

Responses to the [April 2023 consultation](#) on proposals to modify Network Rail's network licence requirement on timetable publication

ORR has redacted all personal data from these responses

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*Serco Caledonian Sleepers submitted a response to the consultation but asked for its response not to be published

Arriva Trains (UK) response to ORR's initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Yes, at Arriva Trains we do not believe that the change is in the interest of the Customer and therefore do not want to see any changes and by implication there is no need to change the text in the Network Code

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

Yes, at Arriva Trains we believe there will be severe impact for customers/end users. We want to see longer booking horizons so that customers can take maximum advantage of Advanced Booking tickets and we see 12 weeks as a minimum that we want to maintain and in the future even extend. We want to offer customers the opportunity to book travel for their long distance journey at the same time as for instance Hotels, and to do this we need to open up the booking window NOT reduce it.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

No, at Arriva we do not support the change from 12 weeks to 8 weeks and as such do not endorse a change in definition

Response publication redaction

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

Publish response

Publish redacted response removing any commercially sensitive information

Do not publish response

About

This section allows you to input information about yourself and/or your organisation. All of the fields are optional, except your email address which we will use to contact you if we require more information relating to your response. Any personal data that you provide will be processed in accordance with ORR's privacy notice (www.orr.gov.uk/privacy-notice).

5. Full name

[Redacted]

6. Responding on behalf of an organisation/group or as an individual? (please provide organisation or group name)

Arriva Trains (UK)

7. Email address

[Redacted]



Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Avanti West Coast

Email*: [REDACTED]

Telephone number*: [Click or tap here to enter text.](#)

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

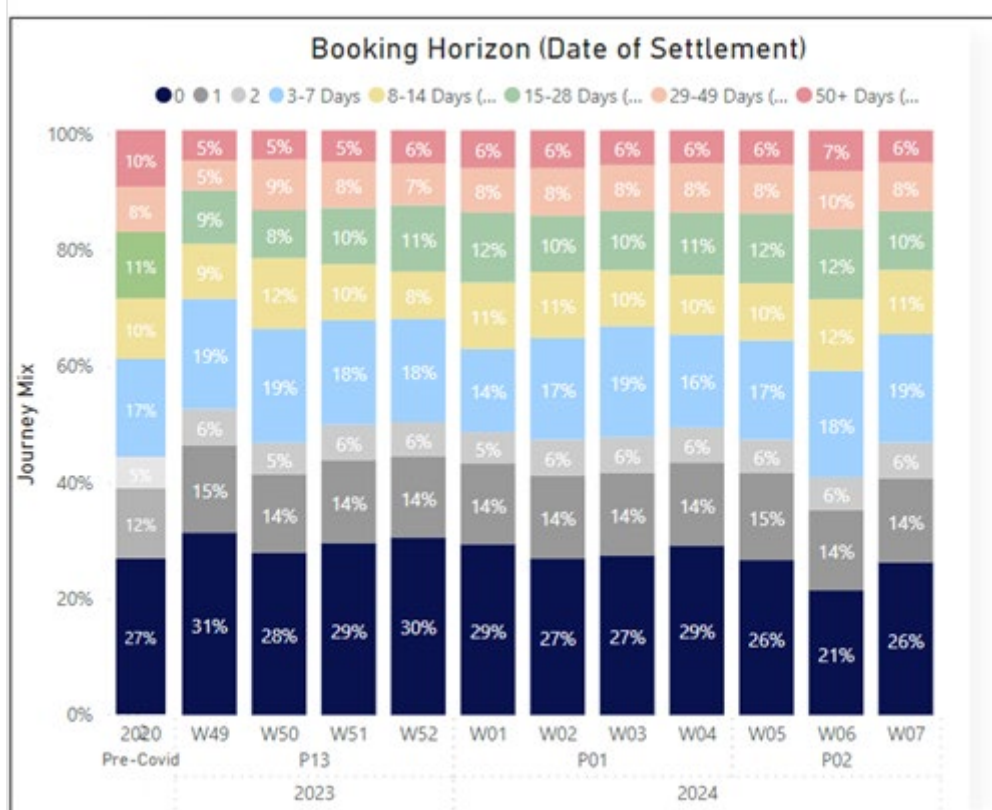
Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

We support this simplification, with the Network Code being the single reference to the contractual timescales. We note that this does not change the current contractual timescales, and we will be keen to fully engage with future consultation on proposed changes to the Network Code.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

The current percentage of customers booking between T8 and T12 is currently only 3.1% of reservations, pre-pandemic it was still only 4%. The chart below shows the current proportion of bookings at various points before travel.



This low percentage would suggest there would be minimal impact on revenue or modal shift opportunities of having a T8 provision instead of T12.

If, however, rail booking horizons could be extended out to T24, this would be the point at which we would be able to compete more effectively with airlines on long distance journeys. In 2019, we were able to open reservations 24 weeks prior to the travel date. The result of this was a 50% increase in revenue, from additional journeys we believe would not have been made by rail had the early booking opportunity not been available.

The industry-wide project currently underway with Operators and Network Rail will allow unvalidated timetables to be published at T12. This, in association with the timetable comparator tool, should allow TOCs, in the majority of cases, to release tickets for retail at T12 in any case. This should mitigate the impact of the Informed Traveller timescales being maintained at T8.

Maintaining and growing customer confidence, whilst continuing to confirm timetables later than twelve weeks in advance, is dependent on fit for purpose systems to support with validating and checking timetable publication. Any changes must be communicated to customers reliably using systems such as the timetable comparator tool.

On busy, multi-operator routes, such as the West Coast, changes to timetables, for example due to engineering work, are regularly subject to variation on timetable validation post-bid. This will therefore be after the unvalidated publication under the industry-wide project mentioned above. On this basis it is not only key, that between Operators and NR, complex short-term changes to timetables can be validated and finalised as efficiently as possible, but, that changes to bids are flagged to Operators expediently to ensure customer awareness during the advanced retailing of tickets.

Proposed modification of definition: “Relevant Timetable Changes

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

We work to this assumption but have no concerns if this should be explicitly referenced. We are keen to work closely with Network Rail to improve customer information and our customers’ ability to plan ahead with confidence.

Publishing your response

We plan to publish all responses to this consultation on our website. Should you wish for any information that you provide to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily 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.

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If you are seeking to make a response in confidence, we would also be grateful if you would annex any confidential information, or provide a non-confidential summary, so that we can publish the non-confidential aspects of your response.

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 General Data Protection Regulation and Data Protection Act 2018.

Consent

In responding to this consultation you consent to us:

- handling your personal data for the purposes of this consultation; and
- publishing your response on our website (unless you have indicated to us that you wish for your response to be treated as confidential as set out above.)

Your consent to either of the above can be withdrawn at any time. Further information about how we handle your personal data and your rights is set out in our privacy notice.

Format of responses

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Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Bexhill Rail Action Group

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Bexhill Rail Action Group is neutral on the technical question of harmonising industry practice timescales with Network Rail's licensing conditions, but opposes any reduction in the 12-week requirement for finalisation of timetables.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

BRAG supports maintenance of the existing 12 week notice requirement for a number of reasons: (1) We represent a community on the south coast, and many

outbound journeys are longer-distance and therefore planned in advance. This is equally the case for business, commuting and leisure travel (2) Our local economy is also dependent on inbound visitors, and stakeholders require as much notice as possible if there is to be disruption to leisure traffic over summer/bank holiday weekends e.g. due to engineering blockades (3) Many Advance tickets increase in price closer to travel dates, so it is possible to envisage differences in fares if tickets on some routes are available before others.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response. No

– not if this entails a reduction from the existing 12 weeks – see Q.2

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- 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.

From: [REDACTED]
To: [Licensing Enquiries](#)
Cc: [REDACTED]
Subject: [EXTERNAL] Opposing timetable shortening
Date: 10 May 2023 16:58:10

To the proposers of the modification to Network Rail's network licence requirement on timetable publication,

I'm the CEO of UK travel tech start-up, [Byway](#). At Byway we are fighting travel's impact on the climate by making flight-free travel simple. This proposal goes against everything we're trying to do.

Eurostar services to and from Britain are open for booking up to 330 days in advance, and many of our European counterparts open services for booking six months in advance. Many airlines open bookings a year in advance.

In order to reduce the amount we rely on air travel for holidays, we need to make booking train travel easier, not harder! The proposal to reduce the booking window for UK rail not only hinders planning holidays within Great Britain and from GB, it also makes it significantly harder to cater for international visitors coming to GB.

Our European counterparts open bookings long in advance, so do airlines. If we want to reduce the carbon impact of tourism we need to make it a lot easier and more competitive to take overland transport, and that means allowing bookings well in advance.

Advance bookings allow travellers to secure the best accommodation options and not suffer expensive last minute booking prices or finding destinations booked up.

This move will likely see travellers booking flights from London to Edinburgh because that's what's available when they're planning their holiday, or even avoiding UK holidays altogether. This has a material impact on the climate at a time where we need to be supporting and facilitating flight-free alternatives more than ever.

Please reconsider this proposal and instead consider how Great Britain can compete with the superb rail offerings in Europe, for example requiring all train operating companies in Great Britain to release draft timetables one year in advance and have final versions of timetables available six months in advance with bookings open at least 180 days prior to travel.

Thank you, and please don't hesitate to reply for further information or a conversation,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Campaign for Better Transport's response to ORR's initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Campaign for Better Transport does not feel that the consistent failure to meet the T-12 requirements is sufficient justification for introducing T-8 instead. The focus should be on addressing the problems which prevent the current timeliness requirements being met. This, combined with the changes to the licencing text as proposed, could set a concerning precedent. If T-12 is unachievable, what if T-8 is also? Should it then be reduced to T-4? Simplifying the process would run the risk of alterations for the benefit of operators and Network Rail, and therefore be detrimental to the 'Informed Traveller' principle.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

Campaign for Better Transport believes that reducing the time period in which passengers can book their journeys will be damaging to both leisure and business travellers.

It is natural for both companies to plan business trips and people to plan holidays several months in advance of their proposed departure date. In both cases there is an instinctive belief that flying is both cheaper and faster than going by train. Restricting the ability to book in advance will further embed aviation as the go-to mode of travel. Furthermore, individuals who premise their future travel plans on current timetables will suffer inconvenience and disruption if the train they proposed to take is not in fact running when they have an opportunity to book. Across Europe, travellers can book trains four months in advance. According to Omio Group, this has contributed to a 20% increase in rail bookings post-COVID.

If the ORR and train operating companies are serious about not only restoring passenger numbers to pre-pandemic levels, but growing rail use, they must make it easier to book train tickets and build confidence in reliability, rather than taking this counter-productive step.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

N/A

Response publication redaction

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

Publish response

Publish redacted response removing any commercially sensitive information

Do not publish response

About

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5. Full name

[Redacted]

6. Responding on behalf of an organisation/group or as an individual? (please provide organisation or group name)

Campaign for Better Transport

7. Email address

[Redacted]



Response to ORR’s consultation – Initial consultation: proposals to modify Network Rail’s network licence requirement on timetable publication

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Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]
Job title: [REDACTED]
Organisation: Community Rail Network
Email*: [REDACTED]
Telephone number*: [REDACTED]

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

Please include this information in the published response:

[Community Rail Network](#) supports those working and volunteering in community rail and their partners. It shares best practice and connects community rail partnerships and groups together, while working with governments, the transport industry and voluntary sector to champion community rail and shares its insights on sustainable and inclusive transport.

Community rail involves working with train operators, local authorities, and other local and transport partners to involve communities with their railways and stations, promoting sustainable travel, social inclusion, and tourism, helping communities to have a voice on rail and transport development.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

No comments at this stage.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

1. The community rail movement is heavily invested in promoting leisure travel and tourism by rail. Rail tourism allows people to travel without adding to traffic congestion and pollution, offers a sociable, inclusive, and enjoyable travel experience, and provides opportunities for supporting tourist attractions and local businesses to boost economies.
2. Given the widespread acknowledgment that transport emissions must be cut to help tackle the climate emergency, rail-based tourism has the potential to emerge as a sustainable alternative to car and air-based tourism, as it provides a significantly greener option for the medium-length distances associated with domestic tourism, 80% less emissions than car use, and an 84% reduction compared to domestic flights. The need to encourage and enable this modal shift is a key priority within the Department for Transport's Transport Decarbonisation Plan, and its importance has been recognised by the Climate Change Committee, independent Net Zero review, and a wide range of transport academics.
3. Community Rail Network is encouraging community rail partnerships and groups to seize the opportunities linked to the increased domestic tourism market by identifying their local tourism offer and working with partners to promote it to leisure visitors. The local knowledge held within community rail, and its local links, gives partnerships and groups an advantage in building positivity and interest in their line and attracting visitors.
4. For example, to help to encourage a return to rail, and greater numbers of leisure travellers, many community rail partnerships and groups have engaged with Community Rail Network's 'Days Out by Rail' campaign. This project urges visitors to discover Britain's community railway lines and stations by providing inspiring ideas through themed itineraries, promoted via our tourism website, Scenic Rail Britain.

5. All community rail-related tourism promotion is at least somewhat dependent on people being able to confidently plan rail travel well in advance of making their journeys, and not releasing timetable and ticketing information and offers far enough in advance makes this process more difficult. This is exacerbated if such planning involves links with other travel modes or stays and/or visits that help to support the economies of the places they are visiting, e.g. accommodation bookings, tickets to visit local attractions etc.
6. **Therefore, we are concerned that any reduction in the forward planning window for journey planning and buying tickets, e.g. from 12 weeks to eight, could make this process less convenient, and could potentially lead people to choose to travel by car as a seemingly easier and more dependable travel option. Were this to happen, all of the sustainability benefits outlined above, would be lost.**
7. We note the point made at 3.14 in the consultation document, which states that majority of passengers purchase tickets within the eight-week window before they travel. That suggestion is reassuring, but we also note the point made in 3.9, which states that neither Network Rail nor passenger operators have met T-12 consistently for a number of years. If T-12 were to change to T-8 and slippage were still to occur, for whatever reason(s), then this could have the potential to reduce the journey planning and ticket buying window for leisure travellers more significantly, which as stated above, would impact negatively on work/projects with community rail.
8. This negative effect may be tempered by the impact of the Smarter Information, Smarter Journeys (SISJ) programme as outlined in 3.12, but we would need to see further evidence as to the success of this programme in minimising disruption to leisure journeys.
9. We will consult our community rail partnership members on this, and other elements of these proposed modifications, ahead the statutory consultation later this year, when we would envisage submitting a more detailed and informed response.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response. No
comments at this stage.

Publishing your response

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Consent

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Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: CrossCountry Trains

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Removing explicit reference to T-12 from Network Rail's Network License and instead pointing the timeline for publication to that stated in the Network Code is a pragmatic way of being more adaptable to future change.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

The publishing of timetables as early as possible is preferable to facilitate advanced planning for our customers, particularly given the strength in the leisure market currently. The ability to book in advance gives customers more choice, especially where other modes of transport are required (flights, bus interchange etc) and provides confidence that our services are an attractive choice for their journey. Reducing the time available for customers to book advanced journeys could have the effect of people choosing alternative modes of transport away from rail and could suppress post COVID recovery.

The technology solution of a timetable comparator tool, introduced by the Smarter Journeys, Smarter Ticketing Programme gives the possibility of continuing to open advanced purchases and seat reservations at, or close to, T-12, irrespective of the timeline imposed on Network Rail publishing final timetables through its license. The tool is still in its infancy and there is more work required on the process involved in its use. The tool is being used at CrossCountry to open some services up for advanced purchase and reservation purposes between T-8 and T-12 and is being trialled and used at other train operators, though not all at this stage.

The timetable comparator tool does offer a potential solution to moving timetable publication dates of final timetables later than T-12 (and earlier in some situations) but would carry the risk of requiring Network Rail to undertake a process it is not mandated or regulated to do, i.e. publish the draft timetables at T-12 unvalidated even though the Network Code would be updated to reflect final timetables to be published at T-8 as per the proposal. The use of the timetable comparator tool could reduce the impact on the customer and potential revenue loss of the later publication. CrossCountry would support the moving of the publication of final timetables to T-8 only if the process surrounding the use of the tool, particularly that of Network Rail publishing the draft amended timetables at T-12 (or close to T-12) unvalidated, is worked into the Network Code as something Network Rail must undertake on a weekly basis.

In 2019 (the last full year pre COVID), on average ~75,000 reservations were made on CrossCountry services per month before T-8. This equates to ~6% of total reservations per month. While a small percentage of overall reservations, it does show there was an appetite amongst customers for early booking. Numbers of reservations pre T-8 post COVID remain suppressed, likely due to reservations not being open before T-8 until recently and Industrial Action pushing confidence in

booking reservations to later timescales. There are indications that the desire to book tickets earlier is returning, especially given the recovery in leisure travel.

The planning of journeys across the rail network needs to be enabled across all Operators at the same timescale to enable end to end journey bookings. In 2019, ~10% of tickets and reservations booked at CrossCountry per month were to and from locations off the CrossCountry network (this has dropped to ~5.5% in the last 12 months). There is a link between customers being able to book an end-to-end journey at the point of sale, pre or post T-8, and that the industry needs to be aligned to reduce any risk of revenue loss and suppressing growth.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response. CrossCountry agrees with the inclusion of publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes” within the Network License.

Publishing your response

We plan to publish all responses to this consultation on our website. Should you wish for any information that you provide to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily 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.

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Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: DB Cargo (UK) Ltd.

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

DB Cargo welcomes the opportunity to respond to this consultation. It is acknowledged that the industry cannot continue to be non-compliant with the Network Code. There have been pressures on the Train Planning community since the on-set of the Coronavirus pandemic and in the case of the Informed Traveller (T-12) process for considerably longer. Fundamental changes to the WTT and Informed Traveller processes could increase these pressures yet further through introduction of a further Timetable Change Date per annum.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

DB Cargo supports the proposed licence modification text, which will ensure alignment between the Network Code and the licence condition.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

DB Cargo has concerns with regard to the impact of compressed planning timescales. Freight operators have seen a variable quality of "Offer response" associated with WTT changes. The level of rejected bids has frequently been a concern and compressed timescales are likely to mean there is insufficient time to expedite the dispute process and achieve meaningful remedy. Whilst the flexibility specifiers and funders are looking for is understood, it does appear ironic that the proposed solution for delivering a reliable and high-performing mixed-traffic railway is to compress the current train planning timescales.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

DB Cargo is content with the proposed additional wording.

DB Cargo notes in the first two paragraphs of the Summary section of the consultation references to "Train timetables" when it should be referring to "Railway timetables". As the safety and economic regulator, the industry rightly expects the ORR to uphold standards, including the presentation of consultations.

Noting the comments in 3.9, DB Cargo wishes to respond that along with some other freight operators it continues to be compliant with the Informed Traveller (T-12) process, despite the fact this is causing additional churn. Why has there been no enforcement action from ORR?

DB Cargo is concerned to note the current industry culture around "late change" so far as disruptive possessions for maintenance is concerned. It is unclear what impact the BTPF changes and compressed planning timescales will have, but the current situation is unsatisfactory. It is resulting in a failure to meet the reliability and performance needs of freight operators and their customers.

Publishing your response

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About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Disabled Persons Transport Advisory Committee

Email*: [REDACTED]

Telephone number*: [REDACTED]

**This information will not be published on our web site.*

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

DPTAC found this a challenging consultation to respond to, given the extensive use of, often unexplained, technical terms and language in the consultation document. As such we think it worth summarising our understanding of the consultation its context, as this has formed the basis of our response.

Our understanding is that this consultation seeks preliminary stakeholder views (ideally with supporting evidence) on the proposal that Network Rail's 'Network Licence' should be changed so as state that National Timetable publication dates would be aligned with the Network Code rather than specifying that they should be available twelve weeks before travel, as is the current position. This is in the expectation that Network Rail, in line with recommendations emerging from the 'Better Timetables for Passengers and Freight'(BTPF) programme, will seek agreement from the ORR in due course to amend the Network Code requirement for the National Timetable to be published 12 weeks ahead of travel (T-12) to 8 weeks ahead of travel (T-8). As such, the consultation also seeks views on the potential impacts on passengers of moving T-12 to T-8. This preliminary consultation will be followed by two further formal consultations on the required changes to the Network Licence and Network Code respectively.

In isolation, the proposed change to the Network Licence to align it with Network Code, as set out in section 4 of the consultation document seems sensible; there is a clear need for alignment between the Network Licence and the Network Code, and the proposed change removes the need for changes to the Network Licence should the Network Code change in the future. This is essentially a procedural change and we do not see any impacts on accessibility as a result of the proposed change.

However, the proposed change is in anticipation of Network Rail ultimately seeking agreement for the Network Code to be amended to require timetables to be available at T-8 rather than T-12. The far more important issue, therefore, is whether moving from T-12 to T-8 will benefit or disbenefit passengers and, in the context of DPTAC's specific responsibilities, what the benefits and disbenefits of such a change would be for disabled people. In that context, this consultation seeks to anticipate the expected follow-on consultations focussed on the changes to the Network Licence and Network Code required for any move to T-8 by seeking views and evidence on the potential impacts on passengers.

Question 2 of this consultation focusses on this issue, and we will provide our initial views in response to that question. However, in anticipation of the likely further consultations, we thought it worth making some general contextual observations at this stage.

