levels of Network Rail performance noting the challenges faced.

Areas that suggest a more realistic forecast include:

- Overall NW&C assumptions on asset risks are higher than other Regions and take a more pessimistic view on worst outcome in the Monte Carlo. They assume the biggest deterioration in punctuality due to asset related risks across all the Regions. Chiltern provided additional commentary on asset risks in their consultation response supporting NW&Cs position;
- Slightly more schemes that we have classified as deliverable than ambitious;
- Weather impacts in the base are towards the higher end of what might be expected. NW&C have provided evidence that the weather, autumn and structures impact on the base year is close to the median over the

past 10 years. We still consider the data suggests the weather impact is towards the high end of what is typical; and

- NR Delays show overall worsening relative to CP6 exit.

4.4.4 Cancellations

4.4.4.1 Year 2 exit

North West and Central have changed to use a year 2 (2025/26) exit position based on their regular regional forecasting (known as RF6) instead of that produced by the CP7 performance reset model. For cancellations it is within 0.05% of the forecast produced by the central CP7 performance reset model for year 2, so is essentially the same.

We examined the current trends in cancellation performance. We identified improvements in TOC attributed cancellations at West Midlands Trains (WMT), Northern and Merseyrail in the current year that are greater than assumed by North West and Central, even by year 5. This follows completion of fleet introductions at WMT and Merseyrail, and timetable changes at Northern to mitigate on-the-day cancellations. If the cancellation performance for these operators continues at the current levels, then we expect the average performance for 2025/26 to be better than the current Region forecast.

4.4.4.2 Scheme review

The “keep trains safely moving” scheme is still applied across all categories. It therefore applies a lower benefit to NR categories than might be expected based on the scheme description, and probably a higher benefit to TOC categories. We would expect a more ambitious assumed benefit to deliver greater benefits in the specific cause categories expected to be impacted, therefore retained this as deliverable.

As with the impact of the delays scheme, we consider the year 3-5 externals mitigation scheme does have a degree of ambition considering the long-term trend. Following discussions with NW&C, we revisited the assumptions for the AWC traincrew cancellations modelled impact and now consider that the scheme is consistent with the stated intent. This has therefore changed from deliverable to balanced.

Because the performance improvement for Northern, WMT and Merseyrail in the current year has exceeded the assumed improvement in the model schemes, we have changed the classification of these schemes from balanced to deliverable.

Overall, the number and scale of schemes that we have classified as deliverable is greater than those we have classified as ambitious.

4.4.4.3 Overall assessment

We consider the NW&C cancellations forecast to be **slightly more realistic** than ambitious. This is a change from our previous assessment of the May 2025 submission of realistic.

Factors that suggest a more ambitious forecast include:

- Cancellations predicted to decrease overall (although not in all years) with an assumed improvement in TOC cancellation performance (mostly traincrew) across several operators;
- Inclusion of Trespass and Vandalism mitigation for Years 3-5; and
- Assumed benefits from Network Performance Board-driven initiative ‘Keeping Trains Safely Moving’ scheme.

Areas that suggest a more realistic forecast include:

- More schemes have been assessed as deliverable than ambitious;

- The baseline year had greater impact from weather than is typical for the region and has not been adjusted for; The Region have set out this was a considered decision and the “keeping trains safely moving” scheme mitigates weather impacts; and
- Assumed improvements in TOC cancellations for WMT, Northern and Merseyrail are less than already being delivered in the current year.

If the recent improvements in operator cancellations performance are maintained, and were included in the forecast assumptions, this would have a material impact on the forecast trajectory.

4.5 Southern

4.5.1 Summary of changes

The following changes were made in the Southern September 2025 submission:

- Passenger Demand - As more passengers return to rail, delay minutes increase; Southern updated their approach to be informed by updated demand forecasts and applying the relationship between demand and punctuality.
- SWR/Wessex timetable enhancements deferred from Year 4 to Year 5.
 - The first and second point combine to make estimated performance in Year 4 worse than in the May 2025 submission.
- Victoria phase 5 – this now impacts all of Kent for all cause categories in the September submission, rather just Orpington for non-track assets as modelled in the May forecast.
- Balcombe Tunnel work is completed in year 1 and is incorporated into the base, and so the scheme has been removed.

