

MCWR Industry Consultation Responses

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From: [Martin Clarke](#)
To: [Gianmaria Cutrupi](#)
Subject: Re: Industry Consultation – MCWR, Section 17 Application, Nottingham-Bristol Temple Meads
Date: 14 February 2025 11:36:29
Attachments: [image001.jpg](#)

Hi Gian

Thanks - also an interesting proposal! As with Liverpool-Cardiff Airport, We're happy to support this application on the basis of open access operations having demonstrated that they improve passenger satisfaction and value for money through increased choice and competition.

In both cases, we'd invite the applicant to work with us as they develop their service proposition.

Best regards

Martin

Andy Hamilton

From: Andy Hamilton
Sent: 26 February 2025 22:01
To: Martin Clarke
Cc: Gianmaria Cutrupi
Subject: Industry Consultation – LSWR & MCWR Section 17 Applications

Martin,

Many thanks for your positive comments about our 2 proposed open access operations. We look forward to engaging with Transport Focus as our proposals develop.

Kind regards

Andy Hamilton



From: [Consultations](#)
To: [Gianmaria Cutrupi](#); [ian walters](#)
Subject: RE: Industry Consultation – MCWR, Section 17 Application, Nottingham-Bristol Temple Meads
Date: 27 February 2025 09:17:19
Attachments: [image002.png](#)
[image003.png](#)
[image004.jpg](#)

OFFICIAL

Dear Gian, Ian

Thank you for the e-mail about MCWR's Section 17 application.

For this consultation, the geographic remit of London TravelWatch only covers Bedford and so our comments only relate to MCWR's proposed services to/from that station.

London TravelWatch has no objections to this proposal, as they will have no negative impacts on existing passenger services.

Regards

Trevor Rosenberg
Policy and Advocacy Officer

London TravelWatch, Europoint, 5-11 Lavington Street, London, SE1 0NZ

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London TravelWatch is the operating name for the London Transport Users Committee

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7th March 2025

Dear Gianmaria,

XCTL's response to Proposed Application under Section 17 between Network Rail Infrastructure Ltd and Midland, Central and Western Railway.

This letter constitutes XCTL's formal response. Unfortunately, we are unable to support this Section 17 Track Access Application at this current time. We do not have sufficient information to demonstrate to us that your proposal is viable, due to several issues within.

There are platform capacity concerns at Nottingham. Even with the current level of passenger services at the Nottingham station, capacity is at a premium and therefore we are concerned at how these services could conceivably fit into the operating plan there, especially as it would be the terminus for the long-distance MCWR services. We are not clear whether MCWR intend to layover in the platform or shunt to another location during the layover.

There are also capacity concerns through Leicester, with the Midlands Connect aspiration for more Leicester to Birmingham services and the proposed new service between Leicester and Coventry. Leicester - Wigston North would also become increasingly congested with these services in the timetable.

We note that there is a planned layover of almost an hour at Bristol Temple Meads. We are not clear whether MCWR intend to layover in the platform – and whether the capacity exists to do so - or shunt to another location during the layover.

Furthermore, we would like MCWR to provide some tangible evidence of its contingency plans for times of disruption?

XCTL would like Network Rail/Midland, Central and Western Railway to resolve the above before we will be in a position to support this application.

Yours Sincerely



Martin Haffner
Track Access Manager



Martin Haffner
Track Access Manager
CrossCountry
5th Floor, Cannon House
18 Priory Queensway
Birmingham
B4 6BS

11th April 2025

Dear Mr. Haffner

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

Thank you for your comments on MCWR's Nottingham-Bedford-Oxford-Bristol Temple Meads Section 17 Open Access application as part of the industry consultation undertaken by Network Rail.

We note your comments about our proposals and in particular about the relationship between our proposals and some of the potentially competing strategic plans on the routes.

Part of 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 yourselves, DfT, Network Rail and other passenger and freight operators.

Following the consultation, we propose to move forward with further detailed operational planning whilst at the same time engaging in detailed discussions with key stakeholders including DfT and Network Rail.

However, we hope that the following feedback on your comments is useful to help you better understand our proposals in the meantime:

Nottingham Platforming

Whilst MCWR recognises that Nottingham is a busy station node, our initial planning has indicated that there is capacity to accommodate the additional proposed services. During the next phase of detailed operational planning, we will undertake a full analysis of the platforming requirements at Nottingham throughout the day.

Leicester Congestion

Similarly with Leicester station, our initial planning has indicated that there is capacity to accommodate the additional proposed services. During the next phase of detailed operational planning we will undertake a full analysis of the platforming requirements for the proposed services at Leicester throughout the day, noting that our services passing through the station will not be as demanding as the listed aspirational terminating services.



Bristol Temple Meads Station

Whether MCWR services layover or shunt would be entirely dependent on the capacity at the specific time during the day. Clearly, laying over in the platform is far more convenient from a resource point of view and probably less risky from a performance point of view, but the outcome will be driven by the planning. We note that some CrossCountry currently layover for a similar length of time.

Contingency Plans

MCWR will develop contingency plans at the appropriate time in the planning cycle – it would be largely abortive work until a firm and detailed timetable is understood and agreed with Network Rail.

In summary, we welcome CrossCountry's comments and will give further consideration to the issues raised during the next stages of our planning. MCWR firmly believe that our proposals present an opportunity for both the travelling public and the taxpayer, and look forward to presenting further plans in the coming months.

Yours sincerely

Ian Walters
Managing Director

From: [Peter Sargent](#)
To: [Gianmaria Cutrupi](#)
Cc: [Ian Walters](#)
Subject: RE: Industry Consultation – MCWR, Section 17 Application, Nottingham-Bristol Temple Meads
Date: 11 March 2025 12:41:16
Attachments: [image001.jpg](#)

OFFICIAL

Dear Gian

WMRE notes this application which has the potential to provide useful new connectivity between the East Midlands and Oxford and Bristol. While the service itself does not serve the West Midlands we are actively working with DfT, Network Rail and Midlands Connect to develop proposals for enhanced services between Birmingham and Nottingham and Leicester as part of the Midlands Rail Hub project. We are also supporting proposals being developed by Midlands Connect to enhance services on the Coventry – Leicester – Nottingham route. We are concerned at the potential conflict between these service enhancements, which enjoy a high degree of political support across the East and West Midlands, and the new application. We would therefore require confirmation that capacity exists, particularly around Nottingham, to accommodate the proposed Nottingham-Bristol service alongside these future service plans which are needed to support investment in major capacity upgrades in the West Midlands as part of the Midlands Rail Hub project to which £123M of public funding has already been committed.

Kind regards

Peter

Peter Sargent
Head of Rail Policy and Strategy

Direct Dial:
Mobile:
Email:

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Find out about WMRE by visiting [West Midlands Rail Executive](#)

 Please consider the environment, before printing this email.

From: [Chris Matthews](#)
To: [Gianmaria Cutrupi](#); [SLC](#)
Subject: RE: Industry Consultation – MCWR, Section 17 Application, Nottingham-Bristol Temple Meads
Date: 12 March 2025 10:14:36
Attachments: [image001.jpg](#)
[image002.png](#)

OFFICIAL

Hi Ian and Gian,

Unfortunately at this point in time Freightliner cannot support this application – we need a better understanding of the paths this application would use and how they interact with other services/what level of flexing would be required to accommodate.

We also have concerns over capacity utilisation between Didcot and Wooton Bassett between this and other competing Open Access applications, and how these will be accommodated while providing capacity for both existing freight services and capacity for growth in line with the legal commitment to grow volumes by 75% by 2050.

Once we have some further information on paths and interactions we will, of course, review this.

Regards

Chris

Chris Matthews
Head of Planning (Long Term)
Freightliner Group Limited

Mobile:

Email:

Web: www.freightliner.co.uk

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Chris Matthews
Head of Planning (Long Term)
Freightliner Group Ltd

11th April 2025

Dear Mr. Matthews

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

Thank you for your comments on MCWR's Nottingham-Bedford-Oxford-Bristol Temple Meads Section 17 Open Access application as part of the industry consultation undertaken by Network Rail.

We note your comments about our proposals and in particular about the relationship between our proposals and strategic freight plans for the routes.

Part of 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 yourselves, DfT, Network Rail and other passenger and freight operators.

Following the consultation, we propose to move forward with further detailed operational planning whilst at the same time engaging in detailed discussions with key stakeholders.

We will happily share the next stage of planning at the appropriate time.

Yours sincerely

Ian Walters
Managing Director

Chiltern Railways response to MCWR Section 17 application

12th March 2025

Dear Gianmaria/Ian,

Please find below the full response to the MCWR (Midland, Central and Western Railway) submission for a Section 17 track access application dated 12th February 2025.

Chiltern Railways are unable to support this application, at present. Further information is needed to adequately consider this application. Our response has been separated into strategic themes to group together items which may be related.

Train Service Timetable

- MCWR have stated that the initial draft timetable has been developed based on the December 2024 timetable. Chiltern Railways note that a significant number of East West Rail (EWR) CS1 services were included in the December 2024 timetable database and were subject to an Event Steering Group (ESG) with significant work undertaken at Oxford and Bletchley. The draft timetable included in the Form P appears to show several significant clashes with EWR CS1 services when reviewed in industry systems. Several paths were introduced as Class 5 Empty Coach Stock (ECS) workings for the purposes of train crew familiarisation. Please can MCWR confirm that their draft timetable has been completed in line with EWR CS1 services and that no significant clashes occur?
- Section 4.1 of the Form P suggests that initial MOIRA 1 runs of the proposed timetable demonstrates that the service meets the 'Not Primarily Abstractive' test threshold. In the December 2024 timetable, there are no public EWR CS1 train paths in the timetable database. Can MCWR confirm if consideration has been made for EWR CS1 services in their final state as Class 1/2 services as part of the 'Not Primarily Abstractive Test', please?
- Please can MCWR confirm if consideration has been given to ECS workings at the start and end of day? If iterative paths have been considered, are they conflict free, particularly around Nottingham and Bristol Temple Meads?
- Has any analysis on platform capacity at Bristol Temple Meads and Nottingham been undertaken? If so, are there any challenges that could impact the path through EWR and Oxford?
- Table 2.1 of the supporting model Track Access Contract states 8 services each way on a Sunday – the Form P suggests only 6. Please can MCWR confirm whether it intends to apply for 8 services per day across the whole of the week?

