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11 April 2025

Dear Alice,

Network Rail Representations for the 27th Supplemental Agreement (SA) submitted under Section 22A of the Railways Act 1993 for the Track Access Contract (TAC) between Network Rail Infrastructure Limited and Hull Trains Company Limited (Hull Trains) dated 17 March 2016

1 Purpose

- 1.1 This letter provides final representations from Network Rail for the 27th SA submitted under Section (S) 22A of the Railways Act 1993 for the Track Access Application between Network Rail and Hull Trains Company Limited submitted to ORR on 05 January 2024.
- 1.2 This representation builds upon the representations submitted by Network Rail for this application on 15 February 2024, 31 May 2024, 28 June 2024 and the 14 March 2025 ECML General Representation on Complex and/or Competing Applications interacting on ECML King's Cross - Edinburgh and Leeds.
- 1.3 The latter of these letters provided important information to support ORR when it comes to making decisions on applications in this geography including context on the work in developing the ECML Policy, ECML Industry Task Force, key performance information, as well as updates on power supply assessment. The annexes to that letter include relevant information including Timetable Performance Analysis and ECML Power Supply Modelling and where there is specific relevance to this application, reference will be made in this representation.
- 1.4 The purpose of this final representation is to provide ORR with Network Rail's final position on this application. As the access rights sought in this application are at the ECML interacting location some of the evidence and data to support our position is contained in the ECML General Representation letter dated 14 March 2025. Network Rail can confirm that based on the facts, data and evidence outlined in this representation and the ECML General Representation, it is not supportive of this application.

- 1.5 Where there are a number of applications seeking capacity at the locations referred to in this letter, and as detailed in Annex A, the basis of our support of applications either in total, or in part (as can be determined by reading the relevant representations), may have a connection to our position on all other applications at that location. You may wish to wait for final representations on related applications and the information provided therein prior to making your decision.

2 Background of the Application and Network Rail Representations

- 2.1 In line with ORR's letter of 24 April 2024 to the industry on 'Competing and/or complex track access applications for December 2024, May 2025 and December 2025 timetable changes' (CCA), Hull Trains submitted this application to ORR on 05 January 2024 as a S22A and its inclusion within the CCA was confirmed by ORR in the Annex of their letter of 24 April 2024.
- 2.2 As requested by ORR, Network Rail submitted a High-Level Plan in June 2024, and a further detailed plan was published on Network Rail's website in August 2024 and updated in January 2025. Network Rail made its initial representations on this application on 15 February 2024, where an initial view of the application Form P and SA was provided. On 08 March 2024 Hull Trains responded to the Network Rail initial representations. Further representations were made by Network Rail on 31 May 2024 and 28 June 2024, and Hull Trains made a further representation on 22 July 2024. Further to this Network Rail issued a General Representation on the East Coast Mainline (ECML) to ORR dated 14 March 2025.
- 2.3 In its representations on 15 February 2024, 31 May 2024 and 28 June 2024, Network Rail highlighted a number of items in the "Network Rail Review of Form P and associated documents" section of the letter. Where we have not had a response to the points highlighted we have noted this below for the Operator and/or ORR to address or take into consideration.
- 2.4 The points we would like to highlight from the initial representations and the course of action we require, are as follows:
- 2.4.1 Within the SA:
- Network Rail's observations on the SA that were provided on 15 February 2024 still remain. For example in section 2.2 a) Hull Trains have stated "Section 22" when this is currently a Section 22A application and so should be changed to "Section 22A". We note in a meeting on 06 February 2024 Hull Trains stated that it was left as a "Section 22" as the intention is to "flip" the application into a Section 22 in due course. Furthermore, in sections 3.2, 3.3, 3.4, 3.5: Network Rail believes "5.2", "5.4" and "5.5" are incorrectly quoted. The ".2", ".4" and ".5" should be removed.
 - In Section 4 Calling Patterns (Table 4.1: Calling Patterns), and if ORR was to direct, Network Rail would like a footnote added to the table so that the proposed calls at Worksop and Woodhouse are only allowed once the necessary operational readiness has taken place including the running of a test train. Hull Trains has yet to address these points by providing an updated SA though we note in a meeting with Hull Trains and ORR on 07 April 2025 that Hull Trains intend to do so. We would expect ORR to take the above comments into account when they make a direction.
 - 5.1 (a) Specified Equipment: Network Rail noted on 15 February 2024 the inclusion of "Class 221 and 222 DMU (Service Group PF02 only)" and "Class 802 Bi-Mode 5-car Units (Service Group PF01 only)". Network Rail wished to understand the length of the Class 221 and 222 units, for example will they be 5-car or 7-car units. Hull Trains have since confirmed that only 5-car units will be used but, as also stated on 15 February 2024, the route clearance process and Vehicle Change process are required and Network Rail is not aware of the Vehicle Change process beginning and would like to be informed of progress on the route clearance. Hull Trains has yet to address these points and, and if ORR was to direct, Network Rail would like Hull Trains to conclude the standard industry process (including Vehicle Change) and then agree a separate SA for the inclusion of the Class 221 and 222 units. We would expect ORR to take the above comments into account when they make a direction. In relation to the route clearance it is Network Rail's understanding that Hull Trains have undertaken a gauging survey between Sheffield and Retford for both class 222 and class 802 but further work is required on an attainable speed survey and compatibility for both class 222 and class 802 (to enable the application for a Statement of Compatibility). Furthermore we would like to highlight to ORR that there have been numerous applications both directed by ORR or currently being considered by ORR which state the intention to use either Class 221s or Class

