Paul Harris
Head of Franchise Management
Network Rail Infrastructure Ltd
Baskerville House
Centenary Square
Birmingham
B1 2ND

Alice Kaiser
Office of Rail and Road
25 Cabot Square,
London
WC2B 4AN

25th April 2025

Network Rail General Representation on Complex and/or Competing Applications Interacting on Location West Coast Main Line.

1. Purpose

This letter is being sent to ORR as a general representation for applications submitted by Operators to ORR on or before 20 May 2024, for Complex and/or Competing Applications that interact at one of the nine interacting locations (as listed in ORR's letter to the industry dated 24 April 2024), but in particular those interacting with the West Coast Main Line ('WCML') London Euston-Nuneaton. These applications will also impact other areas of the North West and Central Region (NW&C). Network Rail is making general representations which should inform the ORR in its decision-making process with regards to applications on the WCML (highlighted in paragraph 4 of this letter).

This letter is subsequent to our previous letter dated 07 February 2025 which also provided representations relating to the WCML South. The 07 February 2025 letter remains applicable to the applications and nothing in this letter replaces anything provided in the previous letter. The focus of that letter was on the fast lines and services running into London Euston as the majority of passenger services operating on the WCML South originate or terminate at London Euston. This makes London Euston the key location during times of perturbation for managing service recovery through the cancellation of services. As a terminus location, platform capacity is vital when managing perturbation as services must depart before arriving services can terminate. Moreover, not having the flexibility to move stock in either direction reduces the ability to free up capacity, resulting in the station becoming congested quickly. Network Rail has continued to highlight the importance of maintaining a resilient timetable and the detrimental impact increasing the quantum of service can have on performance.

Current performance metrics had been included that demonstrated performance is currently not meeting expectations and is expected to decline further once all services, which currently hold access rights, are running. In the December 2025 timetable, Avanti has rights to run additional services between Liverpool and London Euston, and First Rail Stirling has rights to run services between Stirling and London Euston. Validation of the December 2025 timetable is ongoing with the timetable offer due on 13 June 2025.

Pedestrian flow analysis provided shows that capacity at London Euston is forecast to be exceeded more regularly and for longer durations once services are running for all current access rights. Any further growth to passenger numbers because of further access rights granted and services run would further exacerbate the current challenges the station faces in passenger flow and the consequential passenger experience.

The capacity assessment provided, with the representation dated 07 February 2025, has been completed for the fast lines on the section of WCML between London Euston and Rugby; it cannot be assumed that paths would be available beyond Rugby to accommodate the access rights from their origin or to their destination. Any capacity assessment does not consider either diversionary or ancillary moves required for operators to run their services.

The information contained within this letter is provided in addition to previous representations.

This letter responds to ORR's requests, both in meetings and email correspondence, that Network Rail demonstrates progress in assessing applications submitted to ORR by 20 May 2024.

Whilst the technical analysis referred to in this letter will be used as assurance of the proposed access rights for the current Section 22A's and Section 17's applications affecting the WCML South, this representation does not constitute our final representations on any of the applications (or specific access rights within that application currently being sought). [We expect the final representations to be with you week commencing 19 May 2025 or where possible we will seek to expedite.]

Where there are a number of applications seeking capacity pertinent to the WCML South and as detailed in Appendix 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. Accordingly, you may wish to wait for final representations on related applications and the information provided therein prior to making your decision.

The rights contained within Appendix A are highlighted as follows:

- Blue for passenger rights requesting capacity where services are not accommodated in the May 2025 timetable.
- Purple for passenger rights requesting capacity where services are accommodated in the May 2025 timetable.

2. Summary of this General Representation

This letter provides further performance information to support ORR in its decision-making process for deciding applications. Performance information is provided relating to WCML South and other key locations for which the rights within the applications interact.

Network Rail also provide conclusions from the recent power supply modelling undertaken for the NW&C Region.

Network Rail is not expecting to support any additional rights on the WCML South seeking to utilise additional capacity on the fast lines, with the potential exception of one Manchester to London Euston service contained within Avanti's proposed 17th Supplemental Agreement. This service has been running under Contingent Rights since the December 2024 timetable, and it is Network Rail's understanding that if not granted Avanti would still require capacity in the form of an Empty Coaching Stock (ECS) move to balance stock at London Euston.

Network Rail is currently assessing Caledonian Sleeper's 9th Supplemental agreement, which is not looking at an additional path but a diversion via Birmingham International and which currently holds a firm quantum right between London Euston and Rugby. Work is ongoing to assess the application and Network Rail cannot yet confirm whether it is supportive.

3. **Background**

On 24 April 2024 ORR issued a letter to the industry on "Competing and/or Complex track access applications for December 2024, May 2025, and December 2025 timetable changes." Across nine interacting locations listed in that letter, a total of 82 unsupported Applications, under sections 22A and 17 of the Railways Act 1993, were submitted to ORR. This is an unprecedented volume of unsupported applications to be received at the same time and with potentially competing and conflicting requirements for areas of capacity which are already constrained. The process created by ORR's 20 May 2024 deadline, and the subsequent management and consideration of applications, has therefore been unique in its nature.

53 applications were received for the 20 May deadline which directly impact the North West & Central Region (not just WCML), of which 26 applications relate to passenger services and 27 applications relate to freight services. Following that letter from ORR and the submissions from existing and new Operators, as invited by ORR, Network Rail submitted their first representations to ORR by 28 June 2024. As requested by ORR, Network Rail submitted a High-Level plan for assessing the applications within this representation, and a further detailed plan was published on Network Rail's website in August 2024 (and updated in January 2025).

Additional to these representations, further representations were provided to ORR on 07 February 2025 concerning capacity and performance considerations for WCML South.

Since publication of the high-level plan in August 2024, Network Rail has endeavoured to complete key workstreams within the plan earlier than previously stated and has been able to achieve earlier completion of power supply modelling than originally foreseen. This is due to using the proposed timings provided by Operators to Capacity Planning for analysis, rather than a fully validated timetable base.

Our published program of work to assess applications continues forward with Phase 5 of our High-Level Plan (07 March 2025 – 13 June 2025), in which we will continue to assess December 2025 applications. Any other assurances we have stated previously need undertaking within the Routes and necessary functions, to provide evidence in future representations.

4. Complex and Competing Applications

In response to ORR's request to the Industry dated 24 April 2024, operators submitted applications for any future service aspirations affecting nine 'interacting locations', including the West Coast Main Line between London Euston and Nuneaton. Of the 53 applications impacting North West & Central Region, 24 applications were received for the 20 May deadline which directly impact the WCML South, of which 8 of these applications relate to passenger services and 16 applications relate to freight services.

