Emyl Lewicki
Head of Freight and Open Access
Office of Rail and Road
By email only

Rob Neep
Customer Relationships Executive
Network Rail Infrastructure Limited
By email only

09 May 2025

Dear Emyl,

Network Rail Infrastructure Limited Representations for a New Track Access Contract submitted under Section 17 of the Railways Act 1993 between Network Rail Infrastructure Limited and East Coast Trains Limited (North West Services)

Following our previous representation on 28 June 2024 specific to this application and the West Coast Mainline (WCML) General Representations dated 07 February 2025 and 25 April 2025, this letter provides the final representations from Network Rail for a new Track Access Contract (TAC) submitted under Section 17 of the Railways Act 1993 between Network Rail Infrastructure Limited ("we") and East Coast Trains Limited (North West Services) ("Lumo North West").

The application was submitted by East Coast Trains Limited (North West Services) ("Lumo North West") to Office of Rail and Road (ORR) on 16 May 2024, which included the submission of the Form P and a draft Track Access Contract. Lumo North West aspire to run the following services from 2027 to 2037:

- Six (6) trains per day in each direction between London Euston and Rochdale on weekdays (SX) and Saturdays (SO);
- Five (5) trains per day, in each direction between London Euston and Rochdale on Sundays (SUN)

The purpose of this final representation is to provide ORR with Network Rail's final position on this application (and the specific access rights within it) and will do so by providing facts, data and evidence to support our position.

Network Rail can confirm that based on the facts, data and evidence outlined in this representation it is not supportive of this application. Our rationale for not supporting this application is explained in the

following sections.

Where there are a number of applications seeking capacity at the locations referred to in this letter, 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.

West Coast Main Line South General Representation Letters

We sent two letters of representations for applications affecting the WCML South Fast Lines dated 07 February 2025 and 25 April 2025. Within the representations consideration is given to Lumo North West's track access application, given that it contains access rights pertaining to WCML (South). All the considerations made in the letters are relevant for Lumo North West and we would ask ORR to take them into account when assessing their proposal.

These letters provided important information to support ORR when it comes to making decisions on applications in this geography. The annexes to those letters include relevant information and where there is specific relevance to this application, reference will be made in this representation.

We would like to highlight key points of the letters which are more pertinent to this application namely:

- 07 February 2025 Letter - Timetable Capacity, Timetable Performance, Passenger Flow at Euston Station, High Speed Two; and
- 25 April 2025 Letter - Performance Concerns Affecting WCML Applications, Power Supply, Congested Infrastructure, Manchester Task Force (MTF), and Manchester North West Transformation Programme (MNTP)

Access Rights Sought in the Application

The rights sought in this application are for:

The rights included in the Section 17	**Specific locations identified in ORR's Letter of 24 April 2024**
6 trains per day London Euston – Rochdale, SX and SO 5 trains per day London Euston – Rochdale, SUN	A - WCML South

Form P Application

We understand that this application is seeking access rights from 2027 to 2037, but the Timetable Change Dates in the Form P are not entirely clear. For example, the Timetable Change Dates are not specified in the 'Summary' section, but they appear to be mixed in 'The Proposed Contract or Amendment' section with references to either the 'Principal Change Date' and 'May' (the Subsidiary Change Date) in 2027 for the proposed Start Date and the 'Principal Change Date 2037' for the proposed End Date.[1]

[1] East Coast Trains Limited (North West Services), *Application to the Office of Rail and Road for a Passenger Track Access Contract, or an Amendment to an Existing Contract*, 16 May 2024, pp. 2-4.

Lumo North West mentioned “we believe that for all but one station (Warrington Bank Quay) that the application does not compete with other services. Following the start of the ‘Complex and Competing Applications’ workstream, we believe that this application competes with several others for capacity on the West Coast Main Line (WCML) South Fast Lines and in the northern end of the WCML, for example the Manchester area.

Track Access Contract

Network Rail acknowledges the TAC that Lumo North West have included with their application. As we do not support this application, we cannot agree with the terms drafted in the TAC. We shared our key findings on the submitted TAC in our previous letter of representations of 28 June 2024.

The Specified Equipment

We previously commented Lumo North West’s specified equipment in our letter of representations of 28 June 2024.

