

Feras Alshaker
Director, Planning and Performance



Ellie Burrows
Managing Director, Eastern

Sent by email

26 January 2026

Dear Ellie

ORR response to Network Rail's Managing Change proposal to amend the CP7 Year 2 On Time target for Eastern region

Thank you for your letter on 04 December 2025 and accompanying data detailing a request under ORR's Control Period 7 (CP7) Managing Change Policy (MCP) to amend the Year 2 On Time target for Eastern region, due to the impact of the East Coast Main Line (ECML) timetable change implemented on 14 December 2025.

I am writing to provide an update on our assessment on your proposal, classified as a Consulted Change.

Before moving on to the proposed change, I must respond to two specific points you raised in your letter.

1. Your letter describes access decisions taken by ORR in 2016 to grant access rights to London North Eastern Railway (LNER) and East Coast Trains Ltd (Lumo). In paragraph 5 it suggests that ORR's access decisions at that time substantially drove a requirement to invest £4bn of taxpayer's money to improve the infrastructure on the ECML.

To suggest that the investment was required to accommodate ORR's decisions is factually incorrect. ECML network enhancements had been identified and scoped out as an upgrade programme ahead of these access decisions, and were included in the [2015 Hendy Review](#) which reviewed the Network Rail enhancements portfolio following cost overruns in CP5. The access decisions that ORR took were based on the expected capacity to be delivered by the upgrade programme. Ultimately not all of the upgrades were delivered as anticipated at the time the access decisions were taken, thereby not creating all of the expected additional capacity, and requiring elements of the putative timetable to be reconsidered.

2. In paragraph 13 it suggests that ORR had recently taken a position of disagreeing on whether this change proposal under consideration constitutes a Relevant

Change. ORR has not assessed whether this proposal constitutes a Relevant Change until this letter.

Context

The new ECML timetable is intended to deliver more frequent services, increased capacity and faster journeys. However, with 100 additional trains onto the Eastern network per day, and a more congested railway, we agree with the assessment that a reduction in punctuality performance is likely.

While the potential for change was foreseen during ORR's Periodic Review 2023 (PR23), the final structure and impact of the timetable could not be robustly forecast at the time. The timetable change was therefore explicitly excluded from ORR's PR23 assumptions. However, as part of ORR's CP7 Performance Reset of Years 3 to 5, which concluded in December 2025, we accepted the principle that the timetable would reduce overall punctuality and accordingly determined targets for those years.

Managing Change Policy

Our [PR23 Final Determination](#) set ambitious but realistic targets for Network Rail to deliver the requirements set out in the Government's High Level Output Strategy for CP7. [Government's High Level Output Strategy for CP7](#). When we set the Year 2 (April 2025 to Mar 2026) targets for Eastern region, the impact of the ECML timetable change was excluded, for the reasons set out above.

Our [CP7 Managing Change Policy \(MCP\)](#) provides a framework for Network Rail to respond to changes in circumstances during the control period, ensuring that regulatory outcomes remain realistic and credible, when material factors, such as timetable changes occur. This ensures that changes do not undermine the integrity of settlements, and ORR can make meaningful comparisons across years and regions.

In line with ORR's CP7 Managing Policy, we confirm this change is considered a Relevant Change because:

- It constitutes a change in accountability or funding across Network Rail's Business Units and/or is a change to one or success measures in the outcomes framework or a change to the baseline trajectory for one or more of the success measures;
- The ECML timetable change was explicitly excluded from ORR's PR23 assumptions;
- The timetable change has a material impact on what Network Rail should deliver in operating, maintaining and renewing the network as set out in our final determination (including outcomes set in the final determination and/or their monitoring metrics);

- The industry-wide nature of decision making around the timetable change meant that Network Rail is not wholly responsible for its implementation and some circumstances were outside of its control; and
- Network Rail has provided sufficient evidence that the ECML timetable change materially alters the operating circumstances and that the impact of the timetable change will be sustained over a period of time and is not a temporary fluctuation.

However, based on the evidence provided, and in line with our MCP, we consider that the proposed adjustment to the Year 2 On Time target for Eastern region should be classified as an Exceptional Change, as it risks undermining the settlement of a Network Rail Business Unit - the ECML timetable change was explicitly excluded from ORR's PR23 assumptions and the timetable change causes a material impact to the target of the Eastern region's On Time success measure.

ECML timetable change proposal

As an Exceptional Change, we are attaching conditions to our acceptance of this change, directing a different amendment to the targets to that proposed by Network Rail using the same methodology we used for the recent [reset of performance for the final three years of CP7](#).

Network Rail proposed a reduction of 1.2 percentage points (pp) to the On Time trajectory for Eastern region in Year 2 set out in ORR's Period Review 2023 Final Determination. This reduction is calculated as being a specified percentage of the performance reduction Network Rail expects to see in Year 3. Using Network Rail's calculation, the PR23 Final Determination target would change from 70.4% to 69.2% for the region and the England & Wales On Time target would change from 66.9% to 66.5%.

We have assessed your submission and calculated an alternative reduction for Year 2. We agree that the specified percentage you used to calculate the effect in Year 2 compared to Year 3 was appropriate and therefore used that factor in our own calculation.

However, we retain a different interpretation of the evidence in respect of the timetable's performance impact in Year 3. We have used the same alternative calculation for Year 3 for this Year 2 change, so our methodology is consistent with the trajectories ORR published in December 2025 for the performance reset of Years 3 to 5 of CP7.

Based on following this methodology, the Eastern region's Year 2 target for On Time, set out in ORR's PR23 Final Determination, would reduce by 0.7pp to 69.7%. *Next steps*

Our response will be published on our website before the amended target is then implemented for reporting on Year 2 performance.



We will also let the funder (DfT) know in line with the requirements of the MCP.

Yours sincerely

Feras Alshaker

Director, Planning and Performance