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By email

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Dear Feras

The East Coast Mainline timetable change and relevant changes to success measure trajectories

1. In line with ORR's Managing Change Policy, I am writing to inform you of a relevant change impacting the outcomes trajectories set in ORR's Final Determination for CP7.
2. From December 2025, the East Coast Mainline (ECML) timetable change will offer more frequent services between Newcastle and London King's Cross, faster journeys between Edinburgh and London, and Leeds and London. This will add 16,000 seats per day for passengers along this key corridor.
3. While these changes deliver substantial benefits in journey times and capacity, they also result in a more tightly timed and congested railway, which will affect punctuality. Changing the regulatory outcomes will align regulatory performance expectations with the access, capacity and timetable decisions of the industry.
4. Industry modelling, overseen by a cross-industry forum and informed by previous timetable changes, indicates a -1.2 percentage point impact on the Year 2 On Time (OT) target for the Eastern Region. No significant impact is expected on passenger or freight cancellation metrics. The targets for years 3-5 have been reviewed by ORR as part of the performance reset, but the decisions on those targets do not have any bearing on this managing change proposal.

Context and stakeholder engagement

5. In 2016, ORR granted Access Rights for London North Eastern Railway (LNER) and East Coast Trains Ltd [Lumo] on the ECML. To accommodate both the incremental services and operating the new Hitachi rolling stock, a series of infrastructure interventions were required at a cost of over £4bn. The likelihood of a performance decrement was made clear to the ORR in Network Rail's submission in advance of this 2016 decision.

6. An ECML Event Steering Group (ESG) was formed in 2019, bringing together Network Rail, train operators, and the Department for Transport (DfT) to make transparent, inclusive, and timely decisions on the development of the new ECML timetable, balancing passenger, freight, and funder needs.
7. In February 2024 the ESG closed following ECML Programme Board endorsement on 17 January 2024 to deploy the new ECML Timetable in December 2024, subject to the outputs of the completed performance modelling. However, DfT accepted a recommendation from the Industry Timetable Assurance Project Management Office (PMO) that the ECML timetable change should be deferred from December 2024 to allow further work to deconflict existing access rights and timetable bids.
8. An independently led, executive-level ECML Industry Task Force (herein referred to as “the Task Force”) commenced in June 2024 to provide strategic direction to the ongoing work. The Task Force, including representatives from Train and Freight Operators, ORR and funders, developed solutions to the problems of the new ECML Timetable, drove consensus on the outcome(s), and delivered recommendations for industry funders and specifiers.
9. On 17 October 2024 the Independent Chair of the Task Force wrote to DfT to advise that the Task Force had considered issues and risks for the implementation of the timetable change, including the expected decrement to performance levels. This letter recommended proceeding with implementation of the new ECML timetable in December 2025 to realise the benefits of capacity investment, recognising the trade-off with performance outcomes. Concerns were noted from GB Railfreight (representing themselves and other Freight Operating Companies), ScotRail and Transport Scotland. The Task Force recommendation was accepted by DfT and subsequently endorsed by the Secretary of State in December 2024.

Impact

10. The introduction of the ECML timetable is expected to have a wide-reaching impact across all four Eastern routes. Modelling shows a clear and sustained shift in baseline performance. Based on analysis of previous timetable introductions, we forecast an initial decline beyond the baseline, in the shape of a bathtub curve from the point of introduction in Year 2 of CP7 (December 2025) with recovery back to the baseline over subsequent years. The forecast OT delta for CP7 year 2 (compared to expected performance without the timetable change) is -1.2 percentage points. Calculated based on RailSys outputs, we anticipate reaching a stabilised performance position, -2.3 percentage points lower than the forecast without the impact of the timetable change. The impact in Eastern also impacts the England & Wales On Time trajectory, as shown in Annex A.
11. The ECML timetable change materially impacts the baseline performance that Network Rail and industry can realistically deliver in Year 2 of CP7. Without adjustment, Network Rail will be held to targets for this year that are no longer

credible or aligned with actual conditions, undermining both incentives and regulatory legitimacy.

Safety impact assessment

12. The introduction of new timetables on Network Rail's infrastructure is governed by Standard NR/L2/OPS/031 which identifies any risks to key route safety controls and establishes if these are acceptable as ALARP from the change in services planned. This timetable has been through this safety validation process and no significant risks against the launch of the timetable were identified.

Engagement with ORR

13. In January 2025, during a regular periodic meeting between ORR's Network Regulation and Network Rail's Planning & Regulation teams, it was agreed the proposed case would be considered a 'relevant change' under the CP7 Managing Change policy as it impacts an outcomes target in ORR's Final Determination.
14. On 14 March 2025, Network Rail (East Coast Route's Route Director), wrote to ORR as part of Network Rail's general representation on complex and/or competing applications interacting on the ECML. In section 9 of that letter, we set out the results of the performance modelling, including the expected decrements and the industry's response. Further modelling on the bathtub impact has been shared and discussed with ORR and operators as part of the CP7 reset process.