222s. ORR should consider whether there is enough rolling stock availability for any application directed in support of the requested access rights.

In their representation letter of 08 March 2024, Hull Trains stated:

- “...we are unable to definitively time ECS trains in and out of Sheffield and this is something that both our timetabling teams are aware of. However, given our proposed operating hours, we are not too concerned about exceeding the 18 TPH limit over Welwyn viaduct.” Network Rail notes that Hull Trains did not bid at D-40 for the proposed services included in this 27th SA for December 2025 and instead intend to bid for them in the Subsidiary Change Date (SCD, which will fall in May) 2026 timetable. Network Rail will need to take cognisance of the 18 trains per hour (TPH) limit if and when Hull Trains bid for SCD 2026.

In their representation letter of 22 July 2024, Hull Trains stated:

- That they note the comments “regarding power supply and performance modelling but, given the present uncertainties, we would expect this to be carried out as part of the validation process of the determined timetable rather than be done, based on incomplete or out of date information...”

We would expect ORR to take this comment into account when they make a direction. Network Rail can now confirm that the power modelling has been undertaken for this 27th SA and the outputs were included in Annex M of the ECML General Representation dated 14 March 2025. As stated in the ECML General Representation, until such point future power upgrades are commissioned, Network Rail will be holding a TP-HAZID workshop ahead of any future proposed change to the running of trains in electric on the ECML.

In their representation letter of 22 July 2024, Hull Trains stated:

- “In respect of the 27th Supplemental, we are currently in the process of finalising the depot location for the proposed cl.222 stock. It is an existing location, well versed in maintaining cl.222 stock but, depending on the paths available, this may have an impact on our ability to serve Meadowhall.”

Network Rail now believe, based on the Hull Trains rejected bid for May 2025 and the Advanced Notice Timetable Change (ANTC) for December 2025 issued on 22 November 2024 (D-55 for Dec-2025), that the empty coaching stock moves (ECS) are proposed between Crofton Depot and Sheffield to enable the extensions between Sheffield and Meadowhall.

Network Rail would like to acknowledge that Hull Trains notified Network Rail and ORR on 19 December 2024 that the application is now for the “May-Dec 2026 timetable period” and is “dependent on 22x rolling stock availability and the required mobilization/recruitment period following the eventual ORR decision point”. This was confirmed when Hull Trains notified Network Rail and ORR on 27 February 2025 with a revised Form P and that the application had not changed from the original application submitted to ORR on 05 January 2024 apart from the start date (to SCD 2026 - which will fall in May) and we note that ORR has updated the details for this application on their website to this effect and so have agreed to the change. The detail of the change:

- “There has been a change to the start date. This has been caused by revised rolling stock availability.”

