

Responses to CP7 passenger train performance reset – consultation on targets for 2026 to 2029

[CP7 passenger train performance reset: consultation on targets for 2026 to 2029 | Office of Rail and Road](#)

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ARRIVA RAIL LONDON



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

This pro-forma is available to those who wish to use it to respond to our consultation. Other forms of response (e.g. letter format) are equally welcome.

Please send your response to prm@orr.gov.uk by **5pm on 5 September 2025**.

Please contact Matt Wikeley, Head of Rail Outcomes, at ORR with any queries: matt.wikeley@orr.gov.uk

About you

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As part of the CP7 passenger train performance reset, we are consulting on proposed performance targets for Time to 3 (England & Wales only), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel at both a national and regional level. We have done this after assessing national and regional performance plans alongside associated targets submitted to us by Network Rail.

The proposed targets will be used to monitor and hold Network Rail to account in years 3 to 5 of CP7.

Question 1: 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?

The proposed targets do not align with the expressed position of the National Performance Board, which is targeting the industry with moving the On-time to 3 (“OT3”) measure towards 90%.

For metro operators, such as London Overground and the Elizabeth line, the most appropriate measures are cancellations, journey time and the interval between trains.

We propose that the cancellation measure is utilised for metro operators, and is suitably weighted to incentivise the appropriate behaviours; and

We propose that an On-time (“OT3”) measure (including cancellations) is applied at destination (and potentially some key interchange locations or stations with high demand) rather than at every station. This is a step towards a measure that better reflects the extended journey times often experienced by customers during delay, by capturing the effect of extended intervals between trains as well as cancellations.

The OT measure is less relevant to a metro operator, with passenger journey time and service intervals being more relevant than the punctuality of individual trains.

Question 2: Do you have any views on our assessment of Network Rail’s plans and the findings of the Independent Reporter?

The targets need to be operator specific. This requires more granular performance data at a regional, route and individual train operator level, to enable Network Rail’s performance to be tracked accurately at a local level.

The quality of the performance data provided needs to improve to support this.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

It should be recognised that *‘one size doesn’t fit all’* when it comes to setting Network Rail targets.

For GTS an OT3 measure (including cancellations) should be utilised at destination and some key interchange locations or stations with high demand.

The OT measure is too focused on individual train punctuality and does not reflect the overall customer experience.

An OT3 at destination metric is a reasonably good indicator of service intervals and customer journey time. The OT metric, applied at every station, does not provide an accurate reflection of service intervals or customer journey times.

To be effective, the measures must be aligned with customer expectations. For high-frequency services such as the Elizabeth line and London Overground the measures should reflect passenger expectations of service frequency (the time customers expect to wait for a train) and the journey time (how long customers expect their journey to take).

Therefore, greater focus should be placed on cancellations and journey time to better reflect the actual service provided to passengers.

The industry, and the future Great British Railways (GBR), must have a more robust forecast of performance, reflecting known risks, and should offer a range of metrics to best reflect passenger expectations for different service types, which will vary across the country.

Format of responses

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Publishing your response

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Use of your personal data

The legal basis for processing your personal data is that it is necessary for the performance of a task carried out in the exercise of an official function vested in ORR.

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We will publish your consultation response, withholding or redacting confidential information where appropriate. We will not publish your personal data.

ORR staff may have access to your information for the duration of the consultation process. This will be no longer than a year's duration and all information submitted in response to a consultation which has not been published on our website, will be deleted.

Artificial Intelligence (AI)

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About you

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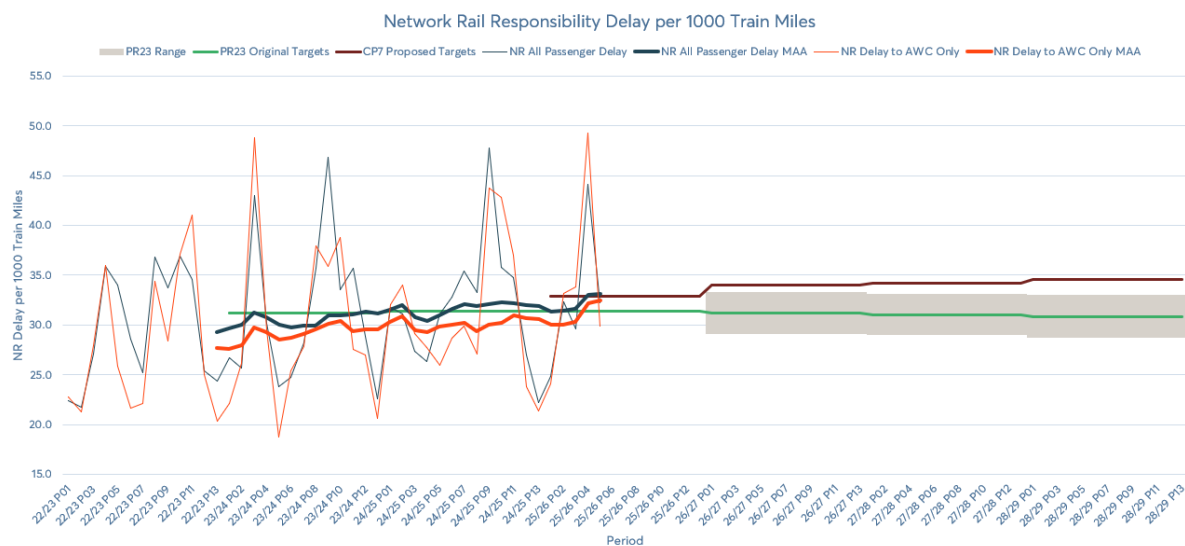
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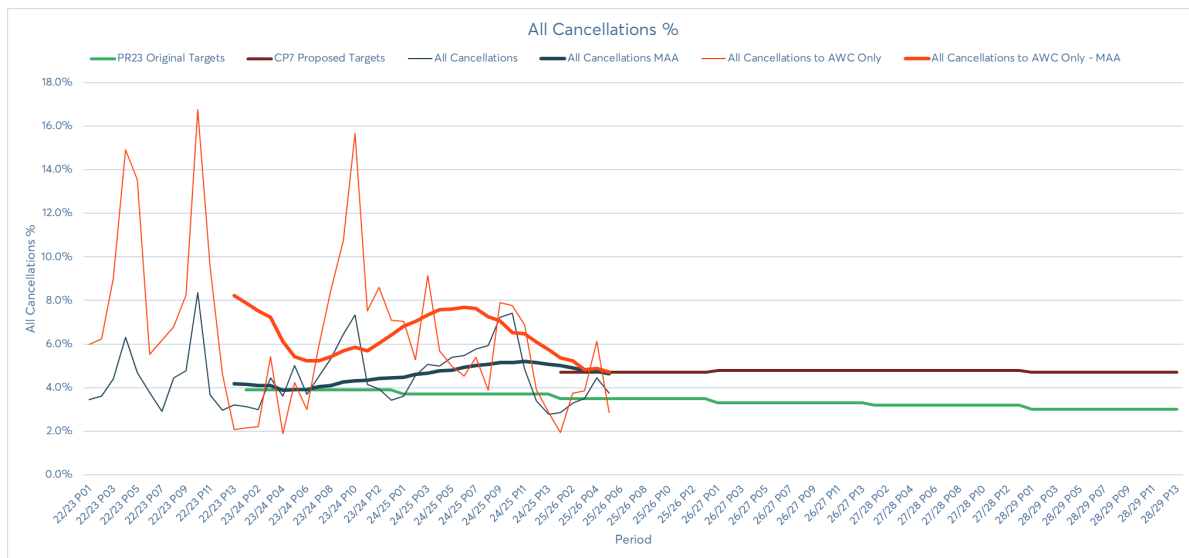
Question 1: Do you agree with the proposed targets for the passenger train performance success measures in CP7 years 3 to

5 and do you consider they are ‘ambitious yet realistic’ in light of the evidence on current and expected factors affecting performance?

Avanti West Coast mainly operate over the North West and Central region (NW&C), and will focus our response on this region. For NW&C, the passenger Network Rail delay per 1000 miles trend has been gradually increasing, and following a poor period 2604, particularly for infrastructure performance, the MAA is now slightly above the original PR23 target at 33.1. Prior to this, the MAA was close to the original PR23 target for FY26. In the PR23 determination, NWC were targeting a year-on-year improvement in NR delay for the remainder of CP7, however the latest proposal under the CP7 performance reset is now showing the target to be increasing year-on-year.



Cancellations have shown an improving trend in recent periods, however the latest proposal under the CP7 reset shows the target remaining stable for the CP7 remainder (as opposed to the year-on-year improvement initially targeted in the PR23 determination). It should be noted though that the improvement is due to improved TOC-on-Self cancellation performance, not an improvement in Network Rail caused cancellations.



It is understood that Network Rail continues to face financial pressures around the largely fixed funding envelope for CP7, with some anticipated decline in asset condition alongside increasing demands on the network. Due to fiscal challenges, NR are now planning fewer renewals across the Control Period compared to the initial CP7 delivery plan, which will likely cause increased deterioration of asset performance compared to what was initially anticipated. It is shown in the 'National overview of Network Rail's performance trajectories for 2026/27 to 2028/29' document that it is NR Assets and Enhancements that are forecast to contribute to a deterioration in punctuality in the NW&C region. In addition, there is further uncertainty to be managed in relation to changing weather patterns and train operator contributions to industry performance.

Avanti West Coast have a collaborative relationship with Network Rail and have shared expectations around future performance including TOC on Self cancellation levels over the coming years. AWC and NR have jointly developed the Avanti West Coast Joint Performance Strategy, which summarises performance improvement funding options available, and details performance improvement initiatives for delivery over the current year. For example the Linespeed Project, service recovery improvements, initiatives developed as part of the West Coast South First 60 Miles Plan (including some renewal/ upgrade plans), and joint workstreams to reduce external impact from causes such as trespass & fatalities and vandalism. In addition, there are initiatives specifically targeting weather effects; seasonal resilience and contingency plans for extreme weather. It is the intention of Avanti West Coast to develop similar Joint Performance Strategies in collaboration with Network Rail over the remaining years of CP7, with performance optimisation a key priority.

Network Rail's proposals have been reviewed by an Independent Reporter, and the language/ scale used when assessing each NR Region's submission is between 'Realistic' and 'Ambitious' (see below).

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 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 3 is a reasonable balance between ambitious and realistic and a 5 has a high level of ambition. Our findings that underpin these assessments are detailed later in this report and we expect NR to consider these when developing its updated forecasts, for submission to ORR in early September.

Table 1 : Trajectory Assessment Scores Summary

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

AWC agree that the targets set must be deliverable; setting unrealistic targets risks demotivating staff, compounding financial pressures on Network Rail, and adversely affecting the reputation of the industry. Conversely however, AWC is also of the view that the targets must be sufficiently ambitious to drive the best possible levels of punctuality and reliability for passengers. Delivering a good service to rail passengers who expect and rely on trains to get to their destinations on time must remain a top priority, to minimise the stress of disruption, build trust, drive customer satisfaction and attract passengers to the railway.

As well as wishing to provide the best possible service for passengers, operators are under significant pressure from the government to continuously improve performance, and to recover punctuality and reliability to the levels observed in FY20 and prior. There appears to be a fundamental inconsistency between these demands, and the target levels of performance proposed in the CP7 passenger train performance reset consultation document. It is crucial that all parties can be assured that the trajectories proposed, while remaining realistic, are sufficiently ambitious to give the best levels of performance possible under the challenges faced.

Network Rail plans and targets for North West and Central region were ranked by the Independent Reporter as '1 – Realistic', with a noted lack of ambition and a net deterioration assumed across all Network Rail cause categories. Some cancellation reduction schemes were noted to have assumed delay impact that was higher expected. The Independent Reporter's assessment shows several areas in which they would expect to see more ambition or further improvement plans. It is AWC's view that there is scope for the targets to be more ambitious; and more ambition should be reflected in these targets.

It is acknowledged that NW&C have retained more of the T-3 improvements seen during covid affected years from FY21-FY23 than other regions, and that given the

challenges of limited funding and fewer renewals, it will be challenging to maintain performance. However, in AWC's view, a targeted worsenment in normalised Network Rail delay at the current rate is not acceptable.

In addition, as raised in AWC's response to the letter regarding 'Initial draft Network Rail payment rates for CP7 years 3 to 5', AWC remain concerned about the value of the Schedule 8 regime as a realistic incentive for Network Rail to improve performance. Especially given the proposed reduction of the Schedule 8 Network Rail payment rates, it is important that the Schedule 8 benchmarks set in line with the CP7 targets remain ambitious enough to sufficiently incentivise performance improvement.

Question 2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

Avanti West Coast agree with the scope of the review described in the consultation letter. It is pleasing to see that as a result of the model review, calculation issues have been identified and subsequently rectified, though it is also acknowledged that as stated by the Independent Reviewer, "We have not carried out a full technical review of the model and cannot be confident there are not issues beyond those identified". The processes for ranking schemes and trajectories appears to be thorough and consistent.

North West & Central region's proposals have been ranked as '1- Realistic' by the Independent Reporter, noting a lack of ambition. As stated in the answer to Question 1, AWC also believe that the targets could and should be more ambitious.

Challenges to improving/ maintaining performance have been summarised in the consultation document and also in Network Rail's 'National overview of Network Rail's performance trajectories for 2026/27 to 2028/29' document. AWC are keen to understand more about the risk mitigations and improvement plans that have been considered, and to what extent of detail these have been reviewed by the Independent Reporter. It is understood that only mitigations and improvements confirmed as fully funded and deliverable have factored into the forecasts used for the target setting. More information is sought regarding which plans/ mitigations have been included, which have not, and what it would take to confirm funding/ deliverability of the identified plans with impact not yet included in the forecast.

Limited improvement schemes for NW&C are described in the 'National overview of Network Rail's performance trajectories for 2026/27 to 2028/29' document. Greater visibility of Network Rail plans is welcomed, as well as a breakdown of the forecast by category, to give greater assurance of plans to support the achievement of targets.

North West & Central region have been challenged by the Independent Reporter on whether the negative impact of external incidents and weather in its performance forecasts are overstated. It is noted that this has been reviewed as a result. However, it is understood that whilst the impact of Trespass & Vandalism Mitigation has been improved, Weather impact has not been changed. Given improvement initiatives

such as updated contingency plans to mitigate performance in weather related disruption, use of floodwater targets, seasonal preparedness plans to review international best practice, and seasonal resilience plans including a new Key Route Strategy, AWC believe that additional improvement to this category would be ambitious yet realistic.

AWC have some concern regarding the modelling of the “Keep Trains Moving” scheme. The scheme aims to reduce cancellations from certain incidents, but could increase overall levels of delays. This was highlighted by the Independent Reporter as having a modelled impact on delays which is higher than would be expected, assuming a 2.5% increase in all reactionary delay, linked to a 0.1%-0.2% reduction in cancellations. It is understood that Network Rail have since refined the modelled delay impact from this scheme as a result. AWC’s concern is that the scheme conflicts with a proposal by West Coast South to run a 'skeleton service' during a full line blockage, thereby importing lower reactionary delay minutes, but higher cancellation levels. This would particularly apply to fatality incidents, meaning a reduction in External cancellations could be challenging, especially going into AWC 10tph from December. Clarity is sought on how the schemes apply together, and the prioritisation of cancellations versus reactionary delays.