4.5.2 Recommendations Review – Southern

The table below shows the Stage 2 recommendations that relate to the Southern Region, and a summary of our findings of how these have been addressed in the September 2025 submission. The Assessment column is an indication of whether Jacobs consider the recommendation has been addressed such that we are satisfied that the concern has been resolved. Network Rail have reviewed all recommendations and taken action where they consider it was appropriate. As such they have addressed all of the recommendations in their September 2025 submission.

Table 17 : Recommendations Review Findings - Southern

No.	Recommendation	Findings	Assessment
3	For those Regions where the overall assessment is a more deliverable than ambitious trajectory, review the assumptions for schemes that we have classified as Deliverable where alternative assumptions are likely to have a material impact on the trajectory	Southern have updated a subset of the schemes identified as deliverable, but this includes the most material schemes.	Resolved
4	For those Regions where there is a Performance Improvement Plan in place and the full benefits of the plan have not been included in the modelled trajectory,	Southern have not made any changes to their modelling to further reflect the ambition in the Performance Restoration Plan. During Stage 2 we noted the difference in scope of the restoration plan meant that it	Not Resolved

No.	Recommendation	Findings	Assessment
	consider adding assumptions to reflect the committed schemes in full.	would not necessarily have the same balance between ambitious and realistic set out for the CP7 reset. However, there are specific activities described in the Performance Restoration Plan that are not included in the modelling.	

4.5.3 Time to 3

4.5.3.1 Scheme review

We have reclassified the two schemes related to passenger demand from deliverable to balanced. The “Passenger Return Delays” scheme is now better aligned to the evidence in the submission and the “Passenger Delays at Stations” has the assumed modelled deterioration reduced to a level we consider is balanced.

Overall, there are still more schemes that we have classified as deliverable than ambitious, although these are categorised as having a medium and low impact on delays.

The changes to the modelled schemes combine with the corrections to the modelling errors to have lower levels of delay in year 2 and 3 but higher in year 4, because of the assumed greater impact from passenger demand and the benefits from the Wessex timetable recast is modelled to now occur later in the Control Period.

4.5.3.2 Overall assessment

We consider the Southern punctuality forecast to be **slightly more realistic than ambitious**. However, we do not think addressing some of the points discussed below to achieve the balanced assessment would necessarily have a material impact on the forecast trajectory.

Factors that suggest a more ambitious forecast include:

- There is a relatively low level of weather impact on the base. This results in a better starting base position from which the forecast is projected; and
- Assumed benefits from the Wessex timetable in years 5.

Areas that suggest a more realistic forecast include:

- The Forecast trajectory does not recover towards the CP6 exit as performance is forecast to be lower than the CP6 exit by 0.8% for Southern Region’s September 2025 submission;
- More schemes have been assessed as deliverable than ambitious; and
- The modelled schemes do not include initiatives from the restoration plan, such as seasonal preparedness (e.g. SouthEastern is operating its autumn timetable again, but did not in the modelling base year), unattributed & reactionary delays initiatives which could contribute to some recovery towards this level.

4.5.4 Cancellations

4.5.4.1 Scheme review

Two schemes have had their assessment changed, which changes the distribution of the assessment marginally.

GTR Project 94, the recruitment of additional traincrew, has been updated so that the full benefit described by the scheme is now modelled. We have reclassified this from deliverable to balanced.

The Victoria Phase 5 scheme has been updated so that it is now modelled to affect all categories across the whole of Kent instead of specific asset categories in the geography local to the asset renewals. We have therefore classified this as ambitious, as we consider its benefits may be overstated. The Region modelling team confirmed that the scheme is modelled as intended.

The remaining high impact scheme classified as deliverable relates to SWR traincrew. This scheme assumes the increased cancellation risk described as relating to training continues in all years. We think a more balanced assumption would be to assume there is an improvement in cancellations once class 701 (Arterio) training is complete.

The scheme review found there are more schemes that we classify as deliverable than ambitious, although these are mainly in the low impact category.

4.5.4.2 Overall assessment

We consider the Southern cancellations forecast to be **slightly more realistic** than ambitious. However, we do not think addressing some of the points discussed below to achieve the balanced assessment would have a material impact on the forecast trajectory.

