

Suzanne Murray  
Customer Manager  
151 St Vincent's St.,  
Glasgow.  
G2 5NW

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

2 May 2025

**Network Rail Final Representations for the 50th Supplemental Agreement (SA) submitted under Section 22A of the Railways Act 1993 for the Track Access Contract (TAC) between Network Rail Infrastructure Limited and ScotRail Trains Limited dated 3rd March 2016**

## **1 Purpose**

- 1.1 This letter provides Network Rail's final representations for the 50th Supplemental agreement submitted under Section 22A of the Railways Act 1993 for the Track Access Application between Network Rail and ScotRail Trains Limited ("ScotRail") submitted to ORR on 20 May 2024, and later amended by agreement from ORR
- 1.2 This representation builds upon the representations submitted by Network Rail for this application on the 28 June 2024, and the 14 March 2025 ECML General Representation on Complex and/or Competing Applications interacting on ECML Kings Cross - Edinburgh and Leeds.
- 1.3 The latter of these letters provided important information to support ORR when it comes to making decisions on applications in this geography including context on the work in developing the ECML Policy, ECML Industry Task Force, key performance information, as well as updates on power supply assessment. The annexes to that letter include relevant information including Timetable Performance Analysis and ECML Power Supply Modelling and where there is specific relevance to this application, reference will be made in this representation.
- 1.4 The purpose of this final representation is to provide ORR with Network Rail's final position on this application (and the specific access rights within it) and will do so by providing facts, data, evidence to support our position. As the access rights sought in this application are at the ECML interacting location - Edinburgh Waverley - some of the evidence and data to support our position is contained in the ECML General Representation letter dated 14 March 2025.
- 1.5 Network Rail can confirm that based on the facts, data and evidence outlined in this representation and the ECML General Representation, it is supportive of this application, subject to any comments, suggested amendments or specific issues highlighted in this representation.
- 1.6 Where there are a number of applications seeking capacity at the locations referred to in this letter, and as detailed in Annex A, the basis of our support of applications either in total, or in part (as can be determined by reading the relevant representations), may have a connection

to our position on all other applications at that location. You may wish to wait for final representations on related applications and the information provided therein prior to making your decision.

## **2 Background of the Application and Network Rail Representations**

- 2.1 In line with ORR's letter of 24 April 2024 to the industry on 'Competing and/or complex track access applications for December 2024, May 2025, and December 2025 timetable changes', ScotRail submitted this application to the ORR on 20 May 2024 as a S22A application in line with ORR's deadline. By agreement with ORR, this was later superseded by an amended version sent to ORR on 25 March 2025 and we explain this further within paragraph 6.10.
- 2.2 As requested by ORR, Network Rail submitted a High-Level Plan in June 2024, and a further detailed plan was published on Network Rail's website in August 2024 and updated in January 2025. Network Rail made its initial representations on this application on 28 June 2024 where an initial view of the application Form P and SA was provided. ScotRail did not respond to the Network Rail's initial representations. Further to this, Network Rail issued a General Representation on the East Coast Mainline (ECML) to ORR dated 14 March 2025.
- 2.3 In its initial representation on 28 June 2024, following a review of the Form P associated with the S22A, Network Rail had no comments of note at that time. However, in the amended Form P referenced in paragraph 2.1 the following points have emerged:
  - a) In the Descriptions in Table 4.1 included 2.20, 2.23 and 2.24. We believe that the reference to 2.24 is erroneous as there is no associated quantum right in Tables 2.1 in the Track Access Contract.
  - b) Table 2.1 refers to an Edinburgh Waverley to Dunbar access right being converted from an Additional Passenger Train Slot to a Firm Passenger Train Slot. As per the footnote, this was to form part of a separate S22A application (49<sup>th</sup> SA) that has since been withdrawn by ScotRail. This access right is not considered as part of the representation made in this letter.

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

- 3.1 Network Rail can confirm that this application is seeking the proposed access rights at the interacting location, ECML: Kings Cross – Edinburgh and Leeds, and therefore the General Representation to ORR on the ECML dated 14 March 2025 is relevant to this application.
- 3.2 Whilst the entire letter is relevant to this application, we would like to highlight key points of that letter which are more pertinent to this application namely:
  - a) ECML Timetable Performance Analysis;
  - b) Performance Delivery Programme; and
  - c) ECML Power Supply modelling.