Firstly, the premise for moving to T-8 appears to essentially be predicated on the basis that Network Rail has been unable to comply with its existing regulatory requirement to publish the National Timetable at T-12 and that T-8 would offer a more sustainable and deliverable regulatory obligation.

Against this backdrop, we would have expected a much fuller explanation of the short- and long-term factors that had resulted in T-12 being undeliverable and a more detailed explanation of the concomitant passenger benefits that would accrue from moving to T-8. In this context, the benefits set out in paragraph 2.10 of the consultation (and supported by the information in Annex A) were neither clear nor compelling. We were unsure, for instance, what was meant by 'greater emphasis on governance to ensure safe timetabling', why a move to T-8 was needed to achieve this, and what the benefits would be from a passenger perspective. Similar questions were present around the other elements of the rationale for moving to T-8 developed through the BTPF and set out in paragraph 2.10.

We would also have expected the consultation to have provided more information on the likely sustainability of a regulatory obligation based on T-8, given recent experience with T-12. Given this background, what will prevent Network Rail from failing to comply with a new T-8 obligation, thus undermining or eliminating the potential benefits associated with this change?

This is particularly so, given that the underlying rationale for moving to T-8 seems to be the inability to deliver T-12. If there is consistent failure to deliver T-8 then it is easy to foresee a proposal to move to T-6 or T-4, using the same rationale as the proposed move to T-8.

We would finally note that this consultation seeks evidence from stakeholders relating to the proposed changes. In reality, many stakeholders are unlikely to have detailed evidence to submit, whilst TOCs/RDG and Network Rail do have access to relevant data. However, the consultation does not contain any analysis of the data available beyond a link to correspondence with RDG suggesting that only 3% of passengers buy tickets more than six weeks ahead of travel. By contrast the link to research by Transport Focus provided quite a lot of useful and relevant data.

In summary, we did not believe that this consultation provides the level of detailed information and analysis necessary for stakeholders to offer informed views on the proposed changes. In our response to question 2 of this consultation we provide a summary of the additional information that it would be helpful for the planned follow-on consultations to include.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

DPTAC does not have any specific evidence of its own relating to this question, but

we have, however, looked at the Transport Focus research referenced in the consultation document. This provided some interesting insights into passenger behaviour and preferences. In line with evidence supplied by RDG, the research found that the majority of passengers planned their journeys and ticket purchases within six weeks of departure. However, in contrast to the RDG evidence, the research suggested a that a much higher proportion of passengers planned their journeys more than six weeks in advance of departure. This was particularly so for the leisure market, rail's fastest growing market, where 20% of passengers planned their journey 10 or more weeks ahead of travel and a further 19% planned their journeys 6-9 weeks ahead of travel. Reflecting this around two thirds of passengers wanted accurate timetable information to be available in journey planners 12 or more weeks ahead travel.

The Transport Focus report did not provide any breakdown of the research by disabled and non-disabled respondents but it is clear from the demographic breakdown contained in the report that respondents were asked if they had a disability (23% of respondents identified as having a disability). It should, therefore, be possible to disaggregate the research results to provide additional insight into whether disabled respondents displayed different behaviours and preferences to non-disabled respondents. Such information would be highly relevant to any Equality Impact Assessment of the proposed move to T-8 and would also form a very helpful component of the planned follow-on consultations.

In the absence of any disability-specific evidence it is nevertheless possible to put forward some reasoned opinion based on the evidence available. Firstly, there is no reason to suppose that disabled travellers plan their journeys and ticket purchases in shorter timeframes than non-disabled travellers. On the contrary, it seems reasonable to suppose that some disabled people at least plan their rail trips further in advance than non-disabled people because their journeys may require more detailed planning due to accessibility issues (such as needing to ensure that they have secured a wheelchair space for instance).

In such circumstances, some disabled people may only feel sufficiently confident to use the rail network if they have planned their journeys some considerable time ahead of travel. On this basis, our initial view would be that moving to T-8 will impact on the ability of some disabled travellers to plan their journeys and purchase their tickets in confidence. However, in this context, it is worth re-iterating that the disaggregation of the Transport Focus research evidence would provide a more substantive insight into this question.

However, it is also worth highlighting that it also seems reasonable to assume that disabled people have been disproportionately affected by the industry's inability to

deliver T-12. The frequent unavailability of timetables 12 weeks in advance coupled with the material probability that even published timetables would be subject to change as a result of cancellations of or amendments to scheduled services is likely to have impacted on some disabled people's ability to plan their journeys with confidence. This would have been compounded by the problems caused by late changes to and cancellations of services.

From an accessibility perspective this poses something of a dilemma as there are potential downsides associated with both moving to T-8 and remaining with T-12, given the industry's currently inability to deliver in line with its regulatory obligations.

However, this consultation does not provide sufficient insight or information for us to take an informed view on this issue. In order to allow a better-informed view to be taken from an accessibility perspective, it would be helpful if the planned follow-on consultations provided:

- a better understanding of the current position with T-12; in particular why it has proved difficult to deliver and what the impacts have been on passengers (what proportion of trains services have not been available at T-12 and what proportion were affected by cancellation/amendment post publication for instance);
- the extent to which the problems with T-12 have been short-term, Pandemic-specific issues and to what extent they reflected longer-term, more fundamental issues;
- the passenger benefits that can be expected from moving to T-8;
- more insight into the behaviours and preferences of disabled people based on disaggregation of the Transport Focus research;
- more detailed analysis of the evidence available to TOCs and Network Rail.

Given Network Rail's PSED obligations, we would also expect to see a robust Equality Impact Assessment of the proposed changes.

Two final views worth putting forward are:

- This consultation effectively assumes that there will ultimately be a binary choice between T-12 and T-8. However, there is potentially a third option, which is to move to T-8 for a period of time to stabilise performance, but to then consider a return to T-12 once performance had stabilised and the industry felt confident that it could deliver T-12. The proposed change to the Network Licence would facilitate this approach.
- On the evidence available (mainly the Transport Focus research) there is no case for any shorter timeframe than T-8, and the planned future consultations should make it clear that no further reductions beyond T-8 are planned.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

This appears to be a technical change to the definition of ‘Relevant Timetable Changes’ to specifically include Working Timetables within the definition. This seems to be a sensible change without any implications for accessibility, so we have no comment to make on the proposed change.

Publishing your response

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To: Licensing Team
Office of Rail and Road
25 Cabot Square
London
E14 4QZ

(By email only)

23rd May 2023

Dear Sir/Madam,

Re. Initial consultation on industry proposals to modify Network Rail's network licence requirement to publish a timetable 12 weeks in advance of services running

Network Rail's BTPF proposal (PfC120) will move the industry towards three opportunities per year to make coordinated changes to the working timetables. As a consequence, timescales for the whole timetable planning process will be shortened. One of the key changes is that the final confirmed timetable would become available eight weeks in advance of train services running in a timetable instead of twelve weeks (the Informed Traveller).

EMR welcomes the opportunity to respond to the ORR's 'initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication' issued on 25th April 2023. EMR understands that the ORR is looking for evidence of; i) how finalising a timetable with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets and ii) how passengers and end users might be affected by a reduction in the notification period for timetable changes from twelve to eight weeks.

EMR's comments below are based on the consultation and some of the points raised in the document.

- 1) **With reference to Para.9, '*....., is that a significant majority of passengers purchase tickets within the eight-week window before travel and that the industry has made notable progress in communicating with ticket holders about timetable alterations affecting their booked train. Before considering the licence modification or the industry-proposed Network Code change, we have decided to conduct this consultation to give consultees (including passenger representative groups) the opportunity to provide further evidence***
 - Whilst most customers do book within 8 weeks of departure, there are still a reasonable number who book between 12 and 8 weeks. For Advanced Purchase tickets, a considerable number of bookings a year are made between T-12 and T-8, which is around 3.5% of all EMR's Advanced Purchase bookings. There are bookings for flexible tickets without reservations on top of this which we do not have any data. This number is expected to be higher if Network Rail were meeting the T-12 deadline now, whereas currently weekend dates generally are not getting released for bookings until T-8.
 - There is a mention in the consultation document that 'passengers have a range of needs and that some may research their travel options earlier than when they purchase their tickets'. For flights, holidays, and Eurostar etc, people tend to book in advance and would research their travel

options. Therefore, finalising the timetable with fewer than 12 weeks' notice would deter customers from considering using rail in their travel options.

- The industry should be looking to improve on the T-12 window, rather than having it shortened. The move of replacing the reservation system from NRS to RARS was supposed to be the first step in this improvement process. With the NRS, we could open no longer than T-12. Now with the RARS in place, we could theoretically increase the booking window beyond T-12 and that was the assumption by train operators when the RARS was introduced. However, this consequence stemmed from the BTPF programme has taken the industry backward in this respect.
 - EMR acknowledges that a lot of development has gone into being able to send proactive communications to customers when their booked services have subsequently been changed in the timetable. However, some of these technology and scope are still being developed and is not mature enough to mitigate the risks of slipping timetable confirmation from T-12 to T-8.
- 2) **With reference to Para.3.11, '*....BTPF Network Code proposal states a draft timetable would be produced and published at twelve weeks for train operating companies to use that information....*'**
- EMR has concerns with this concept of uploading unvalidated timetable information at T-12 for passengers to purchase tickets with a lack of confidence that the services they book will not be changed. The travelling public are reliant on accurate information well in advance of their journey. The plan to upload unvalidated timings at the Informed Traveller timescale before they are finalised is likely to cause problems to passengers and train operators with much more late change to correct errors and upload validated schedules. This would potentially increase workload not just on Timetable & Resource planners, but also on Marketing and Revenue teams to track and trace customers who have booked tickets with incorrect details.
 - EMR has the ability to contact customers about timetable changes if they have bought tickets 'online'. For customers buying at ticket offices or TVMs etc, there is no current solution for keeping them updated on changes to their bookings. There are currently systems on various retailers that can identify and notify customers of changes to times only, but not changes to the rolling stock which could have an impact on their travel. Also, the current technology can only identify customers who purchased their tickets online, but not all passengers can be contacted.
 - In EMR's opinions, this decision to move timetable confirmation from T-12 to T-8 will damage rail's competitiveness as a mode, particularly for long distance operators. Informed Traveller is crucial to keeping rail competitive with other modes over long distances and there have long been calls to extend the booking horizon to be comparable with bus and air travel and at the very least to match the hotel/hospitality industry so people can actively choose rail as their mode of travel at the point of booking their leisure activity with confidence.
 - As commented previously, people tend to book in advance and would research their travel options when they look for holidays, flights, Eurostar etc. If it is not guaranteed that all passengers who have booked tickets could be notified of major changes to their services, some passengers could miss their connection as a result, and will have no confidence in planning their travel by rail. Therefore, opening the booking for ticket sales before the timetable is confirmed is a risk to the business and could potentially lose public confidence and reduce customer satisfaction.
 - EMR believes that the focus should be on Network Rail improving its planning and timetable validation process and quality rather than expecting customers who book early to accept their plans may often change. As an industry, we should be holding Network Rail to account to meet their agreed targets of T-12, and then looking to extend these to improve the customer experience.

3) **With reference to Para.3.12, ‘...the industry Smarter Information, Smarter Journeys (SISJ) programme, which was established at ORR’s request, is specifically tasked with improving customer information both during unplanned disruption and other timetable changes which affect when trains run. The programme has already delivered the capability for retailers to notify passengers automatically who have booked tickets online if their trains are cancelled or changed....’**

- We acknowledge that the SISJ programme has already delivered the capability for retailers to notify passengers automatically who have booked tickets online if their trains are cancelled or changed. However, there are still many passengers purchasing their tickets at booking offices or via TVMs and the current technology or systems are incapable of identifying those customers who do not book their tickets online. Therefore, this has not increased our confidence to publish ‘unvalidated’ timetables for opening up bookings. Also, customers could become annoyed with constantly getting their bookings changed and would avoid booking before timetables are confirmed.
- EMR has concerns about the maturity and scope of the technology being used to enable the reduction in notification of timetable changes from T-12 to T-8. As mentioned above, there are some changes already not being communicated to customers through the SISJ comparator tool e.g. seat changes and it only covers online sales, so a reasonably high proportion of bookings may be subject to change with no way of communicating that to customers. Furthermore, the technology we currently have is limited and incapable of helping with the rebooking if passengers booked services are cancelled/curtailed.
- EMR has had an aspiration to get the booking horizon initially back to 12 weeks and would like to extend the Informed Traveller timescale to tie in with Eurostar’s booking horizons, which would definitely encourage passengers to travel by train when they plan for their journeys. However, even meeting the T-12 could be a challenge considering the number of late notice possessions by Network Rail when train operators have to amend their timetables with short notices.
- EMR would like the industry to be working towards a ‘correct’ plan at T-12. We do not believe that train operators, particularly for those who operate intercity long-distance services, are in a position to implement this radical change to the Informed Traveller process. We do not have confidence, not until the system could provide adequate customer information to passengers and the system could identify and notify changes to all passengers who have bought tickets for their journeys via all sources. We would like to see the industry to progress the technology to a more advanced stage before progressing this change.

We hope you find our above inputs useful. If you have any further questions regarding our comments in this response, please feel free to get in touch.

Yours faithfully,


East Midlands Railway



Response to ORR’s consultation – Initial consultation: proposals to modify Network Rail’s network licence requirement on timetable publication

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About you

Full name: [REDACTED]
Job title: [REDACTED]
Organisation: First Greater Western Limited (“GWR”)
Email*: [REDACTED]
Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

First Greater Western Limited strongly supports this for the reasons shown in the paper herewith, word document, “GWR Response 23 05 23 to ORR Consultation NR Licence”

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

Not in our experience, as per the paper herewith, word document, “GWR Response 23 05 23 to ORR Consultation NR Licence”

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response. Yes

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First Greater Western Limited (“GWR”) Response to the ORR Consultation: Network Rail Licence:

The Current Requirement of Network Rail.

The Network Rail Licence is a tool with which to police Network Rail’s activities.

The clause under review requires Network Rail to plan its activities such that:

- 1: it plans effectively and efficiently;
- 2: it provides to train operators so far as is reasonably practical under prevailing circumstances suitable and accurate information on infrastructure engineering work led timetable changes either:

- (a) not less than twelve weeks before timetable operation; or
- (b) less than twelve weeks before timetable operation where to provide sooner would compromise to a material effect Network Rail’s Licence Duty to secure: the operation and maintenance of the Network; the renewal and replacement of the Network; and the improvement, enhancement and development of the Network.

Linkage to the Train Operator Licence.

Passenger train operators are required to:

- provide appropriate, accurate and timely information to enable railway passengers and prospective passengers to plan and make their journeys with a reasonable degree of assurance, including when there is disruption; and
- co-operate with Network Rail and other train operators to enable Network Rail to carry out appropriate planning of train services and to establish or change appropriate timetables to enable it to satisfy its timetabling obligations.

Station operators are required to:

- co-operate with train operators so far as is reasonably necessary to enable them to meet their obligations to provide information to passengers.

(There is thus no existing requirement on train operators to provide information to customers to any specific timescale, and there is no linkage to any specific timescale in the Network Rail Licence.)

There is no proposal to change the train operator licence.

Proposal.

The Office of Rail and Road proposes to amend the requirement on Network Rail such that in effect the definition of timeliness (still only required where there is no conflict with other duties) changes from a fixed timescale anchored on timetable operation to one anchored on the timetable process contracted under the Network Code (an element common to all users of each freight and passenger operator's track access contract).

The Network Code can only be amended with ORR Approval, and amendment usually follows an industry initiative and industry consultation with a recommendation being put forward to the ORR by Class Representative Committee which is a body of industry personnel elected by and representing each of the freight and passenger operators and Network Rail. The Class Representative Committee is itself required both to be in existence and be bound in activity by the terms of the Network Code.

Driver.

The industry has developed and recommended to the ORR a change to the timetable development process required by the Network Code. This enables:

1. a third timetable change per year for those operators who desire it;
2. main timetable changes when the markets change in June and October;
3. a concentration of permanent timetable development timescales to aid reduction in late changes; and
4. a concentration of timescales for infrastructure engineering work led short term timetables to reflect current practice for many operators.

Whilst all are seen as benefits, (3) and (4) are required to enable (1) which was the prime objective of the review and is seen as being both desirable and achievable following experience gained in timetable planning during the covid emergency. The corollary is that if (3) and (4) fall down then (1) cannot be achieved.

This concentration of development period for engineering led short term timetables means that instead of operator bid at T-18 (ie eighteen weeks before operation), NR offer to operators at T-14 and upload by NR to public systems at T-12, bids will be at T-12, an offer at T-10 and upload to public systems will be at T-8. In addition a new requirement will be put upon Network Rail to upload at T-12 the operator bid.

It is our understanding that the ORR will Approve the CRC recommendation (and so implement through the Network Code the strategic change to the timetable process) only if:

- 1: A legal way can be found of moving away from a timetable change date in December; and
- 2: Network Rail's Licence is changed to accommodate concentrated engineering led timetable planning timescales.

It is item (2) that is driving the consultation under review here.

Repercussion on Strategy:

It is acknowledged by the passenger industry as a whole that the strategic change is of benefit to the industry.

Repercussion on Sales.

It is clear that at GWR even though we are (because of the lingering effects of the covid emergency) already working under a bid / offer regime of T-12 bid, T-8 upload this has had no effect on our ability to sell direct (or via third party retailers) GWR services with much longer horizons. The reservations database is generally opened for the full half yearly timetable period save where it is known that engineering work will lead to timetable change. This is based on advance notice of forthcoming engineering work from the suite of GWR forecasting output based on the industry Engineering Access Statement published for each timetable which shows engineering requirements for each day. This is refined into a Period Possession Plan currently published 22 weeks out (but intended to be published 18 weeks out under the strategic change) which confirms, amends and introduces (in a small number of cases) the engineering work for each day. If anything is confirmed by this plan that has a material effect on the train service then reservations are suspended for any affected service until the bid is published (now at t-12). GWR reservations are in general available 18 or 19 weeks out and this is not envisaged to change under the new strategic process. It is not therefore anticipated that the strategic change will affect either GWR booking horizons or (except in very rare circumstances where GWR's bid cannot be accommodated) the accuracy of timetables published at t-12 or t-8.

Third party retailers are already advised by GWR of its booking horizon for any service and are able to retail to that level.

There is no evidence available or showing material effect at GWR that sales have suffered in the past few years due to any reduced booking horizon.

Mitigation.

It has been suggested that:

- (a): it is a commercial matter for each train operator when information and ability to reserve a seat or buy a reduced fare ticket is or needs to be available to the public; and
- (b) there might be a need to preserve in the Network Rail Licence t-8 as a minimum offer publication period.

The strategic change to the timetable process gives Network Rail twice the time available to it in the pre strategic change timetable development process to validate a train operator bid concerning engineering led timetables.

The work being delivered under the whole industry Smarter Information, Smarter Journeys programme to improve communications to customers when their train times change after the point of booking will help greatly in taking the industry forward.

Response.

This leads to a GWR response to the Licence consultation:

- supporting the strategic intent;
- applauding the desire for flexibility whilst maintaining a robust hold on the timetabling process through the Network Code;
- advising that in reality sales are available through GWR and third party retail outlets at t-18 (or even further out) for GWR services (and it is believed other intercity operators) and will remain so no matter the result of this consultation or whether the strategic change is Approved;
- suggesting that where long horizons are required this is a commercial need determined by the operator and helped to be fulfilled by the Licence conditions on Network Rail both now and as proposed.

Secondary Proposal.

There is a secondary proposal within the consultation which changes the definition of information captured above (ie engineering led timetable change) to include the main timetable changes each year (ie the base timetable).

It is envisaged this has no effect and reflects current practice. It is therefore supported.

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Annex: The Proposed NR Licence Wording Change.

Changes to the national timetable

7.17 The System Operator shall:

- (a) establish and maintain efficient and effective processes reflecting best practice; and
- (b) apply those processes to the greatest extent reasonably practicable having regard to all relevant circumstances,

so as to provide appropriate, accurate and timely information on Relevant Timetable Changes to train operators.

7.18 For the purposes of Condition 7.17, information on a Relevant Timetable Change shall be deemed to be timely:

- (a) where the System Operator has provided train operators with access to the information ~~not less than 12 weeks~~ before the date that the Relevant Timetable Change is to have effect ~~and no later than the timescales prescribed in Part D of the Network Code, as amended from time to time;~~ or
- (b) where:
 - (i) providing the information ~~in compliance with Condition 7.18(a) 12 weeks or more before the Relevant Timetable Change is to have effect~~ would conflict, to a significant degree, with the Network Management Duty; and
 - (ii) the System Operator provides access to the information to holders of passenger licences as soon as is reasonably practicable having regard to all relevant circumstances.

And not to be changed (but included here for information):

Network Management Duty

- 1.1 The “Network Management Purpose” is to secure:
 - (a) the operation and maintenance of the Network;
 - (b) the renewal and replacement of the Network; and
 - (c) the improvement, enhancement and development of the Network,in each case in accordance with best practice and in a timely, efficient and economical manner so as to satisfy the requirements set out in Condition 1.2.
- 1.2 For these purposes, the requirements are the reasonable requirements of persons providing services relating to railways and Funders, including Potential Providers or Potential Funders, in respect of:
 - (a) the quality and capability of the Network; and
 - (b) the facilitation of railway service performance in respect of services for the carriage of passengers and goods by railway operating on the Network.
- 1.3 The licence holder shall achieve the Network Management Purpose to the greatest extent reasonably practicable having regard to all relevant circumstances including the ability of the licence holder to finance its Licensed Activities (the “Network Management Duty”).
- 1.4 In complying with the Network Management Duty, the licence holder shall in particular ensure that it duly takes into account the interests of all classes of passenger operator and freight operator in satisfying the requirements set out in Condition 1.2.



Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Freightliner Group

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

We do not agree with the proposed wording changes to the Network Licence. Given the current structure of the industry, with franchised passenger operators being under direct control of the Department for Transport, the decision making process for future changes to the Network Code is subject to considerable external influence. It is vital that, should any future changes to timescales be proposed by Network Rail, these should be subject to proper scrutiny, and be fully considered by the ORR and industry stakeholders to ensure the best interests of rail users are taken into account.

Freightliner are concerned that the revised wording as proposed by the ORR will allow further reductions to timescales in the future (beyond the TW-8 deadline subject to this consultation) should this be proposed by Network Rail, subject to the passing of a Class Representative Committee (CRC) vote. The CRC is formed of a group of industry professionals, representing the interests of different types of train operators, however over 60% of the composition fall directly under the same funding source, and as such do not necessarily have the opportunity to stand against proposals. Should the modified text be introduced, in effect the CRC could directly change what is today a key licence timescale. There needs to be additional scrutiny on this and therefore it is crucial that such an important area is specified within the licence to provide an additional safeguard.

As such, the views of rail end users would not necessarily be given sufficient or independent consideration prior to implementation, which would have potential to degrade the attractiveness of rail as an offering to customers and drive modal shift away from rail.

Freightliner believe the proposed amendments to wording should not be progressed. If, following this consultation, the ORR proceed with the amendments to the dates at which timetables are confirmed, we see no reason that the existing wording contained within the Network License cannot be amended to read 'TW-8' instead of 'TW-12' to ensure that the Network Licence continues to show a minimum number of weeks for timetable publication and a fixed annual timetable change date.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

The need to understand disruption to services as a result of engineering work is vital for freight end users – journey time extensions as a result of diversions, or the inability to run services need to be communicated by FOCs to the customer in a timely fashion to allow them to take this information into account as part of their supply chain, ensuring sufficient products are available at their terminals for onward distribution. Not having this information to hand in a timely fashion can result in alternative transportation methods having to be used, reducing rails modal share.

The reduction in timescales that has been in place for several years has led to a general degradation in the quality of timetable offers received from Network Rail, with a significant increase in the number of issues outstanding at the point the 'final offer' is published. We have previously submitted evidence to the ORR highlighting the decline in offer quality and the resulting increase in the amount of reworking required.

This results in freight operators not being able to confirm workable schedules until much later in the timetable production process, usually 1-2 weeks in advance of the train running. This late confirmation adds risk to the delivery of train services, as resource diagrams cannot be confirmed until very late notice, and places increased strain on FOC planning resources. Network Rail have an ongoing funding position with Freightliner for two additional planners in recognition of this, but Freightliner have still experienced the loss of services as a direct result of the late notice confirmation of timetables.

Therefore, continued confirmation of timetables at reduced timescales will, in Freightliner's view, continue to create issues with being able to deliver reliably for customers. This in turn will reduce the viability of rail as an attractive transport mode in the future, at a time where, in line with the UK's legal commitment to net-zero, the focus should be on increasing modal shift from less carbon friendly modes to rail. As such Freightliner does not support the changes to Network Rail's Network License.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response. Freightliner have no specific comments on this modification.

Publishing your response

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If you are seeking to make a response in confidence, we would also be grateful if you would annex any confidential information, or provide a non-confidential summary, so that we can publish the non-confidential aspects of your response. 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 General Data Protection Regulation and Data Protection Act 2018.

Consent

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About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: GB Railfreight Limited (GBRf)

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Firstly, GB Railfreight needs to point out that there has absolutely been no agreement between GB Railfreight and Network Rail Infrastructure Limited to alter the timetable production process over the last few years, informally or otherwise. GBRf thinks this is the same for other freight operating companies and also some passenger operating companies. GB Railfreight believes that the proposed wording change of 7.18(a), to align with differing timescales to T-12 (yet to be proposed in the Network Code but likely to be “no less than 8 weeks”), would lead Network Rail to be in breach of Licence Condition 7.17. From several years on the receiving end of reduced timescale T-12 “Informed Traveller” offers, GB Railfreight asserts that

permitting Network Rail to provide access to information in any time less than 12 weeks out would not be an effective or efficient process, nor can it in any way be deemed best practice. This is borne out by evidence collected by GBRf, between 2015 and end of 2022, that clearly shows a correlation between the reduced timescales for T-12 offers (beginning after May 2018 and continuing through to present) and the number of rejected or unresolved Informed Traveller paths for GB Railfreight. This detailed information is included in a separate letter as part of this consultation response (Appendix A). Inefficiencies have included regular re-working (on both sides) of GBRf's bid plans due to poor reasoning for rejections and bids just not being resolved in time. This has led to a significant resourcing impact for GBRf which has then impacted on other areas of its planning department, both directly and indirectly. Again, the accompanying document (Appendix A) gives more detail on this element. Network Rail's Network Licence is clearly and wholly regulated and overseen by the Office of Rail & Road (ORR). Any change to the Network Code is overseen and scrutinised by the Class Representative Committee, and finally approved (or not) by the ORR. GBRf's view, though, is that the regulation and oversight of the Network Licence is seen to be far more effective when fully in ORR's control, as opposed to via a change process to the Network Code. For all the above reasoning, GB Railfreight cannot agree to the proposed change to Network Rail's Network Licence.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

This response is written with a railfreight operating company, and also the effects to its end-customers (including a passenger company), in mind. As has been experienced by GB Railfreight since 2018, confirming a timetable with less than 12 weeks' notice brings with it a lack of certainty as far out as GBRf and its customers require. Indeed, many of our end-customers (including Caledonian Sleeper) want as much certainty as they are able to receive even greater than 12 weeks out. This is to reduce operational risk to their businesses and ensure other aspects of the freight logistical chain (often worldwide) are not to be disrupted. It must be made clear that the running of a railfreight service from "A to B", in the UK, is often only a very small part of a worldwide logistical chain. Examples: For our pan-world deep-sea and domestic Intermodal markets, at 12 weeks out from the day of service, GBRf is able to inform and discuss with Far East shippers some revision to what might occur with its flows and containers whereas, with a process that doesn't have an agreed revised timetable until around 8-6 weeks out, this is too late for our customers' demands and is a reason for them to question why railfreight is their UK mode of choice. Too short-notice changes, of any sort, lead to quick loss of customer confidence in the railfreight product and must be avoided at all costs in order to reduce the threat of modal shift back from rail to road.

For our cross-Channel services, e.g. the very regular flow from Evian, there needs to be certainty of pathway from France through to destination, and back, so as to not disrupt the mainland Europe part of this flow. Other European countries do not have the flexible timetabling processes that the UK has – e.g. STP and VSTP timing.

For our UK aviation fuel flows, our customers need more certainty in timetabling, not less, so that they can clearly and confidently understand their required volumes needed over any calendar year. Already, 12 weeks of certainty out from “the day of the race” is not far enough for customers and 8 weeks’ notice (or less) of timetabling alteration demonstrably affects our customers’ abilities to rely on rail for moving their products with any degree of certainty, month after month.

With regard to the passenger TOC, *Caledonian Sleeper*, for which GB Railfreight carries out all timetable planning and control work, GBRf has noticed some clear quality issues since the Informed Traveller process has, contractually, unilaterally changed from T-12 to T-8 weeks, or less. Poor quality validation of timings and data have led to timetable schedules not being uploaded for many days, then *Caledonian Sleeper* not being able to open its bookings when it needs to. The link, here, is that the shorter the available windows for quality Informed Traveller timetabling validation to take place, the more errors that creep into the plan, or rejections occur. That causes GBRf and its customers (passenger and freight) interrupted continuity of business and general uncertainty in knowing what is to happen to its trains.

In GBRf’s view, the proposal to alter Network Rail’s Licence Condition, and affect all that follows from that action, is not customer-led. It is being done to help re-dress Network Rail’s lack of action in adhering to its contractual obligations with its customers.

For so many reasons of quality, consistency and a robust plan throughout any given year, reducing the available timescales for the start of Informed Traveller offers (from T-12 to T-8) is not the correct way forward from a customer’s point of view.

In addition, and very much related to the above points, GBRf is still receiving a large number of Late Notice Possession Requests as part of the amended Engineering Access Statement. These have recently been trending between 100 and 168 requests per week, for a national operator such as GBRf. They all need checking and a number of them will lead to even more time-pressed Informed Traveller bids and offers, often at timescales less than T-8 weeks. In GBRf’s opinion, there can be no change to Informed Traveller timescales (to T-8) whilst Late Notice Possession Requests are so extremely high across the UK. Data for these late notice requests, broken down by Network Rail Routes, have also been supplied as a separate document with this response (Appendix B).

This amount of Late Notice Possession Requests are affecting the quality of the Informed Traveller offers and the effectiveness of the Network Rail team, especially in how it validates and returns bids. Under the current, licence-breached planning timescales, these late-notice requests have led to poor planning behaviours, with more cancellations compared to the previous T-12 timescale (pre-May 2018). GBRf is very concerned that these behaviours are being seen as “the norm” and will continue to be the way forward with a reduced Informed Traveller offer timescale of T-8. That cannot occur.

There have also recently been planning errors that have led to operational incidents on the Network caused, in GBRf’s view, by a lack of quality time in which to carry out fit and proper validation. Examples of this include diverting W10 gauge trains via Welwyn Garden City (vice Hertford Loop) when not gauge-cleared; for the recent Carstairs Blockade, routing a W10 gauge trains via platforms at Newcastle Central station through which they are not cleared; offering services back to GBRf which have negative terminal time (i.e. the diverted path arrives after its return path should have departed again).

This all clearly leads back to Licence Condition 7.17 – reduced timescale Informed Traveller processes (as evidenced by results for working at T-8 since mid-2018) clearly put Network Rail in breach of Licence Condition 7.17(a) and 7.17(b).

Network Rail cannot maintain an efficient and effective process reflecting best practice, nor apply those processes to the greatest extent reasonably practicable having reasonable regard to all relevant circumstances, so as to provide accurate (my emphasis) and timely information on Relevant Timetable Changes to GB Railfreight.

GB Railfreight also believes that the proposed change would lead Network Rail to become in breach of Licence Condition 7.9(a) which states that “.....*the System Operator shall establish and maintain (my emphasis) an efficient and effective process for managing the allocation of capacity of the Network, which reflects best practice....*”

In addition, for similar reasons, GBRf believes that Licence Condition 7.12(a) would also be breached by the proposed change in that it would not be able to “*run an efficient and effective process, reflecting best practice, for establishing a timetable, and any changes to it;.....*”

On this basis of the above evidence, GB Railfreight urges ORR to not alter Network Rail’s Licence Condition in the proposed manner.

In fact, for all the reasons mentioned in this response and the information in the attached appendices, GB Railfreight urges ORR to rigorously hold Network Rail to account for its T-12 licence breach and insist it complies with T-12 weeks being the supply of accurate and timely information to operators. The “accurate” element of this Licence Condition is absolutely crucial here and must not be glossed over.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response. GB Railfreight has no issues with this proposal.

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55 Old Broad Street,
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Facsimile: [REDACTED]

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[REDACTED]

Office of Rail & Road,
Two Rivergate,
Temple Quay,
Bristol, BS1 6EH.

24th February 2023

Dear [REDACTED]

GB Railfreight Limited (GBRf) Information on Business Impact from Proposed Changes to the Informed Traveller Process from T-12 to T-8

Further to the FOC workshop held between freight operating companies and the ORR on 6th February 2023, and the information provided by GB Railfreight at that meeting, GB Railfreight is also offering further information in this letter and the accompanying spreadsheets.

Business Risk:

A change of Informed Traveller offers, from T-12 to T-8, introduces new business risk to GB Railfreight and, more importantly, its customers. This is a business risk right now (due to Network Rail not working to required legal timescales, nor having worked to them since the May 2018 Timetable) and some of our customers have noticed changes to our being able to inform them of altered timings far in advance.

Moving the Informed Traveller offer to T-8 means that, with the regular conversations that go on between the parties for GBRf to attain the altered paths it needs to get its customers' set rotations around in 24 hours, we now run out of time to sort all revised paths out. This did not occur when Informed Traveller offers were made at T-12 as it gave more time to resolve issues which led to a far greater chance of ideal, robust paths being finalised.

This response contains compelling data that shows the sharp deterioration in Network Rail's Informed Traveller offers to GB Railfreight since the May 2018 Timetable and to the present day. This is in direct contravention of Network Rail's Licence Condition regarding timescales on informing operators of altered paths and is having a direct effect on our employees' well-being.



Quality of Freight Informed Traveller Offers:

It is the case, and as has been acknowledged by Network Rail on more than one occasion, that the quality of Informed Traveller offers for freight companies is poor, and consistently poorer than those for passenger operators. GB Railfreight can only assess the proposed BTPF Informed Traveller changes on the basis of how it has its current bids treated.

The quality of the offered paths, and the smallest of reasons for rejections of bids, means GBRf has no confidence that regularising a T-8 process would not harm our business even more over a longer period of time, and that is not an acceptable way forward.

Another point to make on how a lack of a quality freight offer affects our business is that those offers that have been made in the reduced amount of valuable time, are often not planned in the most optimal manner. This then leads to GBRf having to crew the services in a sub-optimal manner, with perhaps additional drivers being used when they might not need to have been were a bit more care in validating the path been made.

With this scenario, it is difficult to quantify the delta between an optimally planned revised path and one that has been rushed, which then has inefficiencies trickling down all the way to the "on-the-day" operation.

It must be remembered that, as our business has grown, additional traincrew and locomotives cannot just be found at two weeks' notice. That scenario no longer exists so agreeing an optimal revised train path becomes the absolute priority in keeping trains running around possessions. That becomes seriously under pressure when the validation and offer/response timescales get squeezed even further to T-8.

Rejection Rate Changes:

GBRf has noticed that, as Informed Traveller offer timescales have slipped, and the available time for Network Rail planners to validate bids is that much less, the shorter processing timescales for validating and offering Informed Traveller paths leads to a greater volume of rejections as Network Rail validators seem to reject services with "perceived issues" more quickly now.

Coupled with the above and the whole Informed Traveller process, to make revised paths work, there are often a reasonable number of possession easements required to be made and these take time. The easements are often agreed by the relevant Network Rail Maintenance Delivery Units but that does take time and with squeezed timescales, these successful changes become far less likely, and therefore the desired revised paths for GBRf become far less likely to be offered, with bad results for our customers.

This, in turn, will lead to the loss of railfreight business as our customers become disillusioned with the lack of consistency of service over the course of a year.



Metrics for Informed Traveller Offers Remaining Unresolved or Rejected (2015-2022):

GB Railfreight has collated figures from its own records, for the years 2015 to the present day of 2023, which give the total number of GBRf services that were unresolved or were rejected beyond the informal, unagreed, revised Informed Traveller timescales. This has, latterly, typically been at the T-6 timescale although during the years 2020 and 2021, this was around T-4, and therefore put tremendous pressure on our staff, with some serious results on their well-being as well.

No. of unresolved or rejected GBRf Services beyond revised Informed Traveller timescales:

2015	2016	2017	2018	2019	2020	2021	2022	2023
26	23	36	349	277	457	651	622	55

A more detailed set of figures, also showing the corresponding size of the relevant Principal Base WTT, the % of rejections against the Base WTT size and, among other data, the astounding figure of % increase of GB Railfreight Informed Traveller rejections, for full years 2015 to 2022, are also shown on the rear page of this document.

GBRf has also enclosed attachments with granular week-by-week data for all these years, and going forward through 2023. I believe this will give you the evidence you require and help convince ORR why GB Railfreight has been, and still is, strongly against the proposed changes in Pfc 120 that affect GB Railfreight and its ability to carry out its business with any reasonable degree of certainty.

GB Railfreight's Informed View on Increase in Numbers:

GB Railfreight's current Head of Timetabling worked at Network Rail in the Capacity Planning Dept. from 2014 to 2018 (mid-year), then at GB Railfreight from the start of 2019 and is now encompassing the whole GBRf Timetabling Team. His and my own personal views on what has caused these numbers to rapidly spike, critically affecting GBRf's business, are detailed as follows:

The Network Rail Informed Traveller teams have traditionally been short of skilled, competent planners and there has often been movement out of that role into better paid posts. It had led to short-formed teams which have not really recovered in number and are, therefore, not necessarily ready to respond to major crises, not of their own making.

This put the department on unsustainable footing running into 2018, the year it was profoundly exposed. As can be seen from this data, there was a very sharp deterioration in the number of revised, offered schedules during 2018, which was brought about by the May '18 Timetable crisis.

This amounted to an increase of circa 300 schedules per annum, with T-12 offers coming through to operators between T-6 and T-4, also with a number of double-week offers causing huge issues on quality and workload. There was then a recovery programme put in place, during late 2018, that didn't really bring about recovery to T-12 timescales.



From early 2020, the 'COVID' effect came into play, with the impact of Informed Traveller rejections and unresolved items massively spiking for freight, yet again. Even after the effects of Covid and with more stability (2022), the number sat at over 600 paths having to be dealt with via the Day A for Day C process or even via the <48 hrs. Very Short-Term Planning (VSTP) process.

To be absolutely clear here – this meant that GB Railfreight had to run its week-to-week amended business with no certainty of being able to, in some cases, until just one or two days out. That is still the case today in February 2023. Indeed, for 2023 Weeks 1 & 2 combined (in April), GBRf has just received 55 unresolved and rejected train paths for its business, and that is with at least one additional round of negotiation. Our business cannot continue to be disrupted by this behaviour, let alone have this continue as a permanently changed way of working in the Network Code.

These levels of rejection, I believe, are caused by the desire of Network Rail Informed Traveller planners to seek to 'recover' lost ground, meaning that any conflicts or issues encountered are swiftly met with rejection notifications, rather than quick solutions which, with the right training and knowledge, are possible to attain.

Results and Direct Effects on GB Railfreight and its Staff:

- **Increased sickness levels**

- GBRf has had 3 Informed Traveller planners suffer serious mental health breakdowns as a consequence. Network Rail (Capacity Planning) was alerted to this effect in March/April 2020, at the beginning of Covid, by myself on several occasions in the regular OPPG meetings. It was noted but I do not believe taken seriously, and the effects still not so today.

Our planners care deeply about the quality of product they deliver to Network Rail and our customers. For the reasons outlined above, the whole unilaterally revised Informed Traveller process has had such an impact on the quality of what our team are able to produce that it has directly and indirectly led to real stress and staff sickness.

- **Volume of work increase and re-work**

- As can be seen from the increased level of rejections, GBRf has had no option but to increase the resource required to manage the Informed Traveller process. The total number of GBRf people dealing with the whole Informed Traveller cycle are:

- 2 planners in 2015
- 4 planners in 2018
- 5 planners in 2020

- **Business Risk**

- Several services have required to be bid VSTP (<48hrs. notice bids to Network Controls, with no certainty of being able to run) or cancelled, adding serious risks to our customer business continuity and reputation.



- Supply disruption to the customers, due to schedule cancellations and no alternative Informed Traveller offer, is a continuous weekly issue we now face once some sort of last-minute schedule
- Due to the level of uncertainty that GBRf suffers in not having surety of supply of the revised paths and routes, this increases its costs, and resource is consumed throughout the planning and operations departments.
- Reputational damage - GBRf is often placed in the position where it is informing customers that it cannot give surety to our customers, or cannot run, at very short notice. This affects both customer confidence in our business and that of rail's ability to deliver a reliable service to UK industry.

I hope this gives ORR the granular and transparent evidence it requires to make any informed decisions on changes to Network Rail Licence Conditions.

Yours sincerely,

[Redacted signature]





Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Govia Thameslink Railway

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

- 1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?**

As a participant in the Better Timetabling for Passengers and Freight process and in particular the changes proposed to the Informed Traveller Process; GTR is supportive of the proposed changes to the text.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

GTR's evidence is the proposals will have no notable negative impact on our customers. Most journeys planned on the GTR network are already currently planned in much shorter timescales than 8 weeks. As an example, from a section of the network with greater amounts of leisure travel where customer planning timescales are expected to be greater, in 2022, period 4 (May) only 1% and 0.7% of all tickets sold to Eastbourne and Brighton respectively were purchased further than 8 weeks in advance. Similarly, in period 6 (Aug/Sep), which is typically GTR's busiest time for tourism and coastal travel, only 0.3% of tickets sold to Brighton and 0.5% to Eastbourne were done with greater than 8 weeks' notice. Therefore, for 99% or more of customers, this change is of no consequence. In addition, the change does bring potential benefits over the status quo, primarily in terms of a closer match between planning and information timescales for complex engineering work, by enabling this to be finalised closer to the information delivery date. As a result, we expect in practice to see fewer short notice alterations to a finalised T-8 timetable which will enable customers to travel and plan their journeys with greater confidence. In short, the benefit is for most customers planning within T-8 as there should be fewer changes within this timescale because of the changes introduced by this process. For customers that do wish to plan within the 8–12-week window, they will be able to see a draft timetable ahead of the finalised timetable advertised at T-8. In line with the National Recovery Plan (following the pandemic), GTR has been reliably publishing our finalised timetable at T-8 since June 2022, allowing customers to plan their journeys with confidence 8 weeks in advance. In summary, the current T-12 threshold provides very minimal customer benefit. Publishing a finalised timetable at T-8 by contrast, will provide several benefits for customers including greater confidence that there will be fewer changes between T-8 and T-0 and the setting of clear expectations as to when a timetable can be used for draft planning (T-12 to T-8) and for formal planning (T-8 to T-0). The proposals will mean no change for ticket retail.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

GTR understands that the Working Timetable is in practice the National Timetable from a customer perspective. GTR propose that the ORR drafts a new paragraph which will define the current process regarding the working timetable, rather than modifying the “relevant timetable changes” definition.