Southern experiences an improved position relative to the May 2025 submission driven by correction to GTR traincrew scheme and increased benefits from Victoria phase 5.

Factors that suggest a more ambitious forecast include:

- Southern Region forecasts cancellations to remain under 4% for the duration of CP7, reducing in year 3 and 4, and remain steady in the final year of CP7; and
- Relatively low level of weather impact on the base.

Areas that suggest a more realistic forecast include:

- More schemes have been assessed as deliverable than ambitious;
- The modelled schemes do not include some initiatives from the Performance Restoration Plan;
- Performance remains weaker than CP6 exit and limited progress through CP7; and
- SWR traincrew cancellations – no assumed recovery to the increase in traincrew cancellations, or the additional traincrew cancellations in the base, related to driver training on Arterio. Performance is therefore estimated to worsen marginally at the end of Year 2 from Year 1 driven by assumed operator risks relating to Arterio introduction and not recover this specific concern.

4.6 Wales and Western

4.6.1 Summary of changes

The following changes were made in the Wales and Western September 2025 submission:

- Amended the configuration of many schemes from "All Delay" to "Primary Delay" to ensure the intended impact on reactionary delay is modelled;
- Amended project Brunel scheme to ensure full impacts realised in CP7; and
- Updated TOC schemes result in 0.3-0.4% lower cancellations in years 2 to 5 in the September 2025 forecasts compared to the May 2025 forecasts.

4.6.2 Recommendations Review - Wales and Western

The table below shows the Stage 2 recommendations that relate to the Wales and Western Region, and a summary of our findings of how these have been addressed in the September 2025 submission. The Assessment column is an indication of whether Jacobs consider the recommendation has been addressed such that we are satisfied that the concern has been resolved. Network Rail have reviewed all recommendations and taken action where they consider it was appropriate. As such they have addressed all of the recommendations in their September 2025 submission.

Table 18 : Recommendations Review Findings - Wales and Western

No.	Recommendation	Findings	Assessment
3	For those Regions where the overall assessment is a more deliverable than ambitious trajectory, review the assumptions for schemes that we have classified as Deliverable where alternative assumptions are likely to have a material impact on the trajectory	Wales and Western have not made any specific changes to amend schemes identified as deliverable (other than those related to recommendation 11). They have assumed higher benefits for TOC schemes following work with GWR. They indicate in their submission that they have revisited all schemes.	<i>Resolved</i>
4	For those Regions where there is a Performance Improvement Plan in place and the full benefits of the plan have not been included in the modelled trajectory, consider adding assumptions to reflect the committed schemes in full.	Wales and Western have amended the delay impacts to model the full benefits of project Brunel. There is still a gap for cancellations compared to the recovery plan, but as noted in the Stage 2 report, this would require contributions from TOC categories to deliver. W&W have assumed greater benefits from GWR towards this.	<i>Resolved</i>
11	We recommend all schemes set to All Delay with a percentage input be reviewed to confirm the modelled impact is as intended	Wales & Western have updated the assumptions for these schemes reducing the impact to that intended.	<i>Resolved</i>
12	Ensure that the assumptions for OLE scheme for cancellations are consistent with delays.	This scheme has been updated so the cancellations and delay schemes have a consistent assumptions profile across the years.	<i>Resolved</i>
13	Consider whether the base position should be adjusted to account for worse than typical cancellations in the base period, particularly for weather category	Wales and Western have not introduced any adjustment to the base. They consider that averaging across years does not provide a "reliable risk management approach" and so model specific mitigations.	<i>Considered: Not Amended</i>

4.6.3 Time to 3

4.6.3.1 Scheme review

We changed the assessment categories of a small number of the modelled schemes which Wales and Western had updated. These mainly related to changing the application of the assumptions from "All Delays" to "Primary Delays". This changed the distribution of the assessment marginally. However, it remains reasonably

balanced between schemes that we categorised as leading to a more ambitious forecast than they might have assumed and those more deliverable.

4.6.3.2 Overall assessment

We consider the Wales and Western punctuality forecast to be **balanced** between ambitious and realistic.