- The Timetable Planning Rules state that a minimum of 1.5-minute station dwell times are required for Class 221 rolling stock. The indicative timetable shows at least 1-minute dwells, however, it's not clear as to whether these cater for the minimum 1.5-minute stipulated dwells. Please can MCWR confirm if the compliant dwell time has been included in the detailed paths? If MCWR would be willing to supply F3 prints, it would be useful for strategic assessment purposes please.
- Section 3.1 of the Form P states that MCWR's services will provide 4 new forms of direct train service connectivity currently unavailable to communities across the east-west cross-country corridor. As the indicative start date for MCWR's services is December 2026, please can MCWR confirm if it has participated in/is included in the modelling work for future EWR services, captured under CS1, CS2 and CS3, including expected freight growth? Similarly, with the wider Oxfordshire strategies for rail, including Cowley/Didcot extensions?

Performance

- The Form P suggests that MCWR will undertake performance modelling during the application process. For Chiltern Railways to work towards an acceptance of this application, it would be paramount for us to review performance modelling data. Please can MCWR confirm when the performance modelling will be completed and available to view? Our principal concern is between Oxford and Fenny Stratford, however, any implications on other sections of the route could risk importing delays onto the EWR/Chiltern network. A full overview capturing each service from end to end would be required please.
- Please can MCWR provide details on contingency plans in the event of significant delay?


Infrastructure Constraints

- Chiltern Railways are aware of a weight restriction on BFO-1B bridge between Bletchley High Level and Fenny Stratford. Please can MCWR advise if this structure has been considered and that appropriate mitigations are in place for MCWR, should the bridge not be replaced or strengthened by December 2026?
- Please can MCWR confirm if consideration has been given to Bicester London Road Level Crossing and the increased time that barriers would need to be lowered to facilitate their services? This level crossing carries a level of risk of misuse and failure. In 2024, there were 32 incidents logged at this crossing and over 300 delay minutes associated. With a proposed additional 8 trains in either direction utilising this crossing, please can MCWR confirm it has engaged with Network Rail around the uplifted use of this crossing?
- Of the 11 level crossings on the Marston Vale route, at least three have been subject to Network Changes to close and replace with bridges. Please can MCWR confirm that the risk of additional trains using these crossings, (should some of them still be open by December 2026), has been discussed with Network Rail and appropriate mitigations proposed?

Oxford Station Capacity

- Please can MCWR confirm if the initial draft services are compliant with current and future services at Oxford station? Has consideration been given to EWR CS2 and CS3 timetables which increase the level of service through Oxford station? There are no funded plans beyond the completion of Platform 5 under Oxford Phase 2 to increase capacity.

Fleet

- References are made in the Executive Summary of the Form P to Class 222 DMUs being the sought after rolling stock. Later references suggest 221/222 'Voyager' and 22x rolling stock. The Supplemental Agreement specified equipment states both Class 221 and 222. Please can MCWR confirm which rolling stock it intends to operate, and whether there are sufficient available units for the services they intend to operate, noting the number of open access applications referencing these units currently?
 - The application does not refer to stabling/maintenance locations or arrangements. Please can MCWR confirm where it intends to stable and maintain their units and whether any locations are on, or off route?
 - Please can MCWR confirm initial thoughts on how they would overcome mechanical failure on-route and what arrangements would be made for rescuing of the unit, whilst mitigating delays to the operational railway as much as possible?
 - Section 5.3 of the Form P does not reference route acceptance for the specified equipment. There is a reference made in 4.2 as to Class 22x diesel powered rolling stock being currently used on the Nottingham to Bedford and Oxford to Bristol routes, but that acceptance will be required between Bedford and Oxford. Is MCWR aware of any significant challenges between Bedford and Oxford that may prevent Class 22x rolling stock being authorised between these locations without infrastructure interventions? Class 221s with tilt equipment fitted have been known to be marginally more restrictive than other rolling stock in the Voyager family on certain routes.
 - Chiltern Railways understands that the platforms at Bletchley High Level are capable of accommodating maximum of 4-car trains safely and have a maximum length of 106m. 5-car Class 221 trains are circa 115m in length and do not have Selective Door Opening (SDO) functionality. Please can MCWR confirm if they have considered this in their final calling pattern? In addition, as Bletchley High Level station is effectively built on a viaduct, have the safety implications of SDO at this particular location been assessed for say, Class 222 units?
- 

Customer Experience

- Please can MCWR confirm what ticket acceptance arrangements it would consider, should there be disruption or a failure on route?
- Section 6.1 of the Form P states MCWR is not seeking to directly compete with well-established services operated via existing franchises/contracts. Proposals to call trains at Bicester Village, Oxford Parkway and Oxford would be in direct competition with existing Chiltern Railways services and the addition of Bletchley High Level connecting with the aforementioned stations would compete with EWR CS1 services. Consequently, Chiltern Railways believes that Section 6.2 should be fully completed and submitted to the ORR.
- Has MCWR considered predicted demand/passenger flows and loadings and the impact this will have on stations such as Oxford, Oxford Parkway and Bicester Village please? Has the impact to existing facilities such as gatelines, platform capacity and toilets been considered?

Train Crew

- Has MCWR considered the number of train crew required to fulfil the operation, including where they will be based? It would be helpful to include detail around proposals for PNB activities and which facilities may be used. Will train crew changes be required during the journey, which could increase station dwell times and import risk?
- Please can MCWR advise on their proposals for recruitment of train crew? Will MCWR seek qualified drivers from the industry and has the impact of this been considered? Has consideration been given to training and route refreshing?

Long Term Planning

- Please can MCWR confirm if it is aligned with Midlands Rail Hub aspirations, particularly between Leicester and Nottingham?

If further clarity from Chiltern Railways can be provided on any of the points raised above, please don't hesitate to reach out.

Kind regards,

Josh Watkins
Network Development Manager, Chiltern Railways

Banbury Integrated Control Centre, Higham Way (off Merton Street), Banbury, Oxon, OX16
4RN



Josh Watkins
Network Development Manager
Chiltern Railways
Banbury Integrated Control Centre
Higham Way (off Merton Street)
Banbury
OX16 4RN

11th April 2025

Dear Mr. Watkins,

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

Thank you for your comments on MCWR's Nottingham-Bedford-Oxford-Bristol Temple Meads Section 17 Open Access application as part of the industry consultation undertaken by Network Rail.

We note your comments about our proposals and welcome the detail that you have included.

Part of 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 yourselves, DfT, Network Rail and other passenger and freight operators.

Following the consultation, we propose to move forward with further detailed operational planning whilst at the same time engaging in detailed discussions with key stakeholders.

In the meantime, we hope that the following feedback on your comments is useful to help you better understand our proposals:

Train Service Timetable

- The consultation timetable was developed on a standard hour principle whereby we used industry systems to plan a service in the middle of the day and then replicated this same pattern throughout the day to establish the full consultation timetable. Following this consultation we now propose to develop the full day timetable from first principles. As part of this we would appreciate a clearer understanding of the EWR timetable so that we can seek to work alongside and not to the detriment of the EWR proposals. Would you be willing to nominate a contact point within your planning department so that contact be made for further discussions on this?
- The lack of MOIRA data for EWR does present a challenge to the normal approach to determining the NPA assessment. As with all proposals, however, there will be a business case / business plan, which we can work together to enhance, from development of enhanced revenue opportunities or potentially more significantly cost efficiencies and



contributions. We believe that we will be able to demonstrate overall benefit to the tax payer as a result of our proposals.

- MCWR note the comments about ECS workings at the start and end of the day. Some basic analysis has been undertaken but more is to be done as a part of the more detailed operational planning process.
- MCWR can confirm that it intends to seek rights for 6 services on a Sunday.
- The consultation timetable is based on passenger timetabled times – MCWR can confirm that a minimum of 1.5 minutes has been used for station dwell times. Attached to this letter we have included the F3 prints of the indicative path used to develop the timetable.
- MCWR can confirm that this is a recently announced proposal and therefore has not been included in any EWR or wider Oxfordshire strategies. We are seeking to work closely with DfT and EWR to develop this proposal further to enable the realisation of some of the longer term aims much quicker than would otherwise be delivered.

Performance

- MCWR can confirm that performance modelling will be undertaken once a detailed train plan has been developed. We will of course share the outcome of this with interested and affected parties.
- MCWR can confirm that contingency plans will be developed at the appropriate time in collaboration with Network Rail and other potentially affected Operators.

Infrastructure Constraints

- MCWR understand that there is a temporary RA2 limitation on BFO-1B bridge between Bletchley High Level and Fenny Stratford. MCWR's preferred rolling stock is Class 222 units which are classified as RA2.
- MCWR can confirm that we are aware of the issues surrounding Bicester London Road Level Crossing. This will be explored with Network Rail in the next stage of our planning process.
- MCWR can confirm that we are aware of the issues around level crossings on the Marston Vale Route. This will be explored with Network Rail in the next stage of our planning process.

Oxford Station Capacity

- MCWR can confirm that it is aware of the concerns about capacity at Oxford Station. We propose to discuss this with key stakeholders including the DfT and Network Rail during the next phase of development of this proposal.

Fleet

- MCWR can confirm that the preferred rolling stock for this proposal is Class 222 units and believe that sufficient of these units will be available.
- It is intended to stable and maintain the units at Alstom's Central Rivers facility at the Nottingham end of the route. Options are still being explored at the Bristol end of the route.

T: www.slcrail.com 4 Brindleyplace, Birmingham, B1 2JB

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- Contingency plans will be developed with Network Rail for ultimate assistance. However, as Chiltern will be aware from their own fleets, using units with fully independent power sources on each vehicle does mean that failure that would require assistance is very unlikely.
- Whilst Class 22X units are in use on much of the proposed routes, MCWR recognises that a Vehicle Compatibility process will be required. However, from data gathered to date no significant issues are expected.
- MCWR notes the comments about Bletchley High level station. The preferred rolling stock option of Class 222 units are equipped with SDO, however a PTI assessment will be required for this location before any arrangements are finalised.

Customer Experience

- MCWR can confirm that we are seeking a collaborative approach with this proposal and would be expecting to enter into mutual arrangements with parallel operators in the event of disruption.
- MCWR believe that our proposals can complement those of the DfT that are delivered through National Rail contracts, and that is the basis of our statement of non-competition. We believe there will be some abstraction and sharing of revenues, however there will also be substantial growth opportunities from enhanced services. MCWR note that with the current funding structure of the National Rail Contracts, all the risk in this respect is held by DfT and Treasury and we believe that we can demonstrate overall benefit to the taxpayer as a result of our proposals, which of course we will need to address with DfT and ORR directly in the usual way.
- MCWR note the comments about passenger flows at EWR stations, however we do not believe that a 2 hourly 5-car service is likely to be a significant issue to current passenger flows. However, we would be happy to discuss the issues with Chiltern if there are specific concerns.

