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Appeal under Regulation 32 of The Railways (Access, Management and Licensing of Railway Undertakings) Regulations 2016 by Virgin Management Limited

As requested in ORR's correspondence of 21 March 2025, Network Rail is writing to ORR to provide representations in relation to that appeal.

Where this response refers to a "regulation" or "the regulations", it refers to a regulation within / or The Railways (Access, Management and Licensing of Railway Undertakings) Regulations 2016, unless the context requires otherwise. References to Part J are to Part J of the Network Code. Reference to "Avanti" is to First Trenitalia West Coast Rail Limited.

Enclosed with this written submission is a pack of supporting documents. References to page numbers in the response document are references to page numbers of the attachment unless the context explains otherwise.

Preliminary Matters

Network Rail raise the following preliminary matters, the effect of which render the appeal invalid and/or bound to fail.

1. Locus Standi

The application for access made to ORR on 17 May 2024 was made by Virgin Management Limited "(or such other Virgin Group entity as shall be confirmed in due course)" and was said to be made by them as an "Aspirant Railway Undertaking". This regulation 32 appeal has also been brought by Virgin Management Limited ("VML"). As explained in their latest filed accounts [page 1 – 2] VML "... is principally engaged in providing management services to its subsidiaries and other affiliated companies." and that those management services are provided " ...in line with contracts agreed between the relevant parties.". As the wording makes clear, where VML are providing management services they are provided to pre-existing legal entities and those entities have a contract for management services with VML.

Regulation 32 is available to “an applicant” and, “applicant” is defined in regulation 3. In summary, an applicant must be either a railway undertaking (also a defined term within the regulations and one which VML clearly do not meet) or, a person or legal entity with a public-service or commercial interest in procuring infrastructure. The definition gives non-exhaustive illuminating examples of what is intended by “other persons or legal entities”, none of which are proposed or aspirational entities, management services or entities which do not yet legally exist.

VML:-

- (i) is not a rail undertaking as is clear from the statutory definition and VML’s own application which describes them as “aspirant”;
- (ii) does not currently operate any rail transport operations of the type described in the regulation 3 definition of “applicant”;
- (iii) does not have a commercial interest in procuring infrastructure capacity. It is a management company providing management services;
- (iv) has not provided any information to show which (if any) already existing VML subsidiary or other affiliated company they are providing the management services for which could or has an interest in procuring infrastructure;

The relevance of these omissions is further expanded upon below. In so far as VML’s locus standi to bring this regulation 32 appeal, Network Rail’s position is that VML do not meet the statutory definition of an “applicant” and so do not have locus to bring the regulation 32 appeal. Accordingly the appeal should be dismissed.

2. Defective Ground

VML rely upon regulation 32(2)(c) as the basis of the appeal i.e. “the allocation process and its result as prescribed in Part 5 and Schedule 4”. As set out at box 2.4, VML’s appeal “... relates to the decision by Network Rail (“NR”) dated 5 August 2024 (the “Notice”) to modify the Track Access Contract of First Trenitalia West Coast Rail Limited’s (“Avanti”)...

The applicant considers that, in respect of its decision, NR failed to correctly follow and incorrectly applied the required process for the surrender of access rights, as set out in Part J of the Network Code.”

VML are conflating two different processes and wrongly using the regulation 32 process to complain about matters concerning Network Code (here Part J) decisions regarding a third party Access Beneficiary. The application to appeal is therefore an incorrect use of regulation 32. Accordingly the appeal should fail.

The importance of this point is further made with reference to preliminary point 1. VML, who do not meet the criteria for being an applicant able to make a regulation 32 appeal and, are incorrectly using the regulation 32 process regarding allocation to complain about matters concerning Part J decisions regarding a third party Access Beneficiary who has existing access rights.

3. No Meaningful Remedy Available

Even if VML have standing to bring this appeal and, even if their appeal is valid and succeeds, the remedy sought will not assist VML such that this appeal is of academic/redundant to the aim VML seek to achieve.

VML seek ORR to overturn what is said to be Network Rail’s decision of 5 August 2024. However, Network Rail did not make a decision on 5 August capable of being overturned. The decision in issue is Network Rail’s mandatory notification to ORR of Avanti’s obligation to temporarily surrender rights. Having received a Part J2.1.2 notice of surrender, Network Rail were obliged by Part J2.1.3 to notify ORR. Accordingly there is no decision to overturn and no remedy in that respect can be directed by ORR.