The forecast for punctuality and delays included in the September 2025 submission did reflect a worse position to the forecast included in the consultation based on the May 2025 submission. This was primarily due to the change to schemes to apply to "Primary Delays". As this relates to correctly applying intended evidenced assumptions, we did not consider this required the overall forecast trajectory assessment to be changed.

Factors that suggest a more ambitious forecast include:

- Year-on-year improvement in all years. Wales and Western are the only Region to have a net benefit and no modelled deterioration in any specific category;
- Assets: Wales and Western are the only Region to assume a net improvement in the performance impacts from assets related issues, despite the challenging funding environment;
- Our assessment of the schemes has more schemes classified as ambitious than deliverable; and
- The forecast incorporates assumed operator contributions.

Areas that suggest a more realistic forecast include:

- Some schemes we have identified could contribute to a slightly more realistic position and the Region has not modelled any uncommitted stretch that would lead us to consider it is overly ambitious; and
- As noted by Heathrow Airport in their consultation response, we recognise that improvements were from a low base, but their target at the end of CP7 remains below other regions. We do, however, consider this difference is typical of the relative levels between the Regions historically; this is likely due to the train service offering in the Region.

4.6.4 Cancellations

4.6.4.1 Scheme review

The number of schemes that have a high impact on cancellations have increased compared to the May 2025 submission. This is due to increased assumed benefits from GWR schemes. These are the benefits from the class 175 fleet, project Unity (Intercity Express Trains fleet availability) and reduced cancellations from traincrew and Sunday drivers. These are areas where there has already been significant improvement at the operator.

There has not been a material change in the Network Rail attributed cancellations in the September 2025 submission, but the GWR schemes described above have a material impact on the forecast from year 2 onwards, resulting in a net improvement of 0.4% compared to the May 2025 submission.

4.6.4.2 Overall assessment

We consider the Wales and Western cancellations forecast to be **balanced** between ambitious and realistic. This is a change from our previous classification of slightly more realistic than ambitious.

Factors that suggest a more ambitious forecast include:

- Assumed increased benefits from TOC schemes on both cancellations and fleet, although it might have been reasonable to have assumed further improvement in TfW fleet towards the end of CP7 as they move through their introduction reliability bathtub;

- More high impact schemes assessed as ambitious than deliverable;
- Cancellations performance is expected to improve in years 2-4 and is below CP6 exit after Year 1; and
- Externals cancellations impact in the base is lower than recent trends.

Areas that suggest a more realistic forecast include:

- Slightly higher than typical weather impacts in base (although some schemes mitigate this, there is no specific adjustment);
- The forecast does not achieve the level that is set out in the Performance Improvement Plan for the end of CP7; and
- Heathrow Express raise in their consultation response the performance in recent periods as consideration for reduced targets. We consider that this performance is within normal levels consistent with the overall forecast and further commitments from TOCs would be required to deliver lower levels beyond this.

4.7 Scotland

4.7.1 Recommendations Review

Scotland's submission in September 2025 reflected the position in May 2025 as Scotland are confident in their forecasts and made no changes.

Table 19 : Recommendations Review Findings - Scotland

No.	Recommendation	Findings	Assessment
14	A more ambitious trajectory would be achieved by considering the areas of the plan that are assumed to contribute to the STPM and could contribute to a reduction in cancellations but have not currently been accounted for in the cancellations trajectory. We recommend NR review these schemes and where appropriate include the relevant impact in the cancellations trajectory.	Scotland Region have not amended their submission.	<i>Not Resolved</i>

4.7.2 Cancellations

4.7.2.1 Overall assessment

Scotland improved performance from 2.5% at CP6 exit to 2.2% in Year 1, the forecast performance is expected to fall back in year 2 to 2.3%, maintaining that performance in Years 2 to 5.

The Region have not shared specific Cancellations forecast modelling; the focus of their modelling is on Scotland Train Performance Measure (STPM).

The submission indicates benign weather conditions and the reduced timetable in Year 1 helped performance. Therefore, the Region forecast includes a rise in cancellations in year 2 and no further improvements as performance returns to the plan. Had weather impacts been typical in year 1 outturn would have been between 2.3% and 2.4%.