2.4.2 Within the Form P:

- Section 3.4 Terms not agreed with the facility owner:
 - Network Rail’s concerns, as stated on 15 February 2024, still apply:
 - Network Rail awaits a response on ETCS fitment from Hull Trains as retrospective fitment may be required for the class 22x, noting the upcoming East Coast digital railway expected from December 2027 onwards.
 - The proposal would mean increased use of Thrumpton curve on the approach from the east into Retford (at the moment this is used three times a day in each direction Mon-Sat so this Hull Trains proposal would increase that to 7 times a day). It has come to light that a renewal of areas on Thrumpton curve with poor and/or jointed track sections is planned

in Control Period 9 (CP9) (for circa £6m), with no scope presently to accelerate - as per action 914 included in correspondence from the Industry project management office (PMO) Steering Group dated Thursday 30 January 2025.

- Has a driver training and unit allocation plan been drawn up and shared as part of this process so can begin running from the revised start date of SCD 2026.
 - The new services in this application may exceed the 18 trains per hour (tph) maximum quantum between Digswell Junction and Woolmer Green Junction (including the Welwyn viaduct) that ECML Industry Task Force do not wish to exceed.
- Section 4.2 Capacity: Network Rail's observations, as per the 28 June 2024 representation, still stand, i.e. collaborative work has taken place on paths based on the ECML ESG base prior to ECML sprint activity, and this is prior to the implementation of the proposed ECML December 2025 Timetable. Hull Trains has since confirmed that this application is for Subsidiary Change Date 2026 via its amended Form P sent to ORR on 27 February 2025. Network Rail can now confirm that the power modelling has been undertaken for this 27th SA and the outputs were included in Annex M of the ECML General Representation dated 14 March 2025.
- Section 4.3 Performance: Network Rail can confirm that performance at Sheffield remains a concern and adding new services everyday into Sheffield will only compound the concern further. Furthermore, in line with the 15 February 2024 representation, Network Rail will need to give consideration to the expected implementation of the proposed ECML December 2025 Timetable as this impacts this application between Retford and King's Cross. Network Rail would like to be sure that this additional service proposal does not negatively impact performance. However, Network Rail is aware, as per the discussion with Hull Trains on 06 February 2024, that Hull Trains are willing to work with Network Rail on any initiative to improve performance at Sheffield and the ECML.
- Section 4.4 Maintenance and renewals: Network Rail's observations, as per the 28 June 2024 representation, still stand, i.e. route clearance work ongoing in relation to compatibility and impact on the track asset to support this proposed Hull Trains service between Retford and Thrumpton. Network Rail can provide the following update, as provided as a response to the Industry PMO Steering Group action 914, on the track asset between Retford and Thrumpton:
 - The current Sectional Appendix Route Availability restrictions for this section include Class 222's which are proposed to be operated (by Hull Trains in this application) and that position is supported by a Track Asset condition report that concludes the current condition of the both the Up and down Retford curve and points 2251A and 2251B does not enable the introduction of services of the type of rolling stock proposed without a renewal. The Asset Manager will opine on whether to issue a Network Change if further restrictions are required.
- Section 5.1 Changes to rights: Network Rail noted in its initial representation of 15 February 2024 that the "application does not include detail on ECS moves and Network Rail would wish to see this to understand the wider network impact". Further on 28 June 2024 Network Rail stated "Stabling and depot arrangements not yet confirmed". Network Rail now believe, based on the Hull Trains rejected bid for May 2025 and the Advanced Notice Timetable Change (ANTC) for December 2025 issued on 22 November 2024 (D-55 for Dec-2025), that the empty coaching stock moves (ECS) are proposed between Crofton Depot and Sheffield and will enable the extensions between Sheffield and Meadowhall.
- Section 5.3 Specified Equipment: Network Rail notes that "Initially, the service is to be operated by a class 221 or 222 unit but eventually by a new (unspecified class of 80x) unit once they become available to lease." As a consequence of the intention to procure class 80x (which will include electric traction), Network Rail can now confirm that the power modelling has been undertaken for this 27th SA and the outputs were included in Annex M of the ECML General Representation dated 14 March 2025. Furthermore, as also stated on 15 February 2024, the route clearance process and Vehicle Change process are required and Network Rail is not aware of the Vehicle Change process beginning and would like to be informed on progress with route clearance. We would expect ORR to take this comment into account when they make a direction.