For clarity, the following passenger applications contain access rights pertaining to WCML South:

- Caledonian Sleeper Limited 9th
- West Midlands Trains Limited (WMT) 32nd
- First Trenitalia West Coast Rail Limited (Avanti) 3rd, 14th (14th has been withdrawn), 17th & 18th
- East Coast Trains Limited (Lumo North West) Section 17
- Virgin Management Limited (Virgin Trains) Section 17
- The Wrexham, Shropshire & Midlands Railway Company Limited (WSMR) Section 17

Network Rail considers the Avanti West Coast 11th Supplemental Agreement, submitted to ORR on 20 May 2024, as concluded. ORR has already made a decision in relation to the application, due to the rights being sought relating to the December 2024 timetable, with the rights expiring at the May 2025 timetable change date.

For clarity, the following freight applications contain access rights pertaining to WCML South:

- Colas Rail Ltd 10th
- DB Cargo (UK) Ltd 83rd
- DB Cargo (UK) Ltd 91st (subsequently withdrawn)
- Devon and Cornwall Railways Limited (DCR) 2nd
- Direct Rail Services Limited (DRS) 17th
- Freightliner Heavy Haul Limited (FLHH) 24th, 25th, 27th, 28th
- Freightliner Limited (FLIM) 23rd, 24th, 25th, 26th
- GB Railfreight Limited (GBRf) 25th, 34th
- Legge Infrastructure Services Limited 2nd
- Varamis Limited 2nd

5. Congested Infrastructure

Network Rail previously expressed concerns about capacity constraints on the WCML and in May 2020, Network Rail issued declaration of congested infrastructure for the WCML South Fast lines: Camden Road South Junction to Ledburn Junction Inclusive.

In February 2020, further analysis on WCML capacity was carried out as a result of a cross-industry group meeting in December 2019, in which it was agreed that the findings obtained in Network Rail's 'West Coast Main Line and Trans-Pennine Capacity and Performance Assessment' (2013) would be reviewed and subsequently updated. This was following a request from the ORR to review applications for additional services by 5 applicants.

With effect from 11th May 2020 Network Rail declared the infrastructure on the WCML South fast lines between Camden South Junction and Ledburn Junction as congested infrastructure. This declaration was made under the Railways (Access, Management and Licensing of Railway Undertakings) Regulations 2016, regulation 26 (2) because, following consideration of access requests received; Network Rail considered that this element of the infrastructure would be likely to become congested during the December 2020 timetable period. Consequently, Network Rail initiated a WCML Industry Planning Group ('IPG') in May 2020 which was tasked with considering options for generating additional capacity and improved performance. The IPG reported in January 2021 that a restructure of the WCML timetable could provide additional capacity and improved performance. The IPG therefore then initiated a second phase of work to develop and evaluate options for a restructured timetable, which was ultimately delivered under the governance of the Event Steering Group ('ESG') in December 2022.

As demonstrated in our representation of 07 February 2025 Network Rail will not be able to accommodate all applications seeking capacity on the WCML Fast Lines for the December 2025 timetable and beyond. As the declaration of congested infrastructure made in May 2020 remains active, Network Rail will not be reissuing a further declaration of congested infrastructure.

On 9 July 2024. Network Rail issued, "Early Indicator of Likely Congestion" notices in relation to the following sections of the North West & Central network:

- Acton Lane feeding area
- Washwood Heath / Willenhall feeding area
- Crewe / Weaver feeding area

These Early Warning Indicator notices related to the impact of capability constraints on known or likely applications for electric traction capacity. Having updated the power supply modelling as part of the May 25 onwards applications, Network Rail still has concerns in these areas.

6. **Performance Concerns Affecting WCML Applications**

Background

Network Rail has undertaken further analysis of the performance of the fast line timetable on WCML South (between London Euston and Rugby). The analysis conducted has shown the importance of ample recovery being available to absorb sub threshold delays before locations where there are multiple services tightly flighted. The current Operating Plan is not performing to a consistently high level, and recovery from incidents are taking longer to recover due to the successive flighting of trains on the WCML Fast Lines. This is particularly being felt at Rugby in the Up Direction when services are converging, and at Ledburn Junction and Rugby in the Down Direction towards the afternoon / evening peak.

West Coast Main Line Performance – London Euston to Rugby

Timetable Resilience

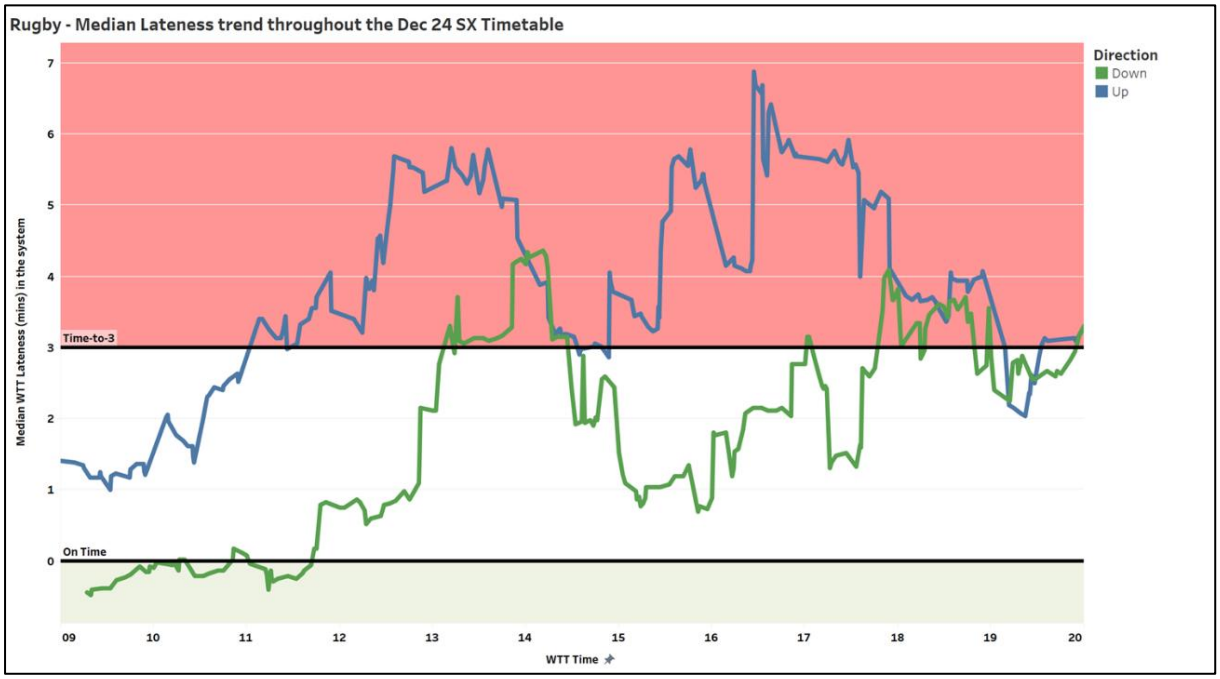
It is important to have a timetable that is resilient. A resilient timetable is one that, on a good day when no major unplanned disruption is taking place, can withstand typical variations in train presentation without significant spread of delay between services and across service groups. This is typically a function of either the content of the timetable plan itself or the content of the resource plan. Factors that underpin a resilient timetable plan include:

- Firebreaks in the timetable at key conflict points to prevent spread of delay service group to service group.
- Turnaround times that are robust to minor delays on inbound workings.
- Dwell times that reflect reality.
- Robust analysis before compliant but risky moves are introduced e.g., overtaking, splitting and joining, repeated re-occupations on minimum headways etc.