The Region acknowledges that several of their schemes may drive a reduction in cancellations but maintain the flat trajectory for cancellations is appropriate to allow flexibility in operational decisions to deliver the best outcome for the passenger (i.e. whether to run a train late or cancel the service for recovery).

Factors that we considered ambitious include:

- The forecast trajectory maintains performance across the control period, maintaining most of the improvement in cancellations already achieved in the last 2 years, although does not return to historic levels; and
- Most of the reduction in 24/25 compared to 23/24 was due to a reduced impact from severe weather, autumn & structures category. We might expect more cancellations in this category in a typical year.

The plan includes several schemes that might result in performance benefits to cancellations and not just STPM punctuality, but no net improvement has been assumed, suggesting a more realistic/deliverable trajectory, these include:

- Improvement following investment in fleet sanding;
- Further collaboration with all parties in Scotland to address issues across the industry;
- ScotRail have established driver recruitment plans;
- PRIMA introduced to reduce weather events impact;
- Vegetation clearance schemes; and
- Hyndland Guardian Presence aims to stop disruption to the network but is also highly valuable to society and the individuals impacted by these incidents.

Although there are some factors which might suggest that a more ambitious cancellations forecast trajectory might be achievable, we considered this in balance with their ambitious targets for STPM and the Region's case for cancellations targets that allow them to balance the mix between punctuality and cancellations to achieve the STPM targets. Therefore, we view the Scotland retaining the cancellations trajectory from the PR23 Final Determination as **balanced**.

5. Consultation Responses

Responses were received from:

- **DfT Operators:** London North Eastern Railway (LNER), Northern, South Western Railway (SWR) and TransPennine Express (TPE)
- **Franchised Train Operating Companies:** Avanti West Coast (AWC), Chiltern, East Midlands Railway (EMR), Govia Thameslink Railway (GTR), Great Western Railway (GWR), West Midlands Trains (WMT)
- **Open Access operators:** Heathrow Express, Grand Central, Hull Trains and Lumo
- **Transport for London operators:** Arriva Rail London (London Overground) and GTS Rail Operations Limited (Elizabeth Line)
- **Other stakeholders:** Heathrow Airport, London TravelWatch, Transport Focus, Transport for Greater Manchester and National Union of Rail Maritime and Transport Workers (RMT)

General themes that were raised:

- Most Franchised/DfT operators (with the notable exception of LNER in their initial response) indicated they were supportive of target levels included in the consultation, although some expressed concern about the potential disconnect from government ambition
- Most other respondents consider the targets are cautious and should be more ambitious
- Operators on the East Coast Main Line express concern about how targets have been set for the December 2025 timetable change, the targets being easy to achieve and not being ambitious.
- LNER in its original response to the consultation indicated that Network Rail had not engaged with them on the “bathtub” introduction risk for the December 2025 timetable. They therefore indicated that they could not support it. LNER provided a supplementary response in October 2025. In this they indicated they were now content with the analysis of performance following past timetable changes and support the inclusion of the “bathtub” curve performance impact and Network Rail’s calculation of this impact, acknowledging the inherent uncertainty.
- Northern and TransPennine also provided a supplementary response following further engagement with Network Rail. Like LNER, they also indicated that they were content with the analysis and forecast for the impact of the December 2025 timetable.

Our scope was to consider any robust evidence from consultation responses which fundamentally challenges the Independent Reporter and/or ORR assessment of Network Rail’s plans. In the table below we have drawn out specific points from the consultation responses that highlighted points of evidence or factors that required specific consideration as part of the assessment of the Regions’ trajectories. We have considered these points when carrying out our assessment of the forecasts set out in section 4.

Table 20 : Consultation Responses Evidence Considered

Respondent	Point raised/evidenced	Jacobs’ view
Heathrow Express	On Cancellations, they point to recent performance just over 3%.	Although period 5 was good this is within normal periodic variability consistent with a higher annual level of performance. Based on 2024/15 period 12 to 2025/26 period 6 average performance, W&W are on track to achieve the 4.1% 2025/26 modelled exit position. P5 also had some timetable reductions to help deliver the levels quoted by Heathrow Express.