NW&C have reached out to TOCs operating over the region, holding a session on 27th August to update on the targets being proposed, outline the work originally undertaken, and the subsequent work as a result of challenges from the Independent Reporter. Avanti appreciate the ongoing collaboration work between Network Rail and the Independent Reporter to enhance the forecast and improve ambition in appropriate areas, and look forward to seeing the detail on the resulting changes. Summarised results have been shared by Network Rail, and initially indicate good improvements for years 3 to 5 compared to those published in the consultation, however additional challenge may still be required to determine further scope for improvement.

Further, 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.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

Nothing further to raise above the responses given to Questions 1 & 2.

Please provide evidence to support your views, such as relevant information from business plans, research, policy documents or other materials.

Thank you for taking the time to respond.

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CHILTERN RAILWAYS



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

About you

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Question 1: 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?

In February 2025 the Secretary of State for Transport published the consultation A Railway Fit for Britain's future [A railway fit for Britain's future - GOV.UK](#) Within this the Government wants the public "having confidence that their train will be on time, with delays no longer seen as an inevitable fact of daily life." This is set out as one of the six key objectives that make up the Government's vision for the railway

- "Reliable – so that people can have confidence in their journey."

This aligns the Request for Business Plan issued by DfT in late September 2024 to National Rail Contract holders that "the ambition is to return levels of reliability and punctuality nationally to the best levels seen in the last decade (excluding 2020/21), and to provide a railway that passengers can rely on."

The proposed targets for passenger train performance in CP7 Years 3 to 5 need to align with the strategic objectives set out by Government. The proposed targets in England and Wales for T-3, and delay minutes per 1000 miles train travel are worse than the CP6 exit point and CP7 Year 1, respectively. For Cancellations, the CP6 exit point is achieved in Year 5.

Chiltern Railways Network Rail route mileage is almost exclusively on NorthWest & Central. Within the proposed targets it is notable that the T-3, Cancellations and

Network Rail delay minutes per 1000 miles train travel are worse than the CP6 exit point. We met with NorthWest & Central in late August who presented a set of revised proposed targets. The new proposed targets are improved compared to those published 10th July and removes the 'targeted' deterioration in Network Rail delay minutes per 1000 miles train travel. These are welcome changes, but the revised proposal remains worse than the CP6 exit point. It is important that there is alignment across industry targets and the Government's vision, but currently there is a gap between these two components.

The funding settlement for CP7 and impact of increasing costs is having a detrimental impact on NorthWest & Central's work to deliver performance. This has been evident in the deferral of planned trackwork renewals, changes to foliage standards, known solutions to performance problems unable to be fully enacted, such as axle counter powering arrangements at Banbury, and power cable replacement. Tight finances are a reason behind a trial of the impact of reduced Traction Gel Applicator use on Central Route in autumn 2025. While these changes may be realistic considering the evident cost pressures in NorthWest & Central, there may be further opportunities to halt the performance deterioration compared to CP6 exit point by reassessing the allocation of financial resources within Network Rail to each Region.

Question 2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

We consider the use of a Trajectory Assessment Score Summary to determine if the Network Rail plans meet the "ambitious yet realistic" criteria at a Regional level helpful, as it provides context to the proposed targets. The assessment has assisted in providing focus on NorthWest & Central proposed targets and aided our discussions with the Region.

We note the comments about Central Non-Track Assets. During 2023 – 2025, Chiltern have experienced several disruptive incidents caused by cable faults between London and Leamington Spa. Work has taken place to map cable joints between these points, so enabling quicker response to future failures, and some 'spot' renewals but it has not removed the risk posed by the age and condition of the cabling. Embankment faults have also arisen, with long term remedial works in some cases not implemented due to a shortage of funding. These factors may prove helpful in providing context to Central Route delivery. We are happy to have further discussions with the ORR on this matter if this would prove helpful.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

We have no further comments.

Yours sincerely



Peter Finch

EAST MIDLANDS RAILWAY



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

About you

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Question 1: 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?

Overall, EMR is comfortable with the proposed targets, although we recognise there is more to do to ensure the industry deliver better performance for our customers. EMR is supportive of the move to T-3 as the primary punctuality measure as it aligns TOCs and Network Rail and makes it easier to set common goals and objectives.

The change to the targets gives Network Rail more flexibility to address system issues however we must not lose sight of the value customers place on reliability and consistent level of service. Lowering the targets may fail to incentivise improvements across the rail network where improvements are achievable.

The decline in punctuality in rail year 26/27 reflects the headwinds to performance outputs which EMR anticipates, including the introduction of new fleet and the ECML timetable change impacting network performance from December 2025.

For cancellations there is a strong link to Train Operators Train Crew and Fleet. EMR is introducing a new fleet for LDHS services which we expect to have an initial negative impact on performance but then improving towards the end of CP7; our traincrew position remains in healthy state and is not expected to drive a significant change in cancellations. Our preference for cancellations specifically would be to remain in line with the original expectations, noting this will require close collaboration between Network Rail and Train Operators. Cancellations represent the highest pain point for customers with the strongest correlation to customer satisfaction so we believe that the industry should be challenged to increase focus on this measure.

We welcome the introduction of Network Rail Delay Minutes per train mile, as this will improve accountability for infrastructure related delays and incentivise Network Rail to target interventions that deliver a performance benefit.

Question 2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

EMR operates across five Network Rail routes, which then contribute to the overall TOC outcome. EMR has a productive partnership with our lead Route East Midlands, which forms part of Eastern Region. Since being placed onto the escalator for deteriorating passenger performance in 2024, the Eastern Improvement Plan has set out a renewed focus on delivery of key workstreams which have been recognised in the Independent Reporter review as address performance issues. EMR recognises there is still more to do, and EM route and wider Network Rail areas need to focus on delivery of performance benefit.

As part of the report's consideration of the outturn position, we would have liked to have seen the Independent Reporter consider how the regulation of performance outcomes at a Regional level can impact on the effective incentivisation of whole system outcomes. EMR and EM Route are relatively highly co-dependent on performance on Southern Region (Kent and Sussex Routes) but the findings do not highlight the lack of collective incentives for Regions to address cross-boundary impacts.

EMR is concerned that the link between targeted investment in asset renewals, etc and the performance outcomes arising from asset performance is not sufficiently explored in the review. Furthermore, there is a very strong link between timetable structure and flexibility to cope with minor perturbations (robustness) and performance outcomes. Understanding what level of performance is deliverable requires a detailed consideration of industry plans to address timetable performance. At the same time sustaining the commercial viability of timetables, and promoting growth through freight and open access operations, is a key dependency during the current and future control periods. Overall, it would have been good to see the link between the performance outcomes that the industry aspires to, the cost of delivering those performance outcomes, and the potential to trade off performance for other benefits drawn out further: in other words, an

understanding of the performance the industry can afford to sustain could be more explicit in the independent report.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

The three measures address the main key components on performance; T-3 is a more realistic measure which better reflects the current industry approach to timetable planning.

As part of ORR monitoring and transparency the financial incentives for schedule 8 must remain closely aligned with these targets to drive meaningful performance improvement.

EMR believe that continuous improvement in performance outputs is a more useful and sustainable measure of success than the achievement of fixed targets set and measured at a moment in time, and often been set years in advance, and therefore not reflecting emerging issues and risks.

GRAND CENTRAL



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About you

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Question 1: 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?

Thank you for the opportunity to comment on the CP7 passenger train performance reset consultation on targets for 2026 to 2029.

Grand Central (GC) is a key stakeholder on the East Coast Mainline (ECML) and stands to be significantly impacted by the revised targets as they are flowed through to the schedule 8 performance regime, especially given the proposed targets allow for a significant deterioration in performance on the ECML and Eastern Region, with targets now not proposed to return to the CP6 exit position during the current control period.

The targets proposed for Eastern Region for T-3, see the largest deterioration compared to other regions, with 26/27 forecasting a 4.4% (in relative terms) drop in performance compared to 24/25 actuals, this is concerning especially given performance since the start of CP7 has seen a general deterioration. Whilst we cannot comment for all operators, the impact on GC services has felt significant, with the first year of CP7 seeing Network Rail (NR) on GC delay minutes exceeding targets agreed with NR on average by 20% each period, having a significant impact on customers and their experience of the railway.

The current actual Moving Annual Average (MAA) for T-3 performance on Eastern Region is 84.6%, currently falling behind the target of 85.5%, and given the impact GC has felt during this time in relation to passenger satisfaction, delay repay claims and discretionary compensation, a drop in target to 81.9% for 2026/27 is extremely concerning both in terms of the impact on customers and the financial impact on GC as a business.

We appreciate that the proposed deterioration is driven by a number of factors including previous targets being deemed too optimistic, and more specifically the forecast impact of the implementation of the December 2025 timetable on the ECML as well as the initial impact of the East Coast Digital Programme (ECDP) when we ultimately achieve signals away. However, we are concerned that allowing for such a significant deterioration in performance would impact on long run demand at a time when the ECML is seeing a significant increase in service levels, therefore setting more ambitious targets would go some way to ensuring as much as possible is done to ensure any impact on future rail demand is minimised.

Reviewing NR's proposed performance trajectories for Eastern region, we can see the forecasts are driven by a number of factors. Excluding the impact of the ECML December 2025 timetable and ECDP, the majority of these factors show very little impact on the target performance levels (overall net negative impact) at the end of CP7, with the exception of an improvement associated with external events. Effectively, without the impact of the December 2025 timetable change and ECDP, performance at a base level is not expected to improve over the next 3 years as a result of any NR activity. This shows limited ambition in improving performance, especially at a time when seeking initiatives to minimise performance impact on

customers should be a top priority with such a significant timetable change being introduced.

The impact of the ECML timetable implementation stands head and shoulders above in terms of being the key driver of deterioration in T-3 performance over the remainder of the control period. What is not clear from the NR proposals, is the benefit of any offsetting activity to this impact. A huge amount of work is ongoing across the ECML to ensure a smooth implementation of the December 2025 timetable. Similarly, a series of performance initiatives are being developed in order to minimise the impact. We would therefore urge ORR to seek clarification that some mitigating measures will be factored into the trajectories.

Similarly, whilst ECDP is anticipated to have a performance detriment in the first instance based on the implementation of Northern City lines (NR quote a 4% drop in on-time performance), it is not clear what benefit is anticipated following a successful implementation. A key benefit of the ECDP is cited as improving performance resulting in more punctual trains. It is not clear what benefit has been included by NR in its trajectories for the latter years of the control period.

On the basis of the above we would therefore not consider the proposed targets set as 'ambitious' but could actually be deemed cautious.

Question 2: Do you have any views on our assessment of NR's plans and the findings of the Independent Reporter?

It is positive to see the elements the ORR has focused on in its assessment of NR's performance plans along with the findings of the independent reporter. It is also positive to see the expectation for further review by NR in order to reflect the work ongoing to mitigate the performance impact of the implementation of the December 2025 timetable. A huge amount of activity across NR and operators has been ongoing to mitigate the anticipated performance impact and it would be disappointing if this was not reflected in the targets proposed.

One area that we remain specifically concerned about is the anticipated performance impact of the introduction of the ECML timetable in December 2025. The proposed impact is significant and has the potential to allow performance on the ECML to deteriorate below current levels without any incentive for NR to further mitigate this once the timetable has been introduced. This would impact on customer demand, at a time when additional capacity through additional services is being introduced.

It is our understanding that it is the performance modelling that was undertaken and reported on by NR in March 2025, that NR has used (alongside some other analysis) to inform its performance trajectories. The Railsys modelling undertaken, considered a modelled December 2023 base timetable with an Advanced ECML December 2025 modelled option – with a specific focus on identifying opportunities for further improvement.

It is important to note that within the NR report It states that “*the modelling is normally used to understand timetable choices, rather than an attempt to predict a future ‘target’*”, which is on the face of it what NR appears to have done in proposing its remaining CP7 targets based upon this modelling.

All analysis conducted in the modelling was in the time scope from 1400 to 2000 for a Wednesday timetable and therefore is not representative of a whole day or whole week picture. We would therefore query whether the proposed trajectories have taken account of and reflected the scope limitations of the performance modelling undertaken, especially given the proposed use of these trajectories within the ongoing schedule 8 recalibration and the potentially significant financial impact on train operators.

Additionally, the December 2025 timetable has now been offered and is due for implementation. This timetable will be different to the timetable that was modelled to support the previous analysis. It would therefore be useful to fully understand how any timetable changes will be reflected in the proposed trajectories particularly for 2026/27, given the impact this could have on customers and the financial impact this could have on Train operators.

On the basis of the above comments and the concerns raised by the independent assessor, we remain concerned that uncertainty in the modelled impacts, and limitations of the time and day scope does not provide a detailed enough evidence base to inform such an important series of targets, potentially exposing operators to significant financial payments.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

As detailed in the consultation, the impact of targets being reduced will flow through to the ongoing schedule 8 recalibration and will drive incentive payments between operators and NR for the remainder of the control period. As a result of this the impact on operators will be two-fold. Firstly, customer compensation and delay repay costs will continue at current levels or further increase, potentially resulting in an impact on future demand and revenue. Secondly, where NR begins to exceed these targets, NR will receive bonus payments, exposing operators to further financial payments. In this instance, we believe NR would be held almost entirely neutral to the worsening of performance if not in some cases benefiting from it, whilst operators are left taking the full financial impact associated with increased customer compensation and reduced longer term demand.

Whilst we recognise the challenges in setting long term train performance targets, we are concerned that allowing for such a high level of initial deterioration in 2026/27 will result in targets which have the potential to be easily outperformed exposing operators to additional financial payments.

Please provide evidence to support your views, such as relevant information from business plans, research, policy documents or other materials.

Thank you for taking the time to respond.

Format of responses

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Publishing your response

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Will Godfrey
Director, Economics, Finance and Markets
By email

23rd October 2025

CP7 Performance Reset

Dear Will,

Thank you for providing the additional opportunity to comment on the CP7 Performance reset and associated schedule 8 recalibration, prior to the round table discussion which is due to take place in York on 3rd November 2025.

Grand Central (GC) has already responded to the ORR's consultation on Network Rail (NR) targets associated with the CP7 performance reset, as well as providing detailed comments in relation to the draft schedule 8 parameters provided as part of the Schedule 8 recalibration. As set out in our responses, we remain extremely concerned that the NR targets for Eastern region are not ambitious and remain extremely cautious specifically in relation to the estimated impact of the introduction of the East Coast Mainline (ECML) December 2025 timetable, which is based on outdated and limited scope performance modelling and the initial impact of the East Coast Digital Programme (ECDP) of which the timescales are already slipping to the right.

Our concerns are further compounded by how these targets flow through to the schedule 8 performance regime following the sharing of the initial draft parameters, specifically the NR Benchmarks and whether the approach to recognise the impact of the December 2025 timetable change is appropriate and sufficient enough to incentivise NR to improve performance. This response sets out some further concerns in relation to the recalibration building on the comments already provided by GC.