## **4 Congested Infrastructure**

- 4.1 The congested infrastructure locations referred to in the ECML General Representation letter dated 14 March 2025 are not relevant to this application. However, we would like ORR to note that the "Early Indicator of Likely Congested Infrastructure: East Coast Main Line" dated 14 March 2025 citing Location 4: Between Newcastle East Jn and Monktonhall Jn (Edinburgh), is relevant to this application. This is only relevant to the Dunbar to Edinburgh

Waverley (via Musselburgh) rights contained within this application, as detailed in paragraph 6.1.

## **5 ECML Proposed December 2025 Timetable**

- 5.1 As referred to in the ECML General representation letter dated 14 March 2025, in February 2024 the ESG closed following an ECML Programme Board endorsement on 17 January 2024 to deploy the new ECML Timetable in December 2024, subject to the outputs of the completed performance modelling.
- 5.2 At the point in time of ORR's letter to the Industry on 24 April 2024, the Department for Transport (DfT) had accepted a recommendation from the Industry Timetable Assurance Project Management Office (PMO) to funders that the ECML ESG Timetable should be deferred from the December 2024 timetable change.
- 5.3 An ECML Industry Task Force (herein referred to as "the Task Force") commenced in June 2024 as an independently led executive-level cross-industry meeting that provides strategic direction for the work programme. The Task Force develops solutions to the problems of the new ECML Timetable, drives consensus on the outcome(s), and delivers recommendations for industry funders and specifiers.
- 5.4 On 17 October 2024 the Independent Chair of the Task Force wrote to the DfT to advise that the Task Force met on 10 October 2024, reviewed the considerations, issues, and risks, and recommended proceeding with implementation of the new timetable for ECML in December 2025. This was on the basis that the timetable is deliverable and meets the Task Force objectives that were set. Concerns were noted from GB Railfreight (representing themselves and other Freight Operating Companies), ScotRail and Transport Scotland. The Task Force recommendation was accepted by the DfT and subsequently endorsed by the Secretary of State in December 2024.
- 5.5 The Task Force had worked collaboratively up to 31 January 2025 to further de-risk the transition of the ECML ESG timetable from development to timetable production.
- 5.6 Advanced work completed by Network Rail Capacity Planning, to inform the December 2025 timetable risk, involved aligning cross boundary paths in the ECML ESG developed timetable with the latest developments in the wider National Working Timetable (WTT) and associated Rolling Spot Bids (RSB). This process has highlighted that, despite previous timetable development work, the national freight and passenger timetable has evolved and this work has been necessary to reduce the risk that capacity decisions may need to be made during the timetable production period between D-40 to D-26.
- 5.7 Therefore, where in this letter and in the ECML General Representation letter we have referred to the proposed ECML December 2025 Timetable, we are referring to the timetable work above namely, either full or in part, the:
  - a) timetable which was developed by the ECML ESG and later deferred in April 2024;
  - b) Timetable where solutions were developed to the problems of the ECML Timetable as part of the Task Force;
  - c) Advanced Timetable Work (undertaken between April and October 2024) to de-risk the transition of the ECML ESG timetable from development to timetable production; and;

- d) Advanced work to inform timetable risk including aligning cross boundary paths in the ECML ESG developed timetable with the latest developments in the wider National Working Timetable and associated Rolling Spot Bids.

5.8 So, where Network Rail highlight in this representation and the ECML General Representation letter (in the relevant annexes to that letter) whether the access rights sought on ECML in each application are as Network Rail expects in the proposed ECML December 2025 Timetable, we are referring to whether the access rights align to the above Timetable work.

## 6 Access Rights Sought in the Application

6.1 The rights sought in this application are for:

- a) 3 x firm rights from Dunblane to Edinburgh Waverley via Falkirk Grahamston, SX and SO, Service Group HA02 in tables 2.1;
- b) 4 x firm rights from Edinburgh Waverley to Dunblane via Falkirk Grahamston, SX and SO, Service Group HA02 in tables 2.1;
- c) 1 x firm right Dunbar to Edinburgh Waverley via Musselburgh SX, Service Group HA02 in tables 2.1; and

6.2 In Table 4.1, Service Group HA02, Description 2.20, 2.23 (we have noted in paragraph 2.3 (a) that 2.24 is erroneous) for services between Edinburgh Waverley and Dunbar via Musselburgh, Wallyford and East Linton shall be deleted from the Additional Stations and inserted into the Regular Calling Pattern to provide firm rights.

