



Louise Beilby  
Senior Access Executive  
Office of Road and Rail

11<sup>th</sup> April 2025

Dear Ms. Beilby

**Midland Central and Western Railway (MCWR)**  
**Section 17 Open Access application: Nottingham-Bristol Temple Meads**

Thank you for the opportunity to comment on Network Rail's representations on our Nottingham to Bristol Section 17 Open Access application.

The purpose of our application and early Network Rail-led industry consultation was to enable us to understand other industry members' strategic plans and perspectives and thence fully develop our overall proposition and full timetable options in a collaborative and complementary rather than competitive manner with DfT, TfW, Network Rail and other passenger and freight operators.

We very much want to work with rail industry partners to deliver a better, value-for-money railway for passengers as you will also observe in our comments back to the DfT. For example, we'd like to share our innovative investment approaches to services, stations and infrastructure, our 'Third Party' new stations model creating 'new to rail' markets and modal shift such as Worcestershire Parkway (2020), as well as our own experience as investing train operators.

We very much appreciate the feedback we have received from Network Rail as well as other consultees and firmly believe that this will enable us to progress to a much more detailed operational plan including comprehensive timetabling and performance analysis. And would expect to proceed going forward on a much more open basis with Network Rail in particular.

The following notes pick up on Network Rail's specific and detailed comments:

**Specified Equipment**

We note Network Rail's comments relating to Route Clearance. We recognise the need to undertake a full route Compatibility Assessment for consideration by Network Rail. We will consider what work would be appropriate at this stage to confirm for ourselves and Network Rail that there are no significant issues that could add significant cost or time to our proposed start dates.

We note and understand Network Rail's comments about the numerous applications that have listed Class 22X units as the proposed rolling stock. We believe that at the current time there is a realistic prospect of these units being available for this proposed service.

**Capacity**

The MCWR consultation timetable was developed based on the principal of identifying a path during the middle of the day and then extrapolating that path to other hours to create a full day's timetable. We acknowledge that the next stage of planning will be to seek to develop a full day timetable with detailed planning for each path.



## **Complex and Competing Applications**

We acknowledge the current situation and accept that our application will be dealt with in line with the terms of reference for the current NR and ORR process that is underway.

## **Performance**

We welcome the opportunity to work with Network Rail to develop a remit for the proposed Performance Modelling.

## **Eastern**

We can confirm that we are in discussions with Alstom (as the OE manufacturer of the Class 22x vehicles) with a view to having the units at the Nottingham end of the route stabled and service at the Alstom Central Rivers facility. This would also be the location where periodic maintenance would be carried out.

We note the comments about early morning platform capacity, however we also note that a not insignificant number of services leave Nottingham currently in the 0500 to 0700 timeframe including services not stabled at Nottingham overnight.

## **North West and Central**

We note the complications outlined by Network Rail relating to the East West route between Bedford and Oxford. Nonetheless we believe that this proposal presents an opportunity to realise some of the EWR outputs earlier than would otherwise be the case – we are addressing those proposals directly to EWR and DfT.

## **Wales & Western**

We note and appreciate Network Rail's detailed commentary. We are encouraged to see acknowledgement that there is potential for one new hourly path on the busy section between Swindon and Didcot parkway – we believe that there is potential to combine the GWR proposal for an Oxford to Bristol service and this proposal to deliver the “missing link” between Oxford and Bristol with the added benefit of further links across EWR and into the East Midlands.

## **Rail Freight**

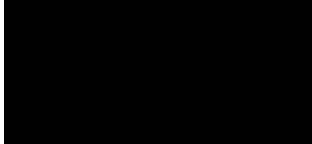
We note and understand the need for a long term strategy on increasing both freight and passenger usage of rail. However, we note that any such proposal will only get time limited Access Rights and extension of those rights would need to continue to be weighed against the other competing needs for the capacity.

We believe MCWR's proposal can be one part of swift, early, cost-sharing and revenue growing, delivery of new and real connectivity, economic and environmental benefits to north, mid and south Wales, Merseyside and the borders with England.



We look forward to working closely with Network Rail going forward to progress these plans to a point where they are able to support the application.

Yours sincerely



Ian Walters  
Managing Director