Train Crew

- MCWR have considered some outline Train crew plans, but it is too early in our planning process to have concluded the detail that Chiltern seeks.
- MCWR recognise the industry concerns around train crew recruitment. We can confirm that it would be our intention to have a mix of existing and new train crew and that we have already started to consider how such training could be achieved. MCWR would be interested at the appropriate stage in working closely with Chiltern to achieve and align our goals / objectives.

Long Term Planning

- MCWR can confirm that we are fully aware of the Midland Rail Hub aspirations and have started a dialogue with WMRE.



In summary, we welcome Chiltern Railways comments and will give further consideration to the issues raised during the next stages of our planning. MCWR firmly believe that our proposals present an opportunity for both the travelling public and the taxpayer, and look forward to presenting further plans in the coming months.

Yours sincerely,

Ian Walters
Managing Director



Single Train Report

Train: XX 1Z02EJ(QJ) SX [QJ/54800000] Network Rail Virtual Freight Company

TrainID:	1Z02EJ	Train Class:	1	Train Category:	XX
SignalID:	1Z02	TOC TrainID:		Train UID:	
Bid/Offer Status:	BI			Validity Status:	
TOC Status:		RSID Headcode:			
From:	19/05/2025	Until:	13/12/2025	Days Pattern	SX
Origin Loc:	NTNG	Origin Time:	12:23	Service Code:	54800000
Destination Loc:	BRSTLTM	Destination Time:	15:43	ODT:	Mondays to Fridays
Distance:	190.8mi	Model Train:	222	Timing Load:	222/-/125/-
Publication Date:		Train Length (m):	0	Power Type:	DMU
		Limiting Speed:		Trailing Load:	
Bank Holidays:		Sleepers:		Catering:	
Reservations:		Brand:		Ops Char:	
Business Sector:		Accommodation:		UIC Number:	

Location	Location Name	Working Times		Public Times		Dwell	Activity	Line		Allowances				Public Offsets	
		Arr	Dep	Arr	Dep			Plat	Line	Eng	pth	prf	Adj	Arr	Dep
NTNG	Nottingham		12.23		12.23		TB	7 Up	D						
NTNGMJN	Mansfield Jn		12/25			/			UNF						
BESTNSJ	Beeston South Jn		12/27			/				1					
TRENT	Trent		12/30½			/									
TRENTJ	Trent South Jn		12/31			/									
LOGHBRO	Loughborough	12a36½	12.38	12.37	12.38	1:30	T	2 Up	FL						
SILEBYJ	Sileby Jn		12/42			/			FL	3					
SYSTNSJ	Syston South Jn		12/46½			/			FL						
LESTER	Leicester	12a50½	12p54½	12.51	12.54	4:00	T	3 Up	UFL						
WGSTNNJ	Wigston North Jn		12/57½			/			UFL						
KLBYBDG	Kilby Bridge Jn		12/59½			/			UFL						
MRKTHRB	Market Harborough	13a06½	13.08	13.07	13.08	1:30	T	2 Up	UFL						
KETRGNJ	Kettering North Junction		13/14½			/			UFL						
KETR	Kettering		13/16			/			UFL						
KETRJSJ	Kettering Sth Jn		13/17			/			UFL						
HRWDENJ	Harrowden Jn		13/19			/			UFL						
WLNBRO	Wellingborough		13/20			/			UFL						
SNBKJN	Sharnbrook Jn.		13/25			/			UFL	1			½		
BEDFDN	Bedford North Jn.		13/29½			/			USL						
BEDFDM	Bedford	13.31	13p32½	13.31	13.32	1:30	T	1 Up							
BESJOHN	Bedford St Johns		13/34½			/							-3		
KMPSTNH	Kempston Hardwick		13/36½			/									
STWRTBY	Stewartby	13a38½	13.40	13.39	13.40	1:30	T	1 Up							
MLBRKB	Millbrook (Bedfordshire)		13/41½			/									
RIDGMNT	Ridgmont		13/45			/							½		
WOBURNS	Woburn Sands		13/48			/									
FSTR	Fenny Stratford		13/51			/									
BLTCHHL	Bletchley High Level	13a53½	13.55	13.54	13.55	1:30	T	8 Up							
WINSLOW	Winslow		14/01½			/									
CYDNWJN	Claydon West Jn		14/04½			/							1		
BCSTGJN	Bicester Gavray Junction		14/09½			/									
BCSTRTN	Bicester Village	14.10	14p11½	14.10	14.11	1:30	T								
OXFPWAY	Oxford Parkway		14/16½			/							1		
OXFDWRJ	Woodstock Road Junction		14/19			/				1					
OXFDNNJ	Oxford North Jn.		14/21			/				1			1		
OXFD	Oxford	14a24½	14p26½	14.25	14.26	2:00	T	3 Up	URL	1					

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Location	Location Name	Working Times		Public Times		Dwell	Activity	Line		Allowances				Public Offsets	
		Arr	Dep	Arr	Dep			Plat	Line	Eng	pth	prf	Adj	Arr	Dep
HINKN	Hinksey North		14/29			/									
KNGTNJ	Kennington Jn		14/30			/				1			½		
DIDCTNJ	Didcot North Jn		14/36½			/					5½				
FOXHALJ	Foxhall Jn		14/44			/							1		
WANTRD	Wantage Road		14/49			/			ML						
CHALLOW	Challow		14/51½			/					1				
UFNGTN	Uffington		14/54			/				1					
SDON	Swindon	15.01	15.03	15.01	15.03	2:00	T	4 Down							
WTNBSTJ	Wootton Bassett Jn		15/08			/									
CHIPNHM	Chippenham	15a15½	15.17	15.16	15.17	1:30	T								
THNGLEJ	Thingley East Junction		15/19			/									
THNGLYJ	Thingley Jn		15/19½			/				1	1½				
BTHMPTJ	Bathampton Jn		15/27½			/									
BATHSPA	Bath Spa	15.30	15p31½	15.30	15.31	1:30	T			1					
NSMRSTJ	North Somerset Jn		15/40½			/			DM						
BRSTLEJ	Bristol East Jn		15/41½			/			DM				½		
BRSTLTM	Bristol Temple Meads	15.43		15.43			TF								
Location Data Changed		From	To												
BEDFDM	Timing Load	222/-/125/-	221/-/125/-												

Single Train Report

Train: XX 1Z03EJ(QJ) SX [QJ/54800000] Network Rail Virtual Freight Company

TrainID:	1Z03EJ	Train Class:	1	Train Category:	XX
SignalID:	1Z03	TOC TrainID:		Train UID:	
Bid/Offer Status:	BI			Validity Status:	
TOC Status:		RSID Headcode:			
From:	19/05/2025	Until:	13/12/2025	Days Pattern	SX
Origin Loc:	BRSTLTM	Origin Time:	11:39	Service Code:	54800000
Destination Loc:	NTNG	Destination Time:	14:58	ODT:	Mondays to Fridays
Distance:	190.8mi	Model Train:	221	Timing Load:	221/-/125/-
Publication Date:		Train Length (m):	0	Power Type:	DMU
		Limiting Speed:		Trailing Load:	
Bank Holidays:		Sleepers:		Catering:	
Reservations:		Brand:		Ops Char:	
Business Sector:		Accommodation:		UIC Number:	

Location	Location Name	Working Times		Public Times		Dwell	Activity	Line		Allowances				Public Offsets	
		Arr	Dep	Arr	Dep			Plat	Line	Eng	pth	prf	Adj	Arr	Dep
BRSTLTM	Bristol Temple Meads		11.39		11.39		TB						½		
BRSTLEJ	Bristol East Jn		11/40½			/			UM						
NSMRSTJ	North Somerset Jn		11/41½			/					3				
BATHSPA	Bath Spa	11a52½	11p54½	11.53	11.54	2:00	T								
BTHMPTJ	Bathampton Jn		11/57			/									
THNGLEJ	Thingley East Junction		12/02½			/									
CHIPNHM	Chippenham	12a04½	12.06	12.05	12.06	1:30	T								
WTNBSTJ	Wootton Bassett Jn		12/13½			/				1					
SDON	Swindon	12a19½	12p21½	12.20	12.21	2:00	T								
UFNGTN	Uffington		12/29			/					3				
CHALLOW	Challow		12/33½			/			ML						
WANTRD	Wantage Road		12/35½			/				1					
FOXHALJ	Foxhall Jn		12/40½			/					5		1		
DIDCTNJ	Didcot North Jn		12/48½			/							½		
KNNGTNJ	Kennington Jn		12/54			/				1					
HINKN	Hinksey North		12/56			/									
OXFD	Oxford	12a57½	12p59½	12.58	12.59	2:00	T	4 Down	DML						
OXFDNNJ	Oxford North Jn.		13/01			/							1		
OXFDWRJ	Woodstock Road Junction		13/03			/					2				
OXFPWAY	Oxford Parkway		13/06½			/									
BCSTRTN	Bicester Village	13a12½	13.14	13.13	13.14	1:30	T	2 Down							
BCSTGJN	Bicester Gavray Junction		13/14½			/									
CYDNWJN	Claydon West Jn		13/19½			/							0:30		
WINSLOW	Winslow		13/22			/									
BLTCHHL	Bletchley High Level	13.28	13p29½	13.28	13.29	1:30	T	7 Down							
FSTR	Fenny Stratford		13/32			/									
WOBURNS	Woburn Sands		13/36			/							-1		
RIDGMNT	Ridgmont		13/37½			/									
MLBRKB	Millbrook (Bedfordshire)		13/41			/									
STWRTBY	Stewartby	13.42	13p43½	13.42	13.43	1:30	T	2 Down							
KMPSTNH	Kempston Hardwick		13/46			/							2:30		