The rights included in the 50 <sup>th</sup> SA	Specific locations identified in ORR's Letter of 24 April 2024	Interaction
Additional access rights between Edinburgh Waverley and Dunblane (and return).	(f) ECML Kings Cross-Edinburgh and Leeds	Edinburgh Waverley
One additional right between Dunbar and Edinburgh Waverley	(f) ECML Kings Cross-Edinburgh and Leeds	ECML between Edinburgh Waverley and Dunbar

6.3 Annex B of this letter contains a table which shows all of the access rights requested in this application when set against the proposed December 2025 ECML Timetable.

6.4 The Table in Annex B provides details of the access rights characteristics i.e.:

- a) Origin;
- b) Destination;
- c) Quantum by Day of Week (Peak or Off Peak);
- d) If the access rights are currently held in the contract and proposed change is an amendment to those rights for e.g. calling pattern change, contingent to firm etc; and
- e) Which locations it interacts with from ORR's list of nine locations in their letter to the industry 24 April 2024.

- 6.5 The table also identifies if the access rights origin and destination, quantum and calling patterns sought in the application, are as expected for the Proposed ECML Timetable for December 2025.
- 6.6 In line with Network Rail's ECML letter to ORR on 14 March 2025, Network Rail can confirm that the rights sought in this application on the ECML, namely Dunbar to Edinburgh Waverley, are in line with what was expected in the proposed December 2025 ECML Timetable. This includes the change of Wallyford and East Linton from Additional Stations to Regular Calling Pattern as described in paragraph 6.2 and referenced in Annex B.
- 6.7 However, this application also describes access rights between Edinburgh Waverley and Dunblane (and return). These are not as expected in the proposed December 2025 ECML Timetable (Annex B) for the following reasons:
- a) The quantum of access rights are not as expected. The additional schedules associated with the access rights described in this application are not present in the proposed December 2025 ECML Timetable. However, the passenger services associated with the allocation of this capacity are expected to run from Edinburgh Waverley after 19:00hrs and are perceived to pose little risk to performance or any other consideration under the "Scotland Activities" plan or the Decision Group and are therefore supported.
- 6.8 The timing loads for all the access rights sought in this application are not as expected. The Schedule 5 tables in the Track Access Contract specify CI158 for services from Edinburgh to Dunblane (and return) and CI380-4 for the Dunbar to Edinburgh Waverley rights. Both have been Bid as CI385. It is noted that changes to timing load can affect timings and therefore how capacity is used. However, this is not a material risk to capacity allocation, or power draw in this instance although we would expect the corresponding Schedule 5 tables to be updated to reflect the correct timing loads.
- 6.9 Scotrail have submitted an access proposal at D40 for services that align to the access rights requested within the application.
- 6.10 Network Rail would like to acknowledge that ScotRail notified Network Rail and ORR on 19 February 2025 of their intent to defer the application from May 2025 to December 2025 timetable which is still within the timeframe scope of the Complex and/or Competing Applications process as established by ORR in its letter to industry on 24<sup>th</sup> April 2024
- 6.11 No access rights characteristics within the deferred S22A have changed from the original submission.
- 6.12 The numbering of the S22A has not changed.
- 6.13 The access rights sought do align with the access that the operator has bid to use in the December 2025 Timetable; there are no instances of rights being sought in this application that are not intended to be used from December 2025.