3 East Coast Mainline (ECML) General Representation Letter dated 14 March 2025

3.1 Network Rail can confirm that this application is seeking the proposed access rights at the interacting location ECML: King's Cross – Edinburgh and Leeds and therefore the ECML General Representation to ORR is relevant to this application.

3.2 Whilst the entire letter is relevant to this application, we would like to highlight key points of that letter which are more pertinent to this application namely "Unused LNER Firm Directed Rights", "ECML Timetable Performance Analysis" and "Congested Infrastructure".

3.3 *Unused London North Eastern Railway (LNER) Firm Directed Rights*

3.3.1 The ECML ESG Timetable does not include the Unused LNER Firm Directed Rights as stated in paragraph 5 in Network Rail's ECML General Representation letter to ORR.

3.3.2 The ECML Timetable planned for introduction in December 2025 does not include 8 LNER firm rights Monday to Saturday, 7 firm rights Sunday Only, between London King's Cross and Leeds via Wakefield or Micklefield directed by ORR in 2016.

3.3.3 The specification for the LNER service to/from London King's Cross had been reduced from 6.5 trains per hour (tph) to 6 tph with agreement from the DfT in 2021. This reduction retained the 0.5 tph London King's Cross – Middlesbrough service, albeit as far as York, with the 0.5 tph London King's Cross – Leeds service being descoped. ECML Programme Board on 21st March 2021 noted the recommendation from East Coast Route to defer the 0.5 tph London King's Cross – Leeds service, including the conditional outcome of journey time reduction between London King's Cross and Leeds, to a post-ECML ESG [December 2025] future timetable change.

3.3.4 As of 14 March 2025 Network Rail have formally declared congested infrastructure on relevant routes between Huntingdon North Junction (Jn) and New England North Jn (Peterborough) and Doncaster Marshgate Jn and Leeds Copley Hill West Jn.

3.3.5 Work undertaken by the ESG has shown definitively that this 0.5 tph London King's Cross – Leeds service uplift cannot be accommodated alongside the other ESG outputs. As such the service cannot run in this timetable, or in future timetables, alongside the other industry endorsed aspirations without additional infrastructure and associated development activity, which is currently unfunded and uncommitted.

3.3.6 In line with our representations elsewhere that the 0.5 tph should not be directed any further in a TAC that relates to the ECML as there is no additional capacity expected to be available beyond December 2025 for its use, and so we do not believe an equivalent allocation is appropriate to be included in TACs.

3.4 *Congested Infrastructure*

3.4.1 As stated in the ECML General Representation letter dated 14 March (paragraph 6) Network Rail has declared Congested Infrastructure for the December 2025 New Working Timetable for three lines of route on the ECML.

3.4.2 One line of route that this application is proposing access rights for, are:

- Between Huntingdon North Jn and New England North Jn (Peterborough)

4 Proposed ECML December 2025 Timetable

4.1 As referred to in the ECML General representation letter, in February 2024 the ESG closed following an ECML Programme Board endorsement on 17 January 2024 to deploy the new ECML Timetable in December 2024, subject to the outputs of the completed performance modelling.

4.2 At the point in time of ORR's letter to the Industry on 24 April 2024, the Department for Transport (DfT) had accepted a recommendation from the Industry Timetable Assurance Project Management Office (PMO) to funders that the ECML ESG Timetable should be deferred from the December 2024 timetable change.