Publishing your response

We plan to publish all responses to this consultation on our website. Should you wish for any information that you provide to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily 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.

Under the FOIA, there is a statutory code of practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, if you are seeking confidentiality for information you are providing, please explain why. If we receive a request for disclosure of the information, we will take full account of your explanation, 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.

If you are seeking to make a response in confidence, we would also be grateful if you would annex any confidential information, or provide a non-confidential summary, so that we can publish the non-confidential aspects of your response. 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 General Data Protection Regulation and Data Protection Act 2018.

Consent

In responding to this consultation you consent to us:

- handling your personal data for the purposes of this consultation; and
- publishing your response on our website (unless you have indicated to us that you wish for your response to be treated as confidential as set out above.)

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Format of responses

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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.

Grand Central Rail's response to ORR's initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Yes, At Grand Central we do not believe these changes benefit our customers or rail users more generally and as such do not support any change reducing the timeline from 12 weeks to 8 weeks, nor, therefore, any consequent modification text in the Network code.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

Yes. Since opening up Timetables beyond T-12 in March 2021, Grand Central has seen regular and consistent purchasing of fares right through the booking horizon from T-12 to T-26 weeks, demonstrating the value to customers of having the opportunity to plan and book travel up to 6 months in advance. Reducing the timescale at which NR are able to confirm the timetable will have a double impact on customer confidence – a shorter timescale will always be met with a reduction in customer confidence with regards the timetable, but the greater impact is likely to be the consequent message that reducing from 12 to 8 weeks will send to customers. This is highly likely to cause concern around why the timescale is diminishing, as well as confusion as to why, when current industry messaging is focused on improving customer service, this change is contrary to that objective.

A further impact of the change will be that TOCs' ability to open new TTs will decrease from T-12 to T-8 weeks, further reducing the opportunity for customers to purchase fares. A critical period for this will be the release of the December TT each year, as this coincides with a high number of Christmas bookings. A T-8 timescale will mean opening the December TT in early to mid-October which clearly limits customers from purchasing fares for the busiest travel period of the year and will further lead to increased concerns about festive travel plans.

Beyond this issue regarding Dec TT and Christmas, more generally following the Covid-19 pandemic,

we know a greater proportion of longer distance advance journey customer bookings are for leisure purposes with a particular uplift at weekends and public holidays. It is our contention that these customers will be making their plans for such travel well in advance of the proposed 8 weeks, for instance to coincide with tickets for a theatre or music/sport event, with an associated hotel booking as well. In this context, the proposed reduction to 8 weeks is not customer-centric and is a significantly retrograde step for the industry at a time when we are seeking to build confidence with customers.

Our position would therefore be to encourage a lengthening of the booking horizon working towards an airline-style T-52 as the objective.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

No, At Grand Central we don't believe these changes benefit our customer and therefore don't support any change reducing the timeline from 12 weeks to 8 weeks and consequent modification to the definition of "Relevant Timetable Changes"

Response publication redaction

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

Publish response

Publish redacted response removing any commercially sensitive information

Do not publish response

About

This section allows you to input information about yourself and/or your organisation. All of the fields are optional, except your email address which we will use to contact you if we require more information relating to your response. Any personal data that you provide will be processed in accordance with ORR's privacy notice (www.orr.gov.uk/privacy-notice).

5. Full name

[REDACTED]

6.Responding on behalf of an organisation/group or as an individual? (please provide organisation or group name)

Grand Central Rail

7.Email address

[REDACTED]



Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name:

Job title:

Organisation:

Heathrow Airport Limited

Email*:

Telephone number*:

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Heathrow Airport Limited has no comments from the perspective of an Infrastructure Manager.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

Heathrow Airport Limited has no comments. However, we would like to ask a question on 3.14 of the ORR \ Initial consultation: proposal to modify Network Rail's network licence requirement on timetable publication:

The RDG say the majority of passengers purchase tickets within the eight week window before travel. Is this with the timetable confirmed at T-12 before COVID or T-8 which the industry is currently publishing the timetable?

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

Heathrow Airport Limited has no comments from the perspective of an Infrastructure Manager.

Publishing your response

We plan to publish all responses to this consultation on our website. Should you wish for any information that you provide to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily 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.

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Response to ORR’s consultation – Initial consultation: proposals to modify Network Rail’s network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Highspeed 1 (HS1)

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

This amendment to the Licence seems appropriate as it will make the process for any future changes to the timetable planning timeframe (where it is appropriate to do so) less complex as long as the proper governance remains in place for making changes to the timeframe set out in the NRIL Network Code – ie that there needs to be stakeholder consultation and ORR approval of any changes.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

SETL and DB Cargo operate across both the conventional network and the HS1 network, and for DB Cargo onto the EU Continent. They will need to follow the different timetable process for these networks, which adds complexity for these operators. HS1 does not currently have plans to change the timetabling process in our Network Code – the current volumes on the network do not warrant the additional costs of having more frequent timetable changes. NRIL’s capacity planning team has given HS1 assurance that our dedicated resource for HS1 timetable planning will be able to deliver the planning services required under HS1’s Network Code. Even so, this misalignment will have adverse impacts on the operators with increased costs and complexity. We question whether the change in timetabling process for NRIL – both the move from T-12 to T-8 and the change to 3 times per year from twice a year – and the increased cost and complexity this imposes on the railway system is appropriate at this time when the market is still recovering from Covid and price shocks. This will also make it more difficult for passengers who make longer journeys and cross network journeys (and pay higher ticket prices) as they tend to need to book further in advance than 8 weeks.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

Yes, as this will make it explicit that the definition includes Relevant Timetable Changes.

Publishing your response

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- ensure that the PDF's security method is set to no security in the document properties.

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

19th May 2023

Dear sir / madam

IRR response to the ORR's "Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication"

Introduction

Independent Rail Retailers represents the majority of independent retailers of train tickets in Great Britain; collectively we sell over £2.5bn worth of train tickets annually, and help customers to find the best value fares and the most suitable journeys across the country. Consequently we understand what customers need and want, at a whole-network (and not just a TOC- or route-specific) level.

Summary of our response

We have considered the proposals to reduce the timetable horizon from 12 weeks to 8 weeks. We consider this to be a backwards step for the industry, and likely to reduce revenue. We therefore **oppose** this change.

However, we recognise also that there are practical reasons (resources, industrial action) why it is much more difficult to deliver a timetable to T-12 than it was four or five years ago. These reasons are, however, temporary – they are not a basis on which to make permanent changes to the customer proposition. We are able to **support** the reduction to T-8, **providing** that it is temporary and there is a published plan to return to T-12 within one to two years, and to increase to T-16 and then T-20 (both of which are commonly found on other European networks – Network Rail is an extreme outlier in this area) within three to four years.

Putting customers first

The ORR asserts that the majority of customers book their train tickets no more than 8 weeks ahead. This is true; only about 12% of tickets are booked more than 8 weeks ahead.

However, this hides the fact that it is the more expensive and higher yield tickets that tend to be booked further ahead – with people wanting to make plans for events, breaks / holidays, and other commitments. Equally, customers new to rail, and customers visiting the UK from abroad are likely to

Independent Rail Retailers represents the majority of train ticket retailers. Find out more about us and our members at independentrailretailers.co.uk.

want to book further ahead. These are both market segments that the rail industry must make more efforts to attract, and not take actions such as this which will put them off.

Context: delivery of T-12 today and T-8 tomorrow

Although timetables are supposed to be firmed up by T-12 (84 days ahead of travel), today there are 9 TOCs that do not offer Advance tickets up to 84 days ahead (see Appendix 1 for our survey of TOC booking horizons). Even if this were to be reduced to 8 weeks (56 days), there would still be two TOCs (Northern and TfW) that did not make the grade, with two more (Greater Anglia and ScotRail) only just making it.

However, the furthest booking ahead date hides a startling fact – that, when “excluded days” are taken into account – 12 TOCs do not offer even 8 weeks booking horizon. (We excluded strike days in this analysis).

From a customer perspective this is incredibly confusing. Customers cannot be expected to understand what is on offer, or what they should be able to book, for anything other than the simplest journey under these circumstances. There must be rail network-wide consistency in the booking horizon in order to build trust amongst customers (and prospective customers) again.

A customer-centric solution

We recognise that there may be practical reasons behind a (temporary) need to reduce to T-8. We can support this only if:

- All TOCs meet T-8, and there are no exceptions to this (and that ORR enforces this)
- T-8 is regarded as a temporary solution and there are firm committed plans to return to T-12 within a reasonable timescale (such as 1 to 2 years), and then to increase the available booking horizon to T-16 and then T-20 consistently and across all TOCs simultaneously, within 3 to 4 years; and that ORR enforces this too.

A consistent horizon across all TOCs – with no exceptions¹ – creates a proposition that can be understood by customers, and marketed / promoted nationally. It is especially important in attracting new customers to rail – these are customers who have much-reduced confidence in the ability of rail to deliver, and for whom confidence needs to be restored.

All retailers can – together – further extend the booking horizon through the use of the initiatives within the “Smarter Information Smarter Journeys” (SISJ) programme. This enables the production of a firm timetable to be divorced from the selling of tickets. However, it must not be used as an excuse to implement a much shorter timetable planning horizon (as this passes on to all retailers an increased cost in managing customers whose itineraries have changed, as well as affecting more customers and reducing satisfaction overall).

Exception for routes with direct air competition

For routes with direct air competition, and where rail has a competitive offer, the industry needs to allow booking up to at least 6 months ahead (airlines typically offer up to almost a year ahead).

In the UK this is principally the London to Edinburgh flow (though not intermediate flows) and, possibly, the London to Glasgow flow.

¹ Except in the case of emergencies.

Conclusion

IRR supports using a customer-focused approach to determine the timetable publication date by Network Rail. This is essential to deliver rail revenue recovery, and to grow revenues beyond what they were before Covid.

In our view, the proposed reduction of the timetable publication date by 4 weeks (from 12 to 8 weeks) represents a seriously negative impact on the railway's ability to recover and grow; it is clearly driven more by operational self-interest than customer focus.

Nevertheless, we accept that there may be practical reasons for doing this now, albeit on a limited and temporary basis only. We accept it only if there is a plan to, first, return to 12 weeks within one to two years; and a plan to increase the horizon further to 16 and then 20 weeks at least, within three to four years.

Further, we accept it only if the common practice of having many days of "exceptions" within the 12 (or 8) week period is ended immediately, and if all TOCs (and therefore all retailers) have a consistent customer offer that they are able to make. This will drive customer understanding, build trust, and enable a whole network wide approach that can underpin delivery of increased revenues.

Yours sincerely



Appendix 1: TOC booking horizons are completely inconsistent

Booking horizons by TOC (surveyed on 6th May 2023)

TOC	Max	Days	Days missing	
Avanti	Fri 28 July	84	13	1, 2, 8, 9, 15, 16, 17, 18, 19, 20, 21, 22 and 23 July
LNER	Fri 3 November	182	13	27 Aug; 9, 10, 16, 17, 23, 24 and 30 Sep; 1, 7, 8, 28, 29 Oct
GWR	Fri 15 September	133	20	29, 30 and 31 July; 1, 2, 3, 4, 5, 6, 9, 10, 11, 12, 13, 14, 21, 22, 23, 24 August; 10 September
EMR	Fri 21st July	77	6	1, 2, 8, 9, 15, 16 July
CrossCountry	Fri 14th July	70	0	
TPE	Fri 3 November	182	25	9, 15, 16, 22, 23, 30, 31 July; 6, 13, 20, 27 Aug; 16, 17, 23, 24, 30 Sep; 1, 7, 8, 14, 15, 21, 22, 28, 29 Oct (varies by route)
Southeastern	Thu 20 July	76	8	24, 25 June 1, 2, 8, 9, 15, 16 July (also not after 22.00 more than 8 weeks in Advance)
SWR	Fri 21 July	77	7	20, 21, 22, 23, 24, 25, 26 June (WoE route only)
Southern ? Gatwick Express	Fri 28 July	84	12	17, 18, 24, 25 June; 1, 2, 8, 9, 15, 16, 22, 23 July
Chiltern Railways	Fri 28 July	84	20	14, 15 May; 4, 10, 11, 13, 14, 15, 16, 17, 24, 25 June; 1, 2, 8, 9, 15, 16, 22, 23 July
Caledonian Sleeper	6 May 2024	365	0	
Hull Trains	Sun 15 Oct	163	0	
Northern Rail	Sat 24 June	50	0	

Independent Rail Retailers represents the majority of train ticket retailers. Find out more about us and our members at independentrailretailers.co.uk.

Scotrail	Fri 30 June	56	0	
TfW	Sat 17 June	43	0	
Greater Anglia / Stansted Express	Fri 30 June	56	0	
Heathrow Express	6 May 2024	365	4	25, 26 Nov; 24, 27 Dec;
WMT	Fri 14 July	70	8	17, 18, 24, 25 June; 1, 2, 8, 9 July
Thameslink	Fri 28 July	84	10	24, 25 June; 1, 2, 8, 9, 15, 16, 22, 23 July
Grand Central	Fri 6 Oct	154	7	10, 16, 17, 23, 24, 30 Sep 1 Oct
Lumo	Sun 8 Oct	156	0	

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Appendix 2: a real-world example of the impact of inconsistent TOC booking horizons

This example shows how the difference between LNER (182 days horizon, excluding their 13 exceptions) and Northern (50 days horizon) plays out in the real world, for a real customer making a journey from London Kings Cross to Poppleton.

Poppleton is a local station on the York to Harrogate line served solely by Northern Rail with a train every hour; it's just under three miles from York.

Because both trains need reservations to be 'open', and reservations are not open for the Northern Rail service, there are no Advance fares available from London to Poppleton, but there are from London to York. This creates huge price differentials, for just three miles. This is baffling to customers, and prevents a consistent message such as "always book as far in advance as possible, because it's cheaper" from being marketed.

To	date	Service	Advance	Cheapest walk up
York	5th July	07.00	£101.60	£160.30 (Anytime)
Poppleton	5th July	07.00	None available	£160.30 (Anytime)
York	5th July	09.06	£25.40	£130.50 (Off-Peak)
Poppleton	5th July	09.30*	None available	£130.50 (Off-Peak)

*connects with service to Poppleton, whereas the 09.06 requires a longer wait

(survey completed before introduction of LNER single leg pricing, but the principle remains)

Appendix 3: TOC booking horizon explanations on TOC websites

Note: not all TOC websites are clear on what booking horizons actually are, with some being quite vague or referring to the National Rail website

The screenshot shows the top half of the Transpennine Express website. The navigation bar includes 'TICKETS', 'TRAVEL UPDATES', 'TRAVELLING WITH US', 'EXPLORE THE NORTH & SCOTLAND', 'HELP', and 'OFFERS'. The main heading is 'Plan ahead and save on fares'. Below it, text states: 'As soon as you know the time and date you'd like to travel, book an Advance train ticket and you could **save over 50%**'. A sub-heading asks 'But how far ahead can you book Advance train tickets?'. The 'North route:' section lists routes: Liverpool – Manchester – Leeds – York – Newcastle; Manchester Airport – Manchester – Leeds – York – Middlesbrough – Saltburn; Manchester – Leeds – York – Scarborough; Liverpool – Manchester – Leeds – Hull; and Stopping services between Manchester & Huddersfield, Huddersfield & Leeds; Edinburgh – Newcastle. It specifies booking horizons: 'Services are available for booking until: Mondays to Fridays - 3 November 2023*, Saturdays - 28 October 2023*, Sundays - 2 July 2023*'. It also lists 'Dates closed due to industrial action:' for May (12-13, 31) and June (3), and '*Awaiting engineering updates for the following dates:' for July (9, 15-16, 22-23, 30-31), September (16-17, 23-24, 30), and October (1, 7-8, 15, 21-22, 28-29). The 'Anglo-Scottish West Coast route:' section lists Manchester Airport – Manchester – Preston – Carlisle – Edinburgh/Glasgow and Liverpool – Preston – Carlisle – Glasgow. A 'Cookie Preferences' button is visible on the left.

A 'Buy train tickets' form with two input fields: 'Departing from...' and 'Going to...'. A 'Buy tickets' button is located below the fields.

A promotional banner with the text: 'BOOK IN ADVANCE AND SAVE 50%*. And we won't charge you a booking fee'. A 'FIND OUT MORE' link is at the bottom. The background shows a train interior.

The screenshot shows the bottom half of the Transpennine Express website. The 'Anglo-Scottish West Coast route:' section lists Manchester Airport – Manchester – Preston – Carlisle – Edinburgh/Glasgow and Liverpool – Preston – Carlisle – Glasgow. It specifies booking horizons: 'Services are available for booking until: Mondays to Fridays - 3 November 2023*, Saturdays - 28 October 2023*, Sundays - 2 July 2023*'. It also lists 'Dates closed due to industrial action:' for May (12-13, 31) and June (3), and '*Awaiting engineering updates for the following dates:' for July (9, 15-16, 30) and October (22, 29). The 'South route:' section lists Manchester Airport/ Liverpool – Manchester – Sheffield – Doncaster – Cleethorpes. It states: '*Advance fares are currently not available for sale on the South Route for travel on Fridays, Saturdays, Sundays or Mondays. Reservations for seats, wheelchair spaces and bike spaces do remain available.' It specifies booking horizons: 'Services are available for booking until: Mondays to Fridays - 3 November 2023*, Saturdays - 28 October 2023*, Sundays - 2 July 2023*'. It also lists 'Dates closed due to industrial action:' for May (12-13, 31) and June (3), and '*Awaiting engineering updates for the following dates:' for September (9-10). A 'Cookie Preferences' button is visible on the left.

Independent Rail Retailers represents the majority of train ticket retailers. Find out more about us and our members at independentrailretailers.co.uk.

Advance Purchase Exclusions

tpexpress.co.uk/special-offers/advance-bookings/advanced-purchase-exclusions

TRANSNORTH
EXPRESS

TICKETS TRAVEL UPDATES TRAVELLING WITH US EXPLORE THE NORTH & SCOTLAND HELP OFFERS

South route:

Manchester Airport/ Liverpool – Manchester – Sheffield – Doncaster – Cleethorpes

*Advance fares are currently not available for sale on the South Route for travel on Fridays, Saturdays, Sundays or Mondays. Reservations for seats, wheelchair spaces and bike spaces do remain available.

Services are available for booking until:
Mondays to Fridays - 3 November 2023*
Saturdays - 28 October 2023*
Sundays - 2 July 2023*

Dates closed due to industrial action:
 May: 12-13, 31
 June: 3

***Awaiting engineering updates for the following dates:**
 September: 9-10
 October: 14-15

Please note that reservations onboard our Nova fleets are possible up to 1 hour before services depart from their origin.

I WANT TO...

See ticket offers | Get inspired | Check live train times | Get in touch | Book travel assistance | Plan my journey | Buy tickets for attractions

Cookie Preferences

Feedback

Advance Train Tickets | Southeast

southeasternrailway.co.uk/tickets/tickets-explained/advance-tickets

When are Advance Tickets available?

- Weekday bookings for Advance tickets are available until Thursday 20 July
- Weekend bookings for Advance tickets are available until Sunday 18 June.
- Services departing after 22:00 will only open 8 weeks in advance to take into account any late night engineering works.

Strike dates

The following dates are subject to industrial action resulting in services being suspended from 22:00 the day before until 08:00 the day after:

- Friday 12 May
- Saturday 13 May
- Wednesday 31 May
- Saturday 3 June

Details last updated 28 April 2023

What routes are Advance Tickets available on?

Advance Tickets are available on selected routes including some high-speed services.

Unfortunately, Advance Tickets are not available for journeys entirely within the London Travelcard area (Zones 1-6), or from selected stations close to London.

Where can I buy an Advance Ticket?

Can I change the journey or get a refund on an Advance ticket?

Can I reserve a seat?

When can I use an Advance Ticket?

Are there discounts for children?

Feedback

Independent Rail Retailers represents the majority of train ticket retailers. Find out more about us and our members at independentrailretailers.co.uk.

South Western Railway

Buy tickets Train tickets Plan my journey Travelling with us Destinations and offers Help and support

When can I buy an Advance ticket?

We'll put advance tickets on sale up to 12 weeks ahead of time and you can buy them up to the time of departure, but the earlier you book, the better the chance of getting a cheaper ticket! Remember that Advance tickets are limited in number, so when one fare is sold out, it won't be available anymore for that train.