T: www.slcrail.com 4 Brindleyplace, Birmingham, B1 2JB

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Location	Location Name	Working Times		Public Times		Dwell	Activity	Line		Allowances				Public Offsets	
		Arr	Dep	Arr	Dep			Plat	Line	Eng	pth	prf	Adj	Arr	Dep
BESJOHN	Bedford St.Johns		13/48½			/				1					
BEDFDM	Bedford	13a51½	13.53	13.52	13.53	1:30	T	2 Down	DSL						
BEDFDN	Bedford North Jn.		13/54			/			DFL				½		
SNBKJN	Sharnbrook Jn.		13/57½			/			DFL						
WLNGBRO	Wellingborough		14/02½			/			DFL		1½				
HRWDENJ	Harrowden Jn		14/05			/			DFL						
KETR SJ	Kettering Sth Jn		14/07			/			DFL						
KETR	Kettering		14/08			/			DFL						
KETR GNJ	Kettering North Junction		14/09½			/			DFL						
MRKTHRB	Market Harborough	14.16	14p17½	14.16	14.17	1:30	T	1 Down	DFL						
KLBYBDG	Kilby Bridge Jn		14/24½			/			DFL						
WGSTNNJ	Wigston North Jn		14/26			/			DFL				½		
LESTER	Leicester	14a29½	14.31	14.30	14.31	1:30	T	2 Down	FL						
SYSTNSJ	Syston South Jn		14/35			/			FL						
SILEBYJ	Sileby Jn		14/36½			/			FL						
LOGHBRO	Loughborough	14a39½	14.41	14.40	14.41	1:30	T	1 Down	FL						
TRENTJ	Trent South Jn		14/46½			/									
TRENT	Trent		14/47			/				1			1		
BESTNSJ	Beeston South Jn		14/52			/			DNS1						
NTNGMJN	Mansfield Jn		14/56			/			B						
NTNG	Nottingham	14.58		14.58			TF	5 Bay							
Location Data Changed		From	To												
BEDFDM	Timing Load	221/-125/-	222/-125/-												



Ref: TK0034 \GWR\NRC\DfT

REDACTED VERSION

Great Western Railway
Milford House
1 Milford Street
Swindon, SN1 1HL

GWR.com

Gianmaria Cutrupi
Aspirant Open Access Operators Manager, Freight & Customer
Network Rail Infrastructure Limited

23 May 2025

Dear Gian,

GRAND CENTRAL RAILWAY COMPANY (“GCRC”) T/A – APPLICATION UNDER SECTION 17 SEEKING A TRACK ACCESS AGREEMENT FOR SERVICES FROM BRIGHTON TO NEWCASTLE VIA LONDON GATWICK

We refer to the Section 17 application in respect of GCRC (the “Application”) and thank you for inviting GWR to submit a consultation response regarding the Application.

GWR has grounds for concern regarding the Application and objects to its Approval. GWR’s concerns are set out in further detail in this response and include:

- a) the services proposed in the Application conflict with the requirements placed upon us by the Department for Transport in our National Rail Contract; and
- b) it is our opinion that the Application will not pass the relevant ORR tests. As emphasised in the letter dated 6th January 2025 from the Secretary of State to the ORR in respect of the consideration of Open Access applications, there is a balance to be struck to ensure the benefits provided by Open Access operators outweigh the impacts they have on taxpayers and the ability to operate the network efficiently. Whilst the ORR will determine how much weight will be placed on each of its statutory duties when considering the Application, we believe the following considerations are particularly relevant to GWR:
 - i. **Performance:** The Western Route is fast approaching congested status, and Reading - Gatwick performance is being managed to

secure material improvement. GCRC has not yet undertaken detailed performance modelling so additional time is required to fully assess the potential impact;

- ii. **Capacity:** GCRC has not validated the paths required and the proposed changes may conflict with existing services, and with strategic plans in place by Network Rail and sub-national transport bodies;
- iii. **Abstraction:** GWR's initial analysis indicates a high level of abstraction of industry revenue, with the service unlikely to meet the ORR's "Not Primarily Abstractive" test. It is likely too that the absolute level of revenue abstraction will be too great;
- iv. **Engineering Work:** at weekends when many two track operations are required for construction of Old Oak Common new station, a diversionary route via Acton will not be available and
- v. **Financial Viability:** No new markets or sections of track are being served. The services proposed under this Application are likely to be financially viable only through substantial revenue abstraction given that it mirrors existing core routes for the majority of the journey.

Summary of Objections

The key grounds for GWR's objection include the use of finite capacity (incl. the impacts of potential congestion), the likely detrimental effect on performance and significant industry revenue loss from abstraction. There are potential opportunity costs of approving a duplication of existing connectivity that could obstruct potential alternative uses of the network in the future that should also be considered.

GWR believes that there are no new markets served in this proposal that are not already sufficiently covered by existing Operators and that the Application should be seen in this light.

At the outset we note that further detailed work will be required to test the assumptions within the Application, particularly regarding timetabling and the resultant operational and economic impacts on GWR. This will require the building of a timetable and performance model that has not been possible within the current consultation timescales. We assume that Network Rail have identified a similar need for more detailed and time-consuming work to more fully and appropriately respond.

Whilst we are firmly of the view that this modelling is required, this response sets out

in more detail the principles for our objections, alongside identifying where further detail is needed from GCRC and where time for more rigorous testing is required on GWR's part.

Use of capacity

To fully understand the impacts of the Application on the existing timetable, GWR will need to create a new base timetable with the proposed services included. This would then require services to be deconflicted to ensure that the Application can be accurately modelled from a revenue and performance perspective. This exercise will require more time than allowed by the consultation timescales but is something GWR believes is critical prior to any decision due to the potential cost impact to the taxpayer and to establish the true detriment of the Application, including declining performance and associated revenue depletion.

Whilst a relatively small proportion of the total distance of services applied for, the Application has the potential to significantly impact on both existing capacity and future aspirations on the GWR network (including GWR services operating on the Western, Wessex and Sussex Routes). Given the significant role that the likes of the Thames Valley, Oxfordshire and the wider "Oxford Cambridge Growth Corridor" (as described by the Chancellor) must play in driving the nation's economic growth, it is vital that the use of finite capacity in these areas is carefully considered both now and in the future. Given the proximity of both Heathrow and Gatwick Airports (the latter of which the Application proposes to serve), these decisions on use of capacity become even more vital.

GWR is keen to help provide and facilitate the services that will encourage and meet this corridor growth.

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 2: technical or financial information relating to an undertaking's business plan; Redaction Reason 4: technical or financial information relating to an undertaking's marketing and pricing strategies. We have included timetable and product offer in this category; and Redaction Reason 6: technical or financial information relating to an undertaking's market shares.]

Strategic plans for the area show a desire for a number of local initiatives that may compete for space with the application, including aspirations to better serve the thriving technology sector between Didcot and Oxford.

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 2: technical or financial information relating to an undertaking's business plan; Redaction Reason 4: technical or financial information relating to an undertaking's marketing and pricing strategies. We have included timetable and product offer in this category; and Redaction Reason 6: technical or financial information relating to an undertaking's market shares.]

GWR is keen to continue its work with Gatwick Airport in strengthening the offer and providing more seats throughout the day and night for the growth required to support the second runway. We have this last timetable change introduced later trains in the evening to meet demand for air services and airline / airport staff.

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 2: technical or financial information relating to an undertaking's business plan; Redaction Reason 3: technical or financial information relating to an undertaking's cost structures; Redaction Reason 4: technical or financial information relating to an undertaking's marketing and pricing strategies. We have included timetable and product offer in this category; and Redaction Reason 6: technical or financial information relating to an undertaking's market shares.]

Significant work was undertaken to enable GWR's three trains per hour to be pathed in the working timetable and operated pre Covid between Reading and Redhill via Guildford and Reigate. This was only possible with the wrapping of one service around another.

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 2: technical or financial information relating to an undertaking's business plan; Redaction Reason 3: technical or financial information relating to an undertaking's cost structures; Redaction Reason 4: technical or financial information relating to an undertaking's marketing and pricing strategies. We have included timetable and product offer in this category; and Redaction Reason 6: technical or financial information relating to an undertaking's market shares.]

There are known congestion areas sought to be traversed by services under the application. In April 2024 the ORR identified Oxford as one of several areas across the network deemed so sensitive that they require structured application so that robust assessment of capacity and aspiration can ensue. Network Rail have indicated that Oxford - Didcot is under consideration for Congested Infrastructure status.

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 2: technical or financial information relating to an undertaking's business plan; Redaction Reason 3: technical or financial information relating to an undertaking's cost structures; Redaction Reason 4: technical or financial information relating to an undertaking's marketing and pricing strategies. We have included timetable and product offer in this category; and Redaction Reason 6: technical or financial information relating to an undertaking's market shares.]

Furthermore, initial analysis of the suggested services in this area show that the applicant may have two trains of their own at Redhill at the same time, along with a Tonbridge service, a Reigate - Victoria service and a Haywards Heath - Peterborough service, all of which may have little or no scope to flex. Any third party on this route having met needs in congested areas around the country may have strict presentation times thus an effect on capacity on the North Downs route and may limit opportunity for a structured self-contained three trains per hour service between Reading and Gatwick. Making Redhill work along with Guildford is often challenging.

The interim and final stages of Old Oak Common new station on the GWML will affect

capacity there. With it being located so close to Paddington it is germane to train service operation throughout the region.

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 2: technical or financial information relating to an undertaking's business plan; Redaction Reason 3: technical or financial information relating to an undertaking's cost structures; Redaction Reason 4: technical or financial information relating to an undertaking's marketing and pricing strategies. We have included timetable and product offer in this category; and Redaction Reason 6: technical or financial information relating to an undertaking's market shares.]

Performance

The Application suggests that detailed performance modelling is yet to be undertaken. We believe that this is vital to understand the performance challenges arising from this Application and would wish to ensure an industry underwritten exercise is undertaken. As well as any Network Rail modelling, in particular GWR would be seeking to use our performance modelling software to understand performance implications arising from increased congestion in Oxford and the Thames Valley (which we know has particularly acute performance challenges already), regulation at Reading and on the North Downs

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how;]

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 2: technical or financial information relating to an undertaking's business plan; Redaction Reason 3: technical or financial information relating to an undertaking's cost structures; Redaction Reason 4: technical or financial information relating to an undertaking's marketing and pricing strategies. We have included timetable and product offer in this category]

Revenue Abstraction from GWR

GWR's initial analysis indicates a high level of abstraction of industry level, with the service unlikely to meet the ORR's "Not Primarily Abstractive" test.

[Redaction Reason 1: technical or financial information relating to an undertaking's know-how; Redaction Reason 2: technical or financial information relating to an undertaking's business plan; Redaction Reason 3: technical or financial information relating to an undertaking's cost structures; Redaction Reason 4: technical or financial information relating to an undertaking's marketing and pricing strategies. We have included timetable and product offer in this category; and Redaction Reason 6: technical or financial information relating to an undertaking's market shares.]