During PR23, ORR confirmed it would include the ability to undertake mid-control period recalibrations in order to add flexibility into schedule 8, and following the outputs of the impact assessment, committed to the mid control period recalibration ahead of year 3 of CP7.

The impact assessment rightly recognised that where benchmarks are historically fixed for the duration of the control period, the regime may not be accurately calibrated if any external shocks occur during the control period which could potentially result in large or volatile payment flows between parties. The impact assessment also acknowledged the uncertainty in the PR23 calibration as another driver for introducing the ability for a mid-control period review.

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Given the recognition of this uncertainty in the PR23 recalibration, it is extremely concerning that the way in which it is being sought to 'fix' the PR23 recalibration is by introducing what can only be deemed as further uncertainty, through the artificial deterioration of the NR performance targets with the introduction of limited scope performance modelling into the NR trajectories.

As commented in our response to the schedule 8 draft parameters, it is our understanding that it is the performance modelling that was undertaken and reported on by NR in March 2025, that NR has used (alongside some other analysis) to inform its performance trajectories which have flowed through to the proposed NR benchmarks. The Railsys modelling undertaken, considered a modelled December 2023 base timetable with an Advanced ECML December 2025 modelled option – with a specific focus on identifying opportunities for further improvement.

It is important to note that within the NR performance modelling report it states that ***“the modelling is normally used to understand timetable choices, rather than an attempt to predict a future ‘target’”***, however it would appear that this is exactly what has happened with the modelling effectively being used to now set future targets and set benchmarks which could have significant financial consequences for Open Access Operators.

All analysis conducted in the modelling was in the time scope from 1400 to 2000 for a Wednesday timetable and therefore is not representative of a whole day or whole week picture. We would therefore query whether the proposed trajectories which flow through to the NR benchmarks proposed, have taken account of and reflected the scope limitations of the performance modelling undertaken and really challenge NR to minimise the performance impact. It would seem on this point alone that rather than addressing the initial uncertainty recognised in the PR23 recalibration the proposed recalibration will simply introduce more uncertainty, potentially resulting in volatile payments between parties – something the policy implementation in relation to mid-control period recalibrations was intended to avoid.

The uncertainty in the performance modelling undertaken is compounded further in the recalibration by the proposed difference of approach in the development of NR benchmarks and TOC benchmarks. Whilst we appreciate historically NR benchmarks are based on historical data and forecast forward with ORR agreed targets, and TOC benchmarks are based on historic performance only, this mid control period recalibration is (in the context of the ECML and Eastern Region) unprecedented, with the inclusion of NR performance modelling to estimate the negative impact that is expected to occur as a result of the introduction of a new timetable and ECDP.

This modelled impact significantly increases NR's benchmarks but is not considered in the TOC benchmark, leading to a concerning inconsistency between the parameters within the regime.

The ECML timetable, due for introduction in December 2025, is a significant timetable change which will impact operators as well as NR. The timetable introduction has the potential to change the relationship between actual historic train performance and future performance considerably. For GC, York station is a key example of this. Currently GC has only 1 out of its 6 Northbound services at York with a dwell time of less than 3 minutes. From December 2025, 5 out of 6 services have a dwell of under 3 minutes. Whilst GC is working hard with NR and other operators, it is inevitable that GC's performance will likely worsen following the introduction of the timetable. This is just one example of the change in timetable which will potentially impact on GC's ability to maintain historic performance levels and therefore leave it subject to additional penalty payments under schedule 8.

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Applying an impact for the ECML timetable change to NR benchmarks but not to TOC benchmarks introduces an element of unfairness and inconsistency within the regime and has the potential to apply unfair additional payments on operators, either through the NR performance being better than the extreme change in benchmark proposed resulting in potential bonus payments to NR, or through TOC benchmarks not reflecting any kind of reduction in performance resulting in additional penalty payments. The current proposals result in passenger operators carrying the full risk of the timetable implementation, not NR. On this basis the approach appears disproportionate with the proposals being unfairly weighted against Open Access Operators, with NR receiving an allowance in its benchmarks allowing for the performance deterioration, freight and charter operators being excluded from the mid-control period recalibration and Franchise and DFTO Operators being held harmless to the financial impact.

The omission of Freight and Charter operators from the recalibration also presents a further inconsistency and potential perverse incentive between NR, passenger operators and freight and charter operators. Whilst we would not expect NR to behave in this way the approach could allow NR to prioritise the performance of freight services in order to make use of the perceived headroom in the NR benchmarks for passenger operators in order to avoid financial penalties against freight operators.

As set out in our previous response, the recalibration and provided parameters allows for a 42% increase in the amount of delays NR can have on GC services, based simply on estimated forecasts. It is extremely worrying that as a small operator running 10 return services per day, we should be expected to allow for such a deterioration, that would see routine performance become aligned with that which has only been seen a handful of times over the last 7 years and only in the most extreme of circumstances (extreme weather, fatalities etc). Not only do the proposals allow for this situation of such a permanent and extreme deterioration in performance, but should NR operate consistently better than this revised uncertain and significantly worsened level of performance they will be entitled to bonus payments from operators. Indeed, had the proposed NR benchmarks been in place since the start of CP7 GC would have been liable for significant bonus payments to NR for what can only be deemed as relatively poor performance.

The performance modelling undertaken by NR (March 2025) suggests the T-3 performance for GC will deteriorate by 2.4% as a result of the introduction of the December 2025 timetable, it is not clear exactly how this translates into an increase in delays of 42%, however 12 months earlier that the performance modelling of the proposed ECML Event Steering Group (ESG) timetable forecast an improvement in GC T-3 of 1.4% potentially demonstrating further unreliability of the performance modelling.

Whilst not as significant, the performance trajectories include an impact associated with the ECDP and the introduction of digital signalling on some sections of the ECML. It is not clear exactly how NR has incorporated these impacts and the timing of them, given a number of ECDP milestones have already slipped to the right, with the signalling overlay (where both signalling systems will be in operation at the same time) only recently pushed back to July 2026 from December 2025.

Whilst the timing of the proposed impact remains concerning, especially given the uncertainty in some areas of the programme, it is more concerning that NR are effectively being held harmless to the performance impact of the introduction of this new signalling system, with operators again being expected to carry the risk.

ECDP is a significant Network Change programme, and operators are entitled to compensation through Part G of the Network Code for the impact of the implementation of the change. By incorporating the performance impact into the proposed trajectories and this flowing through into the NR Benchmarks, operators are no longer being fully compensated for the impact of the change and will be held financially exposed to any teething problems with the revised signalling system and the impact this could have on individual operators' train service performance and knock on impact this has on customers.

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Incorporating both the estimated performance impact of the December 2025 timetable and the ECDP into NR's trajectories demonstrates an acceptance of quite significant performance deterioration at a time when the service levels on the ECML are increasing quite significantly. If performance deteriorates to the anticipated levels modelled and flowed through to the schedule 8 benchmarks, this will inevitably have an impact on passengers and ultimately demand for these services. It seems contradictory to increase overall service levels providing thousands of additional seats per day at significant cost, but to accept a significant worsening of overall performance on the ECML, which in the long run could reduce passenger demand. Similarly it seems even more contrary to neutralise this impact in the NR performance trajectories reducing the incentive to improve performance significantly at a time when it is needed the most.

In addition to this, seeing a deterioration in performance of GC services to this level will result in increased delay repay and discretionary compensation costs having an immediate impact on GC, but also on its future demand. On the face of it the revised benchmarks will offer little incentive for NR to improve performance, with an acceptance that performance levels will not improve over the remainder of the control period.

GC is extremely concerned with the scale of change proposed to the NR benchmarks applicable to GC services. The revised benchmarks would allow GC to be subject to average levels of delay which are only seen on our services during the most severe network disruption in the current timetable.

It is concerning that such a significant change would be introduced into the parameters of the schedule 8 regime based on an estimated forecast of a timetable change with no firm evidence to support it, leading to significant uncertainty within the recalibration, especially when on the face of it, all of the risk is transferred to the operators and NR is being effectively held financially neutral to the timetable change.

It is inconsistent and disproportionate for the estimated impact of the introduction of the December 2025 timetable and the impact of the ECDP to be only applied to NR benchmarks given operators are also subject to these changes which will impact on our own ability to maintain performance, further supporting the fact that operators are being exposed to the much greater level of risk.

We therefore believe that the proposed NR benchmarks should exclude the impacts of the both the December 2025 timetable and ECDP impact from the trajectories and benchmarks until such time as a more certain impact is known. Following the implementation of the timetable we would then be happy to work with NR and wider ECML operators to undertake a further recalibration if required utilising paragraph 17 of schedule 8.

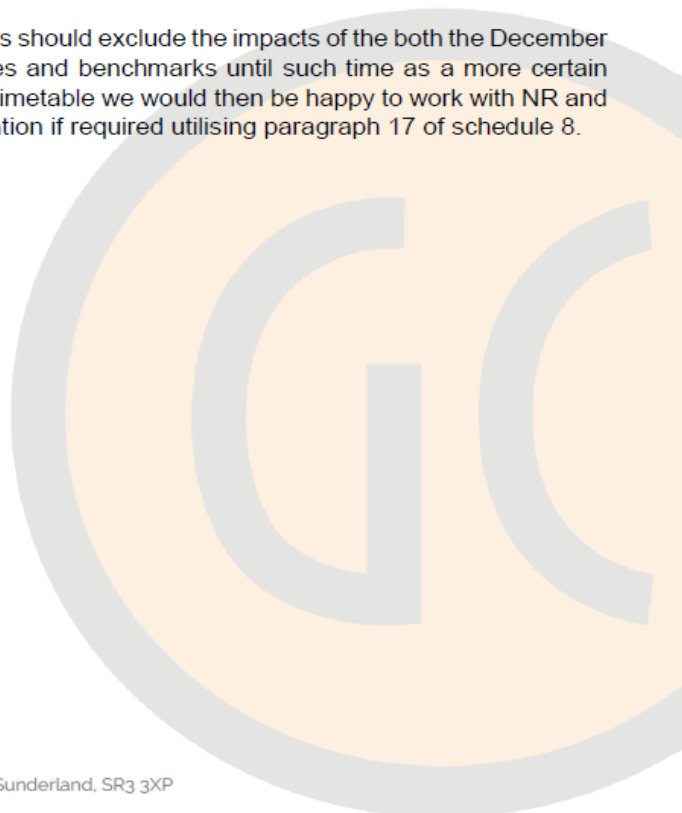
Yours sincerely



Chris Brandon
Director

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GOVIA THAMESLINK RAILWAY

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Afternoon

We would like to respond to the ORR consultation on the NR Performance trajectories, Specifically the one for the Eastern Region. We are concerned that there does not appear to be sufficient challenge, or consideration of its appropriateness for GTR, of the reduction in T-3 performance across Years 3-5, particularly from the Independent Reporter.

So in 2026/27, T-3 punctuality on Eastern Region is forecast to fall by 3.6%, based on a Railsys timetable study which are notoriously unreliable when modelling a development timetable and converting into wider industry punctuality metrics, without accounting for other factors such as changes in traincrew and fleet diagrams. I think this also fails to properly incorporate:

- The south-side Model boundaries are Alfreton (MML) and Stevenage (ECML): it therefore fails to model any of our Thameslink services or are GN Inner services.
- ATO - GTR have yet to experience full ATO (ie 100% drivers trained) which would help reduce knock-on impact southbound and improve presentation at Finsbury Park. This hasn't been modelled particularly the knock-on reduced impact onto Southern Region.
- The benefits of ETCS in increasing capacity south of Stevenage, and allowing trains to run closer together due in 2026 does not appear to have been taken into account. This benefit would have been detailed in the original NR business case. It will also reduce the impact of signalling failures on this part of the route, if only by moving some of this attributed impact from NR to train companies with aspects now being shown on in-cab equipment.

Notwithstanding the above assessment NR Eastern Region than appear to apply an ECML (and Cambridge South) impact equally onto all the Eastern Region constituent Routes and every impacted service group with an assessment of how much delay comes from outside this Region:

- Three out of four of our Eastern Region service groups, including our service groups (ET01/12) that operate on the MML, are pretty well insulated from the ECML and our GN Inners (ET04) that either run on the Hertford Loop into Moorgate or run on Slow Lines, with very little interaction with High Speed services ie stay south of Welwyn Viaduct. This predicted deterioration is therefore neither "ambitious yet realistic" for these services.
- We believe only one of our service groups is significantly impacted by the new ECML timetable, GN Outers (ET05). However they have only been modelled north of Stevenage with the study ignoring both Welwyn Viaduct and train turnrounds at King's Cross.
 - The modelling is only for a small part of the day, 13:30 to 22:00, which doesn't reflect the better running from service startup
 - This is Mon-Fri so the impact needs to be diluted for weekends especially Sundays
 - The interventions being made by our Control if this level of reduced T-3 running is real. This is also not modelled

We therefore do not feel this is a suitable basis to base this predicted performance reduction, based on restricted and flawed modelling of GTR services, which will be unacceptable to our passengers and would require agreed intervention (which may feed into cancellations). We would therefore ask the ORR to:

1. Review whether Railsys, a timetable rather than a railway simulation, is suitable to be the basis of this prediction on Eastern Region.
2. Remove the impact from our unmodelled and largely insulated service groups (ET04, ET01, ET12)
3. Identify a more realistic, reduced impact of the ECML given the points above and apply it only to ET05.

There is a real risk here that such a slackening of the performance benchmarks (ie the £0 position) from Apr'26 will mean that NR will be rewarded for reduced infrastructure delivery on the premise of a simulation run that appears to mainly be modelling transpennine impacts across the north of England. We do not feel this is appropriate.

Thanks

Rob

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Morning Matt

Further to this pack and the recent meeting last week I would like to make the following additional points that I don't believe have been covered previously:

- Page 53 - The adverse impact of the Southern 2015/16 timetable was exacerbated by two factors: restriction of access lines into London Bridge (for the Thameslink Programme) and then an IR dispute caused by a change of the role of conductors. It was not the direct impact of the timetable itself so should not be used to justify the depth and length of the bathtub curve.
- Page 54 - The GTR modelled adverse impact is disproportionately on the Anglia route. This means any issue is self-contained within Anglia and can be resolved much sooner working with Greater Anglia without impacting the ECML. It also means the GTR modelled impact is disproportionately weighted towards Anglia stations when there are much more LNE GTR-served stations, outside the model area but likely to be closely linked to the lower LNE figure (-0.3%).

I hope these further points make sense and can be taken into consideration in your final GTR performance trajectory determination.

Thanks

Rob

GTS RAIL OPERATIONS



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

This pro-forma is available to those who wish to use it to respond to our consultation. Other forms of response (e.g. letter format) are equally welcome.

Please send your response to prm@orr.gov.uk by **5pm on 5 September 2025**.

Please contact Matt Wikeley, Head of Rail Outcomes, at ORR with any queries: matt.wikeley@orr.gov.uk

About you

Full name: Jonathan James

Job title: Head of Industry Coordination

Organisation: GTS Rail Operations Limited ("GTS")

Email*:

Telephone number*:

**This information will not be published on our website.*

As part of the CP7 passenger train performance reset, we are consulting on proposed performance targets for Time to 3 (England & Wales only), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel at both a national and regional level. We have done this after assessing national and regional performance plans alongside associated targets submitted to us by Network Rail.