## **7 Assurance / Assessments / Updates**

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

- 7.2 In our original representation to ORR dated 28 June 2024, we highlighted our approach to assessing areas of Operational, Infrastructure and Performance Risk and how we intended to explore mitigations including, but not limited to, the following:
- a) Operational Risk:
    - i. Level Crossings
    - ii. Signal Passed at Danger (SPAD) Risk
  - b) Operations:
    - i. Signaller Workload
    - ii. Degraded Operation
  - c) Infrastructure:
    - i. Maintenance Engineering Access including Incident Response
    - ii. Asset Reliability (also links to Performance)
    - iii. Power Draw
  - d) Performance Intelligence (Route led view).
- 7.3 This approach and its dependencies on other Route Plans were described in Annex C “Scotland Activities” and Annex D to this representation letter respectively. Further detail was shared in “Interacting Rights – Plan of Work” dated 12 August 2024 and updated 30 January 2025.
- 7.4 In both “Scotland Activities” and “Interacting Rights – Plan of Work” we advised that the majority of the Route based assessment would be via the business as usual “Assessing and assuring the impact of operational risks relating to changes to the train plan” formerly known as “Timetable Change Risk Assessment Group” (TCRAG) process and its timescales.
- 7.5 However, as stated in the “Interacting Rights – Plan of Work” update, we recognised that some assurance activities would need to be accelerated to meet ORR expectations. Consequently, we convened a Decision Group on the 4 April 2025 consisting of functional subject matter experts aligned to the “Scotland Activities” categories as well as colleagues from Capacity Planning, to provide an assessment of any associated risks that might prevent the access rights sought in the S22As being safely and reliably delivered.
- 7.6 The Decision Group’s remit was to assess all Operators S22A applications in line with the “Scotland Activities” plan (as described within paragraph 7.2) and 7.3 to comment using their specialist local knowledge and expertise. Each invitee and functional subject matter expert submitted either a written report prior to the meeting and built on this with verbal representations in person or shared their professional opinion at the Decision Group. In relation to the specifics of the 50<sup>th</sup> S22A, no concerns were raised and the Group decision was to support this application.
- 7.7 Edinburgh Waverley Platforming validation is still ongoing but is of sufficient maturity to support this capacity decision.
- 7.8 There are capacity considerations at Glasgow Queen Street but these do not relate to this application and will be commented on in other applications where relevant to them.

- 7.9 Train services associated with the access rights described in the ScotRail 50th SA were included and discussed at TCRAAG and at the aforementioned Decision Group, as well as the Edinburgh Waverley Platforming validation work.
- 7.10 Notwithstanding those key areas of concerns which are integral to the decision making process as to whether to support the access rights application, namely, Capacity, Performance and Power Supply Modelling, detailed in sections 8, 9, and 10 respectively, no other issues were raised during either TCRAAG or the bespoke Decision Group that would prevent Network Rail supporting the access rights application.

## 8 Capacity

- 8.1 The ECML December 2025 specification developed by the ECML ESG and subsequent ECML Industry Task Force took a holistic view of capacity and performance whilst considering service specifications, service aspirations and journey time outputs from ECML ESG and Task Force members. ORR in awarding the capacity to one of the operators identified as interacting within Annex A, in line with the proposed ECML December 2025 specification, would be allocating a proportion of the capacity that could otherwise be available to other Operators' applications, or elements of applications, which were not included in the ESG specification and that have additional capacity requests at that location.
- 8.2 In the case of any application that is related to the proposed ECML December 2025 Timetable, which was developed, modelled and recommended for progression into the development period - the most applicable alternative option, if the rights sought were not directed, in full or part, would be to allocate capacity to an Operator who has aspirations for an access right with similar characteristics. Consequentially, the ORR may wish to consider the impact on the forecast operation and performance of the Timetable and the basis on which The Taskforce recommended the timetable for implementation and the modelling undertaken to assure it.
- 8.3 The Dunbar to Edinburgh Waverley access right sought is included in the proposed December 2025 ECML Timetable and the quantum, calling pattern, origin and destination characteristics (Annex B) are as expected.
- a) However, there are differences in the expected timing load between what has been requested in this application and what has been submitted for inclusion in the December 2025 timetable, and this has been referenced in paragraph 6.8.
- 8.4 The Edinburgh Waverley to Dunblane (and return) is not as expected in the proposed December 2025 ECML timetable in terms of quantum as referenced in paragraph 6.7 (a).
- 8.5 However, with regard to the Edinburgh Waverley to Dunblane (and return) access rights, the situation in the current Working Timetable is the majority of passenger services are platformed on the west side of Edinburgh Waverley. These are bay platforms and therefore, do not interact with either terminating or originating services from or to ECML. With regard to the passenger services associated with the train slots described in this application, the spread of platform allocation is expected to be similar.
- a) For those services that do use platforms that also accommodate ECML through services, the Edinburgh Waverley Platform validation is sufficiently mature to satisfy Network Rail that there is sufficient capacity available to accommodate all services.
- 8.6 The Edinburgh Waverley to Dunblane (and return) access rights within the ScotRail 50th SA seek to use the same infrastructure as other S22A applications, including the Lumo 12th SA services between Edinburgh Waverley and Polmont Jn. However, we note that other Operators applications have not been bid for in full in any of the timetables in scope of the Complex

and/or Competing Applications. Where this applies to other Operator applications, this will be addressed in the individual representations on their applications.