Additionally VML seek ORR to instruct the “correct application” of Part J. The following then arise:-

- (i) per preliminary point 2 above, VML are erroneously seeking a Part J related remedy in circumstances where their appeal relies on regulation 32(2)(c);

- (ii) Once Part J2.1.2 is triggered by an Access Beneficiary, Network Rail are, per Part J 2.1.3, required to give ORR notice. The requirement is clear and there can be no doubt on the requirements as drafted;
- (iii) VML's remedy if granted would have the effect of being a collateral attack on Avanti's decision that it was obligated to temporarily surrender some of its rights. VML have no locus to challenge Avanti's decision that it was obligated to surrender some of its rights (whether temporarily or at all) and, if VML did have such a right, its appeal ought to be about that decision and not Network Rail's decision to comply with Part J 2.1.3.

In all the circumstances, even if VML's appeal were allowed to proceed and it succeeded, the remedy requested cannot be granted such that the appeal is academic.

Summary Of Preliminary Points

Whether in isolation or in combination, the effect of preliminary points 1 and/or 2 render the application invalid and bound to fail. Preliminary point 3 renders the appeal academic and of no practical effect. For those reasons the appeal should fail.

Substantive Application

Without prejudice to the preliminary points set out above and Network Rail's position that the application to appeal must fail for any one or a combination of the preliminary points, it sets out below its response to the substantive comments in VML's application.

If VML were able to meet the definition of an applicant (which they do not), to make an appeal under regulation 32, VML must believe they have been treated unfairly, discriminated against or are in any other way aggrieved by a Network Rail decision, here concerning the allocation process.

Treated Unfairly

VML do not set out any basis upon which they have been or could be said to believe that VML have been treated unfairly. Nor could they. The matters which VML complain of (the application of Part J to Avanti's track access rights) relate to dealings between Network Rail and Avanti and not to dealings between Network Rail and VML.

Discriminated against

The VML application does not raise any grounds, allegations or basis for claiming that Network Rail have acted in a manner which either deliberately or indirectly discriminated against VML. The chronology of events is clear. Discussions between Network Rail and Avanti had been ongoing for some time prior to VML's application being made to ORR on 17 May 2024. The alleged "decision" regarding Avanti's temporary surrender which VML request to be overturned was an event on 5 August 2024 following many months of discussions between Network Rail and Avanti prior to 17 May 2024 and as is clear from the documents disclosed, do not show any basis to substantiate an allegation (none having been made) that Network Rail's actions discriminated against VML. The substantive discussion and decision making took place prior to the VML 17 May 2024 application being issued and, before ORR contacted Network Rail on 30 May 2024 requesting a letter of representations. In any event, once Avanti had given J2.1 notice, Network Rail were obligated to notify ORR and in doing so were not discriminating against VML; they were complying with their obligations to Avanti and ORR under the code.

In any other way aggrieved

In so far as VML believe they are in some way aggrieved by Network Rail's application of Part J viz Avanti, it is said at 2.4 of the application to be because the Avanti paths should have been made available for other operators to bid for.

Network Rail make the following observations on that:-

- (i) The unused Avanti paths have been available within the timetable being produced for other operators to bid for (i.e. for the period up to Avanti's proposed return to use of the paths).

- (ii) It is not accepted that Part J has been wrongly applied as is alleged. As can be seen from the disclosure and the Part J response below, VML being aggrieved (if indeed they are) is a result of their own erroneous understanding of how Part J operates;
- (iii) Even if VML's understanding of Part J is correct (which Network Rail do not accept), VML's position is that they accept that the paths would have been available for other operators and not exclusively for VML. Accordingly there was no certainty for VML that the paths would be acquired. It is not clear why VML say they are aggrieved at the paths not being available for other operators to bid for;
- (iv) VML's Direct Access Application of 17 May 2024 has not been determined (and is currently not supported by DfT) such that they cannot credibly say they have lost an opportunity to acquire the paths;
- (v) Although the paths have been available for other operators to bid for (per (i) above), Network Rail would not be able to support long term access rights, where to do so would create conflict with the already approved Avanti future use. Network Rail could, subject to its normal processes, support and have supported in other similar cases, time limited rights in the interim period. In the current circumstances, due to the short time and the requirements to mobilise as a new operator, VML would not have been able to operate those paths.
- (vi) As explained further in the Remedies section below, VML are seeking a remedy which materially isn't achievable/available, nor would it have a material beneficial effect for VML.