- 4.3 An ECML Industry Task Force (herein referred to as “the Task Force”) commenced in June 2024 as an independently led executive-level cross-industry meeting that provides strategic direction for the work programme. The Task Force develops solutions to the problems of the new ECML Timetable, drives consensus on the outcome(s), and delivers recommendations for industry funders and specifiers.
- 4.4 On 17 October 2024 the Independent Chair of the Task Force wrote to the DfT to advise that the Task Force met on 10 October 2024, reviewed the considerations, issues, and risks, and recommended proceeding with implementation of the new timetable for ECML in December 2025. This was on the basis that the timetable is deliverable and meets the Task Force objectives that were set. Concerns were noted from GB Railfreight (representing themselves and other Freight Operating Companies), ScotRail and Transport Scotland. The Task Force recommendation was accepted by the DfT and subsequently endorsed by the Secretary of State in December 2024.
- 4.5 The Task Force had worked collaboratively up to 31 January 2025 to further de-risk the transition of the ECML ESG timetable from development to timetable production.
- 4.6 Advanced work completed by Network Rail Capacity Planning, to inform the December 2025 timetable risk, involved aligning cross boundary paths in the ECML ESG developed timetable with the latest developments in the wider National Working Timetable (WTT) and associated Rolling Spot Bids (RSB). This process has highlighted that, despite previous timetable development work, the national freight and passenger timetable has evolved and this work has been necessary to reduce the risk that capacity decisions may need to be made during the timetable production period between D-40 to D-26.
- 4.7 Therefore, where in this letter and in the ECML General Representation letter we have referred to the proposed ECML December 2025 Timetable, we are referring to the timetable work above namely, either full or in part, the:
- timetable which was developed by the ECML ESG and later deferred in April 2024;
 - Timetable where solutions were developed to the problems of the ECML Timetable as part of the Task Force;
 - Advanced Timetable Work (undertaken between April and October 2024) to de-risk the transition of the ECML ESG timetable from development to timetable production; and
 - Advanced work to inform timetable risk including aligning cross boundary paths in the ECML ESG developed timetable with the latest developments in the wider National Working Timetable and associated Rolling Spot Bids.
- 4.8 So where Network Rail highlight in this representation and the ECML General Representation letter (in the relevant annexes to that letter) whether the access rights sought on ECML in each application are as Network Rail expects in the proposed ECML December 2025 Timetable, we are referring to whether the access rights align to the above timetable work which makes up the proposed ECML December 2025 Timetable.

5 Access Rights Sought in the Application

5.1 The rights sought in this application:

The rights included in the 27 th SA	Specific locations identified in ORR's Letter	Interaction
2 return service Sheffield – London King's Cross on a weekday, Saturday and Sunday via Hatfield and Retford	(f) ECML King's Cross-Edinburgh and Leeds	ECML between Doncaster and King's Cross
With a Regular Calling Pattern at Retford, Worksop and Woodhouse		
1 return service Meadowhall – Sheffield on a weekday, Saturday and Sunday	(f) ECML King's Cross-Edinburgh and Leeds	ECML between Doncaster and King's Cross

