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25 April 2025

Network Rail Final Representations for the 51st 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 final representations from Network Rail for the 51st 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 with 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 partially supportive of this application, subject to any comments, suggested amendments or specific issues highlighted in this representation. This means:
- a) The one additional firm right Edinburgh Waverley to North Berwick is not supported by Network Rail.
 - b) The one additional firm right North Berwick to Edinburgh Waverley is supported by Network Rail subject to the existing access right between Prestonpans and Edinburgh Waverley referred to in paragraph 2.3 (a) being surrendered.

Further information on our reasoning can be found in paragraph 6.

- 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 20th 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 25 March 2025 and we explain this further in paragraphs 6.10 and 6.11.
- 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 28th 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, on review of the amended version as noted in paragraph 2.1 we have noted the following point which will also be elaborated in paragraph 6:
- a) Currently, ScotRail holds a Firm access right for a Prestonpans to Edinburgh Waverley passenger service (SX). This right is not included in the proposed December 2025 ECML Timetable and has not been bid for the December 2025 Timetable. From conversations held with ScotRail at meetings to support "Assessing and assuring the impact of operational risks relating to changes to the train plan" it is apparent that the intention is for this access right to be surrendered in favour of the North Berwick to Edinburgh Waverley (SX) access

right. This has not been referred to in the Form P (either original or amended version) and also not included in any accompanying Table 2.1 submission showing intention to surrender.

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.

a) The access rights sought in this application cover the ECML geography between Edinburgh Waverley and Drem Jn.

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;

i. The passenger services associated with both the Edinburgh Waverley to North Berwick and the North Berwick to Edinburgh Waverley access rights were intended to run outside of the time parameters of the ECML performance modelling analysis (14:00 to 20:00hrs). However, this work includes peak and off-peak time periods and does provide conclusions indicative of wider service group performance within the structure of the proposed December 2025 ECML timetable. The aspired services are intended to run in the morning peak to alleviate overcrowding on this line and are not currently running.

ii. In order to assure ourselves that any performance implications are fully understood, local performance work was commissioned. On performance grounds, no reason has been established to not support either access right. More detail can be found in section 9.

iii. However, due to reasoning outlined in paragraph 6.8, Network Rail are not supportive of the Edinburgh Waverley to North Berwick access right at this time.

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.

4.2 The access rights described in this application use ECML geography between Drem Jn and Edinburgh Waverley and therefore, the section between Drem Jn

and Monktonhall Jn (Edinburgh) included in the “Early Warning” letter referenced above is relevant to this application.

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) 1x firm right from Edinburgh Waverley to North Berwick via Musselburgh, Monday to Friday; and
- b) 1x firm right from North Berwick to Edinburgh Waverley via Musselburgh, Monday to Friday.

The rights included in the 51 st SA	Specific locations identified in ORR's Letter of 24 April 2024	Interaction
Additional access rights between Edinburgh Waverley and North Berwick (and return).	(f) ECML Kings Cross-Edinburgh and Leeds	Edinburgh Waverley and Drem

6.2 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.

6.3 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.

- 6.4 The table also identifies if the access rights origin and destination, quantum and calling patterns sought in the application, are as expected for the Proposed ECML Timetable for December 2025.
- 6.5 In line with Network Rail's ECML letter to ORR on 14 March 2025, Network Rail can confirm that the right namely, North Berwick to Edinburgh Waverley (SX) in this application is in line with what was expected in the proposed December 2025 ECML Timetable.

North Berwick to Edinburgh Waverley

- 6.6 The North Berwick to Edinburgh Waverley access right is as expected in the proposed December 2025 ECML Timetable in terms of origin and destination, quantum and calling pattern. However:
- a) As outlined in paragraph 2.3 ScotRail hold an existing Firm access right between Prestonpans and Edinburgh Waverley (SX). This has not been included in the proposed December 2025 ECML Timetable and has not been Bid at D-40. Therefore, Network Rail would expect this to be surrendered before a new access right from North Berwick to Edinburgh Waverley could be directed. The new access right described covers a longer journey and would use additional infrastructure and capacity between North Berwick and Prestonpans.
 - b) If ScotRail wished to retain the Prestonpans to Edinburgh Waverley access right described above, Network Rail would expect the following criteria to be met:
 - i. ScotRail would have to provide evidence of the intention that they will be exercising the access right and (dependant on the intended date of service) to temporarily surrender this right via Part J of the Network Code or for the appropriate footnote to be added to Table 2.1 to date the rights;
 - ii. If ScotRail cannot provide evidence of the intention to exercise the right, then they would need to permanently surrender under Part J of the Network Code; and
 - iii. As ScotRail have not exercised the access right for this service, any relinquishment or temporary surrender is completed before ORR direct on the North Berwick to Edinburgh Waverley portion of the application.