Application of Part J

Use of Part J2

VML's criticism is that Network Rail should not have used the Part J2 process and instead should have used the Failure To Use provisions in Part J4.

Network Rail had identified a failure to use by Avanti which met Part J4.1.1(b), namely "the Part J Access Beneficiary fails to make use of a Train Slot which has been included in the Working Timetable and which relates to that Quantum Access Right."

Part J4.4.1 confirms that where such a Failure To Use has occurred, Network Rail "may" serve a failure to use notice. It is not a mandatory requirement for Network Rail to serve such a notice either immediately after a Failure To Use has been triggered, or at all. VML's application accepts the discretionary nature of the power to serve the notice and, its specific criticism is that Network Rail should have served a Failure To Use notice as part of meeting the Better Use obligations.

As described to the industry by Network Rail in a letter from Jake Kelly, Group Director, System Operator, of 24 April 2023 [page 3 – 5], as part of returning the network post-pandemic [emphasis added]:-

"[Network Rail's] clear preference is for continuous review of access rights and voluntary adjustments or surrender. In this context our guidance is the same as that issued last year and we would ask that operators look at that quantum that they may hold with no plans to use in 2023/24 when working with route customer teams to update their contracts for both new and unused rights. In engaging with our customer teams, operators should look to both surrender of any remaining capacity that will not be required, temporarily or permanently."

As set out in the chronology below and attached, Network Rail were in regular dialogue with Avanti and, had threatened the use of a Failure to Use Notice. However, (i) in keeping with the guidance set out above and, in keeping with Network Rail seeking amicable and mutually agreeable solutions with the train operators who use the network, it worked to find a mutually acceptable and Part J permitted outcome; and (ii) a Failure To Use Notice could have resulted in a dispute. Network Rail chose not to serve the notice and to reach agreed terms with Avanti which were in keeping with the April 2023 guidance.

Accordingly Network Rail reject the allegation that it should have served a Failure To Use notice.

J2.1 Surrender

VML's central position and criticism appears to be that the temporary voluntary surrender of Avanti paths was through the J2.1 mechanism and, that a 2.1.1 surrender does not permit temporary surrenders. VML's position is incorrect.

1. As described in its heading, J2.1 applies to where there is an "Obligation of Part J Access Beneficiaries to surrender Access Rights". That obligation is further emphasised in the wording of J2.1.1 which states that an Access Beneficiary "shall" voluntarily surrender.
2. The obligation to surrender arises where an Access Beneficiary, here Avanti, has no current or foreseeable reasonable on-going commercial need for the train paths. The wording is not "current and foreseeable". Accordingly J2.1.1 is open to be used where an Access Beneficiary has:-
 - a. No current need (i.e. it gives up rights it doesn't currently need) but it has a future need i.e. a temporary surrender;
 - b. A current need but no foreseeable future need (i.e. a managed withdrawal);
 - c. No current and no future need (i.e. an immediate and complete surrender of all rights).
3. As can be seen from the disclosure and the chronology, Network Rail and Avanti were discussing Avanti's usage and the Avanti plan for increasing its usage. Failure To Use was considered, discussed and ventilated with Avanti by Network Rail. Avanti gave notice to surrender, albeit temporarily, some of their access rights.
4. Temporary surrenders are not expressly prohibited by the wording of Part J2.1.1. Furthermore, the permissibility of temporary surrenders were expressly notified to the industry by Network Rail in April 2023 (see above), with the prior approval of DfT and ORR.
5. Avanti had a plan for and intended to increase use of their rights, including to use the majority/all of the train paths from the December 2025 timetable. On 20 June 2024 the Managing Director of Avanti confirmed to Network Rail the Avanti West Coast Timetable Development Plan to use all Liverpool to Euston paths in a phased return for up and coming timetables in order to see the rights being fully used (from the December 2025 timetable) [page 33 – 36]. This is consistent with a number of letters from Avanti who have said that this is only temporary in nature. See for example the 15 May 2023 letter from Georgia Ehrmann, Head of Network Development and Planning (Avanti).
6. In the circumstances a temporary surrender was permissible and, Part J2.1 was the correct process to follow and, was followed correctly by Network Rail.