NR Engineering Access

The only feasible diversionary route to maintain service when the North Downs is not available if four paths are required each way to/from Brighton is GWML /Acton Bank/Kensington Olympia/ Clapham Jn & East Croydon. However, with many 2-track timetable possessions planned between Dolphin Jn & Acton while HS2 work goes on - and all 14 paths per hour hotly-contested and utilised by GWR/MTR XR/HEX - it is

difficult to see how any further paths via GWML are possible.

From an engineering access perspective 1Z09 (Proposed 17.34 Newcastle - Brighton arr. 00.11) would be affected by the Section 5 mid-week times so there may be potential conflict with GWR services if a revised engineering strategy was to be sought.

Rolling Stock type and Automatic Train Protection

As with previous applications of this nature, it is important that the rolling stock that is proposed to be used meets the exact safety, speed and configuration requirements, etc. to fit into the timetable and meet the needs of the network. In addition, any service operating at high speed on the Great Western Main Line is required to be fitted with GW Automatic Train Protection. This is a legacy system and even with the limited rolling stock currently operating with it installed, it is becoming increasingly difficult to support the on-going maintenance of the system due to limited component availability and support from the OEM (Alstom).

We have significant concerns regarding the traction type put forward as this would be older than a Class 802, with the potential to import greater performance risk as a result (especially noting the acceleration performance of the IETs). Older, heavier rolling stock is also likely to have greater wear and tear on Network Rail's track assets.

Whilst such stock will have a Variable Access Charge appropriate to the class, noting the Secretary of State's position on public finances, this could mean that the applicant is paying less for Access whilst having a disproportionately high impact on infrastructure that would necessitate increased maintenance spend as a result.

Increased cost of GWR operation

The Application is short of detail in areas that are likely to have a material impact on GWR's cost base.

To make a full impact assessment of the proposed services, GWR would require the full list of changes to GWR's services that are needed and would apply in practice. This will help us to understand whether the proposal is likely to create additional turnarounds, impacting GWR diagrams and potentially necessitating increased resourcing costs which would be passed on to the taxpayer.

Whilst the location of train crew depots is not clear from the Application, like much of the UK rail industry GWR has put significant effort and resource into the recruitment, selection and training of drivers in order to meet our own service needs following COVID. We would be concerned if a new operator was to seek to then recruit these drivers, who would then need to be backfilled at increased expense to the taxpayer. As a result, GWR would like to understand GCRC'S plans for recruitment and training of traincrew for these new services.

In terms of station operations, GWR has seen a marked increase in the number of customer assists recently, with around a 25% increase in Assistance Requests. Given the additional pressure that the proposed services are likely to place on stations – particularly where they may be targeted at the leisure market - it would be helpful to understand what consideration GCRC has given to resourcing in this respect.

Conclusion

In conclusion, GWR believes that significant additional work and analysis is required in order to fully understand the impact of the proposed services on the economics and operability of our own business. Only through detailed timetable modelling can we fully understand those implications.

However – as detailed in this response – we expect this analysis would support our initial view that these services would eat into scarce resource (if indeed available) required for strategic developments, introduce significant performance risks at a critical time, and have a significant abstractive effect on the industry's revenue returns to the Secretary of State's funds and may import additional operating costs. Crucially, it is our view that on the GWR network these proposals duplicate existing connectivity (albeit with a certain amount of interchange required) to a significant extent and obstruct potential near- and medium term opportunities to make better use of limited capacity on a part of the network that has been identified by Government as being fundamental to delivering economic growth for the UK as a whole.

Therefore, GWR objects to the Application on the following grounds:

- a) It has untested and unverified assumptions on timetable and operability; including whether GCRC services are able to be accommodated robustly alongside GWR and other operators nationally including freight;
- b) the adverse performance impact the Application (if indeed pathable) will import to this part of the Network;
- c) it being unclear on the wider benefits that such a service would provide compared with alternative strategic and governmentally aligned use able to be made of the infrastructure; and,
- d) it would be very strongly primarily abstractive nationally in nature, and it would have an adverse impact on GWR's finances.

In view of the above GWR is not content for the Application to be Approved.

Yours sincerely

Mark Hopwood CBE
Managing Director



Mark Hopwood CBE
Managing Director
Great Western Railway
Milford House
1 Milford Street
Swindon
SN1 1HL

11th April 2025

Dear Mr. Hopwood

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

Thank you for your comments on MCWR's Nottingham-Bedford-Oxford-Bristol Temple Meads Section 17 Open Access application as part of the industry consultation undertaken by Network Rail.

We note your comments about our proposals and in particular about the relationship between our proposals and GWR's plans and the Government's expectations for the routes.

Part of 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 yourselves, DfT, Network Rail and other passenger and freight operators.

Following the consultation, we propose to move forward with further detailed operational planning whilst at the same time engaging in detailed discussions with key stakeholders.

In the meantime, we hope that the following feedback on your comments is useful to help you better understand our proposals:

Pathing

MCWR will now seek to develop the proposed timetable in more detail with Network Rail including ensuring that the proposed paths can be de-conflicted. Once this process is complete, MCWR would be happy to share this work with GWR. It is incumbent upon us to work with Network Rail to do this as part of the application process, and so would seem somewhat of a duplication of industry effort and cost for GWR to seek to create such a timetable for evaluation, particularly since the process should be owned and managed by Network Rail.

Performance

Once the detailed planning exercise is completed, MCWR commit to undertaking detailed modelling using Railsys and making the results available to interested parties. Again, it would seem somewhat of a duplication of industry effort and cost for GWR to seek to develop bespoke modelling at this stage.



In relation to the specific concerns around Swindon and in particular relating to the station dwell at Oxford, we can confirm that whilst the passenger times included in the consultation timetable indicate 1 minute dwell in fact we have allowed a 2 minute dwell at Oxford recognising the potential extra time needed at such a busy station.

Rolling Stock Maintenance and Stabling

MCWR can confirm that at the Nottingham end of the route it would be the intention to stable and maintain the proposed rolling stock at Alstom's Central Rivers facility as this is purpose built to cater for the proposed rolling stock.

Whilst we cannot reveal the plans at the Bristol end of the route as yet, we can confirm that there are currently no proposals to seek to use any GWR facilities and therefore we do not envisage any specific issues or implications for the GWR operation.

Rolling Stock type and Automatic Train Protection

The information available in the GW sectional Appendix appears to be somewhat at odds with the assertion that *"any service operating at high speed on the Great Western Main Line is required to be fitted with GW Automatic Train Protection (ATP)."* Nonetheless we have noted that currently as written the Sectional Appendix would appear to restrict our proposed rolling stock to a maximum of 110mph between Didcot and Bristol with the stated reason *"design limits of TPWS lineside equipment"*. MCWR propose to have detailed conversations with Network Rail and ORR safety team about the issues and why it is necessary to restrict rolling stock that operates at 125mph elsewhere on the Network with TPWS and therefore understand how this issue can be progressed to ensure fair access to the infrastructure. Of course, it is also detrimental to timetabling and performance to have trains on the route not capable of matching the other inter working rolling stock.

MCWR have used the generic term "Voyagers" to describe both Class 221 & 222 rolling stock. Whilst it is the case that the Class 222s were often referred to as "Meridians" this was largely a brand name and it is well understood that the Class 222 units are of the same family as the Class 220 and 221 units originally built by Bombardier (now Alstom) and share many common features that would be directly relevant to their compatibility with the appropriate parts of the network relevant to this application. It is recognised and accepted that a Compatibility exercise will be required once the final rolling stock is identified, but with the backing of the OEM for these vehicles we do not believe that this should present any significant difficulty.

NR Engineering Access

MCWR note GWR's comments about diversionary access to Euston via EWR, and we fully support innovative use of the Network to avoid putting passengers on alternative forms of transport during planned and unplanned disruption. However, it would seem a strange use of the potential of the Network if new regular services were prevented to facilitate very occasional diversionary services.



MCWR note GWR's comments about *"first and last services"* and *"the impact on the existing engineering access regime"*. MCWR would expect to address these issues with Network Rail as a part of the detailed timetable development process. However, in relative terms the additional tonnage created by the MCWR proposed services will be a small percentage of the overall tonnage on these routes and therefore is unlikely to make a significant difference to the overall maintenance requirements on the relevant routes.

Revenue Abstraction from GWR

MCWR note that GWR has chosen to redact their comments about revenue abstraction. We recognise that this is always a highly debated subject with any Open Access operation. However, MCWR note that with the current funding structure of the National Rail Contracts, all the risk in this respect is held by DfT and Treasury and we believe that we can demonstrate overall benefit to the taxpayer as a result of our proposals, as well as passing the various tests required, which we propose to address with DfT and ORR directly.

Increased cost of GWR operation

As stated above, MCWR notes that both cost and revenue implications for GWR ultimately fall to DfT and Treasury. In respect of the specific issues raised MCWR can offer the following reassurance:

- Traincrew - Whilst exact final proposals on traincrew recruitment will be driven by a number of factors, and whilst there will inevitably be some movement of existing traincrew between operators, we can reassure GWR that as a part of the wider operations being considered by the proposers of MCWR, there is an intention to recruit and train traincrew and to play our part in the industry in this respect. We would be happy to work with GWR in the future to potentially co-operate on such recruitment and training to align our goals / objectives where geographically appropriate.
- Station Operations – the MCWR model assumes excellent on board provision and our services are therefore likely to be more self sufficient than many on the Network. However, we also note that Station Operations is a Regulated service and that MCWR will be required to contribute to the Station Operation costs through our station access contracts. Presumably if GWR are having to provide additional personnel on stations as a result of the quoted 24% increase in Assistance Requests, then these costs can be included in regulated access charges going forward.
- Personal Needs Breaks (PNB) locations – at the appropriate time MCWR will make arrangements for traincrew accommodation and facilities. However, we do not believe that this is a material aspect of the determination of this application.

Special Events

MCWR would be delighted to work with GWR in the future to ensure that the proposed services contributed in a positive way to the special events referred to in the letter.



In summary, we welcome GWR's comments and will give further consideration to the issues raised during the next stages of our planning. MCWR firmly believe that our proposals present an opportunity for both the travelling public and the taxpayer, and look forward to presenting further plans in the coming months.