Lumo North West’s aspiration of using “battery-electric 125mph Rolling Stock” to operate the services would exacerbate our current power supply constraints on the WCML. We do not support Lumo North West’s proposed electric traction until the necessary asset upgrades have been completed. Our power supply concerns have been highlighted below and in our representations for applications affecting the WCML South Fast Lines 25 April 2025.

Congested Infrastructure

The section on ‘Congested Infrastructure’ in Network Rail’s General Representation letter dated 25 April 2025 is relevant to this application.

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. Lumo NW’s aspired rights would utilise this 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.

Capacity

As stated in our WCML representations letter 25 April 2025, 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

Work continues against our high level plan (as provided to ORR 12 August 2024 and 30 January 2025) and through this we have identified some potential theoretical capacity on a Sunday for a very small number of paths. However, it is unlikely that a new operator could use this as a foundation to start and manage a new business operation. Timetable capacity is only one element of the assurance process. Although there may be a small amount of potential capacity on a Sunday, this does not take into consideration other assurance activities and considerations such as performance, operational risks, or the extensive engineering plans and disruption to the train service and diversionary requirements. Network Rail is not supportive of utilising this capacity, by any operator, however if the ORR is minded that this should be explored further engagement with Network Rail will be required.

Network Rail has provided evidence on capacity and performance in our two letters of representations on the WCML, dated 07 February 2025 and 25 April 2025. Network Rail is not supportive of the Lumo NW application for capacity on the West Coast Main Line South on the basis of the evidence provided in those representations and supplemented in this representation.

December 2025 Priority Date Notification Statement

Lumo NW have not submitted an access proposal at D-40 for December 2025 for the rights sought in this application and as per the Access Rights sought section the services are not intended to start until 2027. Network Rail cannot currently provide support to rights which have not been bid for the December 2025 timetable and which have been identified as having additional challenges through the assessments completed to date.

As an access proposal has not been submitted for these paths it means the application does not relate to the purpose of the competing and/or complex applications workstream – to make decisions for the three timetables stipulated in ORR letter of 24 April 2024. Network Rail does not support access rights for which there is no confirmed use of capacity as a general point of principle. Network Rail does not believe it is efficient use of capacity to reserve capacity for potential traffic in this manner. We do not expect ORR to make a direction in support of these paths for the reasons we have outlined above, however should it be minded to do so, we want to be clear that further discussion would be needed.

Complex and Competing Applications

Lumo North West's aspired paths present unresolved conflicts against multiple schedules when reviewed against the base timetable (May 2025) and against indicative schedules for rights already directed for First Rail Stirling's London Euston to Stirling and First Trenitalia West Coast Rail Limited (Avanti) services to Birmingham and Liverpool. Additionally, there are unresolved conflicts between Lumo North West's aspirations and multiple services aligned to the below unsupported applications. This means that trade-off decisions would be required to accommodate either a Lumo North West aspiration or other operator aspirations. This application has conflicts with the May 2025 timetable, future directed rights and other unsupported applications, indicating a lack of timetable capacity for the rights in this application.

First Trenitalia West Coast Rail Limited (Avanti) 3rd Supplemental Agreement
First Trenitalia West Coast Rail Limited (Avanti) 17th Supplemental Agreement
Caledonian Sleeper Limited 9th Supplemental Agreement
Colas Rail Limited 10th Supplemental Agreement
XC Trains Limited 38th Supplemental Agreement
DB Cargo (UK) Limited 83rd Supplemental Agreement
DB Cargo (UK) Limited 87th Supplemental Agreement
Direct Rail Services Limited 17th Supplemental Agreement
Freightliner Heavy Haul Limited 25th Supplemental Agreement
Freightliner Heavy Haul Limited 27th Supplemental Agreement
Freightliner Heavy Haul Limited 28th Supplemental Agreement
Freightliner Limited 23rd Supplemental Agreement
Freightliner Limited 24th Supplemental Agreement
Freightliner Limited 25th Supplemental Agreement
Freightliner Limited 26th Supplemental Agreement
GB Railfreight Limited (GBRf) 25th Supplemental Agreement
GB Railfreight Limited (GBRf) 34th Supplemental Agreement
Transport For Wales Limited 28th Supplemental Agreement
Transport For Wales Limited 31st and 32nd Supplemental Agreements
TransPennine Trains (TPT) 58th Supplemental Agreement
Virgin Management Limited Section 17 Application
West Midlands Trains Limited 32nd Supplemental Agreement
Wrexham, Shropshire & Midlands Railway Company Limited Section 17 Application