Additionally, VML's application repeatedly refers to J2.1 and the J2.2 Reasonable Enquiry process. That is an incorrect conflation of rules. Where the conditions for a J2.1 surrender are met (i.e. no current or foreseeable reasonable on-going commercial need) the Access Beneficiary does not need to (indeed should not) make a Relevant Enquiry; they are obligated to surrender. Where an Access Beneficiary is not obligated to surrender but wishes to explore the possibility of surrender, a Relevant Enquiry can be made as part of the decision making and is then part of the process to surrender.

Relevant Enquiries and J2.6 consultation

Network Rail understands VML's position is that:-

1. Avanti made a Relevant Enquiry pursuant to J2.3;
2. The Relevant Enquiry was responded to by Network Rail;
3. In preparing its Relevant Response Network Rail should have consulted.

As defined in Part J, a Relevant Enquiry is "an enquiry made of Network Rail by the Part J Access Beneficiary under Condition J2". J2.3 specifies what information shall (i.e. must) be included in a Relevant Enquiry.

Pursuant to J2.2 and J2.4, Network Rail must respond to a Relevant Enquiry and must provide prescribed information in its Relevant Response. In preparing its Relevant Response Network Rail is required to consult with, amongst others "other operators of trains, other Freight Customer Access Option Holders and other persons whom it has reason to believe intend to become operators of trains or Freight Customer Access Option Holders".

Two points arise; (i) As described in the chronology below and attached, Avanti did not make a Relevant Enquiry i.e. no enquiry was made which included all of the required information to amount to a Relevant Enquiry. Accordingly the need to consult did not arise. (ii) At the time of the Network Rail / Avanti substantive discussions on usage and future usage (ostensibly prior to 17 May 2024), VML had not made its application to ORR for Open Access Rights and as such Network Rail would not have consulted with VML at this point. VML would not have been included in a consultation until Network Rail had received further details (Form P & draft TAC) for VML to be considered as potential access party.

Chronology Of Events

Network Rail's summary position on the events which occurred are set out below:-

- As part of its role as a responsible infrastructure manager and, in compliance with Network Code J9, Network Rail meets regularly with Access Beneficiaries to discuss amongst other things their current/actual and forecast use. Enclosed in the bundle are copies of the notes from the relevant Network Rail/ Avanti meetings.
- On 15 May 2023 and, in response to Network Rail's 24 April 2023 letter to the industry, referenced above, Avanti wrote to Network Rail stating amongst other things that it was continuing to work collaboratively with Network Rail to review the access rights position and, with reference to the preference for voluntary adjustments and surrender of remaining capacity not required, Avanti had reviewed its position reflecting the December 2023 timetable bid. Avanti explained why they considered there had not been a failure to use and, they provided a marked up amended table of rights for Network Rail's consideration. Such exchanges are an ordinary part of Network Rail's management of the railway. [Page 6 – 7]
- Network Rail continued to manage the Avanti access relationship while taking account of the industry guidance issued by Network Rail in April 2023 (referenced above) which notified the industry that both temporary and permanent surrenders of rights were acceptable.
- Discussions with Avanti relevant to the December 2024 and May 2025 timetable began in October 2023. Avanti's e-mail of 11 October 2023 set out a detailed explanation to support their forward look at the Avanti proposed timetable step up trajectory [page 8 – 9]. Avanti had set out a plan for use of their rights and, by way of Network Rail's response also on 11 October 2023 [page 8 – 9], Network Rail sought to understand whether Avanti were willing to relinquish unused rights on at least a temporary basis and, ventilated the possibility that a Part J failure to use notice would be considered.
- Discussions continued at an Unused Access Rights call on 18 October 2023 [page 10 – 12], the purpose of which was to discuss the Avanti resource plan underpinning their step-up aspirations to using the full rights. The meeting included a discussion of unused rights and the Avanti plan regarding those. In particular Network Rail's position was that all TOC's were being encouraged to relinquish unused access rights (per the 24 April 2023 letter to industry) and, Network Rail raised the possibility of a temporary relinquishment of rights from June 2024 to December 2024, failing which a Part J failure to use notice would be issued on 23 October 2023.
- A Rights Review Meeting took place on 1 December 2023 [page 13]. The minutes of that meeting state amongst other things "Paul noted the early indications from AWC are that there will still be unused rights from Dec 24 which NR would need to look to challenge. Further to agreeing previously temporarily relinquishment between June – Dec 24 would be sufficient, NR are considering whether they would want to ask for permanent relinquishment/issue of Part J Notice."
- On 7 December 2023 [page 14 - 15] as a follow up to the Rights Review meeting, Avanti sent Network Rail the material they had discussed (which was stated to be confidential and so is not enclosed with this reply) at the meeting and, throughout December 2023 Network Rail considered and assessed the Avanti proposals, including whether a Part J failure to use notice should be issued.