Yours sincerely

Ian Walters
Managing Director

To: Gianmaria Cutrupi
Aspirant Open Access Operators Manager
Waterloo General Office
SE1 8SW

To: Ian Walters, SLC Rail

(By email only)

12 March 2025

Dear Gianmaria,

Re: Industry Consultation MCWR, Section 17 Application, Nottingham-Bristol Temple Meads

This letter sets out East Midlands Railway's (EMR's) response to Midland, Central and Western Railway (MCWR) Section 17 industry consultation for a new track access contract to operate new services between Nottingham and Bristol Temple Meads from December 2026. EMR has significant concerns about the proposals in the following areas:

Revenue Abstraction

- Based on MOIRA 1 modelling, the proposed MCWR services abstract a high level of revenue from EMR, which will have financial implications on passengers and taxpayers. It is not clear to EMR whether the NPA analysis factors in the abstraction from East West Rail services when they are introduced. Please could MCWR clarify the base timetable used for the revenue analysis?
- Because this proposal has the potential to create significant performance issues on the route, the impact on revenue and therefore benefits and value for passengers and taxpayers of the proposed MCWR services are likely to be exacerbated. We would therefore suggest it would be sensible to carry out a sensitivity test on the revenue impact from any performance change, when the modelling has been completed.

Timetable Structure

- After reviewing the timetable, we have significant concerns about the deliverability of the proposed paths in the December 2026 timetable. The application does not address how the proposal will work with future enhancements to train services in May 2025 and December 2025.
- There is a lack of detail in the consultation and the inconsistent information is making it difficult to carry out a proper assessment. In Section 3.1 of the application, it specifies a call at East Midlands Parkway, but no times are specified in the timetable because you are assessing the feasibility. Please could you clarify what you mean by assessing the feasibility, and what is preventing it from being achieved? Also, in Section 3.1 of the application, it specifies a call at Kettering. However, the station stop is not shown in the timetable and there is not time in the schedule to make the call. Please could you confirm whether the call at Kettering is planned?

The main areas of concern EMR has with the timetable are as follows:

1. In the Up direction the MCWR service is scheduled to arrive in Leicester at xx:51. The CrossCountry service from Stansted Airport arrives at xx:48½ and departs at xx:50. With a 4-minute headway on the Fast Line, how is this proposed to work? Furthermore, if you depart at xx:54, there is often freight booked through on the Up Fast at around xx:57, what happens to the freight path to avoid it impacting the following EMR service?
 2. In the Up direction the MCWR service is planned to depart Market Harborough at xx:08 and arrive at Bedford xx:31, there is no scope for any flexing to this service. What flexing has been made to other Operators services to achieve this, and if you are flexed what is the implication on the path over the Central section?
 3. Platform capacity at Bedford is extremely constrained and we do not believe that the MCWR proposal is sufficiently mature to demonstrate that capacity exists for these services or takes account of the retiming to GTR services to call at the new Wixams station.
 4. In the Down direction we believe the crossing move at Bedford North Jn poses a significant performance risk to EMR services. The xx:50 Nottingham – London St Pancras passes at xx/51, the MCWR service then crosses from the Slow Line to the Down Fast at xx/54 followed at minimum headway by the xx:15 London St Pancras – Corby service at xx/57. The London St Pancras to Corby service is then on minimum headway at Wellingborough with the following Sheffield and Nottingham services. Therefore, we would expect a comprehensive performance modelling to be carried out to understand the impact of these proposed services.
 5. In the Down direction you are utilising one of the standard hour freight paths from Kettering North Jn to Wigston North Jn, Leicester and Syston South Jn. This demonstrates that the additional MCWR path encroaches on freight capacity, which is already limited. Please can MCWR explain how it has created capacity for the existing freight services, on a route section that had previously been declared as congested infrastructure. Also, does this mean EMR services are consequently impacted and flexed by your proposed service?
 6. In the Down direction you depart Loughborough at xx:41, which means the earliest you can pass Trent East Jn is xx/47. In the May 2025 timetable, it clashes with the CrossCountry service from Cardiff to Nottingham which typically passes at xx/48. Journey times on this route are important to the regional economy, which could be compromised by the MCWR proposal.
 7. In December 2025 EMR is planning a new regional timetable to improve rail connectivity in the East Midlands and double the services between Nottingham and Lincoln from 1tph to 2tph on Monday to Saturday. Network capacity at Nottingham is already constrained, and as part of the December 2025 Timetable a significant amount of work has been done to improve the spacing between services through each platform and review dwell times. EMR has significant concerns that the proposed MCWR services will result in additional shunt moves, which will not only make the delivery of the timetable more difficult, but also increase platform sharing which would limit some Intercity services to 5 coaches. This could prevent EMR from strengthening services for peak periods, special events, engineering works and service disruption which could potentially lead to excessive crowding on EMR services and increase safety risks at our stations. Furthermore, this application could also mean that future TSR committed service aspirations cannot be accommodated robustly.
- We have identified numerous issues with TPR compliance on the East Midlands route, which does give us concerns about the implications on the rest of the network. For example, if you were using the December 2024 Timetable as a base, then it is not clear how it works through Bath Spa where you depart at the same time as the Weymouth / Westbury – Gloucester service, which is followed at headway at North Somerset Junction by the Portsmouth – Cardiff service. There may be consequential flexes to other train operators, but no additional information has been provided

about flexes to demonstrate how capacity has been created. It appears that the paths have been forced on the MML and completely disregards freight services.

- EMR is committed to the long-term strategic development of rail services in the East Midlands. In this case we believe that a 2-hourly service represents poor value for money in the future strategic development of the timetable, which in the long term could prevent the introduction of a new hourly service.

Performance

- We would expect a comprehensive performance modelling to be carried out to understand the impact of these proposed services and are disappointed this has not been shared at this stage.
- Nottingham station is extremely limited in terms of platform capacity for 5-car trains and timetable planning does not give the full picture because it becomes an extension of the depot - the early and late trains are likely to be a problem fitting them in. The start and end location for the trains (i.e. depot arrangements) is critical to understanding overall impact.
- The proposal risks carrying delay between Western, West Coast South and East Midlands Route, unless there is significant contingency time included in schedules. It is not likely to be compatible with the demand to improve industry performance outcomes to 90% T-3.
- These proposed services would have potential detrimental operational impact on performance by existing operators across the routes. If the proposal results in worsening performance this will have an industry commercial impact.
- The proposed commencement date of December 2026 coincides with substantial engineering works in the EWR area, i.e. it would commence operation at a point when EWR are doing substantial works in the Bedford area and the MML Electrification Programme between Leicester, Trent Jn and Nottingham. It is likely that these services will be heavily disrupted and competing for scarce capacity with services (passenger and freight) on the MML route with limited availability and capacity of alternative diversionary routes. Also, the proposed timing of commencement before the completion of EWR works at Bedford and MML Programme north of Leicester would increase Network Rail's Schedule 4 costs to the overall budget of those major projects.
- We note that in the future MCWR would be the only Operator of Class 221/222 units between Bedford and Nottingham. Please could you provide more information on the contingency plans for rescue and recovery?

In summary, EMR formally objects to this Section 17 application to operate new services between Nottingham and Bristol Temple Meads until more information is provided. It is not clear to EMR that there is capacity to run these services because MCWR has not provided sufficient evidence in the application to demonstrate that sufficient capacity exists.

Yours sincerely,

Lanita Masi
Network Access Manager
East Midlands Railway



Lanita Masi
Network Access Manager
East Midlands Railway
Locomotive House
Locomotive Way
Pride Park
Derby
DE24 8PU

11th April 2025

Dear Ms. Masi

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

Thank you for your comments on MCWR's Nottingham-Bedford-Oxford-Bristol Temple Meads Section 17 Open Access application as part of the industry consultation undertaken by Network Rail.

We note your comments about our proposals and in particular about the relationship between our proposals and the timetable development on the EMR route.

Part of 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 yourselves, DfT, Network Rail and other passenger and freight operators.

Following the consultation, we propose to move forward with further detailed operational planning whilst at the same time engaging in detailed discussions with key stakeholders.

In the meantime, we hope that the following feedback on your comments is useful to help you better understand our proposals:

Revenue Abstraction

- MCWR note that with the current funding structure of the National Rail Contracts, all the risk in this respect is held by DfT and Treasury and we believe that we can demonstrate overall benefit to the taxpayer as a result of our proposals, as well as passing the various tests required, which we propose to address with DfT and ORR directly.
- Experience in adding a new Open Access service to an existing timetable does not support the assertion that significant performance issues will result and that this will impact on *"benefits and values for passengers and taxpayers"*. In fact the evidence suggests that the contrary is the case – the addition of a new high quality service providing new flows and opportunities is likely to have a positive benefit to other interacting services.



Timetable Structure

- In order for Network Rail to evaluate the MCWR proposals, they require that we demonstrate how the services would fit with the current timetable. Of course, as the application progresses, work will be undertaken on future timetables and the ORR will be able to evaluate these against the access rights that exist for these future timetables.
- MCWR can confirm that stops at East Midlands Parkway and Kettering are not currently in the timetable. We apologise for any confusion.
- MCWR note EMR's detailed timetable commentary and will consider these points during the next phase of operational planning.

Performance

- Once the detailed planning exercise is completed, MCWR commit to undertaking detailed modelling using Railsys and making the results available to interested parties.
- Whilst MCWR recognises that Nottingham is a busy station node, our initial planning has indicated that there is capacity to accommodate the additional proposed services. During the next phase of detailed operational planning, we will undertake a full analysis of the platforming requirements at Nottingham throughout the day.
- MCWR note the comments about the station becoming an extension of the Depot. It is intended to service and maintain the MCWR units at Alstom's Central Rivers facility. The issues around stabled trains at Nottingham will be considered further at the next stage of operational planning and it will be for the ORR to decide whether access rights exist for stabling in platforms that would prevent our services from using Nottingham.
- MCWR note the comments setting out concern about carrying delay between regions – but this is an inevitable feature of longer distance services that are in demand from passengers. We do not believe that such concerns should be used to prevent new service opportunities, and it is for the industry including any relevant Open Access operators, to work together to ensure that such concerns are not realised.
- MCWR notes the comments about EWR related engineering works. We will be addressing these issues directly with EWR and DfT.
- MCWR acknowledges that we would be the sole operator of Class 221/222 units between Bedford and Nottingham. Contingency plans will be developed with Network Rail for ultimate assistance, but MCWR are sure that EMR share the same reassurance based on the infrequency with which the Class 222 units currently operated by EMR require recovery; as is the nature of units with multiple independent power sources.



We will happily share the next stage of planning at the appropriate time.

