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By email

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Dear Paul

Tackling the complexity and burden of regulation

I am writing to you by way of an update following my letter dated 25 June 2025, which described ORR's initial plan to reduce the administrative burden of regulation on Network Rail (NR). This is in response to the Chancellor of the Exchequer's pledge, on 17 March 2025, to drive economic growth by cutting the administrative cost of regulation to businesses by 25% by the end of the current Parliament.

We have been grateful for your team's proactive and positive engagement and input to the process. Progress has been made on the 'quick wins' where the planned phase of activity is now complete.

The joint working between NR and ORR on more complex areas has been particularly welcome. I am confident that the recent collaborative workshops on these will lead to further progress over the coming months, helping to further reduce the administrative burden and improving the effectiveness and efficiency of our engagement.

In this letter I will summarise the progress to date and some further steps, to ensure that benefits continue to be consolidated and monitored.



Progress to date

Quick wins

In my previous letter, I set out some 'quick wins' to be implemented by October 2025, to immediately improve the efficiency and effectiveness of interactions between ORR and NR.

The initial phase of activities is now complete and highlights include:

- Data provision review – reduced NR workload and streamlined data sharing process, by removing or merging 10 redundant or duplicative datasets (6% of total datasets) from the Data Protocol in the current year (Y2 2025-26) and the planned removal of nine datasets from NR's 2026 Annual Return. We have also established the principle of automating data sharing by NR for suitable datasets;
- Streamlined annual reporting – publication of a more concise and focused 2024-25 Network Rail Annual Assessment, with a 70% reduction (93 pages) in the main document and new, short, targeted letters to Network Rail's Regions and System Operator, replacing the previous document chapters. This supports more effective and targeted monitoring and engagement through the year;
- Refined the business planning Re-Forecast (RF) process for Control Period 7 (CP7) – reduced the number of specific meetings and submissions required from NR, in response to feedback from NR and funders; and
- Reviewed regular engagement – introduced consistent meeting principles to share good practice and ensure our interactions continue to drive value.

Full details of all 'quick win' activities to date are set out in the Annex to this letter.

Some quick wins have resulted in "follow-on" activities between ORR and NR that were not identified in the initial planning phase, which our respective project leads are now progressing. For example, we are working on removing at least half of the data provided for the 2026 Annual Return, as that data, or similar data, is already shared via the Data Protocol.

Our teams have agreed to jointly maintain momentum over the coming months, to further embed these improvements and maximise benefits. We will undertake a post completion implementation review in six months' time, to assess progress and benefit realisation against these workstreams and make any necessary adjustments.



Medium and longer-term opportunities

In our June letter we highlighted that some opportunities would be more complex, requiring more scoping to identify meaningful improvements that could be made by the end of the current Parliament.

In September 2025, ORR appointed consultants Arup and Rebel to design and facilitate workshops focused on improving the efficiency and effectiveness of how we work together in specific areas. We are grateful for NR colleagues' support in agreeing the scope of works and the most beneficial subjects to cover, and for their contribution in defining and engaging with the workshops. Early feedback suggests engagement has already generated better discussions in various areas, such as Independent Reporters.

The workshops were in November and covered: ways of working between ORR and NR; requirements arising from interoperability regulations; asset management; and train performance.

Each workshop generated an action plan. Our respective leads for each area will be responsible for implementing the agreed actions and identifying further developments, building on the positive engagement in the workshops. We will continue to closely monitor the workstreams and will use the six-month review described above to assess progress.

The consultants also identified and made recommendations on three overarching opportunities to enhance interactions between ORR and NR:

- improving awareness of specific regulatory processes and guidance, within a robust and targeted regulatory framework;
- better alignment of key contacts to drive more effective and timely engagement; and
- providing greater clarity on the escalation process to resolve concerns or issues.

Our teams are working to define the specific actions that will deliver these improvements. I expect this to planning to be complete by the end of January 2026.



Opportunities requiring legislative change

ORR is currently conducting a post-implementation review of Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGs) on behalf of DfT, which is due to report in August 2026. We have consulted key industry stakeholders on proposals to reduce regulatory burden, including removing Regulation (20), which requires all mainline transport operators to submit an annual safety report to ORR.

Other opportunities identified that require legislative change, such as changes to track access contracts and serving paper notices under the Railways Act 1993, will now fall within Great British Railways' (GBR) remit or be transferred as part of ORR's work ahead of the transition to GBR. We will ensure the work undertaken is fed into upcoming discussions and future legislative reforms in rail, as appropriate.

Next steps

As mentioned above, in summer 2026 we will undertake a post completion implementation review (PIR) to evaluate how well embedded the changes and benefits of the quick wins are in practice. We will also confirm that the actions generated by the workshops have been taken forward appropriately.

We look forward to continuing to work with you on these opportunities.

Yours sincerely

Feras Alshaker

ANNEX – activities for reducing administrative burden

Since publication of the HMT policy in March 2025, we have been working closely with Network Rail (NR) and have implemented a number of ‘quick win’ activities. These are initiatives that were already in progress and/or could be implemented by October 2025, to improve the efficiency and effectiveness of our interactions.

Quick wins

- Transformed the Independent Reporter tracker to streamline the process, reducing the need for additional internal documentation;
- Refined all Independent Reporter documents (e.g. Statement of Works) to ensure they remain fit for purpose and optimise support for key processes;
- Introduced consistent meeting principles to share good practice and ensure our interactions continue to drive value;
- Updated the list of ORR and NR lead contacts across subject areas, for more targeted, consistent and effective engagement;
- Mapped existing ORR and NR business as usual interactions, highlighting opportunities to improve efficiency and promote more effective collaboration;
- Refreshed ORR and NR lead contacts for Managing Change, enhancing consistent engagement and streamlining assurance of (potential) cases;
- Introduced a new project-based approach for Managing Change cases, to support more efficient and timely review and streamlined communication;
- Re-instated regular ORR and NR Managing Change training sessions to support the identification and development of future cases, supporting a more timely and efficient process and improving the consistency of submissions;
- Streamlined the business planning Re-Forecast (RF) process for CP7, reducing the number of specific meetings and submissions required from NR. Levels of engagement for each submission will continue to be reviewed at regular update points through year;
- Refined the Data Protocol for the current year (Y2 2025-26), removing or merging 10 redundant or duplicative datasets (6% of the total datasets);
- Streamlined datasets required for NR’s Annual Return, with the planned removal of nine datasets (6%) from the 2026 Annual Return. Further datasets are being assessed for the 2027 publication;
- Jointly agreed to automate selected Data Protocol datasets/reports from NR, reducing manual workload;
- Introduced a new approach for the 2024-25 Network Rail Annual Assessment, with a shorter main document (reduced from 132 pages in 2023-24, to 39 pages) and new, short, focused letters to Network Rail’s Regions and System



Operator (replacing the previous document chapters), supporting more effective and targeted monitoring and engagement through the year; and

- For ORR's Annual Report of Health and Safety on Britain's Railways 2024-25, replaced the year-end written report to duty holders with a senior level presentation and discussion.