In addition to the applications mentioned above, Lumo North West's Section 17 interacts with other applications on the West Coast Main Line further north to the WCML South location (as identified in ORR's letter to industry, dated 24 April 2024). Therefore, if ORR were to direct this application in line with what Lumo NW are seeking in this application, it would likely impact on the ability to accommodate other rights on the WCML which Network Rail may be supporting in its final representations related applications.

Proximations have also been assessed which highlight the interactions at ORR locations between services. It includes services that are within 6 minutes of other unsupported applications at each of the locations regardless of what platform or line they are using, demonstrating what services or applications could impact others if capacity for those services was altered or if they were delayed even if by only a few minutes during operation. Given the amount of proximations relevant to this application, the combination of these presents a risk to performance and other unsupported applications running

through the same locations.

In particular, over 700 proximations have been found across the West Coast South for this application across weekdays and weekends, which are quantified in Appendix 2.

Performance

Our performance concerns on the West Coast Main Line (WCML) South Fast Lines have been outlined in our two letters of representation, dated 07 February 2025 and 25 April 2025.

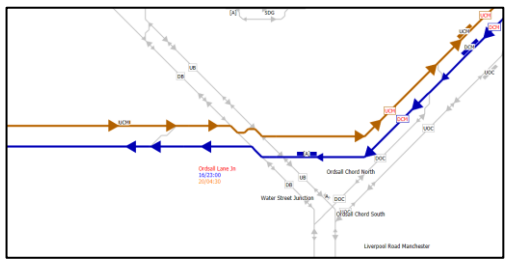
The 07 February 2025 letter sets out relevant performance information in the 'Timetable Performance' section and Appendix C. These set out the importance of having a timetable that is resilient. In particular factors that underpin a resilient timetable plan include firebreaks in the timetable at key conflict points to prevent spread of delay service group to service group. Any additional services introduced on the West Coast South Fast Lines 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 25 April 2025 letter sets out relevant performance information in the West Coast Main Line Performance – London Euston to Rugby section. As set out in this letter, 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.

Manchester Victoria – Rochdale Performance Review

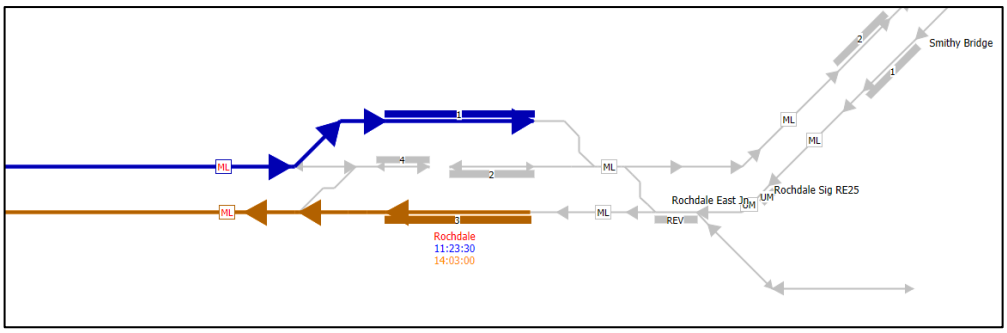
Current performance of this section sees a Time to 3 of 71.5% which is significantly below the overall NW&C position of 82.5%. Infrastructure investment in planned through Manchester North West Transformation Programme (MNTP) (see later section) to support improving the performance outcome.