Resilience of the West Coast South Fast Lines – Up Direction

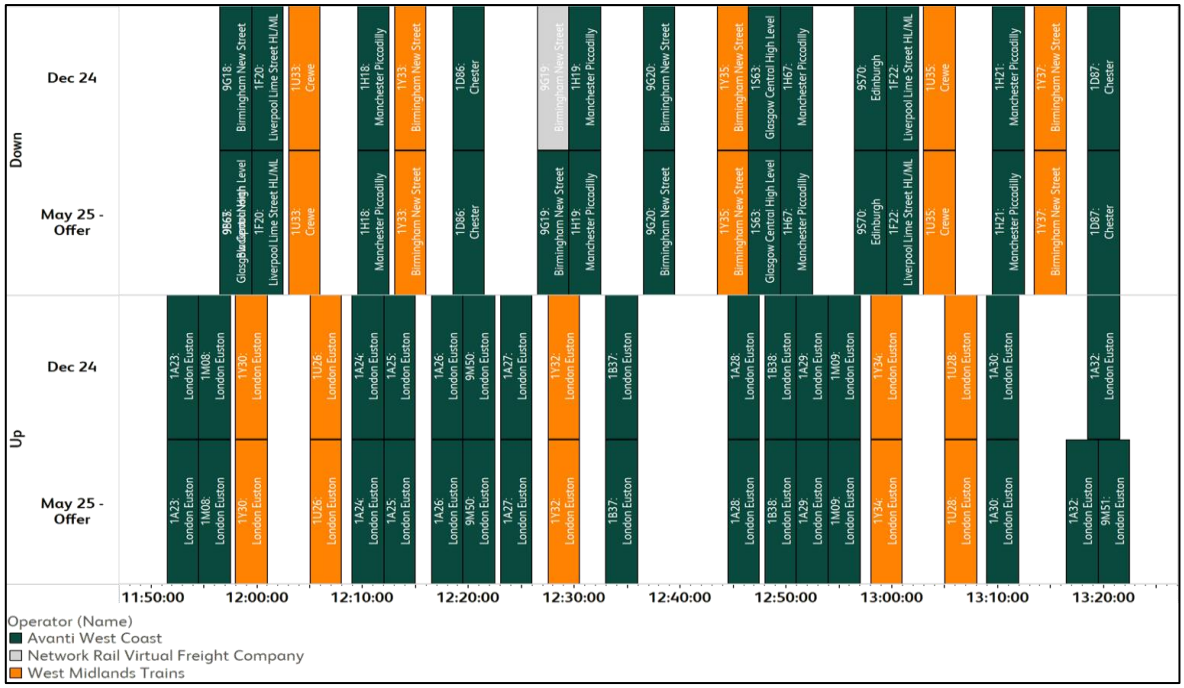
One of the critical points on the WCML is Rugby. Rugby is the point on the network where different long-distance operations converge at Rugby Trent Valley Junction and where punctuality is key to the successful onward delivery of the timetable flighting towards Ledburn Junction and Bourne End Junction as services make their way to London Euston.

There is sub threshold delay in the system, at Rugby, in the Up Direction from ~09:00 until the end of service on a 'good day'. On a 'typical day' at Rugby from ~11:00 in the Up Direction there is always 3 minutes+ lateness in the system:



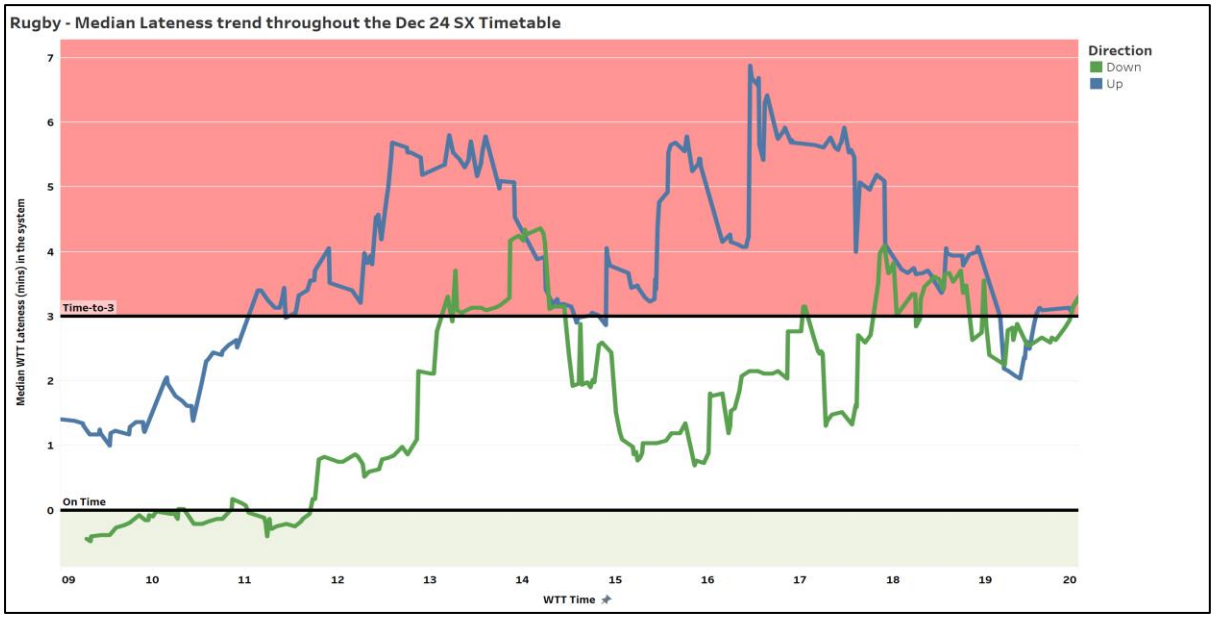
This level of lateness makes the planned presentation of timetabled paths in the south end of the WCML challenging, resulting in the poor punctuality of services currently seen between Ledburn Junction and London Euston through to the evening peak.

Whilst firebreaks are built into the structure between Ledburn Junction and London Euston in the morning peak, off peak and evening peak (as evidenced at Bourne End Junction – off-peak example below), these do not have enough resilience inbuilt to reset lateness that has propagated from the north. On a 'bad day' at Bourne End Junction, 'planned white space' i.e. a firebreak, is almost completely eroded in both the morning and evening peak. The timetable at this point is over stressed and recovery is paramount.