Advance tickets are currently on sale up to and including the dates below:

Route	Available for booking	Notes
Weymouth Route Services passing through Eastleigh and Southampton	Until 21 July	Tickets are unavailable on: - 12, 13 & 31 May - 3 June
West of England Route Services passing through Overton and Salisbury	Until 21 July	Tickets are unavailable on: - 28 April - 12, 13 & 31 May - 3 June & certain journeys between 20 - 26 June
Portsmouth Route Services to/from Portsmouth	Until 21 July	Tickets are unavailable on: - 12, 13 & 31 May - 3 June

Details last updated: 28 April 2023

Are there any extra discounts on Advance tickets?

You can save 34% extra with all railcards on Standard Class Advance fares except Network Railcards and Gold Cards. If you hold the following railcards, you're also entitled to 34% off all First Class Advance fares.

Cookie Preferences Feedback

LNER LONDON NORTH EASTERN RAILWAY

Buy tickets Customer services Sign in / Register

Why can't I book my tickets yet?

We're still finalising our timetable for future travel dates, so some tickets aren't on sale yet. Here you can create a ticket alert for the dates you want to travel and we'll let you know when the cheapest Advance tickets are available to buy.

Sign in or create an account to set up your alert and we'll send you an email when your chosen dates are available to book:

- Create a ticket alert for your journey
- Create a regular alert for the same journey you make each week
- You can cancel or remove your alerts in your Account area at any time.

If you're not already registered with LNER you'll need to create an account to manage your Ticket Alerts below.

For travel agents and larger groups

Please be aware that tickets for travel agents and groups of 10+ are released closer to the day of travel. This ticket alert is for general ticket sales only. Tickets are currently open until 28 July 2023.

[Sign in or register for a ticket alert](#)

Availability and current exclusions

Tickets for LNER trains are on sale up to and including **Friday 03 November 2023**, and usually up to three months in advance.

Tickets are available for travel up to and including:	Friday 03 November 2023
	27 August 2023
Excluded dates not yet available for booking:	9, 10, 16, 17, 23, 24, 30 September 2023
	1, 7, 8, 28, 29 October 2023
	4, 5 November 2023

What to know about tickets for future travel

I can buy your tickets on other sites. Why can't I buy them on yours? [▼](#)

When will your Advance tickets be on sale? [▼](#)

Good service - view our [Current Travel Advice](#) [Service updates](#)

Support About us Travel information

Independent Rail Retailers represents the majority of train ticket retailers. Find out more about us and our members at independentrailretailers.co.uk.

Booking Train Tickets in Advance | gwr.com/your-tickets/choosing-your-ticket/advance-tickets

GWR Buy tickets Your tickets Stations and destinations Travel information Travelling with us Help and support

Book early and save, on average, more than 50%.*

Advance single tickets are one way tickets available on many of our most popular routes. They're great value, and numbers are limited, so you'll need to be quick.

Tickets go on sale up to 24 weeks before travel.*

At a glance

Advance tickets are for travel on specific trains and times. Make sure these are right for you before you buy.

Pros	Cons
Our lowest prices*	Limited availability
Single tickets. Mix and match your journeys	Non-flexible (you must travel on the route, time and date shown)
Reserved seat (where available)*	Non-refundable (unless you can't travel because of cancellations or delays)

Plan ahead

Book up to 24 weeks before you travel for weekday journeys and 12 weeks for weekends.

Service	Available up to
Weekdays	Friday 15 September**
Saturdays	Saturday 9 September**
Sundays	Sunday 10 September**

[Check your journey before you travel.](#)

Buy train tickets

Plymouth (PLY)

Penzance (PNZ)

Find tickets

Good Journey

Cheap Advance Train Tickets | emr.co.uk/tickets-discounts/choose-the-right-ticket/advance-tickets

EMR Tickets & discounts Travel info Routes & destinations Discover Help

Buy tickets Live trains Timetables Careers Login/register Contact us

Latest booking dates

You can currently book tickets for travel up to the following dates:

London route

Day	Date
Saturday	24th June 2023 (Excluding 13th May & 03rd June)
Sunday	25th June 2023 (Excluding 12th & 31st May)
Monday-Friday	21st July 2023

Liverpool to Norwich plus Skegness Route

Day	Date
Saturday	24th June 2023 (Excluding 13th May & 03rd June)
Sunday	25th June 2023 (Excluding 12th & 31st May)
Monday-Friday	21st July 2023

- Get a discount +
- Download our app
- Our price promise
- Business train travel +
- Travelling without a ticket
- Commuter Travel Guide

Independent Rail Retailers represents the majority of train ticket retailers. Find out more about us and our members at independentrailretailers.co.uk.

What are Advance train tickets?

An Advance train ticket is a fare which goes on sale before the day of travel – often 12 weeks. They're non-flexible Single tickets for an A to B journey, which means you'll need to book another ticket if you're returning.

Usually this ticket type is non-refundable, but at CrossCountry we recognise that plans can easily change. That's why we offer free changes to Advance tickets booked online – you can find out more about that [here](#).

Because they can be booked well before a Journey departs, Advance tickets are the best way to organise your travel.

How far in advance can I book?

How to book Advance tickets

Booking an Advance train ticket is simple.

1. Click the 'Buy tickets' button above or find your destination using the route finder below
2. Alternatively, use the [CrossCountry mobile app](#)
3. Select your destination and departure stations
4. Choose your date of departure. Add your return date if you're making the journey back, too
5. Add the number of people travelling, railcards, route preferences, or any promotions you might have
6. Now for us to do the work. We'll present you with all the available tickets, with Standard to the left and First Class to the right
7. When you select a Standard or First-Class ticket, you will be shown if an Advance ticket option is available. It's recommended you book well before your departure date to ensure you can purchase an Advance ticket
8. Once your ticket has been selected, click Continue to purchase

Once you've booked your Advance train ticket, the only thing left to do is make the journey.

OUT	
Thu 25 Aug 2022	
Birmingham New Street to Manchester Piccadilly	
Earlier	
Standard	1st class
16:57 → 18:23 Plat. 4 estimated 1h 26m, 0 changes £37.60 Limited availability	£96.30 Only 4 left
17:04 → 18:46 1h 42m, 1 change £42.10	£119.10
17:31 → 19:02 Plat. 3 estimated 1h 31m, 0 changes £42.10	£113.90 Limited availability
17:57 → 19:23 Plat. 2 estimated 1h 26m, 0 changes £37.60 Limited availability	£96.30 Only 4 left

Get there by train. Get there with Southern.

Are you planning on taking a trip soon? Why not get a head start by arranging your journey now? When you book your trains in advance, you can enjoy savings on your rail fare and get your travels organised early on.

What are Advance rail tickets?

Advance train tickets give you the chance to book your trip for cheaper prices than if you were to buy on the day. Advance tickets are available up to 12 weeks before your travel date and can be used on some commuter journeys. They can be purchased up to the day before travel but it's first come, first served.

Advance tickets are for one-way, single journeys, so if you need to return, you'll need to buy two single Advance tickets.

New Peak Advance tickets

Anyone travelling at peak times on Monday or Friday (morning and evening) can save up to 15% compared to the price of a standard peak fare Anytime Day Return ticket.

Southern peak Advance tickets are available for journeys in both directions between East Croydon, Clapham Junction and London Victoria, and stations south from Three Bridges, as far east as Eastbourne and as far west as Chichester.

When can I use Advance rail tickets?

You can only travel on the date and train shown on your train ticket and reservation coupon issued to you when you book. As this is a set booking, you won't be able to get another train or break your journey. So, if you get off the train at a station on the route and get on another train to complete your journey, your Advance ticket will no longer be valid.

How much do they cost?

Advance tickets are available across the country at different prices, however journeys on the Southern network start from £6.

If you want to upgrade, you can select one of our First Class Advance tickets which start from £19.

The earlier you book, the more likely it is that you'll snap up a £6 ticket. Don't worry if you've not planned that far ahead, though. As our other Advance tickets are often available right up to 6pm the night before you travel.

Here are some of the benefits of booking early on:

- No last-minute dash to the ticket office to arrange travel
- Cheaper fares
- 1/3 off the ticket price if you have a 16-25, Senior, HM Forces, Family & Friends, Two Together or Disabled Persons Railcard
- Using single tickets gives you the chance to mix and match tickets. For example, you could travel standard class on the way out and First Class on the way back

Advance Single Fares | Chiltern | chilternrailways.co.uk/advance-single-fares

中文 | العربية | Accessibility tool | My Account

Chilternrailways Buy tickets Travel updates Ticket types Your journey Destinations & attractions Help & Contact Search...

Service	Availability
Saturday services	Saturday - Coming soon
Sunday services	Sunday - Coming soon
Weekday services	Friday 21st July 2023

Please note that Advance tickets are subject to availability. If there aren't any available at your specified time of travel, you can still get great savings from buying Super Off-Peak or Off-Peak tickets.

Restrictions

*Advance tickets for the following dates are either unavailable or limited.

Routes between London Marylebone and Oxford

Restriction	Dates
Closed	All dates currently closed
Limited	

Routes between London Marylebone and Birmingham

Restriction	Dates
Closed	29/04, 30/04, 01/05, 06/05, 07/05, 08/05, 12/05, 13/05, 14/05, 15/05, 20/05, 21/05, 27/05, 28/05, 29/05, 31/05, 01/06, 03/06, 04/06, 10/06, 11/06, 13/06, 14/06, 15/06, 16/06, 17/06, 18/06, 24/06, 25/06, 01/07, 02/07, 08/07, 09/07, 15/07, 16/07
Limited	

Read our terms and conditions for Advance fare tickets [here](#).

Independent Rail Retailers represents the majority of train ticket retailers. Find out more about us and our members at independentrailretailers.co.uk.



Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to Licensing.Enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Infinitive Group

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

- We think a reduction of 4 weeks in timetable decision making time would require new and innovative ways to improve timetable accuracy, efficiency and measurability. There will be a need for continuous assessment and improvement beyond the current process. This is because Network Rail's timetables are best effort as it is, so an earlier deadline makes the existing manual process less suitable for working out the best timetable as, presumably, the resulting timetable will be 4 week's less optimal. They will

need computer aided decision making to reduce their lead time and simulating their timetables will be a key enabler of this.

- From our recent project work with Network Rail and South Western Railways we know that it is possible to accurately map train locations and compare this against timetables. If timetable planners were given access to train GPS data and suitable tools to enable proper analysis this data could be utilised to fully measure timetable accuracy and efficiency after a timetable is published. This would enable timetable planners to see where improvements could be made based on real-world data.
- There is a wealth of data collected continuously from rolling stock and other railway infrastructure. At Infinitive we feel that this data is currently massively under-utilised. If datasets such as OTMR, CCF & GPS are collected and combined then important new insights in relation to timetables can be revealed. Using the latest technology in terms of big data processing and machine learning is key to unlocking this potential.
- If the above points are taken into account and solutions & improvements suggested by Infinitive were successfully implemented, then 8 weeks would be beneficial compared to 12 as the iteration time and therefore opportunity to adjust and improve timetables would be reduced.
- Beyond the above, the next step would be to move towards a full simulation (or 'digital twin') of train movements and the timetable. This would enable timetable planners to see accurately simulated results before they release a timetable so that any issues could be fixed beforehand and maximum efficiency can be achieved. This would remove the need for the trial and error process where a timetable is released, results monitored, then improvements made. A full simulation would mean iterations and improvements of the timetable could be comparatively instantaneous, as opposed to waiting 8 or 12 weeks to monitor results.
- Measurement, analysis and improved efficiency of the timetable would also lend itself to greater possibility for running additional freight services where there is a window within the passenger train timetable.
- There is further potential with machine learning to measure energy consumption and efficiency of a particular train journey. This could be taken into account when creating timetables to also improve carbon emissions.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

- If the timetable reliability can be improved, based on our above suggestions, then the reduction to 8 weeks should be less of an issue for customers.
- We would guess that for some passengers, being able to see the timetable 12 weeks in advance and book tickets that far ahead is a useful thing. In

reducing that to 8 weeks there would likely be some unhappy customers. If the timetables were made more reliable that would counteract some of this negative sentiment.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

- We agree with the proposed changes as this clarification makes the use of publicly available timetable more reliable for consumption by both service users and organisations that use publicly available timetable data for decision making and service provision.
- We carried out our own SWOT analysis to think about how the change would affect Infnitive. We have included here in case it is of interest:

<p>Strengths</p> <ul style="list-style-type: none"> • Infnitive has experience in matters relating to timetable processing/forecasting 	<p>Opportunities</p> <ul style="list-style-type: none"> • Any improvement to publicly available timetable data consistency makes it a more reliable source for use in Infnitive projects
<p>Weaknesses</p> <ul style="list-style-type: none"> • Infnitive’s experience tends to be on the internal timetable data side, whereas these changes relate to public timetable data 	<p>Threats</p> <ul style="list-style-type: none"> • Any misunderstanding of the significance of this change may result discrediting Infnitive’s competency to potential clients

Publishing your response

We plan to publish all responses to this consultation on our website. Should you wish for any information that you provide to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily 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.

Under the FOIA, there is a statutory code of practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this, if you are seeking confidentiality for information you are providing, please explain why. If we receive a request for disclosure of the information, we will take full account of your explanation, 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.

If you are seeking to make a response in confidence, we would also be grateful if you would annex any confidential information, or provide a non-confidential summary, so that we can publish the non-confidential aspects of your response. 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 General Data Protection Regulation and Data Protection Act 2018.

Consent

In responding to this consultation you consent to us:

- handling your personal data for the purposes of this consultation; and
- publishing your response on our website (unless you have indicated to us that you wish for your response to be treated as confidential as set out above.)

Your consent to either of the above can be withdrawn at any time. Further information about how we handle your personal data and your rights is set out in our privacy notice.

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.



Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: LNER

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

LNER believes that while the move to three timetable changes is a positive one, the reduction in informed traveller timescales is a retrograde step. Advances in technology and improvements in the timetable process should be used to enhance timescales, providing better and more accurate information to customers. LNER would urge the regulator to maintain the current licence conditions for Informed Traveller in condition 7.18.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

[Click or tap here to enter text.](#)

The financial performance of the railway remains a critical challenge and as an industry we need to work together to improve customer confidence to drive revenue.

Increasing the use of rail transport is also a key tool in de-carbonising our economy and supporting sustainable long-term growth.

The key challenge for LNER is that the long-distance market and the impact of the proposed change in the licence requirement.

LNER operates in the long-distance high-speed sector of rail travel with a customer based that is predominantly leisure oriented. The majority of remaining passengers are generally travelling for business purposes. These journeys are flows between major cities – e.g. London to Edinburgh. Commuting and short distance journeys make up a small proportion of our market.

We know from analysis of our passenger numbers that the leisure market has recovered most strongly post-pandemic, particularly on the East Coast Mainline (ECML) where passenger levels are in excess of pre-pandemic levels.

This market tends to plan and book journeys further in advance. They also have competitive alternatives to rail such as air travel or use of the private car. To compete effectively in this market, it is essential that rail is able to present its product to the market as early and as accurately as possible. As a comparison, airline publish schedule 12 months in advance.

Maintaining an extended booking horizon is a key tool in achieving that objective and LNER has led the industry in maintaining and pushing beyond the T-12 limit wherever possible.

Pre-pandemic, LNER maintained a compliance with Informed Traveller timescales for many years.

LNER also took the lead in developing its Horizon project which allowed us to sell tickets before the final timetable was confirmed. This was developed in response due to the much reduce informed traveller timescales during the pandemic and subsequent recovery.

This was never intended as a replacement for the full informed traveller booking horizon but as a mitigation for the shortfall and to enable an extension of the booking horizon beyond 12 weeks when normal timescales were in operation.

It is unfortunate that this solution is being used to support a reduction in Informed Traveller timescales rather than as a means to deliver a timetable to potential customers as early as possible. We know from research that 65% of our passengers surveyed would like to be able to book a ticket 3 to 6 months in advance and almost

half of customers have said that an extended booking horizon will make them more likely to choose rail.

LNER has already supplied the above information to ORR on the impact of reducing the Informed Traveller timescales and is happy to share further information if needed as part of the workstream on timetabling and passenger information.

The revenue impact of this will be shared separately (LNER Annex 1) in order to protect commercial confidentiality.

It should also be noted that the reduction in the timescale for the production of the final timetable has an impact on downstream activities, particularly in the planning and production of traincrew diagrams and rolling stock diagrams. The change to informed traveller timescales reduces the time available to do this. As an industry we should be looking to increase these timescales to provide accurate information to our suppliers and all of our frontline operational staff. This will reduce late notice change and support a safer and more reliable operation of the railway.

LNER would seek to maintain and improve the Informed Traveller timescales so that final timetables are available further in advance of travel. The requirement to produce a final timetable not less than 12 weeks before the day of operation should not be changed.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.
LNER has no comment on this proposal.

Publishing your response

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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.

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- publishing your response on our website (unless you have indicated to us that you wish for your response to be treated as confidential as set out above.)

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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.

19 May 2023

Office of Rail and Road

BY EMAIL: licensing.enquiries@orr.gov.uk

To whom it May Concern,

ORR Consultation on the Proposals to Modify Timetable Publication in Network Rail's Licence

I write on behalf of the Liberal Democrat Group on the London Assembly in response to the consultation on the proposed changes to Condition 7.18 of Network Rail's network licence. This condition requires Network Rail to provide train operators with timetable information twelve weeks in advance of trains running following a timetable change. The change would be to reduce the timeframe from twelve weeks to eight weeks to notify train operators with timetable information.

I would like to express my objection to this change from 12 to 8 weeks given that such a change does not benefit passengers and such a change would not encourage more people to take the train.

The proposed change would give people less time to see if a train is an option for them and make it more difficult for people to plan ahead. The consultation documents state that a majority of people buy their tickets within the 8-week period. There will however remain a significant number of people who do make use of the 8 to 12 weeks window that may be forced to move away from the train given the unavailability of train information.

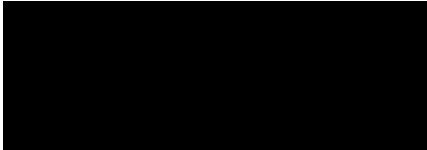
It would also give people less time to buy a cheaper Advance ticket. Given the smaller window, it could mean that ticket prices will rise faster, leading to more people being discouraged from buying a ticket and looking for alternative, less environmentally friendly travel. People struggling in the current Cost-of-Living Crisis will have less time to buy a train ticket and will be particularly vulnerable to the negative impacts of these changes.

Similarly, new potential train users would more easily be discouraged from taking the train and look for alternatives.

The proposal outlined in ORR's Consultation to Modify Timetable Publication in Network Rail's Licence is not appropriate as it does not benefit passengers.

The Liberal Democrat Group on the London Assembly recognises the issues the train companies have faced due to COVID, but for the outlined reasons above does not support the proposal and urges ORR to reconsider.

Yours sincerely,

A large black rectangular redaction box covering the signature of the sender.A black rectangular redaction box covering the name of the sender.

Liberal Democrat London Assembly Member

ORR Consultation on proposals to modify timetable publication requirements in Network Rail's Licence

I am writing on behalf of London TravelWatch to object to the ORR's proposals to modify Network Rail's network licence requirement to publish a timetable 12 weeks in advance of services running.

London TravelWatch (LTW) is the official independent transport watchdog, using evidence to campaign to improve journeys and advocate for all people who travel in and around the capital. We liaise and work closely with transport operators, providers, regulators, and local authorities. In turn, transport operators consult us on proposed changes to services and closures of lines or stations.

Currently, Network Rail are required to provide train operators with timetable information 12 weeks in advance of trains running (T-12). Under these proposals, this deadline would be reduced to just 8 weeks. We believe this would be detrimental to the passengers, reducing the time people have to plan travel and buy cheaper advance tickets, and discouraging travel by train.

While the consultation documents note that a majority of passengers purchase tickets within the eight-week window before travel, this still leaves a significant minority of people who are buying their tickets earlier than this. This change may make it harder for them to plan and make their journeys and may deter them from travelling by train completely.

We believe this is particularly likely to impact people planning longer distance journeys, for example those travelling to a different city for an event or to another part of the country for a holiday. People often book these occasions months in advance, including accompanying services like accommodation. However, the ability to plan and book train tickets only 12 weeks in advance already likely deters some people from travelling this way in favour of alternatives like flying or driving. Reducing this to 8 weeks will further reduce the appeal of using the rail network, at a time when the industry needs to be encouraging more people to use it.

Disabled passengers may also be disproportionately disadvantaged. Trains often have limited wheelchair spaces, and passengers who require these need to have the confidence they can book these in well in advance, particularly before committing to other expenses their journey might involve such as a hotel.

Additionally, lowering the requirement to publish a timetable to 8 weeks in advance of services running reduces the time people have to buy cheaper Advance tickets. This again may discourage people from travelling by train, particularly as many people are facing financial pressures due to the cost-of-living crisis.

This proposal would be also out of step with the direction many other countries are moving, giving passengers more notice of timetables. In France and Italy for example 4 months notice is generally given, while in Germany and Austria it is 6 months. While these are not without problems, for example some missing trains

when first published, they broadly give passengers more timely information to help them plan.

Overall, it is disappointing to see these proposals, which on balance seem to benefit the railway industry and not passengers. We recognise that the industry in recent times has often failed to deliver T-12, creating uncertainty and confusion for some passengers. However, the answer to this needs to be action to improve infrastructure and services so these requirements can be reliably met, and not lowering the bar industry needs to meet at the expense of passengers.