- Network Rail and Avanti continued to discuss matters during their weekly contract management meetings and, internally Network Rail continued their work to validate the information provided by Avanti to assure themselves that Avanti could meet the proposed return/introduction of services.
- On 12 January 2024 [page 16] Avanti notified Network Rail that it was willing to temporarily relinquish a number of unused Access Rights from January 2024 to the beginning of the December 2024/May 2025 timetables.
- On 31 January 2024 Avanti/Network Rail informed ORR of a temporary relinquishment of rights, with immediate effect to the beginning of the December 2024 / May 2025 timetables.
- VML's application to ORR for Open Access Rights was made on 17 May 2024.
- On 20 June 2024 Avanti's Managing Director wrote to Network Rail setting out its updated plan for usage and included details of its Timetable Development Trajectory showing increased usage.
- On 21 June 2024 [page 37 – 39] Avanti wrote to Network Rail giving notice of Avanti's intention to relinquish unused held access rights on a mixture of a temporary and permanent basis.
- On 1 July 2024 [page 40 – 46] Avanti gave notice to Network Rail of its intention to temporarily relinquish unused held contingent access rights the details of which were included in the notice.
- On 16 July 2024 [page 47 – 49] Network Rail questioned the accuracy of the 1 July 2024 notice relating to London Euston to Liverpool as it contradicted the 20 June Managing Director letter.
- On 22 July 2024 [page 50 – 57] Avanti sent a further letter to Network Rail which corrected errors in their 1 July 2024 letter. The 22 July 2024 letter related to London Euston to Liverpool rights which now matched the plan in the 20 June 2024 letter.
- 5 August 2024 notices [page 58 – 65] to ORR were sent by Network Rail and Avanti on 6 August 2024 to confirm the 2 set of relinquishments which had been notified by Avanti (and shared previously with ORR).

As can be seen there was pre-existing and ongoing dialogue between Network Rail and Avanti regarding their use of train paths and, those discussions were (i) an ordinary part of the BAU relationship between Network Rail and Avanti; and (ii) occurred in isolation to and did not in any way take account of VML's application to ORR.

Other chronology relevant to VML's position is as follows:-

- Following VML's application to ORR on 17 May 2024, ORR wrote to Network Rail on 30 May 2024 [page 66] requesting Network Rail to submit a letter of representations by 28 June 2024. The letter of representations was submitted to ORR on 28 June 2024 [page 67 – 82] and, on 2 August 2024 VML responded to Network Rail's letter of representations [page 83 – 85].
- 16 October 2024 during a VML account meeting, VML asked Network Rail for further information on the Part J process applied by Network Rail to the Avanti access rights [page 86].
- On 04 November 2024 [page 87] VML discussed Avanti's unused access rights (2nd Liverpool) with the ORR. Network Rail submitted relevant documentation to the ORR. VML asked Network Rail further Part J questions on Avanti's unused access rights
- 22 November 2024 [page 88 – 89] Network Rail responded to VML's first tranche of Part J queries which had been submitted to Network Rail on 29 October 2024. VML subsequently requested a meeting to discuss the responses provided.
- 12 December 2024 [page 90 – 91] VML responded to the 22 November 2024 correspondence. VML's response set out its view of the Part J process, referenced what it understood to be the timetable of events regarding an Avanti Relevant Enquiry and the related Relevant Response,

referenced an alleged incorrect application of the failure to use provisions and, questioned the validity of any foreseeable future need assessment.