Resilience of the West Coast South Fast Lines – Down Direction

Rugby is the diverging point for Fast Line services that have come from London Euston. Punctuality at Rugby is better in the Down Direction than it is the Up, however lateness is still evident. On a 'good day', lateness in the system at Rugby will stay within three minutes, with sub threshold delay emerging from ~12:00. On a 'typical day' the 3-minute lateness threshold is breached across two 90-minute periods starting at ~13:00 and again at ~18:00:

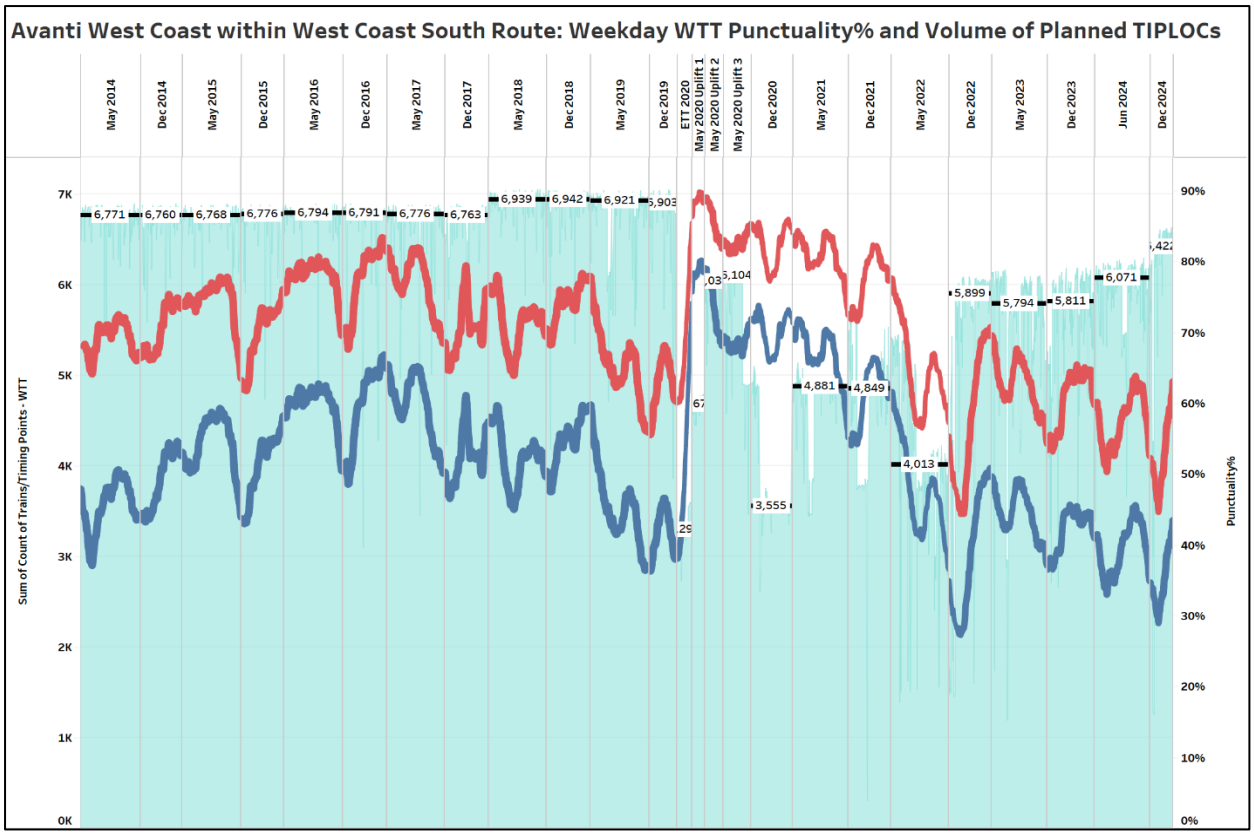


Presentation along the south portion of the WCML is reasonable in the evening peak up until Ledburn Junction. It is at this point on a 'typical day' that presentation is variable, and trains which are designed to run on minimum headways frequently interact with each other.

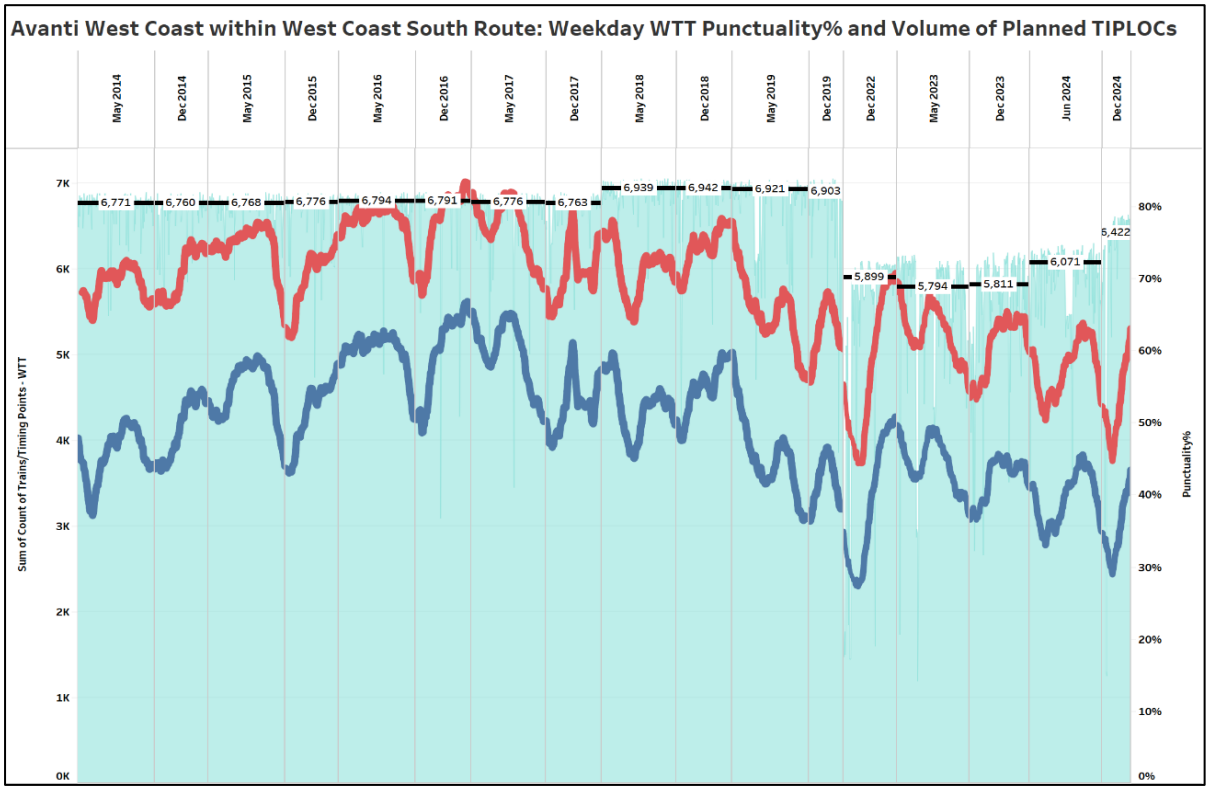
Lateness manifesting itself at Ledburn Junction is typically a symptom of either sub-threshold late starts from London Euston, and/or Down Fast Line trains waiting for signals to cross over to the Down Slow Lines to continue their journey to Leighton Buzzard and other London Northwestern station stops. The net result is seen at Rugby, where from 15:00 lateness in the system gradually increases into the evening peak and breaks the 3-minute threshold at ~18:00.