- 5.2 Annex B of this letter contains a table which shows all of the access rights requested in this application when set against the February 2025 version of the proposed ECML December 2025 Timetable.
- 5.3 The Table in Annex B provides details of the access rights characteristics i.e:
- Origin
 - Destination
 - Quantum by Day of Week (Peak or Off Peak)
 - If the access rights are currently held in the contract and proposed change is an amendment to those rights for e.g. calling pattern change, contingent to firm etc.
 - Which locations it interacts with from ORR's list of nine locations in their letter to the industry 24 April 2024.
- 5.4 The table also identifies if the access rights origin and destination, quantum and calling patterns sought in the application, are as expected for the proposed ECML December 2025 Timetable.
- 5.5 In line with Network Rail's ECML letter to ORR on 14 March 2025, Network Rail can confirm that the rights sought are not in line with the February 2025 version of the proposed ECML December 2025 Timetable.
- 5.6 Furthermore, Network Rail can now confirm, following a check with Capacity Planning, that the bid made by Hull Trains for the May 2025 timetable change was rejected after a re-bid at D-28. In a letter dated 13 November 2024, Network Rail confirmed that the Revised Access Proposal "will not be accommodated in the publication of the New Working Timetable at D26".
- 5.7 Network Rail would like to acknowledge that Hull Trains notified Network Rail and ORR on 19 December 2024 that the application is now for the "May-Dec 2026 timetable period" and is "dependent on 22x rolling stock availability and the required mobilization/recruitment period following the eventual ORR decision point".
- 5.8 Network Rail would like to acknowledge that Hull Trains notified Network Rail and ORR on 27 February 2025 with a revised Form P and that the application had not changed from the original application submitted to ORR on 05 January 2024 apart from the start date (to SCD 2026 - which will fall in May) and we note that ORR has updated the details for this application on their website to this effect and so have agreed to the change.. The detail of the change:
- "There has been a change to the start date. This has been caused by revised rolling stock availability."
- Network Rail notes that the revised start date for the rights sought falls outside of the December 2024, May and December 2025 timetable window set out by ORR in its letter to the industry dated 24 April 2024. Though not stated by Hull Trains in section 10 of the Form P, Network Rail also note the following changes to the original Form P:
- "Date approval or directions wanted by:" has changed from "30/06/2024" to "30/09/25".
 - In section 4.2 Capacity: the second sentence was changed from "Once the December 2024 database is made available, HT will re-do this exercise, but the potential paths have already been identified" to "Work has since continued, using, in turn the December 2024, May 2025 and December 2025 timetable databases. The latter is still a work in progress at NR."
 - In section 5.1 Changes to rights: a final sentence has been added so the second paragraph now states: "It is currently thought that if the first up and last down service will be formed by or continue as an ECS service running via Meadowhall, so rights are sought to run this, in each direction, as a passenger service between Meadowhall and Sheffield. If the ECS runs to/from elsewhere, these rights will not be required."
 - Section 10.1 has also been amended to reflect that the industry consultation has been carried out.
 - Section 10.3 has been updated to state: "The timetable issues remain unresolved as the December 2025 timetable has not yet been finalised by NR. The issue of abstraction (or lack of) is for the ORR to resolve. The relevant route clearance work is still ongoing."

6 Assurance / Assessments / Updates

6.1 The following section will address specific areas of consideration, opportunity and risk relevant to the application or where applicable to specific access rights in the application. Where the outputs relate to specific access rights instead of the application as a whole this will be highlighted in the relevant section.

6.2 Capacity

6.2.1 In line with Network Rail's ECML letter to ORR on 14 March 2025, Network Rail can confirm that the rights sought are not in line with the proposed ECML December 2025 Timetable.

6.2.2 The rights sought were not included in the ECML ESG specification and run through a line of route that has been declared as Congested Infrastructure.

6.2.3 Awarding the rights sought would impact Network Rail's ability to accommodate the rights which are aligned to the proposed ECML December 2025 Timetable and would be an additional service to the performance assessment.

6.2.4 The rights sought in this application are not running in the current timetable.

6.2.5 Network Rail can confirm that an initial piece of advanced timetabling work was undertaken in 2024, based on paths supplied by Hull Trains, with the final technical note issued to Hull Trains on 28 May 2024. ORR should note that this piece of work informed early thinking only and did not address platforming at King's Cross. The trains were also timed on proxy sectional running times (SRTs, for class 180s and 150s) and was completed before the train class proposed to be used was fully route cleared.

6.2.6 The paths submitted for assessment, following ORR's letter to industry in April 2024, were different to those assessed in the previous collaborative work. These paths have been re-assessed against the proposed ECML December 2025 timetable, which has continued to develop since last May. All of the paths aligned to this application, have conflicts against other services in the proposed ECML December 2025 timetable, with all conflicts (excluding those for one Saturday evening service) being fundamental (i.e. they are unlikely to be resolvable and/or would, at best, require significant structural changes to the timetable).

6.2.7 All paths would be additional to the proposed ECML December 2025 timetable and consequently there is a concern over exceeding the route-stipulated quantum over Welwyn Viaduct and the subsequent performance risk of doing so.

6.2.8 The ECML December 2025 specification developed by the ECML ESG and subsequent ECML Industry Task Force took a holistic view of capacity and performance whilst considering service specifications, service aspirations and journey time outputs from ECML ESG and Task Force members. ORR in awarding the capacity to one of the operators identified as interacting within Annex A, in line with the proposed ECML December 2025 specification, would be allocating a proportion of the capacity that could otherwise be available to other Operators' applications such as this 27th SA, or elements of applications, which were not included in the ESG specification and that have additional capacity requests at that location, meaning the ECML King's Cross-Edinburgh and Leeds.