The route has a number of capacity constraints:



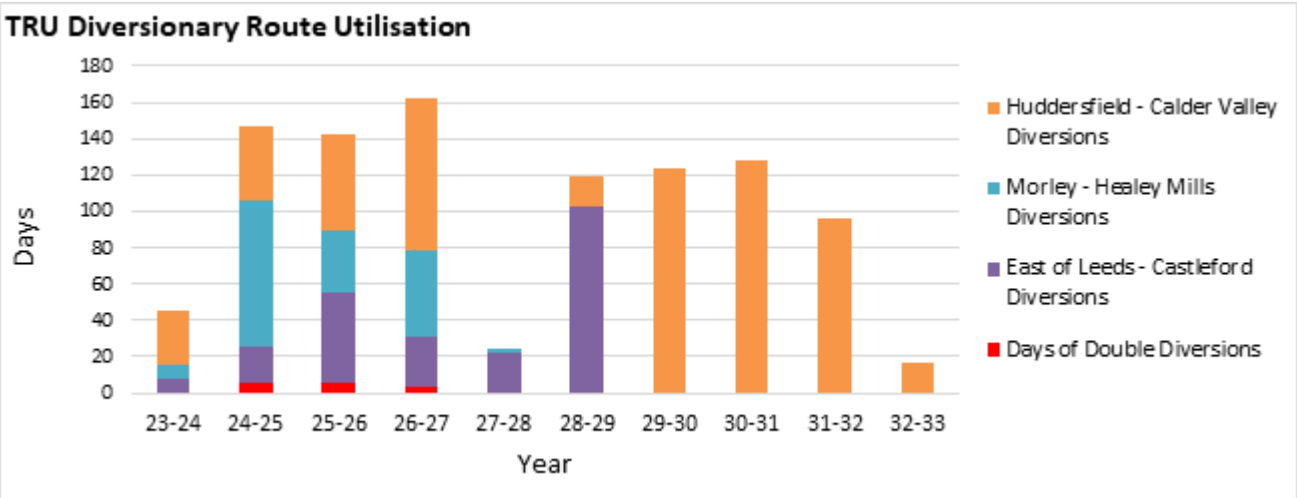
- Ordsall Lane Jn sees a difficult junction move for any services from the Chat Moss towards Victoria, with paths required in between services travelling on the Up and Down Bolton lines.
- Manchester Victoria: lack of additional capacity above the current service level for additional services at Manchester 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. The Lumo North West application is looking to use this station and rolling stock.



Transpennine Route Upgrade (TRU)

As set out in our general representation letter, dated 25 April 2025, 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. The Lumo North West application would be affected by this. 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.



Power Supply

In line with our WCML general representation letter, dated 25 April 2025, 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.

North West & Central

Passenger flow at Euston Station

In our general representation letter of 07 February 2025 we highlighted the importance of Passenger flow at Euston Station.

As stated in that general representation, conclusions show that Euston Station is vulnerable to disruptions associated with delays and cancellations, as well as common cause variance in call to board announcements. The data provided in that representation, suggests that even under the existing demand and timetable, the concourse design does not lend itself to accommodating spikes in demand well. In the short-run, introduction of additional services at London Euston may contribute to poorer passenger experience in the concourse. Additional services may limit station's ability to cope with common cause variance in train service, such as delays to boarding and departure. This means the station has less resilience to demand or operational fluctuation.

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 of our general representation letter dated 25 April 2025 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.

M*anchester 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.

High Speed Two

Access rights sought via this application will interact with DfT and industry proposals, developed with West Coast Partnership Development (WCPD) for High Speed Two (HS2) operation. Specifically any rights where the services will continue north on the WCML after Rugby heading towards Stafford.

A captive service between Old Oak Common and Curzon Street (Birmingham) is planned to commence in the early 2030s. The current expectation is that HS2 service will then shortly afterwards begin running on the existing WCML – to a combination of Manchester, Glasgow and Liverpool, joining the WCML at Handsacre Junction (near Lichfield). Some existing long-distance services will be withdrawn at this point with replacement services added between London Euston and Birmingham New Street/Lichfield to better serve intermediate markets by making use of the capacity released.