- 8.7 To remain consistent with Network Rail's approach in response to applications that have not been bid in any of the corresponding timetables, Network Rail does not support access rights for which there is no confirmed use of capacity as a general point of principle.
- 8.8 We do not believe that ORR should direct on access rights in this process that have not been bid into the timetables in question.
- 8.9 We recognise there are capacity challenges between Edinburgh Waverley and Polmont Jn. We are able to support this and other applications in so far as they provide for the level of access required to support the relevant operators bids for the December 2025 timetable over this infrastructure. We note that Operators have not all bid for all of the capacity they have sought in their S22A applications, and would advise ORR to seek further information and advice from us if it wished to consider directing access beyond that required to support the December 2025 timetable. We are also happy to continue to work with operators in the future to explore any additional opportunities in preparedness for timetables beyond December 2025.

## 9 Performance

- 9.1 Network Rail can confirm that this application was not included in the ECML Timetable Performance Analysis that is included within Network Rail's General Representation to ORR on the ECML dated 14 March 2025.
- The additional Dunbar passenger service is intended to operate in the morning and it's outside the time scope of the performance modelled ECML. However, the conclusions from that assessment can be drawn on as a representation of expected performance. Please refer to Annex L of the ECML General Representation letter dated 14 March 2025 for further information.
  - The passenger services to Dunblane were not included in the proposed December 2025 timetable, nor the performance modelled ECML. However, as outlined in paragraph 8.5 although the Dunblane services originate/terminate at Edinburgh Waverley, they do not typically interact with ECML services and are therefore expected to have limited performance interaction.
- 9.2 Therefore, to understand any performance implications, Network Rail commissioned some further performance analysis, led by the Route. For the avoidance of doubt, all pertinent S22A applications were considered in said performance analysis and the results shared with the Decision Group described within section 7.
- 9.3 Scotland's Railway use the Scottish Train Performance Measure (STPM) in relation to ScotRail train services. Specific to Scotrail's 50<sup>th</sup> S22A, Table 1 below shows the current actual STPM for respective service groups in the December 24 timetable (14/12/24 – 31/03/25).

Table 1– Current performance data for the effected Service Groups for December 2024 Timetable

Origin	Destination	Train Count	PPM%	Comb.PPM%
Edinburgh	Dunblane	2987	95.3	93.3
Dunblane	Edinburgh	2970	91.2	
Edinburgh	Dunbar	479	96.5	95.1
Dunbar	Edinburgh	331	93.1	



- 9.4 The STPM target is 92.5 %. Table 1 shows that currently, both Service Groups are in line to help us achieve our target of 92.5 %.
- 9.5 Overall, the addition of the limited number of access rights being sought in this application are not therefore perceived to be a risk to achieving the Scotland's Railway STPM performance target.
- 9.6 We are mindful that the passenger train schedules associated with the Dunblane access rights have been bid as outlined in the Form P, to run after 19:00hrs at a quieter time on the network and are therefore, considered a low performance risk to an already well performing Service Group.
- 9.7 As a result of this work, Network Rail (Scotland) performance team support the rights sought by ScotRail in this application as the sale of these rights should not adversely impact STPM any more than is expected by the implementation of the ECML ESG timetable. Network Rail recognises there is a compromise position between achieving the outcomes of the ECML ESG and performance and therefore a forecasted small drop is an understood and tolerable trade off.
- 9.8 To note, Network Rail regularly collaborates with all Operators on Scotland's Railway in relation to performance monitoring and performance improvement activities as part of the business as usual.

## **10 ECML Power Supply Modelling**

- 10.1 With regards to the Dunbar to Edinburgh Waverley access right, Network Rail can confirm that this application directly relates to paragraph 11.5 North of Reston to Edinburgh of Network Rail's General Representation to ORR on the ECML dated 14 March 2025.
- 10.2 With regard to the Edinburgh Waverley to Dunblane (and return) access rights, no concerns were raised at the Decision Group. It was noted that the passenger services associated with these access rights are scheduled to run after 19:00hrs at a time when there is less demand for power supply on this line of route.
- 10.3 Due to the nature of power capacity Network Rail may need to impose operational 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 supply. 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, always mindful of our duty of non-discrimination and equal treatment.

## **11 Any other risks or cross-route concerns**

- 11.1 No other risks or cross route concerns have presented themselves.