The proposed targets will be used to monitor and hold Network Rail to account in years 3 to 5 of CP7.

Question 1: 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?

The proposed targets do not align with the expressed position of the National Performance Board, which is targeting the industry with moving the On-time to 3 (“OT3”) measure towards 90%.

For metro operators, such as London Overground and the Elizabeth line, the most appropriate measures are cancellations, journey time and the interval between trains.

We propose that the cancellation measure is utilised for metro operators, and is suitably weighted to incentivise the appropriate behaviours; and

We propose that an On-time (“OT3”) measure (including cancellations) is applied at destination (and potentially some key interchange locations or stations with high demand) rather than at every station. This is a step towards a measure that better reflects the extended journey times often experienced by customers during delay, by capturing the effect of extended intervals between trains as well as cancellations.

The OT measure is less relevant to a metro operator, with passenger journey time and service intervals being more relevant than the punctuality of individual trains.

Question 2: Do you have any views on our assessment of Network Rail’s plans and the findings of the Independent Reporter?

The targets need to be operator specific. This requires more granular performance data at a regional, route and individual train operator level, to enable Network Rail’s performance to be tracked accurately at a local level.

The quality of the performance data provided needs to improve to support this.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

It should be recognised that *‘one size doesn’t fit all’* when it comes to setting Network Rail targets.

For GTS an OT3 measure (including cancellations) should be utilised at destination and some key interchange locations or stations with high demand.

The OT measure is too focused on individual train punctuality and does not reflect the overall customer experience.

An OT3 at destination metric is a reasonably good indicator of service intervals and customer journey time. The OT metric, applied at every station, does not provide an accurate reflection of service intervals or customer journey times.

To be effective, the measures must be aligned with customer expectations. For high-frequency services such as the Elizabeth line and London Overground the measures should reflect passenger expectations of service frequency (the time customers expect to wait for a train) and the journey time (how long customers expect their journey to take).

Therefore, greater focus should be placed on cancellations and journey time to better reflect the actual service provided to passengers.

The industry, and the future Great British Railways (GBR), must have a more robust forecast of performance, reflecting known risks, and should offer a range of metrics to best reflect passenger expectations for different service types, which will vary across the country.

Format of responses

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GREAT WESTERN RAILWAY

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Dear ORR,

Thank you for the above and for the industry engagement on PR23 Reset led by the ORR.

GWR accepts and now applauds the ORR's decision to go with what is seen as being the most true to life level of Network Rail Payment Rate.

With an intermediate reset the information available to Network Rail, both regarding its own resources and capability and the latest plans of the train operators for those years, the trajectory from realistic action plans is more likely this control period than others to be met. In view of this the money flows from Network Rail through Schedule 8 are likely to be reduced significantly with the prospect increasing of income from train operators through that Schedule.

There has been proactive engagement between Network Rail and GWR with the result that action plans have been adjusted to be more comprehensive and to meet reality better with the result that the emerging trajectory is seen as optimum. GWR has been able to explain the effect of Class 175 introduction, as the practicalities of this emerge, and expects that the trajectory for cancellations can now as a result be tougher. More work on developing the trajectory is ongoing with output for later years being produced at present. We are grateful for the excellent work undertaken by the Network Rail team, a number of members of which have now be rewarded with wider responsibility.

Many thanks.

Rob

HEATHROW AIRPORT



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

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Please send your response to prm@orr.gov.uk by **5pm on 5 September 2025**.

Please contact Matt Wikeley, Head of Rail Outcomes, at ORR with any queries: matt.wikeley@orr.gov.uk

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Telephone number*:

**This information will not be published on our website.*

As part of the CP7 passenger train performance reset, we are consulting on proposed performance targets for Time to 3 (England & Wales only), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel at both a national and regional level. We have done this after assessing national and regional performance plans alongside associated targets submitted to us by Network Rail.

The proposed targets will be used to monitor and hold Network Rail to account in years 3 to 5 of CP7.

Question 1: 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?

We acknowledge the proposed performance targets and recognise that they reflect the fixed and constrained funding settlement for CP7. Compared to CP6, Network Rail will be undertaking fewer renewals and focusing more on refurbishment, life-extension repairs, and maintenance activities. The overarching goal to maintain current levels of punctuality while reducing cancellations appears to be a pragmatic starting point for this consultation.

However, it is disappointing that overall passenger performance is projected to decline by the end of the control period relative to its start for much of the country.

For the Wales and Western Region, we welcome the improvement in the Time to 3 metric, although we note that the target remains lower than those set for other Network Rail regions. Similarly, while cancellation rates are expected to improve slightly in the final three years of CP7, the target remains higher than all but one other region. This is disappointing, as it suggests an acceptance of a level of performance that falls short of what passengers and stakeholders should expect.

This is particularly important as these targets will be used to recalibrate the Schedule 8 performance regime. Targets that are not sufficiently ambitious risk weakening the financial incentives for Network Rail to deliver the reliable, resilient service that passengers and stakeholders expect. We urge the ORR to challenge Network Rail to review the underlying assumptions for the Wales and Western route to ensure the final targets are genuinely robust.

We also note that the target for Network Rail delay minutes in this region is broadly in line with most other regions, with a modest improvement anticipated over the course of the control period.

With regard to Heathrow, reliable train performance is critical—not only for passengers relying on timely services to catch flights, but also for airport staff who depend on rail for their daily commute. Looking ahead, we expect rail usage to increase, particularly with future projects such as the Western Rail Link and Southern Access. Sustaining and

improving train performance will be essential to support Heathrow's connectivity and operational resilience.

Looking to Control Period 8, we hope that Network Rail and Great British Railways will set performance targets that demonstrate continuous improvement throughout the period, supported by the benefits of a more integrated "track and train" approach under GBR.

Question 2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

We appreciate the comprehensive and evidence-based assessment conducted by the ORR and the Jacobs Independent Reporter. This process enhances transparency and reinforces stakeholder confidence in the robustness of the target-setting scrutiny. We fully endorse the Independent Reporter's recommendations, especially the call for Network Rail to resolve modelling and methodological concerns prior to finalising targets.

Regarding the Wales and Western route, we acknowledge the progress made following ORR's enforcement action. Nonetheless, sustained focus and tangible outcomes from collaborative engagement remain essential. We support ORR's continued efforts to hold Network Rail accountable to ensure these improvements are enduring.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

Given the poor train performance in the Wales and Western Region during 2023–24, does the ORR consider the targets for Years 3 to 5 to be sufficiently ambitious? We acknowledge that train performance has improved following Network Rail's enforcement action on Wales and Western region following ORR's enforcement action, but continued vigilance and stretching targets are required to maintain this momentum.

Furthermore, it is vital that the final accountability framework, including the recalibrated Schedule 8 financial incentives, holds Network Rail fully to account for all its activities that impact train performance. This includes the effective planning and delivery of engineering works to minimise disruption. The targets being set must be part of a holistic system that incentivises strong performance across all of Network Rail's functions.

Please provide evidence to support your views, such as relevant information from business plans, research, policy documents or other materials.

Thank you for taking the time to respond.

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HEATHROW EXPRESS



Harsha Gautam
HEX Train Services Lead
Heathrow Express Operating Company Limited
The Compass Centre, Nelson Road
Hounslow, Middlesex
TW6 2GW

CP7 reset – consultation on targets for 2026 to 2029
Office of Rail and Road
25 Cabot Square
London E14 4QZ

BY EMAIL to:



22 August 2025

Dear Sir/Madam

HEOC response to ORR's CP7 reset consultation - passenger train performance targets for 2026 - 2029

I am writing on behalf of Heathrow Express Operating Company (HEOC) in response to ORR's consultation on resetting passenger train performance targets for CP7 years 3 to 5.

Our responses to the consultation questions are attached. These have been developed following internal review and discussion with colleagues, drawing on:

- ORR's consultation document and supporting data
- The Independent Reporter's Stage 2 report
- HEOC's own operational experience
- The 2023 process for poor performance monitoring on the Wales & Western route.

Evidence base and previous engagement with ORR

HEOC's position is grounded in our consistent advocacy for ambitious, evidence-based performance targets, as set out in:

1. April 2022 - ORR Technical Consultation on Schedule 8

In this response, HEOC argued against setting performance benchmarks solely on historic data and supported ORR's view that forward-looking trajectories are essential to maintain strong incentives on Network Rail.

Heathrow Express Operating Company Limited. Registered in England and Wales co. no. 3145133.
Registered office: The Compass Centre, Nelson Road, Hounslow, Middlesex, TW6 2GW

2. **2023 - ORR Formal Investigation into Wales & Western Performance**

HEOC provided input highlighting the operational impacts of poor infrastructure performance on Heathrow Express services. We stressed the importance of clear accountability and measurable outputs from joint NR - TOC improvement plans.

Key points in this consultation response

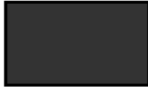
While we welcome the recent improvement in Wales & Western performance following ORR enforcement action, we are concerned that the proposed targets are not sufficiently stretching. In particular:

- The **cancellations target** of 4.3% for 2026 - 2029 is substantially higher than both the PR23 indicative trajectory (~3.3%) and the most recent actual performance (Period 5 - 3.13%). This risks embedding a lower level of ambition and diluting the effectiveness of Schedule 8 incentives.
- The targets do not appear to fully reflect the performance benefits from **Project Brunel** - a major programme of infrastructure works in the Thames Valley, supported by significant operational adjustments and investment from TOCs, including Heathrow Express.

We believe there is a clear case for ORR to challenge Network Rail to set more ambitious targets for Wales & Western, particularly on cancellations, so that they align with recent performance levels and capitalise on committed improvement schemes.

We would welcome the opportunity to discuss our response further.

Yours sincerely,



Harsha Gautam

HEX Train Services Lead

Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

This pro-forma is available to those who wish to use it to respond to our consultation. Other forms of response (e.g. letter format) are equally welcome.

Please send your response to prm@orr.gov.uk by **5pm on 5 September 2025**.

Please contact Matt Wikeley, Head of Rail Outcomes, at ORR with any queries: matt.wikeley@orr.gov.uk

About you

Full name: Andrew Darbyshire

Job title: HS2 and Rail Stakeholder Lead

Organisation: Heathrow Express Operating Company

Email*:

Telephone number*: Click or tap here to enter text.

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As part of the CP7 passenger train performance reset, we are consulting on proposed performance targets for Time to 3 (England & Wales only), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel at both a national and regional level. We have done this after assessing national and regional performance plans alongside associated targets submitted to us by Network Rail.

The proposed targets will be used to monitor and hold Network Rail to account in years 3 to 5 of CP7.

Question 1: 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?

HEOC acknowledges the proposed performance targets for the Wales and Western (W&W) route have been developed within a constrained funding environment. The headline goal to maintain current levels of punctuality whilst reducing cancellations is a pragmatic starting point for consultation.

However, there remain concerns that the proposed targets for the W&W route are not sufficiently ambitious when compared to recent actual performance. For example:

- **Cancellations:** The draft CP7 targets for W&W are **4.3%** in each of years 3–5 (2026–2029). This is **significantly higher than the most recent periodic actual rate of 3.13%** (ORR Period 5 2025 data) and higher than the PR23 indicative target of around **3.3%** for the final year of CP7. This suggests the consultation target effectively bakes in a deterioration from current performance, rather than driving improvement.
- **Punctuality (Time to 3):** The draft year 5 target for W&W is **80.0%**, which is still markedly lower than all other English regions, despite the recent sustained improvement following ORR enforcement action in 2024. By comparison, Southern’s year 5 target is **85.4%** and Eastern’s is **84.6%**.

Given the Independent Reporter’s assessment that the W&W cancellations trajectory is only “*Slightly Realistic*” - due in part to not modelling the full benefits of the Performance Improvement Plan – as such HEOC believes the ORR should require Network Rail to revisit these targets.

HEOC would also note the considerable TOC investment in accommodating disruptive access for infrastructure upgrades under Project Brunel in the Thames Valley.

This has included revised train planning, amended crew diagrams, and the operation of alternative service patterns to maintain connectivity. Network Rail has been keen to promote the performance improvements from these works - yet the benefits do not appear to be fully reflected in the proposed targets.

Given this, a more stretching cancellations target - closer to 3.3% by 2028/29 - is both achievable and necessary to sustain momentum.

Question 2: Do you have any views on our assessment of Network Rail’s plans and the findings of the Independent Reporter?

HEOC welcomes the thorough, evidence-led assessment by ORR, supported by the Independent Reporter (Jacobs). The transparency of the process is important for stakeholder confidence.

HEOC strongly supports the Independent Reporter's recommendations that Network Rail should:

- Review scheme assumptions for W&W cancellations to ensure they are robust and incorporate all committed benefits, including those from the Performance Improvement Plan.
- Consider adjusting the base position for cancellations, given that the baseline year included worse-than-typical weather and external events.

These points align with HEOC's long-standing position - set out in the April 2022 response to ORR's technical consultation on the Schedule 8 regime - that performance targets must be forward-looking and directly linked to funded and committed improvement plans.

It is also worth highlighting HEOC's 2023 input to ORR's formal investigation into W&W poor performance, where the importance was stressed of measurable outputs from joint NR–TOC engagement.

Wales and Western's recent improvement in punctuality, combined with TOC-enabled mitigations under Project Brunel, shows that ambitious improvement is possible when there is clear accountability.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

Given the material improvement in W&W performance since mid-2024, the proposed targets risk underestimating what can be achieved. In particular:

- **Cancellations:** Current performance Period 5 (3.13%) is already well below the proposed targets. Setting a flat 4.3% target for 2026–2029 will weaken Schedule 8 incentives and risk complacency.
A stepped reduction - e.g. 3.8% in 2026/27, 3.5% in 2027/28, 3.3% in 2028/29 - would better reflect recent progress and industry investment.
- **Delay Minutes:** The W&W year 5 draft target is 33.3 minutes per 1,000 miles, which is better than the PR23 delivery plan forecast range (38.8–40.3). This is welcome, but we believe there is scope to bring this down further as Project Brunel benefits are fully realised.

The final accountability framework for CP7 years 3–5 should ensure Network Rail is held to account for all performance-affecting activities, including the planning and delivery of engineering works.

For Heathrow, reliable and resilient train services are essential for passengers, airline crew, and airport staff. Targets should be set to protect this resilience, particularly given expected growth in airport rail demand.

Please provide evidence to support your views, such as relevant information from business plans, research, policy documents or other materials.

Thank you for taking the time to respond.

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HULL TRAINS



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

This pro-forma is available to those who wish to use it to respond to our consultation. Other forms of response (e.g. letter format) are equally welcome.

Please send your response to prm@orr.gov.uk by **5pm on 5 September 2025**.

Please contact Matt Wikeley, Head of Rail Outcomes, at ORR with any queries: matt.wikeley@orr.gov.uk

About you

Full name: Louise Mendham

Job title: Service Delivery Director

Organisation: Hull Trains

Email*:

Telephone number*:

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As part of the CP7 passenger train performance reset, we are consulting on proposed performance targets for Time to 3 (England & Wales only), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel at both a national and regional level. We have done this after assessing national and regional performance plans alongside associated targets submitted to us by Network Rail.