Mobility and Access Committee for Scotland's response to ORR's initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

We have no objection to the proposal.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

We think that 2 months notice is reasonable

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

We agree with the proposal

Response publication redaction

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

Publish response

Publish redacted response removing any commercially sensitive information

Do not publish response

About

This section allows you to input information about yourself and/or your organisation. All of the fields are optional, except your email address which we will use to contact you if we require more information relating to your response. Any personal data that you provide will be processed in accordance with ORR's privacy notice (www.orr.gov.uk/privacy-notice).

5.Full name

6.Responding on behalf of an organisation/group or as an individual? (please provide organisation or group name)

Mobility and Access Committee for Scotland

7.Email address



Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: MTR Corporation (UK) Ltd

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

We consider the proposed reduction of the 'Informed Traveller' threshold from 12 to eight weeks (a reduction by one third) to be a backward step for rail users and for the industry. We therefore do not support the proposed amendment to wording of Section 7.18 of Network Rail's license as this would effectively erase this long-standing requirement on the infrastructure provider.

We consider 12 weeks to be a minimum viable threshold for publication of customer-facing timetable information (and subsequent opening of trains for reservations and sale of Advance fares), to which operators, RDG, Network Rail, ORR and representative bodies such as Transport Focus have dedicated very considerable effort and resource over many years.

Although the 12 week threshold has not been comprehensively achieved by Network Rail, and in some cases by operators, it has at least provided a galvanising goal with the needs of rail users at its core. We share the concerns articulated by [Transport Focus on their website](#): *“This could be bad news for passengers and potential passengers. It could give people less time to see if train is an option for them and to buy a cheaper Advance ticket. Is nailing down the timetable eight weeks ahead rather than three months really the way to win more passengers to the railway? Reducing the threshold for making rail inventory visible and available for sale by one third is a significant erosion of Britain’s passenger offering which we believe will be reputationally and financially damaging to the sector (and consequently to the public purse for operators which receive subsidy or other Treasury support). The message to ‘plan ahead and book early to get the best fares and secure your seat’ has been the mainstay of TOC advertising for the past 10-15 years, and this is the foundation of yield management for Long Distance TOCs.*

(1.1) We consider the proposed reduction of the ‘Informed Traveller’ threshold from 12 to eight weeks (a reduction by one third) to be a backward step for rail users and for the industry. We therefore do not support the proposed amendment to wording of Section 7.18 of Network Rail’s license as this would effectively erase this long-standing requirement on the infrastructure provider.

(1.2) We consider 12 weeks to be a minimum viable threshold for publication of customer-facing timetable information (and subsequent opening of trains for reservations and sale of Advance fares), to which operators, RDG, Network Rail, ORR and representative bodies such as Transport Focus have dedicated very considerable effort and resource over many years.

(1.3) Although the 12 week threshold has not been comprehensively achieved by Network Rail, and in some cases by operators, it has at least provided a galvanising goal with the needs of rail users at its core. We share the concerns articulated by Transport Focus on their website: *“This could be bad news for passengers and potential passengers. It could give people less time to see if train is an option for them and to buy a cheaper Advance ticket. Is nailing down the timetable eight weeks ahead rather than three months really the way to win more passengers to the railway?”* (1.4) Reducing the threshold for making rail inventory visible and available for sale by one third is a significant erosion of Britain’s passenger offering which we believe will be reputationally and financially damaging to the sector (and consequently to the public purse for operators which receive subsidy or other Treasury support). The message to ‘plan ahead and book early to get the best fares and secure your seat’ has been the mainstay of TOC advertising for the past 10-15 years, and this is the foundation of yield management for Long Distance TOCs.

2. Do you consider that confirming timetables with fewer than twelve weeks’ notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

(2.1) The recovery in passenger journeys and revenue following the Pandemic has been characterised by a significant shift in rail usage patterns. As commuting and traditional business travel has declined and become less habitual, so leisure travel and discretionary journeys have increased. Domestic train travel was well placed to capture new markets such as the domestic staycation and days-out trend in 2021 and 2022. Railcard use has increased as a consequence, meaning some customers have already made an up front financial commitment to rail, and should have as much notice as possible of how they might leverage that. If the product is not available,

there is a risk of Railcard purchasers expecting to have their card purchase refunded under their wider legal consumer rights. (2.2) There is evidence of new price-sensitive customers being recruited to rail as well as existing customers becoming more aware of how to secure the best fare by booking as far ahead as possible. The rapid roll-out of yield management of single leg journeys via Advance fares serves these two markets extremely well but relies on inventory being available to purchase (the start point for which is the uploading of timetables by Network Rail). This is no longer the sole preserve of Long Distance operators and is becoming the norm for shorter journeys, an example being Northern's comprehensive yield management of its York to Leeds route. This is good news for customers, who can buy a cheaper fare which is valid for each specific leg of their journey. (2.3) If the railway is to remain relevant to existing and new customers, it must be easy to do business with. A price-sensitive leisure customer should not need to be familiar with the complexity of timetabling processes and Network Rail's engineering work programme in order to purchase a ticket. They should not need to make allowances for this when buying a ticket for a major sporting or music event, accepting a wedding invitation, booking a mini-break in Edinburgh or indeed scheduling a hospital appointment. Within reason, it should be possible to see train times and buy a train ticket at the same time as making these significant calendar arrangements. The proposal to reduce the timetable publication threshold by four weeks removes almost a month from customers' ability to firm up this key aspect of their arrangements and opens up the likelihood of them overlooking rail completely for this and other journey requirements, i.e. the journey and revenue is lost to rail. (2.4) By way of comparison, most airlines open their services for booking 11 months in advance (see here for a useful summary). National Express opens some services for sale 15 months in advance, and Megabus typically opens its services six months ahead of travel. The national coach operators were visible and vociferous in their attempts to recruit rail users to their services during period of rail strikes in 2022/23, ensuring they were part of the journey planning consideration process for some customer segments, leading to loss of journeys and revenue for rail. 3.5. TOCs on the East Coast Main Line (where there is a choice of operators and customers are typically making long distance journeys) have shown that it is possible and desirable to enable customers to buy tickets and make seat reservations in excess of 12 weeks ahead of travel. In 2021, Grand Central and LNER extended their booking horizons to 26 weeks, and this has now been adopted at Hull Trains and Lumo. Although not directly comparable, the Caledonian Sleeper advertises a 12 month booking horizon. (2.6) To achieve this step change in customer centricity required a comprehensive overhaul of internal processes, systems and customer communications. Operators worked in partnership with third party retail channels as well as their own booking engines to make the new proposition as widely available as possible; making their offering visible and relevant to the widest possible audience. It is simply the norm on this line of route. It is no coincidence that these operators are amongst the strongest and most rapid in their recovery from the Pandemic, as reported in ORR's statistical releases. In the most recent ORR publication (data to Dec 2022), journeys on Hull Trains were 107% of the same quarter in 2019, with Grand Central at 97% and LNER at 96%. These operators rely on a long booking horizon to meet their customers' expectations, maintaining their strong customer satisfaction ratings and financial performance.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response. (3.1)

It is useful to make the wording of this section of the license as specific as possible. It may be helpful to supplement the proposed wording with the terminology commonly used by train planning professionals, for ease of understanding and avoidance of doubt. We believe that the abbreviations LTP (Long Term Plan), STP (Short Term Plan) and VSTP (Very Short Term Plan) are typically used in communication between Network Rail’s train planning teams and their counterparts in TOCs to refer to the different types of timetables. (3.2) Our reading of the proposed revised wording is that all types of timetables (Plans) except VSTP (which are usually reactionary to unforeseen circumstances) would come into scope and should be delivered as set out in the Network Code. We would be grateful for ORR’s confirmation of this. (3.3) Please note that we do not object in principle to Network Rail’s licence referring to the Network Code for the specific time threshold for timetable publication, rather than the threshold should be 12 weeks not 8 weeks.

Publishing your response

We plan to publish all responses to this consultation on our website. Should you wish for any information that you provide to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily 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.

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comply with the UK General Data Protection Regulation and Data Protection Act 2018.

Consent

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Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

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Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: National Union of Rail, Maritime and Transport Workers (RMT Union)

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

- 1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?**

RMT Union is broadly opposed to the proposed licence modification text. The proposals to remove the explicit reference to the 12 weeks and replace it with the requirement for Network Rail to follow the timescales in the Network Code would then allow Network to propose an amendment to the Network Code to introduce 8 weeks as the deadline for Network Rail's publication of a timetable in advance of trains running.

RMT believe that this change will not benefit passengers or railway workers and will only serve to benefit Network Rail and Train Operators. RMT has not seen any impact assessment on the potential impacts of this proposed change and proposed subsequent change to the Network Code and we simply cannot support this change without seeing and understanding what impact this will have on passengers and railway workers.

Under the Better Timetables for Passengers and Freight (BTPF) Network Code proposal, cutting the timetable publication deadline from 12 weeks to 8 weeks in the poses real risks to the effective running of the railway network through worsening industrial relations. A policy of understaffing and not filling vacancies from employers has meant that the railway is reliant on overtime and rest day working and rosters that reflect this. Compressing the timetable table notice could cold increase pressure on rostering arrangements There will inevitably be an impact on work life balance. It is not clear to us what assessment has been made on the impact of this change on staff rostering arrangements within the train companies and network rail and we would request that this be done.

Shortening the publication of timetables by a third to 8 weeks runs the risk of adding further pressures on poor performing Train Operating Companies who have for years failed to recruit enough drivers, guards, and station staff. RMT would want to know if ORR, Network Rail or the Train Operators have undertaken any risk or impact assessments to this effect and if not, why not? RMT is acutely aware of the chaos that can be caused when timetable scheduling goes wrong as we saw in the spring timetable fiasco of 2018. These proposed changes are too important to be waived through without proper scrutiny or impact assessments.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

Confirming timetables with fewer than 12 weeks' notice will undoubtedly impact end users to plan journeys with confidence. RMT is concerned that there has not been enough consultation or any impact assessment conducted by ORR or the industry into the impacts these proposed changes under Better Timetables for Passengers and Freight (BTPF) proposals would have.

The consultation document clearly highlighting that “While Network Rail and train operators have already agreed this change, evidence on end user impact has not been comprehensive.” RMT believes that this is the wrong time to propose these changes at a time when Train Operators are failing passengers and failing to run a full timetable day to day due to staffing and rostering issues.

Two train operators owned by parent company First Rail holdings Ltd who over recent years have both been suffering from terrible performance were given special dispensation to introduce new timetables and then a “Timetable Recovery Plan” by

ORR due to severe staff shortages following a ban on overtime and rest day working.

RMT cannot see how opening the door to shorter timetable notices will prevent this happening again in the future. For passengers, in order for Intercity rail travel to compete with domestic air travel at the time of climate crisis there is a strong argument for actually extending the notice longer than 12 weeks rather than shortening it. Passengers making long distance journeys often want to plan further in advance of 12 weeks, cutting this by a third to 8 weeks will not serve to increase rail usage as it creates less certainty, reliability and confidence in rail as a mode of transport.

RMT is also concerned that there has not been any impact assessment on the availability of the cheapest tickets 8 weeks in advance. What reassurance has ORR been provided that Train Operating Companies will not try to use this as a way of increasing revenue? RMT is also not clear what assessment has been undertaken about the impact on passengers and if the passenger watchdogs have been consulted on this change. If not this consultation should take place.

Proposed modification of definition: “Relevant Timetable Changes”

- 3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.**

RMT believes that the proposed modification of definition: “Relevant Timetable Changes” is deliberately vague and does not include reference to the main timetable changes introduced through the publication of the Working Timetable which currently happens in May and December.

It appears that these changes are being made solely to benefit the rail industry and there is little or no consideration on the impacts to railway workers or passengers. Network Rail states that their “Better Timetables for Passengers and Freight Users” will introduce a timetable production process which “is robust and can respond more quickly to unforeseen events and evolving circumstances” and delivers “operational resourcing, efficiencies f having base plans that can be amended with greater agility”.

RMT is concerned that these changes are being proposed to mitigate against the failure of the rail industry to adequately staff the railway and to adequately mitigate against the rapidly decreasing performance levels on our railway due to incompetence of train operators and the cuts agenda from the current Government that means an increasing degradation of our rail infrastructure.

To finalise our response RMT cannot support these proposals as they stand without seeing the impact assessments on passengers and railway workers. For an industry in a crisis of its own making RMT believes these proposals are designed to benefit the rail industry alone and do nothing to improve the experiences of passengers or the lives of railway workers.

Publishing your response

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Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

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Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Network Rail

Email*: [REDACTED]

Telephone number*: [Click or tap here to enter text.](#)

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

This response to the ORR's consultation is on behalf of Network Rail. The proposals set forward in Proposal for Change 120 are the culmination of years of industry co-working to develop an improved and sustainable timetabling process, led by the Better Timetables for Passenger and Freight Users (BTPF) Programme. This is reflected in the outcome of the positive industry vote in favour of the move away from weekly amended timetable publication at T-12 in January 2023. To reach this point consultation was conducted with key industry groups, including groups representing the interests of timetable participants and end user passengers. These proposals are designed to benefit passenger and freight end users, with additional proposals

arising from BTPF led industry consultation including an additional opportunity for coordinated change to the base timetable, and a reduction in the lead times to make changes from 10-12 to 7-9 months. Collectively, these changes will enable the industry to be more responsive to adjusting service patterns, performance issues, and the arising needs of passenger and freight users. Network Rail supports the ORR's proposal to remove the reference to twelve weeks in Condition 7.18 of Network Rail's Licence Conditions, and to replace it with the requirement for Network Rail to follow the timescales in the Network Code. The proposal will help to streamline the regulation of Network Rail's timetable processes and reduce the need for both regulatory documents to be updated, if further amendments are required in the future.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

This proposal is focused on improving operators' ability to advertise and sell tickets in advance, not decrease that ability. This is because the new process de-couples the finalisation of all elements of the detail of amended timetables from the point that Network Rail will publish those timetables downstream, and also the point operators will normally advertise tickets. This is being enabled through the Smarter Information Smarter Journey (SISJ) change programme, which has already delivered technology that supports this de-coupling of ticket sales from weekly amended timetable publication. Network Rail will publish amended timetable information downstream that operators require published at T-12, this is substantially earlier than they have been published over the last 3 years, and earlier than they have been consistently published for the last 6 years. A notification system is available for operators to deploy, should they wish, that will notify a customer of any final minor amendments after that date (technology delivered by the SISJ programme) - some operators are already using this method. Although, any amendments to journeys will be confirmed at T-8, overall, passengers will see schedules earlier than today. Early opening of timetables for reservations supports revenue recovery and many Operators already retail tickets well in advance of T-12 and will be able to continue to do so if the timescales are amended to T-8. These proposals and the system that enables them, reflects similar practices and technology utilised in the airline industry and other online ticketing services. The benefits of this approach were evidenced by a pilot undertaken by Great Western Railway (GWR) and System Operator in 2021. In the pilot pre-validated Informed Traveller amended timetables were published at T-12 and then refreshed at T-8 after validation and offer of the final amended timetable plan. Passengers that had changes to their train schedules between T-12 and T-8 were informed of the changes. The pilot saw a reduction in the number of conflicting reservations and reservation changes and earlier passenger booking. The process provided passengers with insight into the proposed plan earlier and enabled them to

book tickets earlier, taking advantage of discounted fares. This process has now been adopted by GWR with no issues experienced with amendments required to the T-12 published plan, and GWR have advised that the process has not generated any major passenger complaints.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

The current timetable process operates with this definition outlined in the Licence Conditions. Through consultation with industry parties, the BPTF Programme has not identified any negative impact or ambiguity caused by the existing definition and is therefore not aware of any reason that it requires revising.

Publishing your response

We plan to publish all responses to this consultation on our website. Should you wish for any information that you provide to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily 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.

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Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

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About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Nexus

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

No comments

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

Tyne & Wear Metro operates to a regular frequency and as such whilst timetables are published is marketed a 'turn up and go' service. Therefore from a customer perspective if the times of trains change, this does not impact the majority of customers who do not consult timetables. If a part of the network has a replacement

bus service operating due to engineering work, this is generally advertised a few weeks before the relevant engineering works as due to the nature of the operation customers do not plan their journeys far in advance and do not buy advance tickets. Therefore from the perspective of Tyne & Wear Metro customers, moving timetable publication from 12 weeks to 8 weeks will not have an impact on customers.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

From a customer perspective it is logical to include the publication of the Working Timetable on a Timetable Change within the definition of “Relevant Timetable Changes”, as customers seeking to travel on a specific day are concerned about the timetable on that day, rather than whether it is a ‘permanent’ or ‘temporary’ timetable running on that day.

Publishing your response

We plan to publish all responses to this consultation on our website. Should you wish for any information that you provide to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily 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.

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comply with the UK General Data Protection Regulation and Data Protection Act 2018.

Consent

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Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Northern Trains Limited

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

The proposed modifications appear sensible.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

Whilst there are some practical questions surrounding the implementation of the revised process from a commercial/ticketing perspective, we believe the dedicated forums are the correct place to work these through.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response. Avoiding reference to a specific timeframe and instead referring to the timescales laid out in Part D of the Network Code appear sensible as should a future change from T-8 be required it should not be necessary to amend the licence again.

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Omio's response to ORR's initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Omio believes that reducing the booking horizon from 12 to 8 weeks is bad news for the consumer and the rail industry at large. It is completely against the general direction of travel in the wider European rail industry which is seeking to make rail travel more (not less) attractive to customers.

It is clear evidence of taking an operational approach at the expense of consumers. This was always a risk with the implementation of GBR with an operational bias compared to a consumer view.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

Other competing modes of transport e.g. road (National Express, private car) will become more attractive. National Express has a booking horizon of 9 or more months.

Air travel typically is bookable up to 11 months in advance.

Eurostar offers 330 days in advance

Most other mature European markets have a longer booking horizon, eg Thalys 4 months, trains from France to Germany and Italy 6 months.

Coming hot on the heels of the reduction in domestic APD for flights, the aviation sector must be celebrating. Such a move will dilute the attractiveness of the rail sector.

It will reduce revenues for the rail sector - customers often need to have certainty over travel plans and will book ahead - this means the revenue is in the rail industry in advance. Reducing the booking horizon will dilute this for the sector.

Omio's customers regularly complain about the inability to book in advance.

International customers represent an incremental opportunity for the rail sector and they have an even greater general need to plan further ahead e.g. in line with international and intercontinental air travel

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

See previous, it really doesn't make sense from a consumer perspective.

Response publication redaction

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

Publish response

Publish redacted response removing any commercially sensitive information

Do not publish response

About

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5. Full name

[Redacted]

6. Responding on behalf of an organisation/group or as an individual? (please provide organisation or group name)

Omio

7. Email address

[Redacted]



Response to ORR’s consultation – Initial consultation: proposals to modify Network Rail’s network licence requirement on timetable publication

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Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Rail Delivery Group

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

The Rail Delivery Group (RDG) notes that the Class Representative Committee (CRC) has endorsed Proposals for Change to the Network Code, contingent upon a modification to the Network Rail’s network licence. The RDG is aware that not all members of CRC supported the proposal and opines that considerable detail has yet to be worked through.

The RDG takes this opportunity to highlight the imperative that industry internal processes – including commercial, operational and employee-related; whether the responsibility of train operators, Network Rail or third-parties – should be fully aligned to support the proposed changes. Whilst not in scope for this consultation, this is an important point that should not be overlooked.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

The Rail Delivery Group (RDG) agrees with the statements outlined in paragraphs 3.6 to 3.8 of the consultation. The proposal has the advantage of simplifying existing arrangements, without weakening the obligations on Network Rail to adhere to the requirements of the Network Code. The Code provides protection to industry stakeholders, and remains under the purview of the ORR, as indeed will the deliberations of the Class Representative Committee (CRC). The need for endorsement by CRC will continue to offer important safeguards.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

There are two elements to this question which are considered important.

Firstly, the question of end user confidence. In recent years, the industry has been unable to adhere consistently to the twelve weeks publication requirement. The reasons for this are varied and have been explored fully previously. But, in itself, this represents a failure that reduces user confidence. The RDG considers that it is important to agree processes and timescales that provide a high degree of confidence and will not be subject to pressure for last minute change. It also considers that it is important to retain common application of those processes and timescales across all operators, to avoid any being disadvantaged.

The proposals under consideration aim to bring about a sustained ability to confirm timetables at eight weeks. In doing so, instances of late schedule change after publication should reduce – itself a benefit. If this aim is realised, we would anticipate user confidence to improve. Such a sustained ability can also be expected to improve performance (another key factor affecting user confidence) given the focus on “planning at the right times with the right information” [Annex A to the consultation].

The caveat here is that industry internal processes should be fully aligned to support the proposed changes.

Secondly, the ability to purchase tickets or plan journeys. Historically, confirmation of timetables at twelve weeks “is the first point at which passengers are able to book train

journeys” [ORR Factsheet on Schedule 4 Possessions Regime, 30 September 2021]. This is held to be important as customers can begin making travel plans. Despite this, the majority of ticket sales in 2019 (the last full year before the pandemic) were made much closer to the day of travel - 91% within a fortnight of travel; 97% of within six weeks of travel.