- 6.7 On consideration of the above points, Network Rail would be supportive of the North Berwick to Edinburgh Waverley access right.

Edinburgh Waverley to North Berwick

- 6.8 The Edinburgh Waverley to North Berwick is not as expected in the proposed December 2025 ECML timetable and the access right has not been submitted as a passenger service in the access proposal for December 2025 timetable at D-40. It has been included within the access proposal as an empty coaching stock (ECS) move, as provided for in Schedule 5 Paragraph 2.4, as opposed to a passenger service and, therefore, the quantum and calling patterns do not match what was expected. We note that ScotRail may have included this access right as there is

a future plan to use this as a passenger slot subject to a compliant bid. ScotRail has not indicated when or if such a passenger service may commence.

6.9 In light of the above, Network Rail does not support the Edinburgh Waverley to North Berwick access right.

6.10 Network Rail would like to acknowledge that ScotRail notified Network Rail and ORR on 19 February 2025 that the application had changed from the original application submitted to ORR by 20 May 2024 and ORR agreed to the change to the application. The amended Form P was then submitted on 25 March 2025 as referenced in paragraph 2.1.

6.11 The original submission included the following Access Rights:

- a) 1 x firm right from Edinburgh Waverley to North Berwick via Musselburgh, Monday to Friday;
- b) 1 x firm right from North Berwick to Edinburgh Waverley via Musselburgh, Monday to Friday;
- c) 5 x firm rights from Edinburgh Waverley to Tweedbank via Brunstane, Monday to Saturday; and
- d) 4 x firm rights from Tweedbank to Edinburgh Waverley via Brunstane, Monday to Saturday.

6.12 However, the updated submission contains the following Access Rights which is an overall reduction in Access Rights from the original submission:

- a) 1 x firm right from Edinburgh Waverley to North Berwick via Musselburgh Monday to Friday;
- b) 1 x firm right from North Berwick to Edinburgh Waverley via Musselburgh, Monday to Friday.

6.13 The numbering of the S22A has not changed.

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.
- 7.3 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.
- 7.4 However, as stated in the “Interacting Rights – Plan of work update (30/01/25)” we recognised that some 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.
- a) The Decision Group’s remit was to assess each S22A application in line with “Scotland Activities” plan as described in paragraphs 7.2 to 7.4 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 51st S22A, no concerns were raised.
 - b) However as referenced in paragraphs 6.8 and 8.2, Network Rail are not supportive of the access right between Edinburgh Waverley and North Berwick.
- 7.5 Edinburgh Waverley Platforming Validation work is still ongoing but is of sufficient maturity to support capacity decisions.

- 7.6 Train services associated with the access rights described in the ScotRail 51st SA were included and discussed at TCAG, at the aforementioned Decision Group as well as the Edinburgh Waverley Platforming validation work.
- 7.7 Notwithstanding those key areas of concern 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 TCAG or the bespoke Decision Group that would prevent Network Rail supporting the access rights application.

8 Capacity

- 8.1 In line with Network Rail's ECML letter to ORR on 14 March 2025, Network Rail can confirm that not all the rights sought in this Application are in line with the proposed December 2025 ECML Timetable, details of which can be found in paragraphs 6.6 and 6.8. This means that:
- a) The access right sought from Edinburgh Waverley to North Berwick was not as expected in the proposed December 2025 ECML Timetable as outlined in paragraph 6.6a)8 and, due to the timings of the associated passenger service schedule (shared with Network Rail but not Bid at D-40), is also outside of the ECML Timetable Performance Analysis.
 - b) The access right between North Berwick and Edinburgh Waverley is as expected in the proposed December 2025 ECML timetable; however, this is on the basis of a right between Prestonpans to Edinburgh Waverley not being utilised and being surrendered. The additional capacity used by the new right would be between Drem Jn and Prestonpans. The service also largely shares the same stopping pattern as the Prestonpans service with only North Berwick and Drem calls being additional.
- 8.2 To note, both access rights require capacity on the ECML between Edinburgh Waverley and Drem Jn.
- 8.3 As per paragraph 3.2, although both services associated with the access rights sought in this application are outside of the timespan considered by the ECML Timetable Performance Analysis, these are representative of the ECML timetable structure and service group.
- 8.4 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.
- 8.5 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, i.e. . 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.

9 Performance

9.1 Network Rail can confirm that the train services in this application were 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 North Berwick-Edinburgh right was included in the proposed December 2025 ECML timetable but outside of the performance modelled time scope; however, the conclusions drawn are indicative of the overall performance of the North Berwick Service Group. The additional Edinburgh to North Berwick right was not in the proposed December 2025 ECML timetable and the proposed timings of the service were outside of the modelled time scope.

9.2 .

9.3 Therefore, to understand any performance implications, Network Rail commissioned some further performance analysis, led by the Route.