Current performance in December 2024

Avanti West Coast punctuality within the confines of West Coast South has been regressing since May 2017:



This can be further demonstrated when the COVID 'bounce-back' is removed from the data as well as the subsequent timetable changes that saw a reduced service offered up to December 2022:



Above threshold congestion on the WCML is also increasing in the Up Direction. Congestion in this context is when a 3-minute + delay event is caused to the train behind, because the train in front is in the booked path. Even with firebreaks the lack of resilience in the current base plan to recovery to the levels required, means these firebreaks are being eroded and the perturbation of lateness ends up crossing Route boundaries.

Summary Performance Conclusions (WCML South)

The December 2024 timetable does not contain the proposed new services by First Rail Stirling (previously developed by Grand Union Trains), which are not expected to commence operation until December 2025, nor the outstanding additional Avanti services between London Euston and Liverpool, both of which have access rights, but are not yet running. The introduction of these additional services onto the Fast Lines is likely to have a further impact on performance. Network Rail's representation letter dated07 February 2025 stated that as part of the December 2022 Event Steering Group, performance sensitivity testing to assess the impact of adding additional services was undertaken. The Network Rail position (previously expressed both during and following the December 2022 ESG) is that the clear performance delta between the sensitivity test outputs (both T-1 and T-3 metrics), and the specific risks highlighted for the Up Fast Line (between Rugby and London Euston) indicates that the quantum of Fast Line services contained in the December 2022 Concept Train Plan (an output of the ESG) had reached a critical threshold level in terms of manageable capacity utilisation, beyond which the introduction of any further services was likely to trigger a notable compromise to network performance through increased reactionary delay.

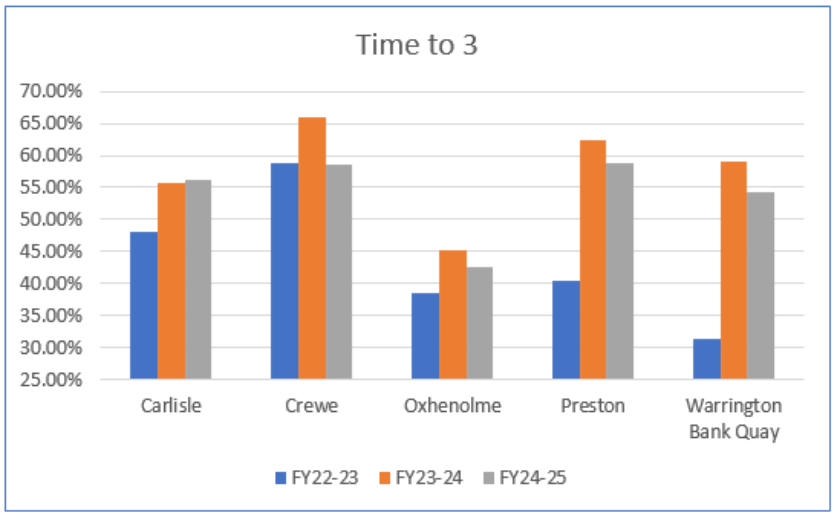
Given the likely impacts as a result of introducing additional services on WCML South Fast Lines, Network Rail does not currently support any additional quantum access rights on the Fast Lines, with the potential exception of the Avanti 17th SA Manchester to London Euston right sought (which is currently operating in the timetable under contingent rights (interim approach) and if not granted would be required to run as ECS for rolling stock balancing purposes, and using capacity, regardless. For the benefit of passengers and freight users, it is Network Rail's view that Operational Performance across all operators on WCML South needs to both recover to, and be sustained at, a higher level than current performance before additional train services, which don't have rights, are considered for inclusion into the timetable.

North of Preston

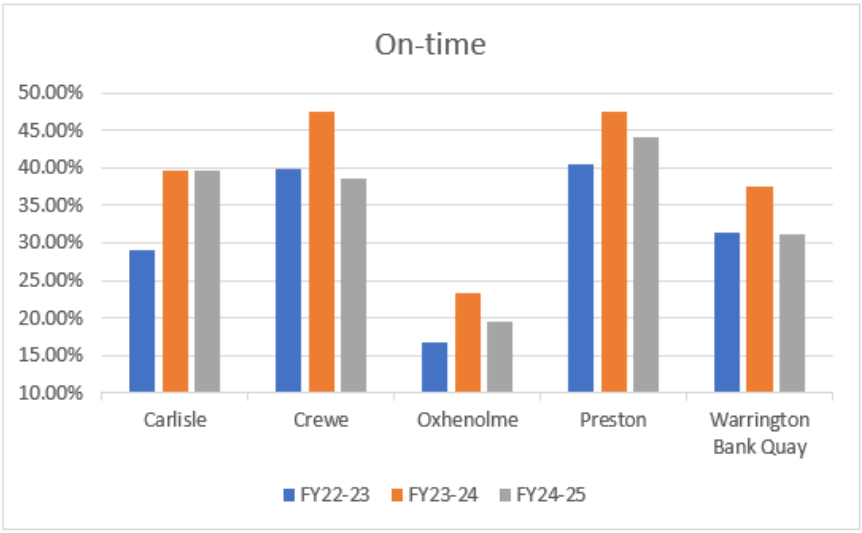
The route North of Preston is predominantly two track railway with considerable gradients and with significant speed differences between long distance passenger services and freight. Capacity on this section of track is very constrained with punctuality nearly 20% lower than the rest of NW&C (Time to 3 of 65.8% MAA P13 24/25 verses the NW&C Region T3 of 82.5% MAA P13 24/25). A two track railway north of Preston operating a mix of traffic means flighting is imperative to performance. This involves consideration for traction speed capability, calling pattern, turnround at destination, freight tonnage and freight length. Given the likely impacts as a result of introducing additional services , Network Rail currently does not support any additional quantum access rights on WCML South Fast Lines, with the potential exception of the Avanti 17th SA Manchester to London Euston right sought which is currently operating in the timetable under contingent rights (interim approach) and if not granted would be required to run as ECS for rolling stock balancing purposes, and using capacity, regardless. All of these compound the issue when trying to manage performance across multiple passenger and freight users.