The proposed targets will be used to monitor and hold Network Rail to account in years 3 to 5 of CP7.

Question 1: 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?

We welcome the opportunity to comment on the CP7 passenger train performance reset – consultation on targets for 2026-2029.

Hull Trains as a Long Distant Operator across the Eastern region and any change to performance will significantly impact us. Upon review what is quite clear, the proposed targets show a significant deterioration in performance on the East Coast Mainline (ECML) and Eastern region over the last three years of the control period.

The largest deterioration of performance targets across the Eastern region is seen through T-3 and delay per 1000 miles. This is extremely concerning to Hull Trains, both in terms of the impact on customers and the financial impact on our business.

We appreciate that the proposed deterioration is driven by a number of factors including previous targets being deemed too optimistic, and more specifically the forecast impact of the implementation of the December 2025 timetable on the ECML as well as the initial impact of the East Coast Digital Programme (ECDP) when we ultimately achieve signals away. However, we are concerned that allowing for such a significant deterioration in performance would impact on long run demand at a time when the ECML is seeing a significant increase in service levels, therefore setting more ambitious targets would go some way to ensuring as much as possible is done to ensure any impact on future rail demand is minimised.

Reviewing NR’s proposed performance trajectories for Eastern region, we can see the forecasts are driven by a number of factors. Excluding the impact of the ECML December 2025 timetable and ECDP, the majority of these factors show very little impact on the target performance levels (overall net negative impact) at the end of CP7, with the exception of an improvement associated with external events. Effectively, without the impact of the December 2025 timetable change and ECDP, performance at a base level is not expected to improve over the next 3 years as a result of any NR activity. This shows limited ambition in improving performance, especially at a time when seeking initiatives to minimise performance impact on customers should be a top priority with such a significant timetable change being introduced.

It has been difficult for us as a TOC to assess the likely impact of the upcoming December 2025 timetable change on East Coast Mainline performance overall, whilst we have received overall performance Railways modelling reports, we have not received full detailed analysis of this, given the data was only modelled on a typical day (Wednesday) between the hours of 1400-1600. We did share concerns with Network Rail that this performance modelling was also completed after a freeze of the December Timetable back early 2025. Since then, many hundreds of conflicts, changes to train running and improvements have been made and incorporated into the December Timetable, so in fact some issues picked up by the performance modelling may no longer have impact to performance or be a factor.

We also share the concerns of the independent reporter on the risk of double counting these timetable impacts. We are concerned that the forecast may mislead target setting modelling by extrapolating from timetable modelling to overestimate the total negative impacts of the timetable change. This concern is due to the timetable modelling using a limited amount of data from a high performing day and comparing outcomes from various timetables rather than predict the outcomes from a particular timetable. Also, we share the same concerns of the application of changes to train services, as again this could also impact the target setting due to over stating the number of services.

We also have good visibility of specific issues within the upcoming timetable (i.e. which specific interactions between trains in the timetable are likely to cause increased reactionary delays) and over the past and forthcoming months are working with all Operators and Network Rail on key areas of performance to incorporate new performance initiatives on top of current performance improvement plans to further improve performance, some of which include station dwells, platform management, regulation statements, customer and fleet plans, all of which improve T-3 and delay improvements. What is not clear from the NR proposals, is the benefit of any offsetting activity to this impact. A huge amount of work is ongoing across the ECML to ensure a smooth implementation of the December 2025 timetable. Similarly, a series of performance initiatives are being developed in order to minimise the impact. We would therefore urge ORR to seek clarification that some mitigating measures will be factored into the trajectories.

Given the enhanced focus on December 25 Timetable performance, plus the current performance improvement plans we feel this should be included in the target setting process in order to allow more ambitious targets to be set.

It is also difficult for us as a TOC to assess the likely impact of ETCS on ECML, given we have not been presented any analysis of the proposed performance modelling which has been overlayed for the last three years of CP7. The trajectories state an expectation of 60% more impact to performance compared to the NCL. Given we are yet to see any performance plans for the programme this could be seen as a low level ambition approach to the performance impact of ETCS on ECML.

Question 2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

One area that is not entirely clear in the ORR and independent reporter assessment is the level of scrutiny that has been applied to the anticipated performance impact of the introduction of the ECML timetable in December 2025. The proposed impact is significant and has the potential to allow performance on the ECML to deteriorate below current levels without any incentive for NR to further mitigate this once the timetable has been introduced. This would impact on customer demand, at a time when additional capacity through additional services is being introduced.

All analysis conducted in the modelling was in the time scope from 1400 to 2000 for a Wednesday timetable and therefore is not representative of a whole day or whole week picture. We would therefore urge ORR to ensure NR has taken account of and reflected the scope limitations of the modelling undertaken in its forecast trajectories, especially given the proposed use of these trajectories within the ongoing schedule 8 recalibration and the potentially significant financial impact on train operators.

Additionally, the December 2025 timetable has now been offered and is due for implementation. This timetable will be different to the timetable that was modelled to support the previous analysis. It would therefore be useful to fully understand how any timetable changes will be reflected in the proposed trajectories particularly for 2026/27, given the impact this could have on customers and the financial impact this could have on Train operators.

On the basis of the above comments, we remain concerned that uncertainty in the modelled impacts and limitations of the time and day scope does not provide a detailed enough evidence base to inform such an important series of targets, potentially exposing operators to significant financial payments.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

We feel that proposed targets are heavily impacted by the December 25 timetable overlay, which the extent of the performance is yet unknown and does not ambitiously show performance improvements or mitigations during the remaining years of CP7. The December Timetable performance can only be modelled and forecasted due to the new introduction, however we feel that the level of impact may have been overstated due to original timetable modelling (early 2025) where many hundreds of trains have now been deconflicted and improved.

As detailed in the consultation, the impact of targets being reduced will flow through to the ongoing schedule 8 recalibration and will drive incentive payments between operators and NR for the remainder of the control period. As a result of this the impact on operators will be two-fold. Firstly, customer compensation and delay repay costs will continue at current levels or further increase, potentially resulting in an impact on future demand and revenue. Secondly, where NR begins to exceed these targets, NR will receive bonus payments, exposing operators to further financial payments. In this instance, we believe NR would be held almost entirely neutral to the worsening of performance if not in some cases benefiting from it, whilst operators are left taking the full financial impact associated with increased customer compensation and reduced longer term demand.

Please provide evidence to support your views, such as relevant information from business plans, research, policy documents or other materials.

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LONDON NORTH EASTERN RAILWAY

London North Eastern Railway
West Offices, Station Rise, York YO1 6GA

LNER.co.uk



Will Godfrey
Director of Economics, Finance & Markets
Office of Rail and Road
25 Cabot Square
London E14 4QZ

3 October 2025

Dear Will,

CP7 Passenger Train Performance Reset Consultation: Concerns Regarding ECML Timetable Benchmarks and Schedule 8 Incentive Alignment

Following our letter of 5 September responding to this consultation, I am writing to provide a supplementary update regarding the CP7 Performance Reset and specifically the analysis underpinning the 'Bathtub' performance curve and the impact of the ECML Dec 25 timetable.

We have now held a detailed meeting with Network Rail to review the analytical basis for the Bathtub curve, including the methodology used to calculate its performance impact. This meeting allowed us to understand the assumptions, data sources, and modelling techniques applied. We also received and reviewed Network Rail Eastern Region's final submission made in September 2025, alongside the independent report titled CP7 Performance Reset Stage 3 Emerging Findings v2 produced by Jacobs, dated 1 October 2025. These are detailed reports which we did not have sight of at the time of writing our initial response to the consultation.

Based on this review, we are now content that the analysis of performance following past timetable changes does support the inclusion of a 'Bathtub' curve performance impact. We are also satisfied with Network Rail's calculation of this impact, acknowledging the inherent uncertainty that accompanies such forecasts. We note that Network Rail has revised its calculation methodology following feedback from Jacobs, which we consider a constructive and necessary refinement.

LNER is deeply involved in the industry-wide readiness activity for the upcoming timetable change. This is a significant change event, and we recognise the presence of several factors which create uncertainty in relation to the punctuality of the new timetable. We understand from Network Rail that while the performance model accounts for multiple factors, it does not include certain risks such as tighter station dwell times or the full spectrum of train services. Moreover, the model's geographical scope is limited and excludes key corridors, notably the area south of Stevenage. These limitations suggest that the risks to the Railsys forecast are weighted to the downside.

We note that the forecasts in Network Rail Eastern's Final Submission are at the regional level, and we understand that Network Rail is undertaking work to produce operator-level forecasts in line with the regional trajectory. We will jointly review these calculations once they have been done so we have a clear and shared understanding of how the regional targets are translated into appropriate operator-level figures for LNER.

London North Eastern Railway Limited
Registered in England No.04659712
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Finally, we accept Jacobs' assessment that the timescales for the CP7 Performance Reset do not permit further modelling of the ETCS effect. We agree that there is no certainty that additional modelling would yield a more robust or materially different outcome. We also note from Eastern Region's Final Submission that the adjustment for ETCS is immaterial.

We trust this supplementary letter provides you with a useful update on our discussions with our Network Rail colleagues and supports the ORR's ongoing assessment.

Yours sincerely



David Horne
Managing Director



LONDON TRAVEL WATCH



CP7 reset: ORR consultation on targets for 2026 to 2029 – London TravelWatch's response

London TravelWatch is London's independent transport watchdog, using evidence to campaign to improve journeys, and advocate for all people travelling in London.

Thank you for consulting with us and inviting our views about the consultation on targets for 2026 to 2029.

Before going on to provide our responses to questions 1 and 2 (we have no comments about question 3), we wanted to make a general point about this consultation. Namely, that although it is open for the public to respond to, the graphs and text are likely to be very challenging to understand especially if you have no prior knowledge of the workings of the rail industry. This will then most probably lead to a lack of responses from those who use the railway and whose views should be welcomed by the rail industry.

We make the following comments to the consultation questions:

(1) 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?

London TravelWatch understands the need to provide certainty and that measures must be realistic and reflect the current and future challenges of the railways. Given this, together with the unlikelihood of major rolling stock refurbishments, the ongoing staffing issues and the financial pressures, we appreciate the need to reset the targets.

However, realistic targets should also provide an opportunity to aim for improvement, even if to do so may be challenging. As it is proposed, however, the draft targets do not necessarily predict significant or, in many cases, any improvement.

For instance, when looking at the targets for cancellations:

- Across England & Wales and Great Britain, the draft target for 2028/29 is only the same as the performance delivered in 2023/24.

- In the North West & Central and Southern regions, the draft targets for 2028/29 are for worse performance than was delivered in 2023/24.

In terms of punctuality:

- The forecast for England & Wales in 2028/29 is only the same as is forecast for 2025/26 – and all draft targets are also below the performance delivered in 2023/24.

And for delay minutes:

- In England & Wales, the draft target for 2028/29 is for worse performance than was delivered in 2024/25 and is only fractionally better than the performance delivered in 2023/24.
- The draft targets for 2028/29 in the Eastern and North West & Central regions forecast considerably higher delay minutes than the actual in either 2023/24 or 2024/25. Even with the much-needed anticipated reduction in delays in the Wales & Western region, it will still see be performing worse in 2028/29 than some other regions.

(2) Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

This government has stated that the rail provision and passenger experience will improve with the introduction of GBR. It is therefore difficult to understand why the ORR has stated that the targets outlined in the consultation are 'ambitious' because the draft targets do not indicate improvement to the service provision and how passengers will see a benefit to the change to GBR.

Within the consultation documents, the ORR has mentioned that it is difficult to predict passenger demand. However, it would still have been helpful to have seen the modelling and mitigation that is used given that we are now over three years since the official end of the pandemic.

Changing weather patterns has also been cited as a challenge to rail provision. London TravelWatch appreciates the difficulties with accurately forecasting the weather due to climate change. But as this is a public document, a full explanation should be given as to why the weather causes such an impact as otherwise it looks like an excuse.

Overall assessment

Turning to the Overall assessment section of the consultation, it is stated that 'Network Rail has based its proposed targets on its own improvements that are fully identified, funded and planned.' We ask if the train operators plans have also been fully identified, funded and planned. Similarly, it is stated that Network Rail has 'also considered recognised risks.' We ask for clarification on what these risks are and if the train operators have also considered recognised risks from their perspective.

This section also mentions the plan for improved collaborative working between rail operators and Network Rail. In 2017, the ORR produced a paper about collaborative working between Network Rail and rail operators, but this consultation does not detail the areas that improved following this piece of work and the expectation for further improvement in the coming five years. There is also the new model of combining track and train, but this consultation does not mention when and where this will cause a positive impact on passenger services by reducing delays and cancellations.

Time to 3

London TravelWatch understands that Time to 3 is an allowance by the rail industry for fluctuations in the rail service arrival times. To a passenger, however, this still constitutes a delay and so it is not an indicator of acceptable service levels. Measurements and targets should focus more on actual right time arrivals and Time to 3 should only be used when absolutely necessary.

Looking at the forecasted Time to 3 targets:

- Even though it is forecast that Wales & Western performance will gradually improve every year until 2082/29, its forecasted performance in 2028/29 will still be well below that of any other region
- In the Eastern, North West & Central and Southern regions, and England & Wales as a whole, the forecasted targets for 2028/29 are all lower than the performance delivered in 2023/24.

The consultation explains that national punctuality ‘has been declining since its postCOVID-19 pandemic peak, as passengers have returned to the network and more trains have been added to timetables.’ Rather oddly, this statement appears to suggest that passenger returning to the network are the cause of decline and that passengers will continue to cause the decline.

The ORR mentions that timetable changes could cause risk but it is unclear what the mitigations are to manage the risk. For example, the consultation says that ‘Network Rail expects that the ECML [December 2025] timetable changes will lead to a...decline in performance in the first 24 months and result in a sustained reduction in performance in punctuality.’ London TravelWatch asks what is being done to manage this.



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

This pro-forma is available to those who wish to use it to respond to our consultation. Other forms of response (e.g. letter format) are equally welcome.

Please send your response to prm@orr.gov.uk by **5pm on 5 September 2025**.

Please contact Matt Wikeley, Head of Rail Outcomes, at ORR with any queries: matt.wikeley@orr.gov.uk

About you

Full name: Paul Hughes

Job title: Finance Manager

Organisation: East Coast Trains Ltd t/a Lumo

Email*:

Telephone number*:

**This information will not be published on our website.*

As part of the CP7 passenger train performance reset, we are consulting on proposed performance targets for Time to 3 (England & Wales only), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel at both a national and regional level. We have done this after assessing national and regional performance plans alongside associated targets submitted to us by Network Rail.

The proposed targets will be used to monitor and hold Network Rail to account in years 3 to 5 of CP7.

Question 1: 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?

We welcome the opportunity to comment on the CP7 passenger train performance reset – consultation on targets for 2026-2029.

East Coast Trains Ltd (hereafter referred to as Lumo) as a Long Distant Operator across the Eastern region and any change to performance will significantly impact us. Upon review what is quite clear, the proposed targets show a significant deterioration in performance on the East Coast Mainline (ECML) and Eastern region over the last three years of the control period.