- 20 December 2024 [page 92 – 93] Network Rail responded to the 12 December 2024 correspondence setting out its substantive position.
- 24 January 2025 [page 94 – 95] Virgin sent a further response to Network Rail disagreeing with the Network Rail position and threatening to launch a Regulation 32 appeal.
- 10 February 2025 [page 96] VML requested a meeting to discuss Part J. Network Rail declined the request.
- 12 February 2025 [page 97 – 98] Network Rail responded again to Virgin reiterating its position.
- 13 February 2025 [page 99 – 100] VML confirmed they were preparing a Regulation 32 Appeal and reiterated their request for a meeting to discuss how to move forward.
- 26 February 2025 VML [page 101 – 108] notified Network Rail that they had issued the Regulation 32 appeal.

Events Leading Up To The Appeal

In so far as the matters set out by VML in section 2.6:-

1. Contrary to paragraph 1, the VML Form P application does not state that the application is being made on the basis that Avanti had not used, nor was likely to use the paths and that the paths should be made available for other operators.
2. VML appear to criticise Network Rail for requiring written correspondence instead of meetings. That criticism is rejected. Having been kept to writing, the parties positions are transparently set out and available for the parties and ORR to consider without the need for reliance on recollections of in-person discussions.
3. The remainder of VML's application at 2.6 does not set out or deal with "Events leading up to the appeal" per the requirement of 2.6.
4. The events leading up to the appeal are clearly set out in the attached chronology and described above. The documents disclosed in support of the chronology demonstrate that VML's correspondence set out their opinion and view of what they understand has occurred and why they say Network Rail have acted erroneously. Network Rail has responded to the VML correspondence clarifying its interpretation and application of Part J as relevant to the circumstances. It is clear from the chronology of events leading up to the appeal that this appeal is about the application of Part J of the Network Code and is not an allegation of breach of Part 5 and Schedule 4 of the Regulations.

Remedy

VML's application seeks the following remedy:-

"...that ORR overturn NR's decision [to allow the temporary voluntary Avanti surrender] ... and instructs the correct application of Part J".

In so far as remedy 1 i.e. to overturn Network Rail's "decision" [to allow the temporary voluntary Avanti surrender] VML request that "the ORR overturns NR's decision, as set out in the [5 August 2024] Notice". Network Rail's position on that is:-

1. The "decision" under challenge is in fact Avanti's decision to temporarily surrender rights. It was not Network Rail's decision. As is clear from Avanti's Part J2.1.2 notice dated 1 July 2024, Avanti considered the circumstances triggering a Part J2.1.1 "obligation" had arisen. There is no Network Rail decision to overturn.

2. In so far as the decision is said to be Network Rail's acceptance of the temporary surrender, Network Rail did not have a right to refuse or reject Avanti's decision to surrender their rights. There was no "decision" for Network Rail to make and, no Network Rail decision available for ORR to overturn.
3. In so far as the "decision" is said to be Network Rail's notification to ORR of 6 August 2024 giving Part J2.1.3 notice and effect to the Avanti notice of surrender, Network Rail were required to notify ORR per Part J2.1.3. No "decision" was made. Network Rail complied with the obligation placed on Network Rail by Part J2.1.3. There is no Network Rail decision to overturn.
4. Without prejudice to Network Rail's position that it cannot be, if the 6 August 2024 notice to ORR was overturned, the paths would not become available. Following what Network Rail understands VML's position to be, VML require Network Rail to then reject or refuse to accept the Avanti Part J2.1.2 notice of surrender. That would likely result in a dispute between Network Rail and Avanti on the application of Part J and in the interim, the rights would not have been surrendered (as the Part J process would be incomplete) and so the paths would not be available for others.

Regarding remedy 2 i.e. ORR instructing Network Rail on the application of Part J, Network Rail's position is:-

- (i) VML, who are not a rail undertaking, nor do they meet the requirement to be an applicant to bring this appeal, nor are they an Access Beneficiary, are requesting ORR to instruct Network Rail on matters relating to the application of Part J which apply to Access Beneficiaries. It is Network Rail's position that, as with VML not having standing to bring this appeal, VML also do not have standing to request or be granted the remedy requested.
- (ii) Alternatively, that ORR should find the application of Part J2 by Network Rail was correct in the circumstances.

Enclosures:-

1. Chronology and bundle of relevant documents
2. Internal Power Point re Part J – Change To Access Rights - Overview
3. Network Rail Internal Guidance – Access Rights Changes (Network Code Part J)

Yours sincerely

Paul Harris

Head of Franchise Management