## **12 Conclusion**

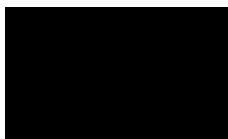
- 12.1 In this representation letter we have confirmed that we do support the access rights sought in this application as:
- a) The Dunbar to Edinburgh Waverley (SX) access right is as Network Rail expected in the proposed ECML December 2025 Timetable. In addition, we have also provided an explanation to ORR of what the proposed ECML December 2025 Timetable is an amalgamation of, in terms of Advanced Timetable Work, and confirmed that our position is based on these assessments.

- b) Network Rail also support that in Table 4.1, Service Group HA02 for services between Edinburgh Waverley and Dunbar via Musselburgh, Wallyford and East Linton shall be deleted from the Additional Stations and inserted into the Regular Calling Pattern to provide firm rights as these calls were accounted for in the proposed ECML December 2025 Timetable.
  - i. However, as referenced in paragraph 2.3 (a), the revised Form P references Descriptions in Table 4.1 including 2.20, 2.23 and 2.24. Network Rail believe that the reference to 2.24 is erroneous as there is no associated quantum right in Tables 2.1 in the current Track Access Contract.
- c) As regards the Edinburgh Waverley to Dunblane (and return) access rights we have set out the reasons for our support in paragraphs 6.7, 6.8, 6.9, 8.5 and provided further reasoning in sections 9 and 10.
  - i. For clarity, these are as follows:
    - a) 3 x firm rights from Dunblane to Edinburgh Waverley via Falkirk Grahamston, SX and SO;
    - b) 4 x firm rights from Edinburgh Waverley to Dunblane via Falkirk Grahamston, SX and SO

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

12.3 If ORR chooses to direct this application, we would like the opportunity to review any finalised Schedule 5 table drafting before ORR directs.

Yours sincerely,



Suzanne Murray,  
Customer Manager,

## ANNEXES

## Annex A – Interacting Locations Matrix

Operator/Application/Type	Status of Application	WCML	irmingham	M- Derby	Derby-	Sheffield	ML&Leed	Oxford	oucester	Cardiff
Alliance Rail Cardiff - Edinburgh 17	Withdrawn		x	x	x	x	x		x	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			
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 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 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			
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			
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			
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			

## Annex B – Table of Access Rights Requested in Application

Operator	SA NO.	Service Group	Service Code	From:	To:	What is the current contractual status of the access rights being sought?  I.e. Firm dated, New Rights, Amended Rights, Contingent Dated	Are these current rights held in line with the ECML Policy? Y/N	How long are the rights being sought for?  I.e. One TT Period, until expiry date of TAC	Weekday		Sat		Sun		Are the Rights for The Origin & Destination in the Application as expected for proposed Dec 25 ECML Timetable (TT)?	Are the Quantum of Rights (by Day) in the Application as expected for proposed Dec 25 ECML TT?	Are the calling patterns for the access rights in the Application as expected for proposed Dec 25 ECML TT?	WCML south	Birmingham	BHM-Derby	Derby-Sheffield	Sheffield	ECML&Leeds	Oxford	Gloucester	Cardiff
									Peak	Off Peak	Peak	Off Peak	Peak	Off Peak												
ScotRail	50th	HA02	23584003	Dunbar	Edinburgh Waverley	New Right(s)	NO	TAC Expiry (31st Mar '27)	0	1	0	0	0	0	Yes	Yes	Yes						X			
ScotRail	50th	HA02	23576003	Edinburgh Waverley	Dunblane	New Right(s)	NO	TAC Expiry (31st Mar '27)	0	4	0	4	0	0	Yes	No	Yes						X			
ScotRail	50th	HA02	23576003	Dunblane	Edinburgh Waverley	New Right(s)	NO	TAC Expiry (31st Mar '27)	0	3	0	3	0	0	Yes	No	Yes						X			
ScotRail	50th	HA02	23576003	Edinburgh Waverley	Dunbar	Amended Current Rights Held in Contract	YES	TAC Expiry (31st Mar '27)	0	1	0	0	0	0	Yes	Yes	Yes						X		Yes	

Please note the 4th row of data in the above Annex B extract relates to the proposed changes in Table 4.1, Service Group HA02 for services between Edinburgh Waverley and Dunbar via Musselburgh to have calls at Wallyford and East Linton deleted from the Additional Stations and inserted into the Regular Calling Pattern to provide firm rights as per paragraph 6.2. There is no quantum change in Tables 2.1.