Respondent	Point raised/evidenced	Jacobs' view
Heathrow Express	On punctuality they point to the W&W targets being lower than other Regions. They argue this is reason for greater ambition.	This is true, but this has always been the case. This is partly driven by the mix of services on the Region. At CP5 exit T-3 was 5.5% lower than Eastern, Scotland and Southern and over 2% lower than NW&C (The gap between W&W performance and the other regions widened during CP6 to be around 10% worse than Southern). The gap at the end of CP5 is comparable to the gaps in the proposed targets. It would not be realistic to have targets to close this gap, and hence deliver a more ambitious trajectory, without specific measures expected to deliver it, probably through changes in services/timetables or specific investment.
Avanti West Coast	AWC highlights the recent improvement in Cancellations on NW&C, primarily driven by TOC cancellations performance.	We also have observed this in the data, and it is a concern. This is discussed in 4.4.3.1.
Avanti West Coast	"Avanti would like to understand more about the extent to which the relationship between delay and T-3 has been reviewed by the Independent Reporter, and whether the amount of T-3 decline is appropriate given the targeted increase in NR delay."	We considered the T-3 regressions during Stage 2 of the project and did not have concerns. The change in T-3 is consistent with the total change in delay but would not appear consistent with specific Network Rail attributed delays forecast included in the consultation. In the May 2025 submission, the forecast had increasing delays attributed to Network Rail offset by operator delays to give an approximately level T-3 forecast.
Govia Thameslink Railway (GTR)	Automatic Train Operation (ATO) - GTR highlights that this could mitigate knock-on impact to the Southern region of Dec 2025 timetable when implemented in full	The Southern Region assumes a 0.1% impact on T-3 related to the Dec 25 timetable. GTR seem to suggest this might be mitigated. Further evidence would be needed to fully determine the outcome.
GTR	ETCS - GTR seem to suggest benefits from ETCS (closer running, reduced signal failures with some moving to operators) south of Stevenage from 2026	The types of benefits they highlight we would not expect until signals away. NR have indicated that it is unlikely to happen during CP7.
LNER	They note the varying modelled impacts on LNER T-3 of Dec 25 timetable. LNER T-3 forecast is 2-3x worse than NR's March 2024 performance report. Decision to proceed with Dec 25 timetable was based on modelled impact of 5% T-3 on LNER. March 2025 modelling suggests 3.2% but the Bathtub ("novel and untested") increases this to 11.4%.	This supports the high degree of uncertainty of the timetable impact and the sensitivity of modelled impacts to changes in the timetable. This might suggest the refinement that has taken place could have a material impact. However, the Railways modelling is the only solid evidence available that is specific to this timetable change and so we consider it is useful to inform the NR forecast assumptions. LNER's initial concerns on lack of engagement with NR on the bathtub analysis moved to a position of support in the supplementary response. This is

Respondent	Point raised/evidenced	Jacobs' view
	LNER supplied a supplementary response in October 2025; they indicated that following further engagement with NR and review they were content with the analysis and support the inclusion of a "Bathtub".	described as due to the additional engagement with NR and visibility of the NR analysis, final submission and the changes made compared to the May 2025 submission.
East Coast Open Access (Hull Trains, Lumo, Grand Central)	Looking at base trajectory without the Dec 25 overlay note that Eastern expected relatively stable. Suggest this shows limited ambition:	The updated submission similarly has limited change without the overlays, but the performance improvement overlay does provide some improvement.
East Coast Open Access (Hull Trains, Lumo, Grand Central)	They note the limited area and timing of the Railsys modelling and that timetable has changed	We are aware of the limitations and have noted this in findings, but the Railsys modelling is the only solid evidence available that is specific to this timetable change.
East Coast Open Access (Hull Trains, Lumo, Grand Central)	They note the work that is ongoing to mitigate issues identified in the timetable such as station dwells, platform management, regulation statements, customer and fleet plans.	We have also raised concerns about the degree to which the mitigation activities that have been described in the NR plans have not been applied to the modelling of the timetable impact (see 4.3.3.2)
East Coast Open Access (Hull Trains, Lumo, Grand Central)	Concern over low level of ambition from ETCS overlay	We reviewed the NR assumptions during Stage 2 and found it was evidence led. The uplifts relate to the potential reactionary impacts and we do not consider the approach to be disproportionate.
RMT	RMT response contains various facts drawn from various resources. These relate to historic performance and the CP7 target and investment levels.	RMT include this evidence mainly to support their points about investment in the railway rather than directly responding to the consultation questions: We have considered historic performance of the Regions alongside our review of their plans and forecasts. As such we consider that the included evidence is accounted for in our review.