Yours sincerely

Ian Walters
Managing Director

(Ian Walters)
and

(Gianmaria Cutrupi)

The Quadrant
Elder Gate
Milton Keynes
MK9 1EN

12th March 2025

Dear All

Open Access Application (MCWR) - EWR Co Response

Thank you for the opportunity to feedback on this application. East West Railway Company and the Programme could not support and would strongly object to this proposal at this time. The following is shared as explanation and justification for this position.

1. During the 2024 Autumn Budget the government reaffirmed its commitment to deliver East West Rail (EWR) to improve the connectivity and unlock the economic potential of the corridor between Cambridge and Oxford. The second phase of this project (CS2) was confirmed as a key commitment for Government, with the introduction of an additional third EWR service to supplement the Oxford to Milton Keynes services of CS1, providing a new connection between Oxford and Bedford. The requirement is to deliver this accelerated key milestone in close collaboration with Network Rail (NR), with a planned entry into service from 2030.
2. Government investment in the CS2 phase of the EWR programme is seeking to deliver early benefits to the taxpayer, residents and passengers but *also critically* to enable the following and final phase CS3 by the middle of the next decade. The CS3 'end state' railway is considered by Government to have the potential to have a transformational effect on this region, of a size and scale that would be seen and felt at a national level. It will build on the investment in CS2 and deliver significant new connections and more services; these outcomes depend in part on the capacity enabled under CS2. The value for money and return on public investment for both CS2 and CS3 will remain key considerations in the Government's decision to continue to invest. In that context, we assume open access bids will have to demonstrate that the ['benefits are not outweighed by costs to taxpayer or impacts on network performance'](#), as per the emerging proposals for Great British Railways. The concept of EWR CS2 is to provide early connectivity between Oxford and Bedford with an additional 1 return service per hour, alongside the existing services, that comprise of a West Midlands Trains (WMT) service between Bletchley and Bedford, Chiltern services between Oxford and Gavray Junction, the confirmed EWR CS1 services

between Oxford and Milton Keynes and sufficient freight capacity that enables the continuation of both existing and the limited CS1 uplift in freight over each section (Western and MVL).

3. The works for CS2 are authorised by The Network Rail (East West Rail) (Bicester to Bedford Improvements) Order 2020. The order was made on the basis that the scope of works authorised was required in order to integrate and run a third EWR service an hour in terms of network capacity (train paths) and consideration of the physical constraints of the system (including essential infrastructure upgrades, remaining single track sections, limited signalling capability, low line speeds and multiple level crossings, where assessments are duly sensitive to uplift).
4. The EWR CS2 programme is now established with collaboration between EWR, the Department for Transport (DfT) and Network Rail (NR) in the development and delivery of the scope, enhancements and outcomes of the instruction.
5. The details of how the scope, requirements and desired outcomes of the CS2 remit will be delivered whilst minimising impacts on other services across the full day and week across the route section (Bedford to Oxford) are proving challenging and, as such, the solutions are still 'works in progress' between EWR, Network Rail and operators.
6. At this stage of CS2 development, there is not yet an appointed operator in place (recognised as a duty holder in the timetabling and track access processes) to lead on securing the capacity and contingent rights required to deliver the EWR train service specification (TSS). At this stage, EWR Co are acting as the 'shadow operator' and CS2 lead on behalf of a future CS2 operator for the DfT.
7. To ensure optimal use of existing and future capacity on the network, we ask that the Office for Road and Rail (ORR) allow East West Railway Company (EWR Co) and Network Rail, the opportunity to finalise plans for CS2 services before concluding any decision to grant future track access rights to other parties which would conflict with prospective services and the significant public investment as now committed.
8. Within the Rail Network Enhancement Pipeline (RNEP) there is an assigned budget aligned to CS2 delivery and both the DfT and EWR Co have developed clear assumptions within the scheme business case which we, Network Rail and others, continue to refine and align with the continued development of the EWR business case, to allow the development and opening of the extended railway (CS1-3).
9. DfT has specified to EWR Co the CS2 level of service that will be provided through a high-level Output Specification and, whilst the operational model is not yet fixed, the expectation is that the services will enable the realisation of the benefits as defined within the business case and complement the longer-term aspirations for CS3.
10. A delivery plan and cost model are in development, with consideration of the existing passenger and freight operators across the CS2 route. It is a concern that this potential additional operator would add further complexity, disruption and increased costs to any programme, not only for CS2 but also the subsequent continued work for CS3.

11. Although the full EWR CS3 services will not commence operation until the mid-2030's, access rights can be applied for by other operators and granted many years in advance. Therefore, applications made in line with the current process and timescales, especially with consideration of the phased handover of capacity enhancing infrastructure, would (if granted) significantly impair and add costs to the feasibility and delivery programme required.
12. We recognise that the timeframes of EWR CS1-3 are a long-term commitment and that the processes for the management of access rights are subject to wider industry review and reform. We therefore actively request engagement with the ORR to develop potential agreement on the principles, management and protection of track access and capacity for both the CS2 and CS3 Concept Train Plans (CTP's). This could well be in line with what was agreed for CS1 but also aligned to the approach as agreed for other significant national rail infrastructure schemes, and the emerging proposals for managing track access under Great British Railways. We seek understanding and support in the mitigation of these significant ongoing risk with capacity and therefore feasibility, not only this first application but with further future proposals of this sort, as we actively seek a longer-term solution.

Yours sincerely,

David Hughes

CEO, East West Railway Company
Connecting communities



David Hughes
Chief Executive Officer
East West Rail

Richard Allen
Managing Director
Chiltern Railways

11th April 2025

Dear David and Richard

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

Many thanks for your feedback of 12 March 2025 on our MCWR application. At the outset may I say that we very much want to work with rather than compete with East West Rail, Chiltern and GWR to deliver a better, value-for-money railway for passengers. 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 (in particular when leading Chiltern from 1996 onwards).

We would thus welcome meeting with you to discuss MCWR's benefits and challenges before we make any formal Section 17/18 submission. Indeed, a core purpose of our application and the Network Rail-led consultation was to enable us to understand industry partners' strategic plans and then fully develop our proposition and timetable options collaboratively with them.

We note your comments at East West Rail about the relationship between our proposal, your plans and the Government's expectations for the route (as set out in your own 2024-25 public consultation documents), and your shared positions that are not supportive of our application. These were similarly expressed in the DfT's 25 March 2025 consultation response alongside its position that it is not supportive of our application at this time (to which we have replied in similar form to this letter).

We also note your comments at Chiltern on timetabling, platforming at Nottingham, Oxford and Bristol Temple Meads, empty stock working, rolling stock and its maintenance, contingency planning, ticket acceptance and train crew, level crossings and bridge infrastructure and are responding to these in parallel with this letter. We are grateful for your detailed and helpful analysis.

We'd hope to be able to talk through how we see MCWR doing 4 key things:

- Complementing rather than competing with government-contracted services.
- Unlocking earlier joint, partnership-based incremental delivery of new Bedford-Oxford connectivity with private sector service, station and infrastructure investment avoiding 100% of cost and risk being held by the taxpayer (taking direct account of your 'existing' and 'consolidated' station options between Bedford and Bletchley).
- Positively supporting industry value for money rather than being a detriment to it.
- Accelerating benefits to the economy, growing communities and the environment in partnership with yourselves.



In our discussions we would also like to confirm to you that we are committed to:

- Undertaking full timetable development alongside rather than separately from yourselves, Network Rail, GWR and EMR colleagues, rigorously modelling and testing performance using industry-approved tools such as Railsys.
- Developing a 'whole route/whole service' 'Non-Primarily Abstractive' (NPA) assessment approach acceptable to yourselves, ORR and other industry parties given the current absence of the East West Rail route in MOIRA.
- Considering how we can work with yourselves and Network Rail to address some of the specific infrastructure investment issues for the Marston Vale line, level crossings or the Bletchley area bridge.
- Engaging further with yourselves and other individual parties to the consultation based on these principles of approach and their detailed responses, including NR routes, EMR, GWR and freight operators.
- Examining how wholly new direct Oxford-Bristol connectivity could similarly be incrementally and collaboratively delivered between DfT/GWR and MCRW, again without 100% of service risk being held by the taxpayer.

Our proposal looks to expeditiously add value to the government's investment in East West Rail by provision of early direct connectivity between the East Midlands, the Oxford-Cambridge Growth Corridor and the South-West, connectivity which does not exist today, nor is within any current rail industry delivery plan.

In doing so we seek to support the principles set out in January 2025 by Science Minister and Oxford-Cambridge Innovation Champion, Lord Vallance for "*coordinated action that drives investment, pulls in investment and unleashes growth*"¹ and meets his expressed "*hurry to get things done*"² and, also in January 2025, that of Rachel Reeves MP, Chancellor of the Exchequer to go "*further and faster to kick start the economy*."³

We believe MCWR's proposal can be one part of swift, early, cost-sharing delivery of new and real connectivity, economic and environmental benefits both on the East West Rail route and beyond it towards the East Midlands and the South-West.

We look forward to meeting with you both at the earliest mutually convenient opportunity.

Yours sincerely

Ian Walters
Managing Director

¹ <https://www.gov.uk/government/news/minister-vallance-underlines-how-oxford-cambridge-corridor-ambitions-can-boost-whole-uk>

² <https://www.bbc.co.uk/news/articles/cgj2n6qgxxg6o>

³ <https://www.gov.uk/government/news/reeves-i-am-going-further-and-faster-to-kick-start-the-economy>

From: [Ian Kapur](#)
To: [Gianmaria Cutrupi](#)
Cc: [ian.walters](#)
Subject: Re: Industry Consultation – MCWR, Section 17 Application, Nottingham-Bristol Temple Meads
Date: 14 March 2025 16:30:43
Attachments: [image001.jpg](#)
[Outlook-A picture .png](#)
[Form P S17 NOT-OXF-BRI TO ORR 100225 ISSUE 2.pdf](#)

Dear Gian & Ian,

It is not clear from this application what the likely effects on network capacity will be, and especially over the Midland Main Line from Trent to Bedford (thence Bletchley), the extremely busy Oxford-Didcot section then Didcot to Wootton Bassett Junction? Each of these sections already has issues accommodating freight services, and particularly freights off East-West Rail used by these new high-speed services to/from the Didcot area. This was recently borne out by the East-West Rail ESG work.