The largest deterioration of performance targets across the Eastern region is seen through T-3 and delay per 1000 miles. This is extremely concerning to Lumo, both in terms of the impact on customers and the financial impact on our business.

We appreciate that the proposed deterioration is driven by multiple factors including previous targets being deemed too optimistic, and more specifically the forecast impact of the implementation of the December 2025 timetable on the ECML as well as the initial impact of the East Coast Digital Programme (ECDP) when we ultimately achieve signals away. However, we are concerned that allowing for such a significant deterioration in performance would impact on long run demand at a time when the ECML is seeing a significant increase in service levels, therefore setting more ambitious targets would go some way to ensuring as much as possible is done to ensure any impact on future rail demand is minimised.

Reviewing NR's proposed performance trajectories for Eastern region, we can see the forecasts are driven by several factors. Excluding the impact of the ECML December 2025 timetable and ECDP, the majority of these factors show very little impact on the target performance levels (overall net negative impact) at the end of CP7, with the exception of an improvement associated with external events. Effectively, without the impact of the December 2025 timetable change and ECDP, performance at a base level is not expected to improve over the next 3 years as a result of any NR activity. This shows limited ambition in improving performance, especially at a time when seeking initiatives to minimise performance impact on customers should be a top priority with such a significant timetable change being introduced.

It has been difficult for us as a TOC to assess the likely impact of the upcoming December 2025 timetable change on East Coast Mainline performance overall, whilst we have received overall performance Railways modelling reports, we have not received full detailed analysis of this, given the data was only modelled on a typical day (Wednesday) between the hours of 1400-1600. We did share concerns with Network Rail that this performance modelling was also completed after a freeze of the December Timetable back early 2025. Since then, many hundreds of conflicts, changes to train running and improvements have been made and incorporated into the December Timetable, so in fact some issues picked up by the performance modelling may no longer have impact to performance or be a factor.

We also share the concerns of the independent reporter on the risk of double counting these timetable impacts. We are concerned that the forecast may mislead target setting modelling by extrapolating from timetable modelling to overestimate the total negative impacts of the timetable change. This concern is due to the timetable modelling using a limited amount of data from a high performing day and comparing outcomes from various timetables rather than predict the outcomes from a particular timetable. Also, we share the same concerns of the application of changes to train services, as again this could also impact the target setting due to over stating the number of services.

We also have good visibility of specific issues within the upcoming timetable (i.e. which specific interactions between trains in the timetable are likely to cause increased reactionary delays) and over the past and forthcoming months are working with all Operators and Network Rail on key areas of performance to incorporate new performance initiatives on top of current performance improvement plans to further improve performance, some of which include station dwells, platform management, regulation statements, customer and fleet plans, all of which improve T-3 and delay improvements. What is not clear from the NR proposals, is the benefit of any offsetting activity to this impact. A huge amount of work is ongoing across the ECML to ensure a smooth implementation of the December 2025 timetable. Similarly, a series of performance initiatives are being developed to minimise the impact. We would therefore urge ORR to seek clarification that some mitigating measures will be factored into the trajectories.

Given the enhanced focus on December 25 Timetable performance, plus the current performance improvement plans we feel this should be included in the target setting process to allow more ambitious targets to be set.

It is also difficult for us as a TOC to assess the likely impact of ETCS on ECML, given we have not been presented any analysis of the proposed performance modelling which has been overlayed for the last three years of CP7. The trajectories state an expectation of 60% more impact to performance compared to the NCL. Given we are yet to see any performance plans for the programme this could be seen as a low-level ambition approach to the performance impact of ETCS on ECML.

Question 2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

One area that is not entirely clear in the ORR and independent reporter assessment is the level of scrutiny that has been applied to the anticipated performance impact of the introduction of the ECML timetable in December 2025. The proposed impact is significant and has the potential to allow performance on the ECML to deteriorate below current levels without any incentive for NR to further mitigate this once the timetable has been introduced. This would impact on customer demand, at a time when additional capacity through additional services is being introduced.

All analysis conducted in the modelling was in the time scope from 1400 to 2000 for a Wednesday timetable and therefore is not representative of a whole day or whole week picture. We would therefore urge ORR to ensure NR has taken account of and reflected the scope limitations of the modelling undertaken in its forecast trajectories, especially given the proposed use of these trajectories within the ongoing schedule 8 recalibration and the potentially significant financial impact on train operators.

Additionally, the December 2025 timetable has now been offered and is due for implementation. This timetable will be different to the timetable that was modelled to support the previous analysis. It would therefore be useful to fully understand how any timetable changes will be reflected in the proposed trajectories particularly for 2026/27, given the impact this could have on customers and the financial impact this could have on Train operators.

Based on the above comments, we remain concerned that uncertainty in the modelled impacts and limitations of the time and day scope does not provide a detailed enough evidence base to inform such an important series of targets, potentially exposing operators to significant financial payments.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

We feel that proposed targets are heavily impacted by the December 25 timetable overlay, which the extent of the performance is yet unknown and does not ambitiously show performance improvements or mitigations during the remaining years of CP7. The December Timetable performance can only be modelled and forecast due to the new introduction, however we feel that the level of impact may have been overstated due to original timetable modelling (early 2025) where many hundreds of trains have now been deconflicted and improved.

As detailed in the consultation, the impact of targets being reduced will flow through to the ongoing schedule 8 recalibration and will drive incentive payments between operators and NR for the remainder of the control period. As a result of this the impact on operators will be two-fold. Firstly, customer compensation and delay repay costs will continue at current levels or further increase, potentially resulting in an impact on future demand and revenue. Secondly, where NR begins to exceed these targets, NR will receive bonus payments, exposing operators to further financial payments. In this instance, we believe NR would be held almost entirely neutral to the worsening of performance if not in some cases benefiting from it, whilst operators are left taking the full financial impact associated with increased customer compensation and reduced longer term demand.



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31 October 2025

Dear Will

CP7 Passenger Train Performance Reset Consultation

Following engagement with Network Rail on the CP7 Performance Reset and the associated forecasting work for the December 2025 timetable change, Northern Trains Limited wishes to express its broad support for the approach taken and to acknowledge the constructive collaboration between Network Rail and its industry partners in improving understanding of the expected performance trajectory for this major change.

We recognise that the December 2025 timetable represents a significant capacity and journey-time enhancement for customers across the North. It also marks a substantial operational step-change, and while every partner has a duty to maximise punctuality, we acknowledge that greater network utilisation will inevitably lead to more trains being affected during disruption and an initial deterioration in overall performance.

We are content with the methodology used by Network Rail to assess the performance impact of the timetable change, including the application of the “bathtub” effect to represent the anticipated recovery profile. We also note and support the refinements made following independent review and industry feedback.

Significant joint work has taken place to test the timetable’s resilience and to develop mitigation proposals for managing disruption. However, we recognise that a short-term downturn in performance is likely as the network adjusts to the new plan, before further developed and optimised mitigations support recovery to the levels of performance our customers expect.

We understand that a Schedule 8 proposal is being developed to mitigate or eliminate commercial concerns arising from the forecast performance trajectory. We welcome this and look forward to further discussion once the proposals are finalised.

www.northernrailway.co.uk

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At the same time, we remain committed to our own improvement ambition of achieving 90% Time to 3 performance with cancellations below 2%, and we will continue to work closely with Network Rail's North West and North & East Routes to test and validate the input data underpinning both the December 2025 forecasts and the wider performance assumptions supporting our respective funding cycles.

We appreciate Network Rail's openness throughout this process and look forward to continuing our close collaboration as we collectively seek to deliver the best possible service for customers.

Yours sincerely



Tricia Williams
Managing Director

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ORR consultation: CP7 reset - consultation on targets for 2026 to 2029
Office of Rail and Road
25 Cabot Square
London,
E14 4QZ

Dear ORR Consultation Team

CP7 passenger train performance reset: consultation on targets for 2026 to 2029

Please accept this as RMT Union's submission to the CP7 passenger train performance reset: consultation on targets for 2026 to 2029.

1. 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?

RMT Union does not agree with the proposed targets and is concerned that ORR's targets for train performance are going backwards. In ORR's Final Determination¹ for Control Period 7, it stated the following:

"We are setting targets that would see the percentage of cancelled trains reduce from 3.7% to 3.2% by the end of CP7."

However the CP7 reset consultation now sets a cancellation target of 3.8% by the end of CP7 in 2029. This is a concerning reversal of targets for CP7 and appears that the rail regulator is accepting that performance will ultimately get worse before it gets better. This is particularly frustrating for RMT Union as we warned about this in our submission to the ORR's PR23 Draft Determination² where we stated:

"RMT believes the risks associated with declining asset reliability will have a highly negative effect on overall train performance over CP7 and whilst Network Rail admit that "it is almost impossible

¹ <https://www.orr.gov.uk/sites/default/files/2025-07/2025-07-10-cp7-passenger-train-performance-reset-targets-consultation.pdf>

² <https://www.orr.gov.uk/sites/default/files/2023-10/25-pr23-draft-determination-consolidated-responses.pdf>

to forecast whole industry train performance accurately over the short term” it is concerning that there are proposals within Network Rail’s strategic business plan that will make asset performance and ultimately whole industry train performance worse including the reduction in renewals causing an increase in Service Affecting Failures of 2% over the course of CP7.

The proposed increased use of operational controls such as speed restrictions will also only serve to make whole industry train performance worse. In Network Rail’s SBP they highlight how by focusing its reduced renewals funding as part of their ‘Market-Led approach could result in an overall fall in asset reliability during CP7. This would likely then create an increase in Service Affecting Failures and a ‘small’ deterioration in train performance. ORR is right to push back on Network Rail’s proposal in the draft determination stating “We expect no further decline in train performance, and for Network Rail to deliver ambitious but deliverable improvements for passengers and freight customers’

RMT’s prediction that performance would worsen under the reduced CP7 funding arrangements and the roll-out of the Modernising Maintenance programme were made following extensive consultation with our membership that work on the frontline of the railway who implicitly understand the impacts that cuts to renewals and de-staffing of the maintenance function is having on the overall performance of the railway.

RMT takes no pride in these prediction becoming reality but RMT believes it is increasingly important for the performance of our railway to improve not degrade or stagnate. As we have repeatedly highlighted, improving performance requires year on year investment in our railway, rather than pursue a policy of maintenance over renewing degraded assets. Investment in our railway ultimately boosts our economy as per studies by Oxford Economics³ which found that for every £1 spent on rail it generates £2.50 for the wider economy.

Latest Railway Performance Statistics

In ORR’s Annual Assessment of Network Rail for 2024/25⁴ it highlighted the following performance statistics for the last annual period:

- Cancellations reached record highs at 4.1%, with train operator cancellations the dominant factor, up from 3.8% the previous year. Network Rail missed its national targets for reliability and punctuality.
- 4.1% figure of passenger services were cancelled means Network Rail missed the 3.4% target set. This is the highest level of cancellations seen since 2014 when recording started.
- 84% of passenger trains arriving within three minutes of their scheduled arrival between April 2024 and March 2025
- During the year, there were more cancellations attributed to train operators 2.3% than to Network Rail 1.8%, with primary causes including train operator staffing and fleet reliability. However, Network Rail cancellations were still a significant factor.

These performance stats show a concerning trend for the first year of CP7.

³ <https://www.oxfordeconomics.com/resource/the-economic-contribution-of-uk-rail/>

⁴ <https://www.orr.gov.uk/annual-assessment-network-rail-2024-2025>

2. Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

ORR's Assessment of Network Rail's plans do not explain why the cancellation target for the percentage of cancelled trains has changed from 3.2% to 3.8% by the end of CP7. Rather the ORR assessment of Network Rail's plans highlight the mitigating factors that will impact performance through CP7. RMT is aware that during the year, there were more cancellations attributed to train operators 2.3% than to Network Rail 1.8%, with primary causes including train operator staffing and fleet reliability⁵.

RMT union remains concerned that performance and reliability remains below standards and expectations as it is often our members on the sharp end either working on highly pressurised front line maintenance roles or in customer facing roles bearing the brunt of passenger frustrations due to this poor performance.

RMT believes that Network Rail's cuts agenda in the Eastern Region directly corresponds with the collapse in performance and reliability across the region. Since August 2022, Network Rail's delay minutes per annum in the Eastern Region have increased from 2.4 million minutes to 3.3 million minutes⁶. Eastern Region committed to deliver huge cuts to their Operating, Maintenance and Renewals budgets with over £1.059bn of cuts throughout Control Period 6 made "by adopting new technology, ways of working, optimising access strategies, and modernisation amongst other initiatives." Of this, £229m of cuts were made in 2023/24 the exact same period the collapse in performance and reliability happened. In the latest Network Rail Annual Report⁷ the Eastern Region state the following:

"Eastern has delivered £119m of efficiencies across our operating, maintenance, support and renewals (OMSR) funding in 2024/25, outperforming our target by £53m. Key initiatives include applying minimal viable product principles during the design phase of renewals projects, delivering cost-effective contracts, optimising access, and efficiencies related to our modernisation and pay reform programmes, with £15.3m of efficiencies linked to our Modernising Maintenance programme. We are aiming to build on this with a further £802m of efficiencies in the remaining years of the control period to deliver our CP7 Delivery Plan commitments."

RMT Union is deeply concerned that at a time when performance for the Eastern Region has got so bad that the Regulator has been forced to intervene and implement an emergency Performance Improvement Plan that there is an expectation that cuts and efficiencies continue to be made.

RMT made every effort to warn the rail industry that huge budget cuts/efficiencies and imposition of the Modernising Maintenance Programme would have a detrimental effect on performance and reliability but also a detrimental effect on maintenance workers health, safety and wellbeing. Our submissions to the ORR's PR23 programme to develop the Final Determination for CP7 were consistent in raising warnings and concerns that cuts, efficiencies and reduction in headcount would lead to these very issues.

⁶ <https://www.orr.gov.uk/search-news/regulator-calls-network-rail-improve-performance-passengers-across-eastern-region>

⁷ P.34 <https://www.networkrail.co.uk/wp-content/uploads/2025/07/Network-Rail-Limited-ARA-2025.pdf>

Network Rail's Eastern Region has now produced a Performance Improvement Plan but RMT believes that any performance improvement plan is simply incompatible with the continuation of the cuts and efficiencies agenda across Network Rail's Regions.

In conclusion, RMT will continue to monitor the performance of all Network Rail regions throughout CP7, we cannot simply accept that performance targets will be shifted to accommodate the economic and financial conditions facing Network Rail and Train Operators and we look forwards to continuing to work closely with ORR on this.

Yours Sincerely

Eddie Dempsey
General Secretary

South Western Railway



South Western Railway Limited
4th Floor, South Bank Central
30 Stamford Street
London
SE1 9LQ

Office of Rail and Road
25 Cabot Square
London
E14 4QZ

5th September 2025

Dear Will Holman

Please find below South Western Railway Limited (SWRL) formal response to the industry consultation seeking views on the passenger train performance targets proposed for CP7 reset for years 3 to 5.