9.4 Scotland’s Railway use the Scottish Train Performance Measure (STPM) in relation to ScotRail train services. 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 Group

Origin	Destination	Train Count	PPM%	Comb.PPM%
Edinburgh	North Berwick	1611	96.2	93.8
North Berwick	Edinburgh	1861	91.8	

9.5 The STPM target is 92.5%. Table 1 shows that currently, both Service Groups exceed this target and are high performing.

9.6 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.

This pragmatic approach is supported by the following finding from ECML December 2025 Advanced Timetable Modelling Report dated 7 March 2025:

- a) “North Berwick Services see a small drop in T -1 and T-3 for both directions. There are some issues getting in/out of Edinburgh due to the platforming not being validated in the cut of the Dec 25 option used for modelling. Turnrounds are mostly larger than the minimum allowed which allow for some recovery,

but there are some exceptions at North Berwick but not driving changes as base and option match.”

- 9.7 As a result of this work, Network Rail (Scotland) performance team would 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 this small drop is an understood and tolerable trade off.
- 9.8 To note, as partners in Scotland’s Railway both Network Rail and ScotRail regularly collaborate in performance monitoring and performance improvement activities as per of the business as usual.
- 9.9 However, as noted in paragraph 6.8 the Edinburgh Waverley to North Berwick is not as expected in the proposed December 2025 ECML Timetable. Therefore, whilst expected performance is not a barrier, Network Rail remains unsupportive of this access right.

10 ECML Power Supply Modelling

- 10.1 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 as the access rights sought cover the ECML geography specified between Edinburgh Waverley and Drem Jn.
- 10.2 In addition, Network Rail (Scotland) commissioned their own Power Modelling to the following scope:
- a) East Coast Main Line feeding areas within Scotland region modelled as 1st stage of ESG 2025 modelling.
 - b) Scope includes areas normally fed by Marshall Meadows, Innerwick and Portobello feeder stations only.
 - c) ESG 2025 Timetable used as Baseline.
 - d) Intact feeding and N-1 outage conditions for Marshall Meadows and Innerwick modelled; Portobello has a stand-by feeder.
 - e) Mid-point between Innerwick and Portobello is currently at Longniddry TSC, new MPTSC currently being constructed at Drem. Both scenarios modelled.
- 10.3 This has shown that while we continue to have concerns about the provision of power on the ECML between areas normally fed by Marshall Meadows, Innerwick and Portobello feeder stations, we can accommodate the access right that we are supporting in this application during intact feeding arrangements.
- 10.4 Consistent with the ECML General Representation letter dated 14 March 2025, 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.

- 10.5 Network Rail wish to collaborate with ScotRail on any necessary power mitigations that may emerge and, where applicable, and agree with ScotRail to set these out in the TAC until such point future power upgrades alleviate the risk. For the avoidance of doubt this includes any ad-hoc request to run in 10-car formation.

11 Conclusion

- 11.1 In this representation letter we have confirmed that we are partially supportive of the access rights sought in this application. To summarise, Network Rail's position is as follows:

- a) Based on the evidence provided in this letter, Network Rail is supportive of the one additional firm North Berwick to Edinburgh Waverley access right. This is as Network Rail expected in the proposed ECML December 2025 Timetable, subject to the surrender of an existing Prestonpans to Edinburgh Waverley access right which was not in the proposed ECML December 2025 timetable nor bid for the December 2025 Timetable.
- b) Network Rail is not supportive of the one additional firm Edinburgh Waverley to North Berwick access right sought, our reasons for not supporting are outlined in paragraphs 6 and 8. In summary:
 - i. It is not as expected in the proposed December 2025 ECML timetable.
 - ii. ScotRail have not included this, as a passenger service, within their access proposal for the December 2025 timetable submitted at D-40.
 - iii. As an access proposal has not been submitted for these paths it means the application no longer relates to the purpose of the competing and/or complex applications workstream – to make decisions for the three timetables stipulated in ORR letter
 - iv. Network Rail does not support access rights for which there is no confirmed use of capacity as a general point of principle.

- 11.2 If ScotRail wants to discuss future aspirations beyond the December 2025 timetable we would be open to discuss these in a future separate application.

- 11.3 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	W	CML	mingham	M- Derby	Derby-	Sheffield	M&L	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
Cross Country 38th SA 22a	Live			x	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	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				
DCR 2nd SA 22a	Live	x	x	x	x			x	x			
DRS 17th SA 22A	Live	x	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	x		
FLHH 26th SA 22A	Live					x	x	x				
FLHH 27th SA 22A	Live	x	x	x	x	x	x	x	x	x	x	x
FLHH 28th SA 22A	Live	x	x	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	x			
FLIM 25th SA 22A	Live	x	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	x			
GBRF 34th SA 22a	Live	x	x	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				