A further section of the HS2 route (from Old Oak Common to Euston) will – subject to funding – be opened later in the 2030s at which point the full HS2 Phase 1 infrastructure will be in place. That will trigger another change to the WCML timetable as more services can be withdrawn from the WCML

south of Handsacre and re-directed to/from London via HS2. Train service specifications for these three stages are in development, decisions about which will be based on ongoing work between HS2 Ltd and WCPD. No part of the current HS2 programme scope delivers additional capacity north of Handsacre Junction, and it will therefore be necessary to reduce the current train service by approximately one path for every HS2 path introduced.[2]

Conclusion

In this representation letter we have confirmed that we do not support this application for a TAC and the access rights sought in this application. Network Rail is not supportive of additional access rights on the West Coast Main Line South Fast Lines for the reasons set out in the two WCML general representations (dated 07 February 2025 and 25 April 2025) and further evidenced in this representation letter, namely performance, passenger flows at Euston, timetable capacity, congested infrastructure and interactions with TRU, HS2 and Manchester programmes. In addition, the proposed electric services would create a power supply risk on the WCML.

Any additional services on the Fast Lines on the WCML South would utilise firebreaks within the timetable and 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 considers that this final representation letter, coupled with representations submitted on 28 June 2024, plus the two WCML general representations dated 07 February 2025 and 25 April 2025 contain sufficient information on this application to enable ORR to make a direction.

Network Rail does not expect ORR to direct the rights and TAC being sought in this application on the basis of the information provided in this representation letter. However, if ORR were to direct Network Rail and Lumo North West to enter into contract, we would like the opportunity to review the terms of the contract

Please do not hesitate to contact me if there is any further information you require.

Yours sincerely,

Rob Neep
Customer Relationships Executive
System Operator

[2] Network Rail, *Network Rail Representations for Applications Affecting the West Coast Main Line (South)*, 07 February 2025, p. 9.

List of Appendices

Appendix 1 – *Proximations*

6-Minute Proximation

- A 6-minute proximation consists between two application schedules.
- Where two services; from different applications only, (not application vs base timetable) utilise the same section of track either 6-minutes before, or after, one another
- 6-minutes is approx. double headway* to draw out how proximity could affect the running of another service.
- This is limited to Wednesday, Saturday and Sunday only. ECML is not included.

*Not all headways are 3 minutes, this figure has been agreed due to the restrictions of Attune conflict reporting

WCML_South				
	Count of Proximations			
Runs in Proximity with	Wed	Sat	Sun	Tot
WSMR S17 EXTRA	91	84	23	198
WMT 32nd BASE	44	78	28	150
Virgin S17 EXTRA	72	72	0	144
Avanti 17th BASE	0	0	52	52
Avanti 3rd BASE	34	17	0	51
GBRf 34th BASE	12	6	4	22
Caledonian Sleeper 9th EXTRA	14	5	0	19
GBRf 25th BASE	5	10	3	18
Avanti 3rd EXTRA	0	17	0	17
DRS 17th BASE	7	9	1	17
DBC 83rd BASE	7	0	7	14
FLHH 28th EXTRA	11	0	0	11
FLIM 24th BASE	11	0	0	11
CrossCountry 38th BASE	5	5	0	10
DC Rail 2nd BASE	5	0	0	5
FLHH 25th BASE	4	0	0	4
FLHH 26th BASE	4	0	0	4
FLIM 25th BASE	3	0	0	3
LIS 2nd BASE	1	0	0	1