Form P Section 4.1 Benefits does ask: *please set out what specific benefits the proposal will achieve. Please describe the benefits to passengers and any impact on other operators, including freight operators.* Consultees do need to understand the answer to this question as part of this application and I look forward to hearing from you.

Regards,



Ian Kapur | Head of Strategic Access Planning

5th Floor, 62-64 Cornhill | London | EC3V 3NH

GB Railfreight Limited | Registered in England number 03707899

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Ian Kapur
Head of Strategic Access Planning
GB Railfreight
5th Floor, 62-64 Cornhill
London
EC3V 3NH

11th April 2025

Dear Mr. Kapur

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

Thank you for your comments on MCWR's Nottingham-Bedford-Oxford-Bristol Temple Meads Section 17 Open Access application as part of the industry consultation undertaken by Network Rail.

We note your comments about our proposals and in particular about the relationship between our proposals and strategic freight plans for the routes.

Part of 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 yourselves, DfT, Network Rail and other passenger and freight operators.

Following the consultation, we propose to move forward with further detailed operational planning whilst at the same time engaging in detailed discussions with key stakeholders including DfT and Network Rail.

We will happily share the next stage of planning at the appropriate time.

Yours sincerely

Ian Walters
Managing Director



Department
for Transport

Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

25 March 2025

Gianmaria Cutrupi, Aspirant Open Access Operations Manager
by email

Dear Gianmaria,

Midland, Central and Western Railway, Section 17 Application, Nottingham-Bristol Temple Meads

Thank you for sharing the above track access application from Midland, Central and Western Railway (MCWR), and for providing the Department for Transport the opportunity to respond to this industry consultation.

The Secretary of State has been clear that Open Access will continue to play a role in the future GBR managed railway where services encourage growth, improve connectivity and capacity and provide more choice for passengers. However, these benefits must not come at the cost of performance of the network, better services for passengers or value for taxpayers. The Department remains committed to Open Access where these conditions are met.

This application from MCWR raises a number of questions regarding impacts to taxpayers as well as concerns relating to network performance, which are detailed below.

It has not been possible for the Department to produce robust analysis of the financial impact of MCWR's proposals as data is not currently available in industry standard software – MOIRA – to give credible revenue outputs over new East West Rail (EWR) infrastructure between Bletchley and Bicester Village. It is also not possible to create a credible base timetable or counterfactual for analysis purposes as government-contracted services will be running along this new infrastructure, the details of which are not yet available. This means the level of potential abstraction at this point is largely unquantifiable but could be significant if service timings overlap.

This means that the Department cannot comment on whether or not the application meets the 'Not Primarily Abstractive' (NPA) test as set out in ORR's guidance, and, while we note that MCWR state that they have "*undertaken initial MOIRA 1 runs of the timetable which suggests that services can meet the 'Not Primarily Abstractive' threshold*", we believe that any such NPA calculation using MOIRA 1 would be inaccurate and have very low analytical assurance.

We would however note that the proposed MCWR service would interface with a number of government-contracted services and therefore likely result in abstraction from a number of contracted operators. This will require significant further assessment by the regulator as this application progresses, and we would stress the importance of ensuring that unacceptable burden is not placed upon taxpayers.

MCWR's proposed services would also materially impact the deliverability of EWR service commitments and therefore reduce the value for money of the significant public investment in infrastructure that has already been made. By delivering new east to west connectivity along the Oxford-Cambridge corridor, EWR can provide faster journeys, open up access to employment and training, unlock opportunities for new homes and support the government's mission to kickstart economic growth. We are concerned that approval of MCWR's proposed services would result in sub-optimal outcomes for passengers as well as requirement for further infrastructure investment at cost to taxpayers in order to enable delivery of EWR services to planned levels, therefore putting at risk the significant economic benefits being unlocked across this region.

Value for money would be further impacted should this application be successful as EWR Construction Stage 2 enhancement work will take place where existing services are not already run, meaning that infrastructure works have minimal impacts to existing services and central costs incurred by track possessions are also minimised. The allocation of rights to MCWR here would therefore impact EWR delivery plans by increasing the time of works, requiring Network Rail to increase spend for track possessions that may impact the proposed MCWR services.

From an operational and performance perspective, we have concerns regarding constraint on capacity and knock-on impacts to wider network performance should MCWR's application be successful. The Great Western Main Line already has severe constraints in a number of areas, notably on paths to Oxford, Swindon, Bristol and Bath, and other Open Access operators have already been approved to operate future services on this area of the network and will therefore add to congestion and complexity beyond that presently experienced. Additional services from MCWR would further add to these constraints, make pathing more difficult, and introduce greater risk to performance of existing services. This risk is exacerbated as, other than over two short sections, Class 22x diesel trains are not currently in use on the Great Western mainline, and rolling stock currently operated by GWR would be unable to assist with rescue of a failed train.

Other proposed services, such as the current GWR trial of Bristol-Oxford services to assess the potential for permanently reinstating these services, as well as regional services that would link on to new EWR infrastructure, would also likely be impacted and potentially made unviable moving forward if rights were awarded to MCWR before existing operators' plans can be fully considered. Additionally, CrossCountry are contracted to reinstate revenue generative services through Oxford to reduce endemic overcrowding and provide for the current level of passenger demand between Reading, Birmingham and Yorkshire, which must also be factored into capacity assessments.

MCWR's application also assumes available capacity on the Marston Vale Line that is reliant upon infrastructure enhancements that have not yet taken place and are due to be funded by DfT to support implementation of an hourly Oxford-Bedford service by 2030. Two single line sections mean that this capacity is therefore not currently available, and it is also clear that certain constraints will remain acute on this line even after completion of enhancement work. For example, this is the case at Bicester Level Crossing where it is expected that there will only be capacity (with regards to how train paths may affect level crossing safety and the associated barrier down time impact) for an additional 1tph even after delivery. Investment has been made in the railway here under the expectation that contracted operators will recoup certain costs through enhanced ridership and revenue, not so that private operators can be the main beneficiaries of significant public expenditure.

Beyond capacity, there are also physical barriers to MCWR's proposed services such as Fenny Stratford bridge (BFO/1b), where concerns around its structural integrity mean the bridge is currently subject to a temporary Route Availability 2 restriction. No regular services are currently routed over the bridge which is set to be rebuilt ahead of CS2's introduction, likely requiring a significant period of route closure. MCWR's rolling stock option using Class 221s, rated RA4, would be unable to run over the bridge at this time.

For the reasons listed above, the Department for Transport does not support this application from MCWR.

We would also note that MCWR seeks a 7-year track access contract from December 2026 to December 2033, but provides no clear explanation why a duration beyond the standard length of 5 years is required.

Please contact me if you wish to discuss this matter further.

Yours sincerely,

Joe Hickey
Deputy Director, Rail Reform Coherence and Cross Cutting Policy



Joe Hickey
Deputy Director
Rail Reform Coherence and Cross Cutting Policy
Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

11th April 2025

Dear Mr. Hickey

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

Many thanks for your feedback of 25 March 2025 on our MCWR application. At the outset may I say that we very much want to work with rather than compete with East West Rail, Chiltern and GWR to deliver a better, value-for-money railway for passengers. 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 (in particular when leading Chiltern from 1996 onwards).

We would thus welcome meeting with you to discuss MCWR's benefits and challenges before we make any formal Section 17/18 submission. Indeed, a core purpose of our application and the Network Rail-led consultation was to enable us to understand industry partners' strategic plans and then fully develop our proposition and timetable options collaboratively with them.

We note your comments about MCRW services' potential to successfully meet the 'Not Primarily Abstractive' test (NPA), the proposal's relationship to East West Rail, a range of operational issues on its route and your conclusion that the DfT is not supportive of our application at this time. East West Rail and Chiltern have also indicated that they do not support our application to which we have responded in similar form to this letter.

We'd hope to be able to talk through how we see MCWR doing 4 key things:

- Complementing rather than competing with government-contracted services.
- Unlocking earlier joint, partnership-based incremental delivery of new Bedford-Oxford connectivity with private sector service, station and infrastructure investment avoiding 100% of cost and risk being held by the taxpayer (taking direct account of East West Rail's 'existing' and 'consolidated' station options between Bedford and Bletchley).
- Positively supporting industry value for money rather than being a detriment to it.
- Accelerating benefits to the economy, growing communities and the environment in partnership with DfT, EWR, Network Rail, Chiltern, GWR, EMR and freight operators.



In our discussions we would also like to confirm to you that we are committed to:

- Undertaking full timetable development alongside rather than separately from yourselves, Network Rail, GWR and EMR colleagues, rigorously modelling and testing performance using industry-approved tools such as Railsys.
- Developing a 'whole route/whole service' 'Non-Primarily Abstractive' (NPA) assessment approach acceptable to yourselves, ORR and other industry parties given the current absence of the East West Rail route in MOIRA.
- Considering how we can work with yourselves and Network Rail to address some of the specific infrastructure investment issues for the Marston Vale line, level crossings or the Bletchley area bridge.
- Engaging further with yourselves and other individual parties to the consultation based on these principles of approach and their detailed responses, including NR routes, EMR, GWR and freight operators.
- Examining how wholly new direct Oxford-Bristol connectivity could similarly be incrementally and collaboratively delivered between DfT/GWR and MCRW, again without 100% of service risk being held by the taxpayer.

Our proposal looks to expeditiously add value to the government's investment in East West Rail by provision of early direct connectivity between the East Midlands, the Oxford-Cambridge Growth Corridor and the South-West, connectivity which does not exist today, nor is within any current rail industry delivery plan.

In doing so we seek to support the principles set out in January 2025 by Science Minister and Oxford-Cambridge Innovation Champion, Lord Vallance for "*coordinated action that drives investment, pulls in investment and unleashes growth*"¹ and meets his expressed "*hurry to get things done*"² and, also in January 2025, that of Rachel Reeves MP, Chancellor of the Exchequer to go "*further and faster to kick start the economy*."³

We believe MCWR's proposal can be one part of swift, early, cost-sharing delivery of new and real connectivity, economic and environmental benefits both on the East West Rail route and beyond it towards the East Midlands and the South-West.

We look forward to meeting with you at the earliest mutually convenient opportunity.

Yours sincerely

Ian Walters
Managing Director

¹ <https://www.gov.uk/government/news/minister-vallance-underlines-how-oxford-cambridge-corridor-ambitions-can-boost-whole-uk>

² <https://www.bbc.co.uk/news/articles/cgj2n6qgxxg6o>

³ <https://www.gov.uk/government/news/reeves-i-am-going-further-and-faster-to-kick-start-the-economy>