Our engagement with Network Rail at the regional level has been strong and constructive. One of our headline initiative is the timetable re-cast, where we have an opportunity to significantly improve performance. This is built into Network Rail's assumptions, though there remains uncertainty regarding the introductory date and at this time this timetable is not confirmed as funded by HMT/DfT, so full approvals need to be secured. On this basis we were initially reluctant for Network Rail to include the forecast benefits of this timetable, but we are aware that the ORR's Managing Change process will need to be triggered should this timetable not take place at the date which it is built into the forecast.

The Department for Transport continues to set Train Operators both different Target levels and (while more aligned now) there are still different metrics in use (e.g. T3 at ALL Stations). It would appear to us, especially as the railways begin to integrate, this is the ideal to fully integrate the metric and target process. This will be essential to eliminate duplication within the industry and to ensure full alignment of delivery targets. At present, there seems to be limited clarity regarding the Department's awareness of Network Rail's ORR Regulatory targets, the implications for regional operations, and whether the Department formally endorses the proposals under consideration.

We look forward to your response.

Yours sincerely,



Hannah Garnish
Senior Regulatory Access Manager, SWR Industry Partnerships.

South Western Railway Limited
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Rail Delivery Group

National Rail



Lawrence Bowman
Managing Director
South Western Trains Ltd.
4th floor, South Bank Central
30 Stamford Street, SE1 9LQ

Sent by email:

Feras Alshaker
Director, Planning & Performance

Will Godfrey
Director, Economics, Finance & Markets

Office of Rail and Road
25 Cabot Square
London
E14 4QZ

Dear Feras and Will,

As we near the finalisation of the CP7 2+3 Reset process, I wanted to share some further considerations specifically associated with Network Rail's Southern Region submission that I thought were important to put formally on the record.

You'll be aware that a key deliverable within that submission is the potential to complete a significant timetable change within the South West Railway (SWR) geography. As we move further into being a more integrated railway in the lead up to Great British Railways, we will use the opportunity working closely as Operator and Network Rail as infrastructure manager and all other industry partners to create an ambitious plan to ensure the proposition can achieve the best possible outcomes for customers and taxpayers alike. The timetable change is intended to provide a range of benefits, including to train performance, in contrast to many timetable changes. This obviously requires very careful development.

The SWR timetable change is very much still under development. Whilst integration will allow us to establish a clearer and more joined up approach (and must enable a more confident understanding of the issues and the opportunities associated with this timetable change), the structure of the timetable and its specific impacts, and requirements (e.g. sufficiency of train crew) are still to be fully confirmed. The Southern Region submission therefore includes "best possible" forecasts of performance impacts based on available information at this time.

We are also now assuming that the timetable change will take place in December 2027, rather than December 2026 as we assumed in the draft May submission. Consequently, the potential performance benefit arises later in CP7, and therefore the phasing of Southern's Time to 3 and delay change has been updated accordingly in the final September submission, as you will have picked up.

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Rail Delivery Group





It's also important to acknowledge that while the Department for Transport are very supportive of the plans to improve the train service, formal approvals are still to be secured, and so the exact timing and scale of implementation, and its benefits, remains to be confirmed.

In short, while we have tried to support Network Rail Southern Region with providing the best possible forecast of performance improvement associated with this change with the information available to us at this time (and for the avoidance of doubt we are supportive of the forecasts which have been put forward), there remains a likelihood that the assumptions associated with the timetable recast will change as we move forward and the proposition matures.

It goes without saying, that as part of the development process we will be working proactively and thoroughly with all partners and stakeholders (I am quite sure involving your team as well).

Kind regards,



Lawrence Bowman
Managing Director

TRANSPENNINE EXPRESS



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

This pro-forma is available to those who wish to use it to respond to our consultation. Other forms of response (e.g. letter format) are equally welcome.

Please send your response to prm@orr.gov.uk by **5pm on 5 September 2025**.

Please contact Matt Wikeley, Head of Rail Outcomes, at ORR with any queries: matt.wikeley@orr.gov.uk

About you

Full name: Philip Chandler

Job title: Strategic Performance Improvement Manager

Organisation: TransPennine Express

Email*:

Telephone number*:

**This information will not be published on our website.*

As part of the CP7 passenger train performance reset, we are consulting on proposed performance targets for Time to 3 (England & Wales only), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel at both a national and regional level. We have done this after assessing national and regional performance plans alongside associated targets submitted to us by Network Rail.

The proposed targets will be used to monitor and hold Network Rail to account in years 3 to 5 of CP7.

Question 1: 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?

We generally agree with the targets and view them as being in line with TransPennine Express expectations for future network performance. As such, the proposed targets generally align with long-term projections of TransPennine Express performance, which similarly foresees an ongoing improvement to cancellation levels in response to improved traincrew availability but limited improvements to punctuality, especially time to 3 punctuality. This is demonstrated by the draft forward targets for future years as produced following the annual target setting process for this year:

Measure	Baseline – 2024/25 up to period 10	2026/27	2027/28	2028/29
T3	70.12%	70.16%	70.62%	70.36%
T15	95.44%	95.03%	95.17%	95.13%
Cancellations	3.69%	4.14%	3.94%	3.96%

Note that:

- These are early draft targets that are subjected to change on the basis of future annual business plans. They are intended to provide a forward view of likely performance levels rather than a committed target level.
- The baseline period saw TransPennine Express operating a reduced number of trains compared to future years, therefore the increase in cancellations is expected in response to a more intensive timetable being operated. Therefore, the years to 2028/29 represent continual improvement in cancellations, despite being a worse percentage score than the baseline.

We also consider the overall targets to be appropriately reflective of current Network Rail funding. Current financial pressures would suggest that dramatic improvements to performance are unlikely considering the improvement that would be needed to the current levels of delays caused by Network Rail attributed incidents, and that therefore it would be unhelpful to set targets on this expectation.

We are confident that TransPennine Express risks and improvement schemes have been included and are reflected accurately with the target setting process but acknowledge potential difficulties in ensuring absolute alignment between the Network Rail targets and future TransPennine Express targets. This is caused by different formats and timescales for future performance modelling, complicated by the timing of responses to the information requested from TOCs. The TransPennine Express response was somewhat delayed by the desire to have an agreed position from the 2025 annual target setting process to be included in the response. We would therefore welcome a process to provide assurance that the information provided by TOCs is reflected in its entirety within the Network Rail targets.

The North West and Central targets are described by the independent reporter as realistic, an assessment that we would generally support. We would welcome further review of the any other improvements that could be achieved to make these targets more ambitious. We would like to understand issues relating to asset performance better to have assurance that these have been captured reasonably. The report does not make it clear whether the region is expecting a decline in the reliability of assets or if the result is instead reflective of expected response times to incidents. This is a vital distinction for modelling of future performance, including consideration of the likely mitigations that the region could put in place to protect performance.

The performance of both Northwest and Central and Eastern regions will be affected by TRU works over coming years, and it appears that these have been applied inconsistently in the target setting forecasts for each region. TransPennine Express annual target setting has consistently included allowances for negative impacts on performance caused by disruption. Work to date has not caused significant issues, but the years included in the reset are likely to see increased risk due to the increasing intensity of work. This does not appear to be accounted for in Eastern region targets. For Northwest and Central, it is not clear as to what might result in the increase in incident numbers (as opposed to incident impacts) across all categories that is suggested occurring alongside TRU and therefore would suggest that this aspect of the target setting is not demanding enough, whilst simultaneously not being focussed on the likely risk that TRU presents.

We consider that the reason for the high weather impact in the base data for Northwest and Central region is due to deficient drainage infrastructure, rather than exceptionally poor weather. We would therefore support the route's approach of not making an adjustment for weather impact but would instead expect that the weather impact in future years can be mitigated by drainage improvements and would expect this opportunity to be reflected in the targets.

In addition, TransPennine Express would expect improvements from changes to the management of hot weather impacts to be included in the forecast. Following the hot weather of July 2022 Network Rail – in the North West, North & East and ECML – has reviewed the capability of the infrastructure to operate in high temperatures and raised the temperatures at which speed restrictions have to be imposed where this can be done safely. The events also led to industry-wide consultation to put in place Key Route Strategies (KRS) which clarified how the Network would be managed during hot weather, the speed at which trains would operate in various circumstances and which trains would run if speed restrictions, condition of the infrastructure and reliability of the fleet reduced the available capacity of the Network. The temperatures experienced in Summer 2022 have yet to be repeated so the improved capability of the Network and the associated train plans have not been fully tested, but should be expected to protect performance if required in the future and therefore should be modelled as an improvement scheme for performance.

It has been difficult for us as a TOC to assess the likely impact of the upcoming December 2025 timetable change on East Coast Mainline performance overall. It would appear that this is being used to mitigate for other more ambitious assumptions elsewhere in the target setting to produce an overall more realistic result. We share the concerns of the independent reporter on the risk of double counting these timetable impacts. We are concerned that the forecast may mislead target setting modelling by extrapolating from timetable modelling to overestimate the total negative impacts of the timetable change. This concern is due to the timetable modelling using a limited amount of data from a high performing day and comparing outcomes from various timetables rather than predict the outcomes from a particular timetable.

Question 2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

We are generally supportive and clear on the assessment done by the independent reporter. We support any clear findings within their report and the overall assessments of both the Eastern and Northwest and Central regional trajectories.

The independent reporter's assessment of the upcoming East Coast Mainline timetable appears well supported. We do not have good visibility of specific issues within the upcoming timetable (i.e. which specific interactions between trains in the timetable are likely to cause increased reactionary delays) and therefore are unable to comment on whether any possible mitigations to these interactions could be made and should be included in the target setting process in order to allow more ambitious targets to be set.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

It remains notable that punctuality of cross-border operators is not included in the Scotland route targets due to the use of Scotland train performance measure, which only considers punctuality of ScotRail services. Cross-border services are therefore only considered within the cancellations and delay targets, which in turn are not necessarily accurately modelling cross border services as the targets are based on STPM. As a result, we would question the integrity of modelling cross-border operators impact on Scotland route targets.

The extent to which the modelling considers and the targets subsequently incentivise improvements to cancellations for operators besides ScotRail is unclear. Two significant improvement opportunities for cross-border operator performance are use of PRIMA/GUSTO and vegetation clearance schemes, which are noted as not being included within the cancellations modelling by the independent reporter but would be especially valuable to cross-border operators by protecting performance on both the East and West Coast Mainlines. This improvement would be enabled by PRIMA and GUSTO reducing the impact of speed restrictions (although not their severity), allowing services to avoid significant delays and cancellations in the event of them being applied. This will be supplemented by reduced incidents of trees falling on the line, which have been significant on both

the East and West Coast Mainlines. We would support cancellations modelling for Scotland route including these improvement schemes to make targets more ambitious, despite the fact that their impact on ScotRail services is likely to be less significant.

Dear Feras/ Will,

I have been asked by my Managing Director, Chris Jackson to give an update on Transpennine Trains Limited perspective on the performance reset which you wrote to him about on 7 October 2025 and is the subject of a meeting of industry leaders on Eastern Region next week.

Train Service Performance is at the heart of running a strong rail business, with improved sustainable performance supporting revenue growth and an on-time railway being a key expectation of customers. We take our responsibilities, as an operator and with the wider industry, to drive actions to support it seriously. Given the mixed traffic, multi operator nature of our network and the Eastern Region – especially ECML - collaboration across the industry is key.

At the current time we recognise a range of conditions that require our efforts to support our performance trajectory's. These include the significant impact of Engineering work and Enhancements on our core operation. TPT faces more than 400 days of disruptive closure in 2026-27 on its core route network with intensity between York and Manchester where the Transpennine Route Upgrade is at peak delivery. As the main operator on this corridor and this part of the Programme within its Enterprise operating model, we know how important this total route modernisation is to get asset performance and network capacity enhanced to deliver improved performance in the medium and long term. In the short term however the loss of flexibility on the network and the need to manage works alongside operations does require significant focus from each entity such as TPT and the support of all leaders via the TRU Programme Board.

We also recognise the need to evolve our businesses both track and train to deliver the periodic financial settlement within Network Rail and the Annual Business Plans and net subsidy reduction trajectories in the Train Operators. The December 2025 timetable sits within this strategy as the realisation of benefits from Infrastructure investment by the DfT as funding client and support to the LNER revenue line that come from the enhanced timetable are our core objective as an industry. We recognise the important part those changes play in the DfT's net industry subsidy reduction plans and the benefits to rail customers on those flows that benefit from improvements. This includes some rail users solely within our region where enhancements between Leeds and Sheffield are planned. We have worked with industry partners to play our part within the timetable development, for example increasing our Newcastle to Edinburgh "Borders" services to enable the intermediate connectivity in that area that supports the wider acceleration of services between London and Edinburgh and expansion of frequency to Newcastle.

Turning to the performance impacts of the timetable and its interface with the performance trajectory reset I would highlight:

- We recognise ongoing work by industry to understand performance trajectory for the Dec 25 timetable change, we have been briefed by NR senior executives in Eastern Region and subject matter experts on their work including the timetable modelling that underpins it. We recognise the NR position in terms of the methodology of how the Dec 25 performance impact has been calculated, including the bathtub impact of the first two years. This aligns with our experience of similar strategic timetable changes such as the West Mainline Timetable in 2008-09
- We stand together with other leadership teams to lean into the challenge as all industry partners have a duty to do everything possible to maximise punctuality. We recognise that the nature of the change on ECML and the increased frequency given baseline performance conditions - without the full ECML upgrade scope as envisaged in 2015 - means punctuality

will deteriorate. It seems clear that this will be particularly in the first and second years and is a trade-off to achieve the capacity and journey reduction enhancements required alongside headwinds such as engineering work to support investment like the Transpennine Route Upgrade.

- We understand that there is a Schedule 8 proposal from Network Rail to mitigate or eliminate commercial concerns around the performance trajectory. This will need to be reviewed in the context of recalibration and DfT policy regarding how it wishes to see Annual Business Plan finance forecasts amended. Ultimately for DfTO train operators such as ourselves and with the move over the remainder of the control period towards ever closer working with Network Rail ahead of GBR this is a matter we would expect to be able to manage with our client/ shareholder. It is important to recognise that other access parties exist in Private sector train operators; Open Access and Freight and thus the STAR model.

We remain ambitious and demanding of our teams and our peers across the industry to do all we can to ensure we improve performance alongside delivering infrastructure and train service enhancements that provide a range of benefits for the different rail industry customers across the network. Chris Jackson and the wider executive team at Transpennine Express will continue to engage with you and our industry partners as this process continues.

Kind regards



Chris Nutton
Major Projects & TRU Director
/ Deputy Managing Director
+44 7771 832211

Control Period 7 reset team
Office of Rail and Road

[Redacted]

Transport Focus
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[Redacted]
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5 September 2025

CP7 passenger train performance reset: consultation on targets for 2026 to 2029

Please find below the response from Transport Focus, the independent consumer watchdog representing the interests of rail users throughout Great Britain; bus, coach and tram users across England, outside London; and users of England's motorways and major A roads.

We welcome the opportunity to comment in this key area, and note the rigour of ORR's process including its request that Eastern and North West & Central regions undertake further work to their proposals. While Transport Focus is not in a position to judge whether the proposed targets for 2026 to 2029 are 'ambitious yet realistic', we can comment from a passenger perspective.