6.2.9 This application is not in line with the expected ECML December 2025 timetable. Consequentially, were the ORR to direct, they may wish to consider the impact on the forecast operation and performance of the Timetable and the basis on which the Taskforce recommended the timetable for implementation and the modelling undertaken to assure it.

6.3 Performance

6.3.1 Network Rail can confirm that the rights sought were not included in the ECML Timetable Performance Analysis (Annex L) that is listed within Network Rail's ECML General Representation to ORR.

6.3.2 The Analysis in Annex L of the ECML General Representation, evidences that: factoring in the increasing level of TSAR above 16 tph over the Welwyn Viaduct and the modelled punctuality of the proposed ECML December 2025 Timetable, any quantum of services above that included in the proposed ECML December 2025 Timetable quantum would further increase the number of services planned on minimum headway, reducing the number of firebreaks in the timetable and the ability to withstand typical variations in train presentation without significant spread of delay between services and across service groups. The addition of these return King's Cross-Sheffield/Meadowhall services would increase quantum above that previously modelled, and recommended, timetable and evidences why Network Rail is not supportive of the rights sought in this application.

6.3.3 Furthermore, in Annex L Network Rail recommends "that where possible, dwell times at stations and performance allowances are used in key locations to protect performance, based on the modelling outputs and also the actual data that is now available post-December 2024 Go-Live to start informing any potential performance improvement activity. We are therefore unable to support its inclusion.

6.4 ECML Power Supply Modelling

6.4.1 Network Rail can confirm that this application directly relates to paragraph 11 of Network Rail's ECML General Representation letter to ORR and is included in the power modelling report in Annex M of said letter.

6.4.2 Network Rail wish to collaborate with Hull Trains on any necessary power mitigations and, where applicable, set these out in the TAC until such point future power upgrades alleviate the risk. For the avoidance of doubt this includes any request to run in 10-car formation.

6.5 Any other risks or cross-route concerns

6.5.1 None. The application goes across both East Coast route on the ECML and onto North & East route between Retford and Sheffield.

7 Conclusion

7.1 In this representation letter we have confirmed that we do not support the rights sought in this application as they are not included in the proposed ECML December 2025 Timetable. All proposed path timings have conflicts against the proposed ECML December 2025 timetable. These rights would increase quantum over and above the modelled December 2025 East Coast Main Line timetable, and over the Welwyn Viaduct, and consequently a further worsening of performance could be expected. Furthermore, and if ORR was to direct:

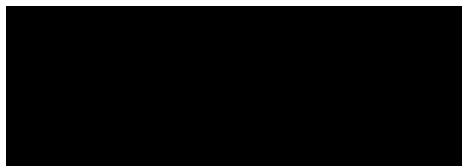
- Network Rail would like a footnote added to the table so that the proposed calls at Worksop and Woodhouse are only allowed once the necessary operational readiness has taken place including the running of a test train; and
- Network Rail would like Hull Trains to conclude the standard industry process (including Vehicle Change) and then agree a separate SA for the inclusion of the Class 221 and 222 units.

7.2 In addition, we have also provided an explanation to ORR of what the proposed ECML December 2025 Timetable is an amalgamation of in terms of Advanced Timetable Work, and confirmed that our position is based on these assessments.

7.3 Network Rail has also highlighted in this letter a number of points we raised in our original representation letter. These are of points of clarification and amendments required to the proposed SA submitted with this application, that Network Rail believes have still not been fully addressed or that ORR need to take into consideration when making a direction on the application.

7.4 The proposed ECML December 2025 Timetable is the output of all the collaboration the industry has undertaken since the ECML ESG was formed in 2019. Our position on this application is an output of that work.

Yours sincerely,



Mark Garner,
Customer Manager,
Eastern Region, Network Rail

ANNEXES

Annex A – Interacting Locations Matrix

Annex B – Table of Passenger Train Slots Requested in Application