Appendix A. Documents Received

The following documents were received during this stage of the review. These were considered alongside materials shared previously.

- Network Rail September 2025 Submission:
 - 2025 09 05_Network Rail_Performance reset national overview submission to ORR_FINAL.pdf
 - W&W_Performance Reset_Final submission to ORR_05 September 2025.pdf
 - 2025 09 05_PMcMahon letter to WGodfrey_train performance reset_Network Rail's updated trajectories_FINAL.pdf
 - Eastern_Performance Reset_Final submission to ORR_05 September 2025.pdf
 - NW&C_Performance Reset_Final submission to ORR_05 September 2025.pdf
 - Scotland_Performance Reset_Final submission to ORR_05 September 2025.pdf
 - September 2025 performance reset submissions_NR TOC Split estimates.pdf
 - Southern_Performance Reset_Final submission to ORR_05 September 2025.pdf
- Model and Outputs
 - Modules - Cancellations model
 - Modules - Punctuality model
 - Cancellations Trajectories -26.08.2025.xlsx
 - Cancellations waterfall interpreter - 26.08.2025.xlsx
 - Delay per 1000 waterfalls - 26.08.2025.xlsx
 - Sept 2025 Cancellations model input schemes.csv
 - Sept 2025 punctuality model input schemes.csv
 - Trajectories - 26.08.2025.xlsx
 - waterfall interpreter - v5 - 26.08.2025.xlsx
 - Scheme by scheme analysis (Routes and Regions) 26.08.2025.xlsx
 - Scheme by scheme Cancellations analysis (Routes and Regions) - 26.08.2025.xlsx
 - Outputs Punctuality 20250826.zip
 - Outputs Cancellations 20250826.zip
- Additional materials supplied by Regions
 - CP7 2+3 Reset - Jacobs Review Meeting (Southern)
 - Impact of Timetables analysis v0.4 (Routes and Regions)
 - EPP Review v1 Draft
 - 2025 11 03_Eastern Round Table_Network Rail summary pack_UPDATE.pdf
- Network Rail Responses to ORR engagement shared with Jacobs
 - CP7_model_assurance_20250822_v1.0.pdf
 - P5P95.xlsx
 - Primary reactionary and all delay examples.pptx

- ORR queries for NR-perf plan submissions-NR version.xlsx
- ORR queries for NR-perf plan submissions-NR version v2.xlsx
- Performance Reset - Eastern supplementary responses
- RE EXTERNAL RE CP7 performance reset - offer to review elements of the submission.msg
- LNER supplementary response.pdf
- Letter to Will Godfrey on performance reset 021025 FINAL
- Letter on Performance Reset from Ellie Burrows.pdf
- Consultation Responses
 - Avanti.docx
 - Chiltern.pdf
 - EMR.docx
 - EXTERNAL CP7 (Years 3-5) Performance Trajectory - GTR.msg
 - EXTERNAL CP7 passenger train performance reset Consultation on targets for 2026 to 2029..msg
 - Grand Central.docx
 - GTS.pdf
 - Heathrow Airport.docx
 - Heathrow Express.pdf
 - Hull Trains.pdf
 - LNER.pdf
 - London Travel Watch.pdf
 - Lumo.docx
 - Northern.docx
 - RMT.doc
 - Southwestern.docx
 - TransPennine Express.docx
 - Transport Focus.pdf
 - Transport for Greater Manchester.docx
 - WMT.docx
 - Arriva Rail London.pdf
 - LNER supplementary response.pdf
 - Northern & TP Express supplementary responses
 - Transport Scotland.docx
 - Additional (sic) responses for Jacobs (211125).docx : (Grand Central, GTR & SWR additional correspondence)
- Additional meeting notes supplied by ORR
 - 20251110 - East Coast Mainline TT change roundtable note (revised for comments).docx