Taking punctuality first, passengers will be thankful for small mercies in that the England and Wales punctuality target for the end of Control Period 7 is point one of a percentage point higher (83.9 per cent) than the 2024/25 year actual (83.8 per cent). But – assuming the target is achieved – performance will still be slightly below that achieved at the end of Control Period 6 (84.2 per cent). Only passengers using Wales & Western region services will see an improvement (four percentage points) which, while punctuality will still lag other regions, shows what can be achieved with sustained focus.

Regarding cancellations, the proposed England and Wales target would represent a point four of a percentage point improvement (to 3.9 per cent) over that achieved in 2024/25 (4.3 per cent). However, the fact remains that just under one in 20 trains in England and Wales would still be cancelled. Notably, this is in stark contrast to the cancellations position in Scotland (2.3 per cent), or just under one in 40 trains cancelled. It also contrasts unfavourably with position in the 2014/15 year where 1.9 per cent of trains were cancelled in England, Scotland and Wales. And it must not be forgotten that these figures exclude trains removed from the timetable in advance – please see below.

In term of Network Rail delay minutes, we note that the target for the end of Control Period 7 will be higher than at the end of Control Period 6.

All in all, while the proposed targets may well be ambitious and realistic, from a passenger perspective they are disappointing. Punctuality and reliability is number two when it comes to what matters most to passengers, and has a significant influence on the number one issue, value for money. And yet the proposed targets will see only a very modest improvement over the next three years.

We make three additional points:

- Network Rail should be encouraged to strive to outperform these targets (they should be regarded as the minimum not the maximum), and in doing so should work closely with train operators to encourage relentless focus on operator-caused delays and cancellations. In theory this should become easier as the infrastructure provider and train operators come increasingly into common ownership.
- We encourage ORR to closely monitor the impact on tight operating discipline of the 'on time, all stations' metric no longer being the primary punctuality KPI. It must not be forgotten that what passengers actually want is trains arriving bang on time, not up to three minutes late.
- We encourage ORR to set a deadline for completion of work to automate the production of 'pre-cancellations' data in order that the industry, governments and stakeholders have an accurate understanding of the proportion of the railway's product that it is not producing.

Guy Dangerfield

Head of Strategy & Intelligence

TRANSPORT FOR GREATER MANCHESTER



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

This pro-forma is available to those who wish to use it to respond to our consultation. Other forms of response (e.g. letter format) are equally welcome.

Please send your response to prm@orr.gov.uk by **5pm on 5 September 2025**.

Please contact Matt Wikeley, Head of Rail Outcomes, at ORR with any queries: matt.wikeley@orr.gov.uk

About you

Full name: Mark Angelucci

Job title: Rail Performance Officer

Organisation: Transport for Greater Manchester

Email*:

Telephone number*:

**This information will not be published on our website.*

As part of the CP7 passenger train performance reset, we are consulting on proposed performance targets for Time to 3 (England & Wales only), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel at both a national and regional level. We have done this after assessing national and regional performance plans alongside associated targets submitted to us by Network Rail.

The proposed targets will be used to monitor and hold Network Rail to account in years 3 to 5 of CP7.

Question 1: 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?

TfGM does not have specific comments on the numerical targets proposed. However, we are concerned that the performance of the North West & Central (NW&C) region is not currently good enough, and the proposed targets appear to imply that Network Rail expects performance to remain broadly the same or worsen.

We are not starting from a high baseline: on some routes, T-3 punctuality is below 70%, however other routes prop-up an average. We feel these targets don't necessarily equate to what passengers feel. In this context, maintaining current levels is not ambitious and risks entrenching poor performance.

We also note the increased prevalence of p-coding by operators in the North West, particularly TransPennine Express, often due to crew availability. This undermines service reliability and transparency. We are disappointed to see this continue despite the ORR's recent letter advising against such practices.

Question 2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

TfGM supports the principle of resetting targets mid-period to reflect evolving conditions. However, we would like to see greater consistency in performance reporting metrics across the industry. Currently, different TOCs use varying standards such as PPM, Right Time (RT), and other bespoke measures, which makes cross-operator comparisons difficult and undermines transparency.

We also recommend that T-15 punctuality and cancellation data be included in Network Rail's NW&C Daily and Weekly automated reports. These additions would significantly enhance our ability to monitor performance and fulfil our responsibilities as a Local Transport Authority.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

TfGM would like to see the industry move towards weighted passenger impact metrics, similar to those used by Transport for London and Transport for Wales. These metrics recognise the greater impact of delays and cancellations on busier services, and we believe that this approach better reflects the interests of rail passengers.

We also recommend:

- Promoting standardisation of performance metrics across TOCs.
- Strengthening oversight of p-coding practices, especially for own-cause issues.
- Enhancing regional granularity in performance targets to reflect local challenges and priorities.

Format of responses

So that we are able to apply web standards to content on our website, we would prefer that you email us your response either in Microsoft Word format or OpenDocument Text (.odt) format. ODT files have a fully open format and do not rely on any specific piece of software.

If you send us a PDF document, please:

- create it directly from an electronic word-processed file using PDF creation software (rather than as a scanned image of a printout); and
- ensure that the PDF's security method is set to no security in the document properties.

Publishing your response

We plan to publish all responses to this consultation on our website.

If you want any information in your response to be treated as confidential, please state this clearly and explain the reasons why, for us to consider. If your response does contain information you would like to be treated as confidential, please include it separately where possible or provide a summary that does not contain confidential details so that we can publish the non-confidential parts.

Please be aware that all information sent to us may still be subject to disclosure in accordance with the information access rights granted by the Freedom of Information Act 2000 (FOIA), the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA) and the Environmental Information Regulations 2004 (EIR).

If we receive a request for the disclosure of information you have sent us that we have not published, we will aim to contact you so that we can take your views into account, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on ORR.

Use of your personal data

The legal basis for processing your personal data is that it is necessary for the performance of a task carried out in the exercise of an official function vested in ORR.

Any personal data you provide to us will be used for the purposes of this consultation and will be handled in accordance with our privacy notice which sets out how we comply with the UK GDPR and the DPA.

We will publish your consultation response, withholding or redacting confidential information where appropriate. We will not publish your personal data.

ORR staff may have access to your information for the duration of the consultation process. This will be no longer than a year's duration and all information submitted in response to a consultation which has not been published on our website, will be deleted.

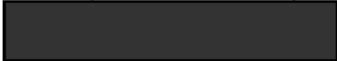
Artificial Intelligence (AI)

We may use AI to analyse consultation responses and identify key themes. Your name and contact details will be removed prior to the use of AI. The data will not be used to train or improve third party AI models and will remain under the control of ORR.

TRANSPORT SCOTLAND

Lee Shedden
Head of Rail Commercial & Business Planning

5th Floor, 177 Bothwell Street, Glasgow, XX



Matt Wikeley
Head of Rail Outcomes Policy
4th Floor, 1 Atlantic Square
York Street Glasgow
G2 8HS



Date:
17 October
2025

Dear Matt,

Office of Rail and Road (ORR) - CP7 passenger train performance reset: consultation on targets for 2026 to 2029¹

The following can be viewed as Transport Scotland's (TS) response to the above ORR consultation, which focuses on targets for England Wales, notably punctuality ("time to 3") and cancellations (by train services), as well as Network Rail delay minutes per 1,000 miles train travel. Payment rates also feature in the consultation.

The consultation document explains that the key Scotland Train Performance Measure (STPM) is outwith the scope of this work of this reset, confirms that it is for years three to five only of the current Control Period, and does not involve any wider reopener of the ORR Final Determination.

"The Scotland train performance measure is the primary punctuality measure for monitoring and holding Network Rail Scotland to account. As a specific requirement in the Scottish Ministers' HLOS this is not in scope for the reset and there is no change from the 92.5% target set for each year of the control period. We are also proposing no changes to Network Rail's proposed Scotland Cancellations and Network Rail delay targets, which remain consistent with our PR23 final determination and Network Rail's CP7 delivery plan respectively." (page 5)

As a result, TS has only limited comments on the consultation and the questions posed. However, this reset is clearly a significant development for the GB rail network as a whole and there are number of other developments associated with it such as updated Schedule 8 benchmarks and payment rates (the near final versions of which are due to be published in November) and the new East Coast Mainline (ECML) timetable, where Scottish Ministers have a strong interest in both. Furthermore, TS will also have a strong interest in the responses of other parties (notably Network Rail) to this material and to the updated payment rates. Until those are quantified, TS will not be able to provide a definitive view although TS notes the ORR's confirmation (your e-mail of 8 September) that Network Rail's performance forecasts in respect of these measures for CP7 are consistent with the previous iteration.

Although the Network Rail delay minutes per 1,000 miles travel is a success measure and prominent in the consultation, TS notes the ORR view that this is not proving a distraction for

¹ [CP7 passenger train performance reset: consultation on targets for 2026 to 2029](#)

Network Rail in Scotland from STPM and indeed can act as an early indicator of performance. It will continue to feature, as noted in the consultation.

"For the remainder of 2025, ORR will also progress the work required to translate Network Rail's train performance targets for Cancellations (by train services) and Network Rail delay minutes into the financial incentive regime so that this is also ready from 1 April 2026. The affected parties are being consulted directly on the specific changes proposed to the financial incentive regimes (i.e. Schedule 8 and consequential changes to Schedule 4)." (page 7)

Therefore, while our comments are limited, TS welcomes the ORR's offer (discussed as part of our recent meeting on 3 September) to continue to discuss the planned and actual impacts, direct and indirect, of the reset.

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?
As these matters do not directly impact on ScotRail, TS has no comment. However, TS will wish to hear more about what final decisions the ORR expect to take and what impact, if any, that might have on Scotland's railway. One particular area where an indirect impact is expected is in respect of payment rates (where rates have been updated to be accurately representative of costs), and it was noted in discussion that although more deviations could be expected the cost impact will be less (estimated to be 28% less than currently). And, on balance, in respect of freight this is likely to mean reduced costs for freight operators.

TS will be keen to understand the quantified impact of this change.

Q2. Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

As mentioned at our recent meeting, TS would wish confirmation of whether any changes to the assumptions contained in the Independent Reporter Report will impact on the ORR's conclusions, such as the delays on the implementation of schemes funded via the Targeted Performance Fund. TS is aware that any proportional impact would be expected to be slight.

Q3. Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

Similar to Q1 above, TS has no direct comment but again is keen to hear more about what conclusions the ORR expect to reach and again what impact, if any, these may have for the Scotland route.

Next Steps

We are agreed on the need for further engagement with TS Rail Delivery and TS Finance and Corporate Services. Raymond Convill and Carole Anne McDermott (cc-ed) respectively would be the contacts in the first instance.

I am copying this letter to Liz McLeod, ORR.

Yours sincerely,

Lee Shedden.

West Midlands Trains



Response to ORR's CP7 passenger train performance reset – consultation on targets for 2026 to 2029

This pro-forma is available to those who wish to use it to respond to our consultation. Other forms of response (e.g. letter format) are equally welcome.

Please send your response to prm@orr.gov.uk by **5pm on 5 September 2025**.

Please contact Matt Wikeley, Head of Rail Outcomes, at ORR with any queries: matt.wikeley@orr.gov.uk

About you

Full name: Matt Guttridge

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Organisation: West Midlands Trains

Email*:

Telephone number*:

**This information will not be published on our website.*

As part of the CP7 passenger train performance reset, we are consulting on proposed performance targets for Time to 3 (England & Wales only), Cancellations (by train services) and Network Rail delay minutes per 1,000 miles train travel at both a national and regional level. We have done this after assessing national and regional performance plans alongside associated targets submitted to us by Network Rail.

The proposed targets will be used to monitor and hold Network Rail to account in years 3 to 5 of CP7.

Question 1: 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?

West Midlands Trains are in broad agreement with the draft performance targets shared for Network Rail performance between Years 3 and 5 of Control Period 7. As all West Midlands Trains services operate within or through North West & Central region, the basis of this decision is heavily weighted towards the draft targets for this region however the agreement also stretches to those regions to which we also interface (Wales and Western).

It is noted that, of all 5 Network Rail regions, North West & Central were the only region to achieve a ‘Reliable’ score for their forecast submission. Whilst the overall narrative (assessing the figures included with the consultation document) is disappointing and West Midlands Trains would have liked to have seen an improvement and tightening of targets through CP7, these figures at least reflect a reliable base position and over-ambitious targets are not given against a backdrop of a challenging performance environment.

Commenting specifically on the draft targets for NW&C included within the consultation document, these show:

- No improvements in T-3 % are forecast through Years 3 to 5 of CP7
- The largest adverse change to cancellations through Years 3 to 5 of CP7 (compared to PR23 forecast)
- An increase in NR Delay Minutes per 1000 miles train travel through Years 3 to 5 of CP7

Whilst a stagnation in T-3 performance, higher level of cancellations and a deterioration in NR delay minutes/1000 miles train travel is disappointing at headline level, these changes to forecast reflect the current performance landscape more accurately than when the PR23 submission was produced. They also reflect workstreams undertaken since the PR23 submission (both at Network Rail and Operator level) to improve performance as well as an updated set of risks.

West Midlands Trains have welcomed the engagement from North West & Central region to understand updates to the forecast numbers included within the consultation document. These changes would be included as part of the September 2025 submission by Network Rail and show a slightly improved picture compared to those included as part of the consultation.

Of greater concern is the misalignment with industry ambitions for operators to achieve 90% T-3 and 2% Cancellations. Given the proposed targets for NW&C are the most reliable of any region, it is therefore evident the industry has some way to

go to achieve the 90%/2% aspirations. The consultation does note that changes to train crew resourcing principles are not included within the base position, and as a key contributor to cancellations, this ultimately places greater emphasis on these workstreams to seek greater performance benefit.

Question 2: Do you have any views on our assessment of Network Rail's plans and the findings of the Independent Reporter?

The assessment of Network Rail plans and consultation of regulatory targets seems misaligned with the current industry challenge and Secretary of State ambition for operators to reach 90% T-3 and 2% Cancellations. Whilst meeting these aspirational targets was not the remit or purpose of this CP7 Y3-5 re-forecast, this is now a primary focus amongst operators and progress towards achieving this is tracked through Network Performance Board (NPB). A greater challenge for Network Rail to produce a reliable forecast that helps deliver this aspiration and see an improvement in performance over CP7 would perhaps have been a pertinent exercise to undertake.

Question 3: Do you have any other views on the proposed targets for these three success measures in CP7 years 3 to 5?

It is welcomed that there will now be greater alignment between regulatory measures for Network Rail and Train Operators. The current (and historic) misalignment between measures has been inefficient and has diluted focus on improvement activity.

Ensuring a cohesive and aligned set of success measures should be a focus as operators begin to transition into Department for Transport Operator (DfTO) and the beginning of CP8.

The worsening of targets compared to PR23 forecasts demonstrates the challenge the industry faces to improve performance, and the step change needed to meet aspirations of 90% T-3 and 2% Cancellations across operators. This exercise therefore acts as a reminder that the industry needs to continually evolve and innovate to improve performance but also the significant work needed in priority areas such as resourcing, fleet reliability and external events to outperform these targets and seek the improvement all within the industry wish to deliver. Providing realistic, although disappointing forecasts, allows the true scale of the work needed to be fully understood.