The tables below consider performance on the North section of WCML between Crewe and Carlisle, and key stations in between:

	Time to 3				
	Carlisle	**Crewe**	**Oxhenolme**	**Preston**	**Warrington Bank Quay**
FY22-23	48.00%	58.90%	38.60%	40.40%	31.40%
FY23-24	55.70%	65.90%	45.20%	62.40%	59.10%
FY24-25	56.30%	58.50%	42.50%	58.90%	54.30%



	On-Time				
	Carlisle	Crewe	Oxhenolme	Preston	Warrington Bank Quay
FY22-23	29.10%	39.80%	16.80%	40.40%	31.40%
FY23-24	39.60%	47.50%	23.40%	47.50%	37.60%
FY24-25	39.70%	38.60%	19.40%	44.00%	31.10%



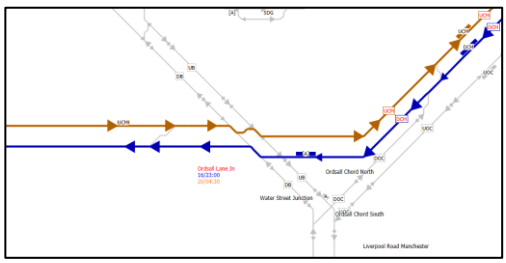
2024/25 has seen a reduction in train performance compared to 2023/24 as a general trend, there are some instances where it has improved however:

- Crewe On Time has dropped to the lowest level of 38.6%, with Time to 3 at 58.5%
- Oxenholme On time is at 19.4%, Time to 3 recorded at 42.5%
- Preston on time is at 44.0% and 58.9% for Time to 3

6.3 Manchester Victoria – Rochdale Performance Review

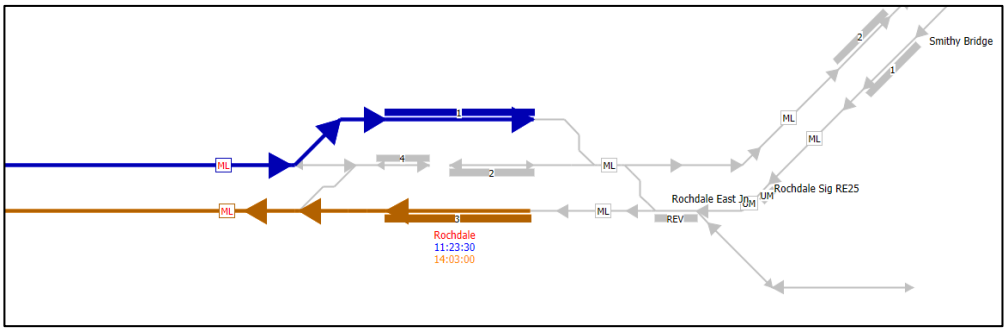
Current performance of this section sees a Time to 3 of 71.5% which is significantly below the overall NW&C position of 82.5%. Infrastructure investment in planned through Manchester North West Transformation Programme (MNTP) (see later section) to support improving the performance outcome.

The route has a number of capacity constraints:



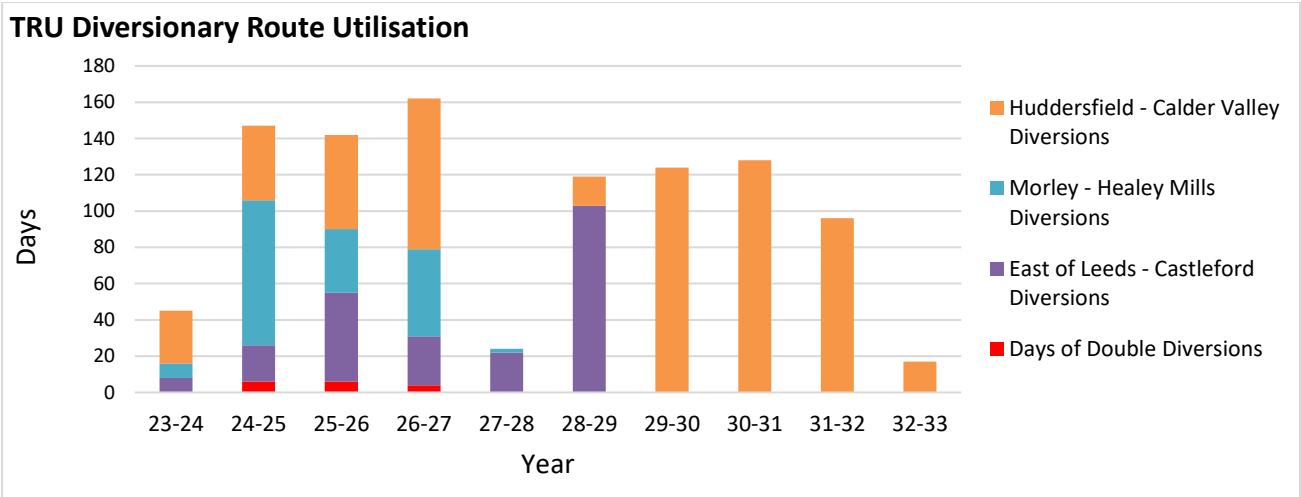
- **Ordsall Lane Jn** sees a difficult junction move for any services from the Chat Moss towards Victoria, with paths required in between services travelling on the Up and Down Bolton lines.
- **Manchester Victoria:** lack of additional capacity above the current service level for additional services at Manchester Victoria
- **Rochdale**: lack of terminating capacity. Trains arriving at Rochdale station from the west have the option of using platforms 1 and 4, which are 198m and 105m respectively. P4 is too short to accommodate either 22x or 80x rolling stock, leaving P1 as the only permissible platform. Platform 1 is utilised at least 4 times an hour by the through passenger Calder Valley services,

alongside all eastbound freight services. Platform 1 is not signalled for a reversal, hence trains would need to shunt via the Reversing Siding (P1 - Reversing Siding - P4), this reversing siding would need upgrading to be able to accommodate a 22X or 80X train length. Both Virgin and Lumo applications are looking to use this station and rolling stock.



Transpennine Route Upgrade

The Calder Valley is the agreed diversionary route for Diggle while TRU is being built. This has diversionary capacity for up to three services per hour to support keeping the Manchester – Leeds passenger market on trains during the main construction phases of TRU (into the 2030s). Therefore, no additional access rights can be granted to Rochdale which do not allow for this diversionary route capability. Both Lumo NW and Virgin applications would be affected by this and Network Rail will comment on these in final representations where applicable. Schedule 2.2 of the Track Access Contract states that "In order to provide Services when any part of the route is unavailable, the Train Operator has permission to use any reasonable route for diversionary purposes, subject to obtaining any necessary route clearance for the Specified Equipment over the route in question." Adding additional paths to the WCML Fast Lines, would mean reducing the capacity for the diversionary route. Consequently, engineering access is less likely to be supported by operators, significantly driving up the cost of delivering work. This has a lasting impact to passenger numbers, which having largely recovered from COVID, would then be impacted significantly by disruption and may turn to alternative forms of transport. There are over 83 days of diversion planned in 2026/27 with over 100 days of diversion needed from 2029/30.



Manchester Task Force (MTF)

The Manchester Taskforce Board was formed by partners and industry members in 2020 to undertake a strategic review of capacity utilisation for the Manchester area including the Castlefield corridor and Manchester Victoria. This resulted in a reformulation of pan Manchester timetables to remove train services that could not be operated practicably to maintain the overall operational integrity of these critical corridors. The timetable today still reflects this approach, with the timetable structure and quantum produced in the December 2022 Concept Train Plan for December 2022. Network Rail emphasises that strategic planning for the current and future timetable structure in Manchester is founded on this approach to capacity utilisation, at least until infrastructure capacity is increased in Configuration State 3 when the approach will be reviewed. This does not yet have fully agreed delivery funding.