The link between the 'sales horizon' and that of 'timetable confirmation creates a process relationship between the commercial-world and that of operations. In reality, however, neither is optimised and there are often conflicting pressures. Some long-distance passenger operators - certainly in Europe but also in GB - open (or are considering opening) ticket sales and reservations earlier than twelve weeks. Such companies develop means to contact customers whose journey plans need amending once timetables are confirmed. This utilises the flexibility offered by modern digital technology and the ease of communicating with intending customers – capabilities that were largely unavailable just a few years ago. Indeed, the ORR recognises the work of the Smarter Information, Smarter Journeys programme within the consultation.

The point here is that the market is increasingly free to offer products further in advance, where there is justification and demand, accompanied by further investment in technology to enable advance purchase, with customer contact where later changes occur for timetable optimisation reasons.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

The RDG agrees with the proposed modification but suggests that the term 'Timetable Change Date' be defined within the licence, perhaps by referencing the definition within the Network Code (as amended from time to time). The proposal has the advantage of aligning existing arrangements, without creating additional future bureaucracy or removing flexibility from the industry.

Publishing your response

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Rail Europe SAS's response to ORR's initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Rail Europe acts as a global retail and distribution partner to the UK train operators. As such we retail tickets for TOCs from the US to eastern Asia and secure access to important overseas markets for the operators. Major European railway companies are either considering or have already extended bookability of tickets to a 6 month horizon. Effectively this means that tickets and therefore the associated timetable data are available for a min. period of 6 months for the convenience of travellers and to incentivise increased usage of rail transport. Therefore the proposed shortening of timetable data availability would regrettably go against trend and potentially disadvantage the rail sector.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

Our observations in the market suggests that travellers want to have as much certainty about their travel plans as possible. This applies above all to timetable data. Planning cycles for travellers, especially for busy periods (holidays, leisure and business events etc.) rely on advance bookings for best fares which is typically more than 8 and often even 12 weeks. The introduction of uncertainty by shortening the notice period for timetables may result in travellers' change of modal choice from rail to road/air. This would be an unintended and undesirable consequence for operators' revenue and against the backdrop of sustainable transport.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

No.

Response publication redaction

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

Publish response

Publish redacted response removing any commercially sensitive information

Do not publish response

About

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5. Full name

[Redacted]

6. Responding on behalf of an organisation/group or as an individual? (please provide organisation or group name)

Rail Europe SAS

7. Email address

[Redacted]

Licensing Team
Office of Rail and Road

By email

25 May 2023

To whom it may concern,

Rail Partners' response to ORR consultation on Network Rail's timetable publication licence requirement

Rail Partners welcomes the opportunity to respond to this initial consultation on proposals to modify Network Rail's licence requirement on timetable publication on behalf of the private sector owning groups of passenger operators and our freight operator members.

Since the beginning of the coronavirus pandemic, the rail industry has worked tirelessly to ensure the continued movement of people and goods across the country. Against a backdrop of rapidly changing demand, a backlog of long-planned engineering works, and significant cost challenges, it has been necessary to adopt a more flexible approach to timetabling. This has meant that the so-called '*Informed Traveller*' deadline of T-12 has necessarily needed to be flexed. Despite this context, Rail Partners is opposed to any proposals to reduce deadlines from T-12 to T-8 on a permanent basis, as this will have a negative impact on the experience of passengers and the ability of freight operators to meet the needs of freight customers.

Although most passengers purchase their tickets close to or on the day of travel, the publication of the Working Timetable further in advance is important for end users in order to coordinate their travel plans. This is particularly salient for long-distance passenger services, where typically passengers are likely to plan further ahead and have more options on which transport mode they use. This is especially important in the run up to holiday periods and major events where passengers often book months ahead. Without clear planning horizons, passengers are unable to purchase advance fare tickets with confidence, reducing rail's commercial attractiveness. The changes enabled by the proposals in this consultation could disincentivise passengers to use rail, in favour of travelling by more carbon intensive modes such as road and air. It is therefore vital that train operators can continue to publish accurate timetables and sell tickets further out than 8 weeks, with a high degree of confidence that they will be able to operate the service as advertised.

The rail industry is facing significant cost pressures as it seeks to recover financial sustainability. Most train operating companies currently operate on National Rail Contracts. Under these arrangements passenger operators are incentivised to bear down on cost rather than revenue generation. The support from some operators to transition from T-12 to T-8 reflects the current contractual framework which does not empower private sector operators to innovate and invest to enhance the customer proposition.

The proposals in this consultation are not customer-focussed and represent an operationally driven solution, rather than considering the impact on rail users. Instead, the focus should be to switch on revenue incentives and provide train companies with the commercial and operational freedom to deliver for customers, focussed not merely on achieving financial sustainability through cost reduction but by growing passenger numbers. Far from reducing the '*Informed Traveller*' deadline, as

an industry we should be looking to extend booking horizons as is the case across multiple other transport modes.

Rail Partners also understands the significant challenges facing Network Rail as it seeks to make up for lost time in the delivery of important maintenance and renewal work on the railway caused by the pandemic and industrial action. Current levels of poor network performance have reinforced the importance of delivering a reliable network that passengers and freight customers can depend on. Some train operators have reported that, under current processes, they have received late notice possessions that without adequate diversionary routing has led to a significant cancellation of passenger and freight services – often at short notice. By moving from T-12 to T-8, there is a risk that these behaviours which are detrimental to the customer become embedded within the infrastructure manager.

As a commercial industry supporting complex national and international supply chains, rail freight operators benefit from the publication of timetables in advance in order to plan their services efficiently. Ongoing network reliability challenges, coupled with the regularity at which late notice possessions are being called is hugely disruptive to the rail freight operators. It is affecting freight customers' perception of the rail freight sector, driving modal shift back to road and could put long-term freight growth, which government has committed to, at risk. Freight operators have consistently voiced concern and voted against the changes that would be enabled by the proposals in this consultation and their position remains unchanged.

Rail Partners would welcome further discussions with the ORR before any decisions are made to change the *'Informed Traveller'* deadline as we hold significant reservations about the detrimental impact this could have on passengers and freight customers.

Yours sincerely,

[Redacted signature]

[Redacted contact information]



Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

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Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Railfuture

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

- 1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?**

No: putting the specified time period into the Network Code makes it easier to respond to customer needs.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

Evidence 1: Holidays : The timescales for booking package holidays, which create demand for connecting trains to airports and seaports, has increased to pre-Covid levels, and prospective passengers can now book up to a year ahead. A very expensive holiday like a cruise, can be booked up to the 2 years in advance. Advance rail tickets to access such an expensive purchase should be available up to 52 weeks in advance with flexibility to change times if necessary, and Advance tickets should be bookable 12 weeks in advance based on the draft timetable. This means a requirement in the Network Code for the draft timetable to be booked at T-12.

Currently for a 2 week holiday, timetables for return trains are not available until 10 weeks before the date from which accommodation needs to be booked. It is not just a question of confirmation of train times, it is a question of knowing whether trains will run at all (ie will there be engineering works, bus substitution, which could be unpleasant, add hours to the journey, and cause onward connections such as ferries, causeways, accommodation check-in times etc to be missed.) If seasoned rail campaigners such as our members find the rail industry's too short window times and fares will drive them to air, think how much this happens with the public at large.

A local example could be: "Would I plan a weekend break in Yorkshire to travel over the Settle – Carlisle line?" Better not. It could well be closed for the weekend. Might also be worth thinking about how anything less than T-12 will affect the rail charter market. This may make it unviable.

Evidence 2: Lack of printed timetables Because printed timetables are no longer available, it's impossible for those who don't have access to the internet to find out even what the default timetable is. Recent research in the London area has shown that 20% of people do not have internet access, and this will surely be replicated throughout the country.

Evidence 3: Mobility Impaired Travel. By not releasing timetables in advance, rail companies are discouraging disabled passengers from travelling: passengers who may only use rail because there is access to toilets and no requirement to use inaccessible coaches. Information on changes during a journey also need to be planned in advance for disabled passengers to allow time to travel from one platform to another at stations.

Evidence 4: There appears to be a contradiction between: 1. The statement in para 3 of the consultation that the BTBF proposal based on processes used since 2020, will be more flexible, efficient, high quality and safer, and (Annex A) is driven by the needs of the passenger and freight market that it is serving: and 2. that operators have frequently been unable to fulfil the timetable produced by those processes, resulting in many cancellations, often without notification to passengers, and that passengers will only be informed of confirmed train times at the 8 week milestone – clearly not a benefit to passengers.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response. Railfuture does not object to this.

Publishing your response

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Sawday's response to ORR's initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Reducing the booking window from 12 weeks will mean some customers are unable to book train tickets when they want. This inability to book when customers want may mean they choose to fly instead, significantly increasing carbon emissions and at odds with the government's emission reduction plan.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

This amendment will cause issues for customers trying to plan trips in advance. This will have a particular impact on customers booking train tickets for the purposes of tourism, large events, major sports fixtures. Companies operating in these sectors, that rely on pre-planning, will be adversely affected by less demand and weaker cashflow. Many airlines, ferry companies and Eurostar make their tickets available 6-12 months prior to booking.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

Response publication redaction

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

Publish response

Publish redacted response removing any commercially sensitive information

Do not publish response

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5. Full name

[Redacted]

6. Responding on behalf of an organisation/group or as an individual? (please provide organisation or group name)

Sawday's

7. Email address

[Redacted]

23 May 2023

To whom it may concern

Please find below Trainline's responses to the consultation questions set out by ORR in relation to proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks.

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Trainline accept the principle of the amendment to Condition 7.18 of Network Rail's network licence (the "Network Licence") subject to our comments in response to Question 2 below.

However, the proposed amendments to Condition 7.18 would mean the timescales in the Network Code could refer to any time period, including a time period of less than eight weeks. To prevent any further dilution of the required access to timetable changes and consequential detrimental impact on the customer's ability to plan journeys and access the best fare available to them, Condition 7.18(a) should be qualified to make clear that the timescales in part D (3) of the Network Code shall not be less than eight weeks.

We also recommend the proposed amendments to Condition 7.18(a) are simplified in accordance with our recommendation set out immediately below.

Recommendation

We recommend Condition 7.18(a) of the Network Licence is amended as set out below. The red text/formatting shows our proposed amendments.

“(a) where the System Operator has provided train operators with access to the information ~~not less than 12 weeks before the date that the Relevant Timetable Change is to have effect within the prescribed timescales in Part D of the Network Code (as amended from time to~~

time), provided that the timescales prescribed in Part D3 shall not be less than eight weeks before the date that the Relevant Timetable Change is to have effect; or”

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

Exec summary

Trainline understands that significant operational challenges have arisen in recent years which have meaningfully impacted industry's ability to fulfil its T-12 obligations. In particular, the global pandemic and ongoing industrial action have resulted in short, medium, and long-term planning instability. This has resulted in considerable uncertainty and inconsistency for customers seeking to plan their journeys. We are concerned about the consequential impact on train service delivery, and the damage to the perception that travel by train is a reliable way to make journeys.

We understand that the T-12 convention has been in existence since Track Access Agreements were first created between Train Operating Companies and Railtrack at the time of privatisation. This means that the principle that timetable certainty should be in place 12 weeks in advance of travel has been an industry construct for almost 30 years. Therefore, any proposal to dilute T-12 to T-8 must be considered as a loss of long-standing customer utility.

Adequate consideration must therefore be given to the customer impact and the important difference between:

- **Confirmation Horizon:** the point at which timetables are confirmed.
 - Currently T-12 with a proposal to move to T-8
- **Booking Horizon:** the point at which Advance Purchase tickets go on sale.
 - Tied to Confirmation Horizon by majority of TOCs, LNER being the recent exception.

We have set out thinking in these areas below to support the following recommendations:

1. If it is necessary to reduce the Confirmation Horizon to 8 weeks, then a structured recovery plan should be set to bring the Confirmation Horizon back up to T-12 -in a way that is sustainable.
2. Such a reduction should only be considered if Booking Horizons (including the release of Advance Purchase tickets) can be uncoupled from the Confirmation Horizon, thus enabling customers to continue to book 12 weeks out, reliably, and consistently across all Train Operators.
3. Furthermore, the opportunity should be taken to consider how the booking horizon may be extended beyond 12 weeks (for example, to 26 or even 52 weeks) and made available consistently across all retail channels.

Customer Impact

Simply reducing the timetable Confirmation Horizon from 12 to 8 weeks will have a tangibly detrimental impact on the customer's ability to plan journeys and access the best fare available to them. Analysis of Trainline search data from March & April 2023 shows that:

- 12% of customers search >8 weeks in advance of their departure date.
 - They would be put at further risk of timetable changes post booking.
- 7% of customers search between 8 and 12 weeks in advance of their departure date.
 - They would subsequently receive fewer AP ticket options.
- 5% of customers search >12 weeks in advance of their departure.
 - As discussed below, there is opportunity to further stimulate this demand.

In addition, reducing the timetable horizon would mean UK Rail falls shorter still of customer expectations set by:

- Rail in Europe, where horizons generally exceed 30 weeks.
- Rival transport modes in the UK:
 - National Express: 46 weeks
 - British Airways: 51 weeks

These factors combined represent a significant depletion of the customers experience, resulting in increased dissatisfaction and risk of customers choosing other transport modes or not travelling at all.

“Booking Horizon” VS “Confirmation Horizon”

We have seen these considerations reflected in LNER’s recent ambitions to uncouple their Booking Horizon from the T-12 Confirmation Horizon. Their Booking Horizon is now around 26 weeks and we have seen a subsequent shift in search behaviour which illustrates customer appetite for this. Analysis of Trainline search data from March & April 2023 shows that:

- 18% of searches for LNER-served routes are made >8 weeks in advance vs the 12% industry average for Long Distance operators.
- This has resulted in a conversion uplift which, if extrapolated across all Train Operators, could equate to around £20m in incremental industry revenue annually.

One of the challenges with this move is the increased likelihood of a customer’s journey being amended post booking and when timetables are confirmed. LNER, Trainline and other retailers have mitigated this risk by ensuring automated systems are in place to alert customers to any changes and provide relevant information about what it means for their journey plans.

The flexibility that is available through the industry’s RARS2 reservation system, and the ability to communicate simply and effectively to customers who hold such tickets (because the vast majority are now booked online) means that this type of process could become the norm, rather than the exception.

The “Smarter Information Smarter Journeys” programme is working to ensure all retail outlets can provide such a service in the near future. This will enable all Train Operators to offer extended booking horizons in the same way that LNER does above, and with the positive impact on both industry revenue and customer utility that LNER has seen. The ability to sell tickets in accordance with these extended booking horizons must be available to all retailers, without exception.

Recommendation

We therefore recommend that:

1. If it is necessary to reduce the Confirmation Horizon to 8 weeks, then a structured recovery plan should be set to bring the Confirmation Horizon back up to T-12 -in a way that is sustainable.
2. Such a reduction should only be considered if Booking Horizons (including the release of Advance Purchase tickets) be uncoupled from the Confirmation Horizon, thus enabling customers to continue to book 12 weeks out, reliably, and consistently across all Train Operators.
3. Furthermore, the opportunity should be taken to consider how the booking horizon may be extended beyond 12 weeks (for example, to 26 or even 52 weeks) and made available consistently across all retail channels.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

Trainline accept the extension of the definition of ‘Relevant Timetable Changes’ to also reference the publication of the working timetable. For clarity, we recommend drafting is added to limb (a) of the definition of ‘Relevant Timetable Changes’ to make clear the terms ‘Working Timetable’ and ‘Timetable Change Date’ have the meaning provided in the Network Code.

Recommendation

We recommend the definition of ‘Relevant Timetable Changes’ of the Network Licence is amended as set out below. The red text shows our proposed amendments.

““Relevant Timetable Changes” means changes to the national timetable of railway passenger services occasioned by:

- (a) *the publication of the Working Timetable on a Timetable Change Date (as defined in the Network Code); or*
- (b) *any renewal, maintenance, and enhancement of the Network; or*
- (c) *any restriction of use of which the licence holder is, or reasonably ought to be, aware;"*

Yours sincerely

[Redacted signature]

E [Redacted email address]
T [Redacted telephone number]

TPE response to ORR Consultation on modification to the Network Rail licence on when it is required to publish the ‘final’ timetable

[REDACTED], [REDACTED], TransPennine Express

23/05/23

Summary

TransPennine Express are not supportive of permanently moving timetable publication dates from TW-12 (12 weeks before travel) to TW-8 (8 weeks before travel).

If implemented, the plans would lead to a deterioration for customers with confirmed timetables being released later. This would mean either customers have to wait until nearer their travel date to book; or they will have the risk of having their booking cancelled when train times are confirmed.

The proposals risk misleading customers and losing their confidence and trust.

The proposals would negatively impact TPE and industry revenue.

Opening “LTP” services for booking

TPE’s standard date for opening services for booking is TW-24 (along with most long distance TOCs), which we continue to operate when possible.

There is an important difference between opening services for booking against an unvalidated LTP timetable compared to an unvalidated STP timetable.

TPE would consider opening services for booking against an unvalidated LTP timetable, under certain conditions.

This would enable a 24-week (or longer) booking horizon to be maintained across a timetable change, whereas now the booking horizon diminishes as we approach a timetable change until the new timetable is published. For example, the December 2022 timetable was published around 12 weeks ahead of travel.

We could confidently open those services which have not been bid differently compared to the previous timetable and therefore would have minimal risk of being amended during the validation process. A “changes only” process could support this further.

Opening “STP” services for booking

We would not open services for booking on dates and routes that we know will be affected by STP changes before the STP changes have been validated and uploaded, whether it be at TW-8 (as proposed), or TW-12 (as under the previous industry standard for informed traveller).

Retailing bookings for an unvalidated STP timetable is inherently riskier than doing so against an unvalidated LTP timetable because it is much more likely (perhaps certain) that the timetable will change when it is finally validated. Knowingly retailing bookings and seat reservations to customers for trains we know won’t operate as shown would be misleading and cause many problems.

Although these proposals assume that the industry could use some form of automatic passenger notification where booked tickets require adjustment, the industry does not yet have sufficiently robust post-sales processes to automatically update customer bookings to mitigate these problems; and the current Smarter Information Smarter Journeys (SISJ) programme of work will not deliver these either.

The latest SISJ activity implemented across the industry enables customers to be contacted if they have booked online and their booked train is amended or cancelled. This does not capture customers who have not booked online. Nor does it do anything to re-book customers on alternative services. Several important customer policies around alternative travel arrangements and ticketing remain unresolved.

Further proposals are in development as part of the SISJ WP1 Priority 2 programme to automatically close train services to booking if Network Rail engineering data indicates that they are likely to be affected by an all-line block. TPE already achieve this through communication between the Service Planning and Revenue Management teams. The proposed process would not capture all services which will be amended by an STP change.

First, there is a risk that services which are not strictly impacted by a possession still require modification. For example, if a train unit or traincrew has a diagram which includes affected and unaffected services; if units are strengthened/destrengthened as part of the engineering plan; the potential for various knock-on effects from other parts of the network which will impact the train plan such as depot access, major blocks for other TOCs, and so on.

Second, the proposal only covers “all lines possessions” but where only some lines are under possession this would still lead to service changes so would require additional trains to be closed to booking. This proposal would certainly not enable TPE to simply open all services for booking and rely on the automated system to close those trains which will be amended at TW-8.

From a train planning point of view, publishing unvalidated train times is not what the system is designed for and adds pressure to the STP team. Upload errors and discrepancies do occur and moving the publish date to TW-8 leaves less time to sort them. It also makes it more difficult to identify them as the difference is no longer whether the train is there or not, but whether it is unvalidated or validated.

Revenue impacts

Following the launch of TPE’s 24 week booking horizon for LTP timetable dates in 2017, we estimated that this brought revenue benefits to TPE of c.£1m per year. Similarly, there would be a disbenefit by moving from 12 weeks to 8 weeks. This would not affect every date of travel but would certainly affect engineering dates and would restrict our ability to open to 24 weeks on some dates unaffected by engineering. In the next few years, TPE will be heavily affected by engineering work for the TransPennine Route Upgrade so this will likely magnify the negative impact of this change. As a rough guide, the benefit of moving from 12 to 24 weeks was £3.7k per travel date. Using the same methodology, moving from 12 to 8 weeks would generate revenue reduction of c.£10k for each travel date affected. We would expect other intercity TOCs would be similarly affected with likely even larger revenue impacts.

This revenue is generated from customers choosing to travel with rail who would not have done so previously because they could not book further in advance than 12 weeks. For example, flights can typically be booked 12 months ahead, and it is common for customers to make even short journey plans more than 12 weeks ahead. For every day of delay in

opening services, there is therefore lost revenue as customers either choose not to travel or make alternative arrangements on different transport modes. Therefore, the permanent delay of STP timetable validation from TW-12 to TW-8 will cause revenue loss to TPE and the wider rail industry. Although the industry has been operating at TW-8 or less for several years, this is not a desirable situation and we should be planning to return to at least TW-12 or longer if we wish to maximise revenue.

We could open against an unconfirmed STP timetable where the publication data is TW-12. Moving to TW-8 is not a pre-condition for this, and in fact as above it would represent a deterioration for customers and TPE revenue since it would reduce booking horizons by 4 weeks. That is, under the previous TW-12 publication date we could open unconfirmed STP timetables at TW-16 if we so wished as compared to TW-12 under the TW-8 publication proposals. However, the point still stands that opening an unconfirmed STP timetable is not desirable from a customer or business perspective. Offering customers an unvalidated TW-12 timetable compared to the previous Informed Traveller offer of a validated TW-12 timetable is unquestionably a deterioration in the quality of the product we are offering to customers.