Appendix 2 – Interacting Applications Matrix

Operator/Application/Type	Status of Application	WCML south	Birmingham	BHM-Derby	Derby-Sheffield	Sheffield	ECML&Leeds	Oxford	Gloucester	Cardiff
Alliance Rail Cardiff - Edinburgh 17	Withdrawn		x	x	x	x	x		x	x
Avanti 3rd SA 22a	Live	x	x							
Avanti 11th SA 22A	Withdrawn	x	x							
Avanti 14th SA 22A	Withdrawn	x	x							
Avanti 17th SA 22a	Live	x	x							
Avanti 18th SA 22a	Live	x								
Caledonian Sleeper 9th SA 17	Live	x	x				x			
Colas 10th SA 22a	Live			x	x	x	x			x
CrossCountry 38th SA 22a	Live		x	x	x	x	x	x	x	x
DBC 72nd SA 22a	Live				x	x	x			
DBC 73rd SA 22a	Live					x	x			
DBC 79th SA 22a	Live			x			x	x		x
DBC 81st SA 22a	Live		x	x	x	x	x	x	x	x
DBC 86th SA 22a	Live					x	x			
DBC 87th SA 22a	Live		x	x	x	x	x		x	x
DBC 88th SA 22a	Live				x	x	x			
DBC 83rd SA 22a	Live	x								
DBC 84th SA 22a	Live							x		
DBC 85th SA 22a	Live									
DBC 91st SA 22a	Withdrawn	x								
DBC 92nd SA 22a	Live									x
DCR 2nd SA 22a	Live	x	x	x	x		x	x		
DRS 17th SA 22A	Live	x	x	x	x	x	x		x	x
EMR 19th SA 22A	Live						x			
EMR 20th SA 22A	Live				x	x	x			
EMR 21st SA 22A	Live				x	x	x			
FLHH 24th SA 22A	Live	x						x		
FLHH 25th SA 22A	Live	x	x	x	x	x	x	x	x	
FLHH 26th SA 22A	Live				x	x	x			
FLHH 27th SA 22A	Live	x	x	x	x	x	x	x	x	x
FLHH 28th SA 22A	Live	x	x	x	x	x	x	x	x	x
FLIM 21st SA 22A	Live		x	x	x	x	x	x		
FLIM 22nd SA 22A	Live		x	x	x	x	x	x		
FLIM 23rd SA 22A	Live	x	x							
FLIM 24th SA 22A	Live	x	x	x	x	x	x	x		
FLIM 25th SA 22A	Live	x	x	x		x	x	x		x
FLIM 26th SA 22A	Live	x			x	x	x	x		x
GBRf 25th SA 22a	Live	x	x	x	x	x	x	x		
GBRf 34th SA 22a	Live	x	x	x	x	x	x	x	x	x
GBRF 41st SA 22A	Live						x			
Govia Thames Railway 62nd SA 22A	Live						x			
Govia Thames Railway 63rd SA 22A	Live						x			
Grand Central 24th SA 22A	Directed by ORR						x			
Grand Central 28th SA 22A	Live						x			
GWR 201st SA 22a	Live							x	x	
GWR 202nd SA 22a	Live								x	
Hull Trains 27th SA 22A	Live					x	x			
Hull Trains 28th SA 22A	Directed by ORR						x			
Hull Trains 29th SA 22A	Live						x			
LIS 2nd SA 22a	Live						x			
LNER 34th SA 22A	Live						x			
LNER 35th SA 22A May '28	Live						x			
LNER 36th SA 22A	Live						x			

LNER 37th SA 22A	Rights were being sought until Dec 2025 so not included in analysis						**x**			
LNER 38th SA 22A	Live						**x**			
Lumo 11th SA 22A	Live						**x**			
Lumo 12th SA 22A	Live						**x**			
Lumo London-Rochdale New Contract S17	Live	**x**								
Northern 57th SA 22	Directed by ORR (some of the access rights in this application were withdrawn before direction and added to the Northern 60thSA)				**x**	**x**	**x**			
Northern 59th SA 22a	Live					**x**	**x**			
Northern 60th SA 22a	Live					**x**	**x**			
Scotrail 49th SA 22a	Withdrawn						**x**			
Scotrail 50th SA 22a	Live						**x**			
Scotrail 51st SA 22a	Live						**x**			
Super Tram 11th SA 22a	Live					**x**				
TfW 28th SA 22a	Live		x	x					x	x
TfW 31st SA 22a	Live								x	x
TfW 32nd SA 22a	Live									x
TPT 58th SA 22a	Live					**x**	**x**			
TPT 62nd SA 22a	Rights were being sought until Dec 2025 so not included in analysis						**x**			
TPT 63rd SA 22a	Live						x			
TPT 64th SA 22a	Live					x	x			
TPT 65th SA 22a	Live						x			
Varamis 2nd SA 22a	Live	x	x				x			
Virgin New Contract 17	Live	x	x							
WMT 22nd SA 22A	Live		x	x						
WMT 28th SA 22A	Live		x	x						
WMT 30th SA 22A	Withdrawn		x	x						
WMT 31st SA 22A	Withdrawn		x							
WMT 32nd (29th) SA 22A	Live	x	x	x						
WSMR New Contract 17	Live	x	x	x						