Appendix B summarises the approach taken for the December 2022 timetable Manchester Recast. This includes the performance impacts and conclusions to reduce the number of services in central Manchester and the work to consult the changes which resulted in the removal of direct connectivity from Sheffield to Manchester Airport, the removal of North TransPennine connectivity (West Yorkshire, Newcastle) to Manchester Airport, removal of Wigan and Southport connectivity to South Manchester and reduced capacity on the CLC Route via Warrington.

Work is now focused on delivering infrastructure interventions to support robust increase in services in the 2030s through MNTP.

Manchester North West Transformation Programme (MNTP)

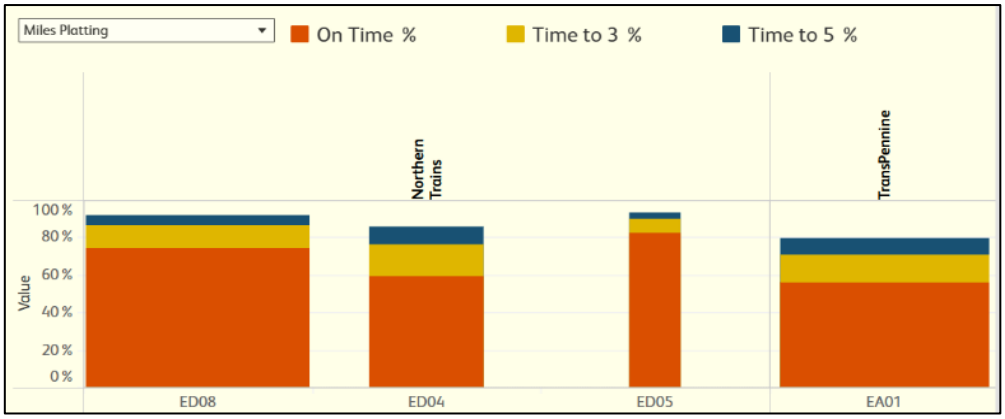
MNTP Configuration State (CS) 2 is the next phase due to be implemented in 2026 which will support performance improvement across Manchester North and Calder Valley services. The following infrastructure will be delivered:

- Salford Crescent additional platform
- Wigan – Bolton electrification
- East of Victoria turnback
- Oldfield Road turnback

Even with this level of infrastructure investment, there is only a minor increase in service level between Manchester Victoria and Salford Central Platforms 1 and 2. Leading to a benefit to performance through the splitting of longer services groups across Manchester Victoria. With the additional benefit of decarbonisation through the ability to operate EMUs following completion of the electrification schemes.

MNTP Configuration State 3 which includes infrastructure interventions at Manchester Oxford Road and Manchester Airport is the first release of capacity on both the Castlefield Corridor and Ordsall Chord. This is the point when there is robust capacity in Manchester for additional services and an expected improvement to central Manchester performance. Consultations have commenced on Manchester Oxford Road scheme design with planned construction in the early 2030s however, as yet, this remains unfunded.

Virgin Trains routing avoiding Castlefield Corridor: The application has amended the routing to serve Manchester Victoria instead of Manchester Piccadilly, with the service routed via Stockport (Heaton Norris Jn) and Miles Platting Junction (via Reddish South) to call at Manchester Victoria. It is positive to see the service proposed away from the congested area of Manchester Piccadilly and Castlefield Corridor. This does, however, introduce further constraints and performance concerns through the crossing moves required at Heaton Norris Jn and Miles Platting.



Miles Platting Junction to the East of Victoria is the main junction between east-west flows to the Calder Valley and Diggle Route. The On-Time for Inter Regional services at this location is very low due to the level of interaction. With TPE Liverpool – Newcastle achieving 39.1% On Time, and the Northern Leeds to Chester services achieving 35% On Time. Introducing a North – South service at this critical junction would risk further delay propagation between WCML and TransPennine routes.

Flow	On Time %	Time to 3 %	Time to 5 %	WTT Poin..
1J - Manchester Victoria to Leeds	80.0 %	93.0 %	95.6 %	1,407
2J - Clitheroe to Rochdale	73.7 %	83.4 %	89.8 %	1,232
9E - Liverpool Lime Street to Newcastle	39.1 %	57.9 %	73.0 %	1,205
1E - Chester to Leeds	52.3 %	73.1 %	84.4 %	1,183
9M - Newcastle to Liverpool Lime Street	39.4 %	53.3 %	61.9 %	1,158
2N - Rochdale to Clitheroe	77.5 %	89.8 %	94.3 %	1,142
2B - Rochdale to Blackburn	73.1 %	87.8 %	96.0 %	1,139
1D - Leeds to Chester	35.0 %	57.1 %	73.5 %	1,113

7. Power Supply Modelling related to WCML aspirations

Background

Following the receipt of the applications on 20 May 2024, Network Rail has undertaken power modelling of the baseline of all current access rights accommodated in the timetable, rights currently held and expected to be introduced in the immediate timetables, as well as undertaken power modelling of the additional rights applied for on 20 May 2024.

Network Rail has worked with operators to assure the baseline used in the power supply modelling of NW&C Region accurately represents services as running in normal daily operations. The modelling has been undertaken by Navitas Engineering. This modelling has been completed utilising Vision/Oslo Simulator and assessed in line with BS EN 50163, BS EN 50388, and NR/L2/ELP/27275.

Modelling has also taken into account existing commercial and contractual arrangements with National Grid (Transmission Network Operator (TNO)) and the Distribution Network Operator (DNO), within the context that Network Rail is obligated to not exceed contractual limits between Network Rail and the DNO or TNO.

In addition to this, modelling has been completed in line with the following industry standards and guidelines:

- Transmission Energy Networks Association Engineering Recommendation P24 (the acceptable level of imbalance (Negative Phase Sequence (NPS)) that NR can export onto the power system) as set out by the TNO.)
- Standard BS EN 50388 Annex A for Thermal Loading of assets
- Standard BS EN 50163 Voltage levels

As the ORR will be aware, Network Rail is currently seeing an increase in the introduction of bi- mode or tri-mode trains to be run in electric, replacing older diesel rolling stock. Previously these have rarely given rise to concern as both passenger and freight operating companies have deployed few electric or bi-mode trains. However, this position is now changing and Network Rail as a responsible infrastructure manager is looking at the effective management of this. Due to the nature of power capacity Network Rail may need to impose further operational controls and restrictions on the use of electric or bi-mode trains (which follow existing procedures) and/or may need to object to the introduction of further electric/bi-mode trains where there is not the requisite power capacity.

Network Rail is conscious of its legal and regulatory obligations for power capacity to be allocated in a fair, open and transparent manner and in the least restrictive way possible, and are always mindful of our duty of non-discrimination and equal treatment.

In its power modelling, Network Rail (NR) has attempted to maximise the capability of the network by assessing a realistic timetable which takes into account aspirations as well as a timetable running under normal operations today and in the expected future timetable (December 2025).