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www.transportfocus.org.uk

23 May 2023

**Transport Focus response to ORR's initial consultation:
proposals to modify Network Rail's network licence requirement on timetable
publication**

Transport Focus strongly opposes the proposal to remove the reference to 12 weeks in the Network Rail License and replace it with a reference to what is set out in Part D of the Network Code. Our objection to this change is two-fold:

- First, we believe that reducing the period in which passengers and potential passengers can rely on times being accurate on apps and websites is contrary to the passenger interest.
- Second, we believe that replacing the current specific time period with reference to the Network Code weakens the protection offered to passengers in future. The Network Code is an industry document that can be amended without public consultation, whereas a requirement stipulated within the License itself can be amended only through a transparent public process.

Expanding on the first of these points, we have grouped our observations under the four headings below.

Why is eight weeks worse for passengers than 12 weeks?

Accuracy eight weeks in advance is self-evidently less good than 12 weeks in advance. But why does it matter to passengers? When people are planning certain types of journey, particularly leisure journeys, that extra four weeks of certainty that the timetable is fully accurate really matters. Whether the railway is an option for them on a particular date in three months' time can be critical to booking accommodation or tickets for other events (for example, concerts or sports). For people wishing to finalise their plans and have peace of mind that everything is 'sorted', not having confidence that the timetable is fully settled for a further four weeks would be singularly unhelpful.

What do passengers themselves say?

In a survey Transport Focus carried out to inform its response to this issue, appended for information, we found that among passengers looking up train times and prices one month or more before travel, “around three months” is the preferred period of accuracy for almost half (48 per cent). One in three (34 per cent) among those looking a month before; four in ten (42 per cent) among those looking two months before; over half (54 per cent) among those looking three months before. It should be noted that “around six months” is favoured by (34 per cent) of those looking two months before. For them, dropping from 12 to eight weeks is going further away from their preference, not towards it. This most recent survey chimes with previous Transport Focus research that has also shown passenger support for 12 weeks as the period the timetable should be accurate.

Implications of publishing a draft timetable

Network Rail’s Better Timetables for Passengers and Freight (BTPF) programme proposes to facilitate train companies selling tickets 12 weeks in advance by, in effect, showing a draft timetable between 12 weeks and 8 weeks. We have significant concerns about this, summarised as:

- The industry has not demonstrated that the level of change to the timetable between draft and final will be minimal – indeed the data we have seen indicates that there could be significant post-publication change (which for some passengers will mean changes after they have bought their ticket).
- The industry does not have a comprehensive mechanism to get in touch with passengers who have already bought tickets when the timetable changes post-purchase. The Smarter Information Smarter Journeys programme has made great strides in this direction, but not all train companies and not all ticket retailers yet have this facility. And it isn’t clear how the gaps will be plugged. But even if they were, the words of one ticket retailer should be noted: “just because you can tell a customer post-purchase that the time of their train has changed doesn’t mean it is a good thing to be doing”
- The industry has not acknowledged that passengers who are affected by changes after the timetable is published are likely to be travelling late at night and at weekends, when engineering work generally takes place. In our view there is an unacknowledged risk that passengers could become stranded or encounter difficulties when fewer staff – in particular managers – are available to resolve problems.

Is this change necessary anyway?

Throughout development of the Better Timetables for Passengers and Freight (BTPF) proposal, Transport Focus has questioned the need to drop from 12 weeks to 8 weeks. The industry states that introducing a third change to the permanent timetable each year (that is, the service that would be provided if no engineering work was taking place) is incompatible with finalising the timetable 12 weeks in advance. However, the industry has not been able to explain why reasonably efficient train planning functions (whether at Network Rail or train operators) cannot accommodate a change to the permanent timetable three times each year and achieve 12 weeks. If the permanent changes are equally spaced, train planning staff would never have less than 17 weeks forward visibility of the permanent timetable. Is the industry really saying that it needs more than five weeks to amend the permanent timetable on a given date to show a revised train plan and associated replacement buses? Even if the industry could demonstrate that this is necessary, because of workload concerns by train operators the original proposal for three permanent timetable changes of equal status has

been replaced with two opportunities for significant change (as now) and a third opportunity to be used in extremis. It therefore appears that 12 weeks is being sacrificed to achieve a third timetable change that is now expected to be distinctly 'light' in nature.

In conclusion, Transport Focus feels that ORR should not allow the proposed change to proceed. Furthermore, we feel that ORR should require the industry to present a plan to re-adhere to the current process at the earliest practicable date.

[REDACTED]

Transport for All's response to ORR's initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

We are concerned that any change to the licence modification text may lead to further changes to the timescale and timeliness requirements in Network Rail's licence. Making the process for changing timescales easier may mean that disabled passengers are subjected to further anxiety and confusion around the planning aspects of their journeys (please see the next answer for more detail). We have serious concerns that this proposal will make the process for further changes to the timetable requirements easier and subject to less scrutiny, thereby making the journey planning and consistency for disabled passengers harder and more confusing.

We are aware that the ORR would require further consultation on any further timetable notice period changes, however we are concerned that this will not be subject to the same review processes as the more serious proposed changes to the licence modifications. We would require significant evidence that this would not be the case in order to lend even cautious support to this proposal.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

We have serious concerns that any shortening of the notice for timetable publications will have an extremely detrimental effect on the ability and confidence of disabled passengers to plan and purchase their train journeys.

Disabled passengers already face a myriad of barriers to planning their travel. Disabled people are forced to plan their journeys, often in meticulous detail, in order to ensure that accessibility and assistance needs are met. For example, disabled passengers often have to search for and find granular information such as widths and heights of platform-train gaps, working status of lifts and escalators, availability of staff at stations and booking assistance, crowdedness levels, nearest toilets, and much more. This is true of disabled people with a wide range of access requirements and is particularly acute for those with mental health conditions such as anxiety.

With this in mind, it is vital that disabled passengers have as much time as possible to receive important travel information, in order to be able to plan their journeys to the level of detail necessary. Giving less than twelve weeks' notice for timetables will cause unnecessary anxiety and worry for

many passengers, who require as much advance notice as possible in order to make sure they have confidence in their plans.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

Response publication redaction

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

Publish response

Publish redacted response removing any commercially sensitive information

Do not publish response

About

This section allows you to input information about yourself and/or your organisation. All of the fields are optional, except your email address which we will use to contact you if we require more information relating to your response. Any personal data that you provide will be processed in accordance with ORR's privacy notice (www.orr.gov.uk/privacy-notice).

5. Full name

[Redacted]

6. Responding on behalf of an organisation/group or as an individual? (please provide organisation or group name)

Transport for All

7. Email address

[Redacted]

Transport for Greater Manchester's response to ORR's initial consultation on proposals to modify Network Rail's network licence requirement on timetable publication.

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Although TfGM allude to some of the positives established by explicitly linking the license and Network Code for the industry, there is a collective concern that the proposed timetable time horizon changes may affect the ability of operators to reliably offer competitive book ahead tickets. As an example of the impact of having long ticket booking horizons, LNER is known to have carried retained much longer booking horizons than comparative TOCs during Covid, and it is noteworthy that LNER has the highest demand recovery of any UK TOC post Covid.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

In order to maintain if not enhance rail's competitiveness it is vital to permit passengers to be able to reliably plan future rail journeys in the same manner as for competing public transport modes. With any reduction in the period passengers can book rail journeys in advance such as to only 8 weeks, rail will fall even further behind coach or air alternatives, which often allows up to 6 months for passengers to book in advance. Therefore, TfGM believes this ORR proposal should be reviewed in order to protect the competitiveness of rail against alternative modes and retain passenger confidence.

Proposed modification of definition: "Relevant Timetable Changes"

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

N/A

Response publication redaction

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

Publish response

Publish redacted response removing any commercially sensitive information

Do not publish response

About

This section allows you to input information about yourself and/or your organisation. All of the fields are optional, except your email address which we will use to contact you if we require more information relating to your response. Any personal data that you provide will be processed in accordance with ORR's privacy notice (www.orr.gov.uk/privacy-notice).

5. Full name

[Redacted]

6. Responding on behalf of an organisation/group or as an individual? (please provide organisation or group name)

Transport For Greater Manchester

7. Email address

[Redacted]

From: [REDACTED]
To: [Licensing Enquiries](#)
Cc: [REDACTED]
Subject: [EXTERNAL] Proposals to modify timetable publication in Network Rail's licence
Date: 24 May 2023 11:57:37

Apologies for the slightly late submission, but here is some input from Transport for the North:

Office of Rail and Road | Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Transport for the North understands train operators struggled to meet T-12 weeks during the Covid pandemic due to fluctuations in services driven by staff availability, lock-down periods etc. There has been negative sentiment and media coverage about the level on uncertainty that short notice timetables introduced, restricting the ability of customers to plan and purchase tickets, with a likely switch of modes (to car, coach, air etc.)

Prior to the Covid pandemic, operators were striving to offer more than T-12 weeks, with some making tickets available for purchase at T-26 weeks (timetable change) where no engineering was planned. For many, this was a franchise commitment as well as being commercially advantageous.

Transport for the North would expect positives established by explicitly linking the license and Network Code for the industry to be maximised. The consultation document references reduction in duplicated effort from reworking timetables produced earlier in the process, and the ability of ORR to hold Network Rail to account and enforce timescales for advance publication as prescribed in Part D of the Network Code. Therefore, Transport for the North would expect that a move T-8 weeks should be delivered 100% at T-8 weeks, rather, than as can still be seen, that some weekends are at T-4 weeks or T-2 weeks where there is late notice engineering. T-8 could likely be more accepted if it became a hard deadline, with ramifications for late publication. It could also be more acceptable if it demonstrably meant the use of short notice P-codes was minimised.

We agree that it is important to understand passenger views on the proposals . The consultation document references the [survey produced by Transport Focus](#) stating "the majority look at train times and ticket prices less than six weeks before they travel."

It is worth noting the survey also found:

- “Over half (62 per cent) have had the experience of looking for train timetable and fare information in advance of a journey only to find this information unavailable.”

and

- “Passengers are more likely to plan further in advance when thinking about making leisure trips.”

With leisure dominating post pandemic rail travel recovery, the shorter window to plan trips by rail is likely to be a concern, especially for the North of England where the visitor economy is key. Transport for the North’s study of the North of England’s visitor economy and its relationship with transport ([Improving transport to support sustainable growth of the North’s visitor economy - Transport for the North](#)) explains that:

- The visitor economy is an important feature of urban, rural and coastal communities across the North, and in many places accounts for a significant share of local economic activity. For example, Cumbria and North Yorkshire have some of the highest shares of overall economic output which is attributable to tourism in comparison to all other UK sub-regions.
- The value of the visitor economy extends far beyond what is quantifiable in monetary terms – the sector also plays an important role by enhancing quality of place, enhancing quality of life for residents, and promoting the conservation of local natural and historical assets.

There may also be a concern that the proposed timetable time horizon changes may affect the ability of operators to reliably offer competitive book ahead tickets.

LNER is known to have retained longer booking horizons than comparative TOCs during Covid, and it is noteworthy that LNER has the highest demand recovery of any UK TOC post Covid.

In order to maintain, if not enhance, rail’s competitiveness it is vital for passengers to be able to reliably plan future rail journeys in the same manner as for competing public transport modes. With any reduction in the period passengers can book rail journeys in advance, rail will fall further behind coach or air alternatives, which often allows up to 6 months for passengers to book in advance, and decision making to drive and book car parking. This is something that needs to be taken into account.

If there is a change, there will be a need to mitigate uncertainty further ahead than 8 weeks with journey planning and disruption elements of Transport for the North’s Connected Mobility Strategy: [Connected Mobility | Digital and ticketing solutions | Transport for the North - Transport for the North](#)

Finally, can we request that we have the opportunity to inout to the next stages of the work. In particular TfN would seek input from our member authorities which it has not been possible to do in the short timeframe of this initial consultation.

We would be happy to discuss any of the points in this submission.



2nd Floor, 4 Piccadilly Place, Manchester, M1 3BN
www.transportfornorth.com



From: [REDACTED]
To: [Licensing Enquiries](#)
Cc: [REDACTED]
Subject: [EXTERNAL] TfW Rail's response to ORR's consultation on proposals to modify Network Rail's network licence requirement on timetable publication
Date: 23 May 2023 17:00:27

Hello,

TfW Rail supports proposals to modify Network Rail's network licence to link timetable publication timescales to the Network Code, paving the way for changes to Part D under PfC120. We have answered each of ORR's questions.

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

No.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets?

No. TfW's own data and research suggests that very few people using our services or purchasing tickets from us for travel on other operators' services plan their journeys more than 8 weeks in advance. Many of TfW Rail's own services are not reservable in any case. There is nothing stopping the industry from making timetables available earlier than T-8 on certain routes where this is deemed more important, where we know there is no engineering work or anything else that will affect those services.

The wider BTPF programme, of which this is an important part, should be delivered as a whole as it will provide flexibility benefits to the planning of Timetables which we expect will improve the quality and integrity of information provided to users.

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of "Relevant Timetable Changes"? Please provide reasons for your response.

Yes.

4. ORR plans to publish consultation responses. Have you provided confidential or commercial information you want redacted?

No.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]



Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: Transport Scotland

Email*: [REDACTED]

Telephone number*: [Click or tap here to enter text.](#)

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Transport Scotland has no objection to the wording of the licence conditions being changed to reference timescales set out in the Network Code. This should simplify the process for making timescale alterations to the timetable production process by only requiring amendment to the Network Code wording in future, instead of also having to update the licence conditions.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

Transport Scotland has a concerns with the proposed move to a T-8 timescale for timetable publication. During the initial BTPF consultations, it was not clearly evidenced that the change would benefit passengers and was not just for the benefit of the industry. It is not clear why the industry should not be aiming to return to the earlier (existing) Informed Traveller timescales. Most ticket booking and reservation systems are currently fed by timetable data, making it an essential technical component in the ability of passengers to book tickets in advance or plan journeys in most cases. With the option remaining for a draft version of the timetable to be published earlier than T-8, could we find a situation where journeys are planned and tickets booked before T-8 but then something changes before the timetable is “final”, impacting the journey? There are obvious implications for maintaining and protecting connections or special event timetables. The integration of the ticketing system / retail offerings with the timetable data will need to be considered as part of these changes. Transport Scotland does not necessarily agree with ORR that the changes would apply to all groups equally. Whilst the licence condition change itself should not have an impact, any changes to timetable publication timescales that this enables could have the potential to have a more significant impact on certain groups. It would be valuable to ensure that an equalities impact assessment is published when the expected PfC is submitted to ORR. Transport Scotland also notes that the proposals are not expected to be supported by freight operators; any changes should not discriminate against any one type of operator on the network.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

Transport Scotland agrees with the proposed additional wording. This would appear to clarify that the conditions specifying a requirement to publish the timetable information in advance of the change also applies to the regular industry timetable change dates, as the current wording could be interpreted to not apply to these occasions. It would also ensure that any future or additional licence conditions which were to make reference “Relevant Timetable Changes” would also apply to the regular industry timetable change dates.

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Response to ORR's consultation – Initial consultation: proposals to modify Network Rail's network licence requirement on timetable publication

Please send your response to licensing.enquiries@orr.gov.uk by **5pm on Tuesday 23 May 2023**.

Please type text into the template provided and note the filenames of any attachments provided in support of your text response.

About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: TravelWatch SouthWest CIC

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

Click or tap here to enter text.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

TWSW has serious concerns about the unilateral decision to shorten timetable notice periods at a time when other modes are seeking to support integration with the rail network through their own timetabling. The 12 week deadline gives passengers reassurance at least 3 months in advance, in an ideal world this would

greater at 20 or 26 weeks out and not reducing it to 8 (only 2 months) is not sufficient to give confidence to users especially leisure who are making up a greater number of users on today's railways, who rely on booking advance tickets and offers if they can't assure themselves there is going to be a train until 8 weeks before then we might lose them to car or air.

"ORR's current understanding is that a 'significant majority' of passengers purchase tickets within the eight-week window before travel, and the industry has made notable progress in communicating timetable alterations to ticket holders." This is a weak premise for change and should not provide guidance on the way forward with timetabling as:

1. It only reflects the actions of those recently using the service and not those whom would have liked the service available.
2. Services have been unreliable and affected by COVID, major renewals, rolling stock issues, industrial action, weather, etc. does not reflect the service which would bring The ORR is reminded of its duties under Section 4 of the Railways Act 2001 which include, inter alia, the duty to promote improvements in railway service performance; otherwise to protect the interests of users of railway services; and to promote the use of the railway network in Great Britain for the carriage of passengers and goods, and the development of that railway network, to the greatest extent that it considers economically practicable.

There is no benefit for the passenger is aspiring to an 8-week window. This offers users and potential users reduced planning ability and less modal choice. Under this proposal, it would not be possible to work your notice period if your commuter service was withdrawn. Decarbonisation requires substantial modal shift and concern around journey certainty among the most frequent barriers to public transport use (see NPS data Transport Focus). Journey certainty is crucial and being able to make journey plans must include all elements of the system as they are inextricable linked. (a Department for Transport aspiration expressed in the Bus Service Improvement Plan materials). The shorter-term approach would have a negative effect on linked modes of transport and may affect services within the wider community.

Enabling better advance planning for public transport use among holidaymakers has relevance for the communities and economy of South West of England and is equally significant to levelling-up. The region has seen student transport severely disrupted through timetable changes during course duration, e.g. Axminster to Exeter College students. Users in this region will more often require more than one mode between origin and destination. The South West's coastal, rural, young, elderly, and vulnerable communities would be hit hard. This would undermine the efforts in places like Devon and Cornwall to make public transport infrastructure to be better used and reverses the gains in ridership made by Transport for Cornwall's co-ordinated timetabling.

We need longer notice periods to better integrate all public transport, enabling

environmentally sustainable journeys and enabling access to opportunities for more people. On the continent railway managers realise this: the railway undertakings represented at European level by the CER (accounting for 93% of journeys) have committed to increasing cross-border booking horizons to a period competitive with air travel – typically a year. Some of the largest companies are already doing pilots of selling tickets 12 months in advance and 11 CER members already have a booking horizon of 6 months or more. (This is despite cross-border journeys almost inevitably being the most difficult to plan and operate.) AllRail, which represents the new entrant operators has also signed up to this commitment. This proposal does not make things easier for passengers. T-12 is clearly better than T-8. It enables one to plan better, to coordinate bookings with other service providers where advance booking provides lower prices (hotels, Eurostar, flights), normally provides wider choice and flexibility, gives a certainty around which plans involving others can be made. At a time when government and the rail industry are trying to get more people back on to the train (see the expensive current ad campaign on television), shortening the timetable confirmation horizon will tip the balance for many businesspeople towards on-line rather than physical meetings.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

[Click or tap here to enter text.](#)

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- ensure that the PDF's security method is set to no security in the document properties.

From: [redacted]
To: [Licensing Enquiries](#)
Subject: [EXTERNAL] Consultation on change to timetable notification period on Network Rail Licence.
Date: 23 May 2023 20:44:47

I am responding on behalf of the Watford Rail Users Group.

We believe that it is a negative step that will have a significant effect on passengers. While a walk up railway means considerable numbers book within the 8 week window, we believe that there are many that plan ahead of that deadline.

Many will arrange holiday and annual leave ahead to avoid rail works planning ahead of 8 weeks. The reduced timescale will also have an effect on the offering of advanced fares.

The proposal will also have a negative effect for staff, because although we expect greater flexibility in the future from them, it is unreasonable that notice of work duties is reduced because the industry can't organise in sufficient time.

While the argument of the ability to change timetables more frequently has an attraction, the risk of passengers missing changes increases and could result in significant customer dissatisfaction.

This proposal is ill timed just as the industry is trying to recover, and although it recognises the practicalities experienced during the recent years, the push should be to return to and achieve the previous deadlines.

The group can be contacted at:
[redacted]

[redacted]
[redacted]
Watford Rail Users Group (WRUG)



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About you

Full name: [REDACTED]

Job title: [REDACTED]

Organisation: West Midlands Trains

Email*: [REDACTED]

Telephone number*: [REDACTED]

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

Proposed modification to Condition 7 text: reference to 12 weeks

1. Do you have any comments on the proposed licence modification text, which is designed to require Network Rail to meet the timeliness requirements as described in the Network Code?

We agree that for the BTPF programme to be achieved then Condition 7.18 will need to change, to reflect timescales within the Network Code.

2. Do you consider that confirming timetables with fewer than twelve weeks' notice will impact the abilities of end users to plan journeys with confidence and/or purchase tickets? Please provide evidence to support your response.

West Midland Trains feels that passengers positively respond to a larger booking windows and whilst post Covid recovery continued despite only realistically being at 8 weeks' notice there is a question that if 12 weeks or higher had been achieved in this period would growth be higher? in reference to

this we would like the door to be left open to future discussions aimed at opening the window further and improving growth and increasing modal share.

Proposed modification of definition: “Relevant Timetable Changes”

3. Do you agree with the proposed modification to include the publication of the Working Timetable on a Timetable Change Date in the definition of “Relevant Timetable Changes”? Please provide reasons for your response.

West Midland Trains believes this is a logical step regarding the additional clarification in the definition of ‘Relevant Timetable Changes’

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