Assessment of the change against ORR's managing change policy

15. In the CP7 final determination, ORR set success measure targets as point values (rather than ranges) for each year of CP7, stating that this provides clarity on the performance levels ORR will monitor and publicly hold Network Rail to account for. ORR's Holding to Account Policy recognises that there may be fluctuations in performance around the point targets, while the Managing Change policy provides a mechanism to change these targets, to remain ambitious yet realistic, when there is a material change in circumstances.
16. Under the Managing Change policy, Network Rail is responsible for determining if a change is relevant and what engagement is required around the change. We have carried out a thorough assessment against all the criteria in the policy and concluded that the East Coast Mainline timetable change is a relevant change. It is not a normal fluctuation in performance, which could be managed within the Holding to Account Policy. It is a material, persistent change to the realistic level of performance that can be delivered and meets all the criteria for a 'relevant change' in ORR's Managing Change policy.
17. **Changes to regulatory success measure baselines are classified as relevant changes** in ORR's Managing Change Policy. Industry modelling has demonstrated that the ECML timetable change will significantly impact Eastern region and England & Wales' On Time performance, a success measure in ORR's Final Determination, from December 2025 onwards. For changes to success measure trajectories, the Managing Change Policy applies for a material change in

circumstances that was not foreseen in baselines trajectories, likely outside of Network Rail's control and leading to a sustained change in realistic performance expectations in future years of the control period.

18. The East Coast Main Line Timetable change **materially changes the operating circumstances** impacting performance levels. It will introduce over 100 additional trains onto the Eastern network per day, requiring a change in service patterns and reducing dwell times at 7% of LNER's stops.
19. While the potential for a timetable change, and a likely performance decrement, was foreseen during PR23, the decision on the structure of that change had not been finalised (as outlined above) and **the performance impact could not yet be robustly forecast during the periodic review** so it was explicitly excluded from our performance trajectories used to inform ORR's decisions on targets.
20. As ORR is aware from its involvement in the Task Force, while Network Rail is involved in collaborative discussions and planning to make the timetable as successful as possible, the timetable change has been driven by funders to deliver £60m annual revenue benefits and **the final decisions on the structure of the timetable are not wholly within Network Rail's control**.
21. As described above, there has been extensive industry modelling on the performance impact of the timetable change, which has consistently evidenced the step-change in the performance levels that the timetable can support. **The impact is expected to be sustained and cannot be realistically assumed to be recovered for several years, with the impact lasting beyond the end of CP7**.
22. The regulatory performance reset provides a mechanism to recognise the timetable change's sustained impact on performance in targets for years 3-5 of CP7, whereas Managing Change is the appropriate mechanism to adjust the affected Year 2 targets and record a realistic starting position for years 3-5.
23. The Managing Change Policy also enables transparency for stakeholders on targets and Network Rail's performance against them at any point in time. ORR's public reporting is the primary tool for providing transparency on Network Rail's targets and performance, so providing clarity through this reporting is essential.
24. Performance against regulatory targets will be interpreted primarily through headline outcomes, i.e. whether targets are "met" or "missed". Failing to reflect such a material change in circumstances within the point targets ORR reports against would be misleading and confusing, and undermines the clarity ORR intended to provide by setting annual, regional point targets in the final determination. The message sent by comparing to an inappropriate target suggests poor performance regardless of the supporting commentary.
25. Without an adjusted target, Network Rail (and the industry) will be seen to have "failed", even if delivery is consistent with revised operating conditions. Equally, if there is genuine under-performance, it is important to separate that from the impact of the timetable change so that Network Rail and industry can be publicly held to account as ORR intended with its CP7 settlement.

26. Holding Network Rail to unadjusted targets in these circumstances could even weaken incentives to achieve the target this year, with potential spillover onto the credibility of targets more generally. As the change is happening during Year 2 of CP7 (as is the nature of timetable changes which happen at two given points in any year), the impact on incentives for delivery over this financial year is limited compared to if the change was made before the start of the year. However, incentives, monitoring and reporting against a realistic and credible target is still vital to support proportionate assessment of performance and to maintain the correct historical record of the actual performance compared to target.
27. In addition to reporting and monitoring for this specific change, the Managing Change policy commits to treating similar changes consistently through the control period (unless there are good reasons for differences). It is important to recognise that this change is relevant, and that changes of a similar materiality and nature would be relevant in the future, to avoid discrediting the Managing Change Policy and undermining its legitimate place in the regulatory framework.

Next steps

28. The East Coast timetable change is clearly a 'relevant' change under the criteria within the policy. Given the scale of the operational impact, the limited control Network Rail had over the final timetable specification, and the unique transitional nature of this year, there is strong justification for a one-off adjustment which is consistent with ORR's Managing Change policy.
29. Network Rail has been clear on this conclusion through multiple discussions with ORR, as part of the consultation and engagement the policy requires. Over these discussions, ORR has not disagreed with us on whether the change is relevant until recently or offered robust explanation of why the policy would not apply.
30. Failing to update baseline trajectories would conflict with ORR policies aimed at clarifying realistic performance expectations for Network Rail and the industry. It also risks discrediting the regulatory process and the managing change policy, as unrealistic targets damage credibility of the regulatory framework and erodes stakeholder trust.
31. In line with ORR's Managing Change Policy, we can provide further supporting information on this change as required, to enable ORR to provide a timely formal opinion on the change.

Yours sincerely

Ellie Burrows
Regional Managing Director, Eastern

Annex A: Proposed target update

| On Time targets | | Year 2 |
|------------------------|----------------------------------|---------------|
| Eastern | Final Determination October 2023 | 70.4% |
| | Proposed change October 2025 | 69.2% |
| England & Wales | Final Determination October 2023 | 66.9% |
| | Proposed change October 2025 | 66.5% |