We have modelled a quantum of operations and traction reflective of the actual operational position.

This means that the timetable modelled does not reflect the worst-case scenario should operators choose to exercise their full existing rights to operate at full lengths or in electric (instead of diesel).

By coupling these modelling results with industry-agreed operational controls and mitigations (including restrictions to operating lengths and arrangements with operators to “notch back” through the areas of concern), three particular areas of concern remain:

- Washwood Heath (evening peak)
- Crewe and Weaver (peaks throughout the day)
- Willenhall

In these areas, further consideration is being given to introduction of additional controls as part of operating the current level of services, including potential rejection of some services with rights under electric traction.

Capacity at locations across the wider system, (including Willenhall, Acton Lane, Edgeley, Willow Park, Galton Junction and Heald Green) means that no additional services running in electric in these areas beyond those for which rights have already been sold can be accommodated until power system enhancements have been delivered. These enhancements are part funded, with outstanding funding subject to ongoing discussions with DfT.

Power Supply Conclusions

Network Rail has undertaken a comprehensive power supply modelling exercise to assess the impact of accommodating all outstanding access proposals for additional electric services against the rights already held by operators (both passenger and freight), on the network's traction power supply capability. The outputs from this analysis have led Network Rail to reach the following conclusion with regards applications for rights (and future returning rights) to the WCML South:-

- The London Euston-Rochdale paths that Lumo has applied for appear in many of the power loading peaks and as such, even if the issues explained above were to be overcome, should not be supported using electric traction until the upgrades have been completed. Currently funding and planned implementation dates are unknown for all interventions.

Given the complexities of the power supply modelling undertaken by Network Rail, the opportunity to discuss the details with ORR directly (focussing on the key constraints and times) would be welcomed.

8. Our obligations:

Network Rail is mindful of following good and established practice as well as regulatory and legislative requirements when considering applications that potentially compete for capacity. The principles within recently repealed Regulation remain good practise in lieu of an alternative policy / framework being established for facility owners.

As access regulator however, ORR has not been subject to this restriction historically. In a number of cases ORR may be close to reaching a decision that requires little additional information from Network Rail. Indeed, we note that it has already made decisions on some interacting rights; for the Hull Trains 28th Supplemental Agreement (SA), Grand Central 24th SA, and Northern 57th SA applications.

As we made clear in our initial representation letters on 28 June 24, from the beginning we have been mindful to make sure we do not unduly discriminate. As highlighted in the Annexes of this letter, Operators are seeking access rights on WCML which also go to other locations which we know may have capacity constraints and the inability to accommodate all. Other locations are not limited to the 9 interacting locations identified in ORR's letter of 24 April 2024, it also includes other locations where the allocation of capacity may be constrained due to the number of access rights being sought in the competing and/or complex applications submitted by 20 May 2024.

As stated in our interim approach, wherever we are able to reach a conclusive position, positively or negatively, we will provide final representations to ORR so that it may reach a decision consistent with its statutory duties. This might relate to a single application or a number that interact in a relatively contained way if we are able to reach a position of confidence about the way these applications interact with others.

We recognised from the outset that the High-Level Plan would take many applications beyond D40, and the interim approach accommodated this, keeping aspirants at the same priority level as those with contingent rights and with no presumption of continuity.

When Network Rail published its original High-Level Plan in June 2024 and more detailed plan in August 2024, and as highlighted in Network Rail's 28 June 2024 representations of the unsupported applications to ORR, it was with the insight and awareness of the dependencies, complexities and risks that the 53unsupported applications (at that time) proposed for multiple interacting locations and Network Rail Routes bring with them.

9. Conclusion

As set out in this representation, and that provided on 07 February 2025, Network Rail believes any additional services on the fast lines on the WCML South would have a significant detrimental impact to performance where the current quantum of services, combined with the realities of operating a mixed traffic railway, already have significant performance challenges and contribute to delivering performance at a level below expected levels.

Network Rail currently does not support any additional WCML South application seeking to utilise additional capacity on the fast lines with the potential exception of one Manchester to London Euston contained within Avanti's proposed 17th SA as it is Network Rail's understanding that if not granted Avanti would still require capacity in the form of an Empty Coaching Stock move in order to balance stock at London Euston. This train has been running since the beginning of the December 2024 timetable.

Network Rail has highlighted Power Supply as a concern in a number of areas. These concerns are expected to limit what Network Rail can support in terms of additional electric traction rights on the WCML and will, where relevant, be commented on in individual representations. Network Rail would welcome the opportunity to further discuss the outputs of the power supply modelling with ORR.

Network Rail believes the concerns outlined in this representation together with the representation dated 07 February 2025, on the South section of the WCML provides the ORR with a significant suite of material to support it in its relevant determinations. Network Rail will provide you with final representations in relation to the applications listed below. We expect to provide ORR with these week commencing 19th May 25 (where possible we will seek to expedite).

- First Trenitalia West Coast Rail Limited (Avanti) 3rd (Monday – Friday and Saturday Only Glasgow and Blackpool extensions)
- First Trenitalia West Coast Rail Limited (Avanti) 17th (Monday - Friday Glasgow and Blackpool extensions and new services)
- First Trenitalia West Coast Rail Limited (Avanti) 18th (1 x Liverpool – London Euston each way on a Sunday)

- East Coast Trains Limited (Lumo North West) (Services between Rochdale and London Euston from 2027)
- Virgin Management Limited (Virgin Trains) (Services between WCML destinations and London Euston from 2025)
- The Wrexham, Shropshire & Midlands Railway Company Limited (WSMR) (Wrexham-London Euston 5 daily services each way)

Given the current evidence and analysis our current position of not being supportive of the applications is unlikely to change.

Work currently continues in line with the High-Level Plan published August 2024 and updated January 2025.

This letter seeks to provide ORR with useful context and detailed information on the application that will support the positions that Network rail takes in our subsequent responses to you in the imminent individual representations.

When we published our original High-Level Plan in June 2024 and more detailed plan in August 2024, and as highlighted in Network Rail's 28 June 2024 representations of the unsupported applications to ORR, it was with the insight and awareness of the dependencies, complexities and risks that the 82 unsupported applications proposed for multiple interacting locations and Network Rail Routes bring with them.

Our representations will be clear on our position on access applications and rights contained within them. In some circumstances this may be on a premise that Network Rail could only accommodate the access rights sought on a certain basis such as quantum only.

Taken as a whole Network Rail believe the above information, with the detail and analysis provided in the Appendices to this correspondence provide the ORR with a significant suite of material to support it in its relevant determinations. Additional application specific details will be provided shortly with final representations. We do not expect ORR to make a direction in support of the WCML Fast Line applications listed above for the reasons we have outlined, but should it do so, we want to be clear that further discussion would be needed on other locations these applications interact with.

If you have any questions or require clarification of any of the material provided herein, please do not hesitate to contact us.

Yours faithfully,

Paul Harris
Head of Franchise Management, NW&C