



David Reed
Senior Executive, Access & Licensing
Office of Rail and Road
25 Cabot Square,
London
WC2B 4AN

11th July 2025

Dear David,

Grand Central's Response to Network Rail Final Representations for the 28th SA (SA) submitted under section 22A of the Railways Act 1993 for the Track Access Contract (TAC) between Network Rail Infrastructure Limited (Network Rail) and Grand Central Railway Company Limited (Grand Central) dated 01 August 2014.

1. Summary

- 1.1. Thank you for providing the opportunity to address the final representations made by Network Rail in relation to Grand Central's proposed 28th SA. We note and welcome Network Rail's support for some elements of the application and we remain confident that our plans to introduce additional services between London, York and Bradford as well as new stops at Peterborough and Seaham, which would be the town's first direct connection to London, can be accommodated within the December 2025 timetable.
- 1.2. The below represents Grand Central's response to Network Rail's representations as well as highlighting some of the wider challenges faced throughout the assessment or lack thereof of Grand Central's proposals for additional services to operate within its existing service groups.

2. Introduction

- 2.1. Grand Central is disappointed that it has taken Network Rail so long to submit its final representations on Grand Central's application for additional track access rights through its proposed 28th Supplemental Agreement to its current TAC. We acknowledge that the approved extension to Grand Central's current TAC to 2038 on the back of investment in new rolling stock and the conversion of contingent rights to firm for a sixth North East path has complicated the drafting of the 28th SA but this is not fundamental to the application for rights for additional paths.
- 2.2. It is now nine years since the rights were first granted for what is now the core of the December 2025 timetable. These were principally for a new open access brand – now Lumo – to operate 5 trains a day in each direction between London and Edinburgh and for an additional LNER train each hour between London and Newcastle with new two-hourly extensions from Leeds to Bradford Forster Square and to Harrogate, extensions from York to Middlesbrough and a new two-hourly fast service between London

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

and Leeds. As noted in Network Rail's latest letter to the ORR it was later concluded that the new two-hourly fast Leeds service could not operate within the current infrastructure.

- 2.3. When the East Coast Mainline (ECML) Event Steering Group (ESG) was set up in 2019 the remit was to prepare, as far as possible, a standard hour timetable for 8.5 long distance high speed (LDHS) trains per hour, with 6.5 of those paths presumed to be for LNER.

3. Grand Central's 28th Supplemental Agreement

- 3.1. Grand Central submitted its proposed 28th SA in line with the ORR's competing track access applications process on 20th May as a section 22A application.
- 3.2. Following development of its initial high-level plan in June 2024, Network Rail provided its initial representations on 28th June 2024, with a subsequent response provided by Grand Central on 22nd July 2024.
- 3.3. Following industry consultation Grand Central made a submission to the ORR in relation to its MOIRA modelled timetable. Within this submission Grand Central advised the ORR that there had been some errors within the original application and changes would be submitted in an updated Form P and SA on 4th October 2024.
- 3.4. The revised access rights sought (a reduction) are set out in the table 3.1 and 3.4 below.

Table 3.1: Monday to Saturday Additional Services

Route	Number of Services
Bradford Interchange – London Kings Cross	2 return services
Wakefield – Bradford Interchange	2 return services
York – London Kings Cross	1 return service
London Kings Cross – Wakefield Kirkgate	1 single leg service

Table 3.2: Sunday Additional Services

Route	Number of Services
Bradford Interchange – London Kings Cross	1 return service
Wakefield – Bradford Interchange	2 return services

- 3.5. The application also includes the following additional station calls shown in table 3.3 and 3.4.

Table 3.3: Monday to Saturday additional station calls

Station	Current Number of calls	Proposed Number of calls
Seaham (North East Service Group)	0	4 in each direction
Peterborough (North East Service Group)	1 in each direction	2 in the Up Direction 1 in the Down direction
Peterborough (West Riding Service group)	1 in each direction	2 in each direction

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

Table 3.4: Sunday additional station calls

Station	Current Number of calls	Proposed Number of calls
Seaham (North East Service Group)	0	4 in each direction
Peterborough (North East Service Group)	0	1 in each direction
Peterborough (West Riding Service group)	0	1 in each direction

- 3.6. The revision to the proposed access rights was referenced in the Form P submission made to the ORR on 4th October in paragraph 10.4 as recognised by Network Rail in paragraph 2.5.5 of its representations. Grand Central recognises the continued drafting error within the SA drafted at the time and would be happy to resolve as required.
- 3.7. Following the deferral of the ECML ESG timetable from December 2024, Grand Central sought the access rights to commence from the May 2025 timetable change yet recognising that the ESG timetable could be further deferred. This further deferral was confirmed in December 2024 with an implementation date set as the principal timetable change date in December 2025.
- 3.8. Grand Central did not submit a further application to reduce or amend its application on the basis that for May 2025 Grand Central had bid, and Network Rail had offered 1 additional return service between Bradford and London as well as some of the additional station calls requested, and therefore approval of the application and rights sought would allowed a phased introduction of the new services, with full implementation in December 2025, aligned with the implementation of the ESG timetable.
- 3.9. It should be noted that the additional access rights sought in the 28th SA, had a duration aligned with the previous expiry of Grand Central's Track Access Agreement (December 2027), prior to the extension of Grand Central's agreement which was agreed under the 31st SA.

4. Context for Grand Central's 28th Supplemental Application

- 4.1. The implementation of the ECML ESG timetable has long been known by Grand Central to present a significant commercial challenge. If revenue were to be spread exactly in proportion to the number of trains, it is clear that, with LNER soon to operate 7 trains every two hours to York, instead of the current 5, Grand Central's 1 train per two hours could reduce its market share on the flow from around 16.7% to 12.5%. Of course there are other factors, but the ORR acknowledged in its 2016 decision on access rights that Grand Central stood to lose significant sums if it did not react with some new initiatives, recognising that the modelling at the time *"ignored whether / how Grand Central would react to increased competition"*¹
- 4.2. Grand Central has since continued to look for opportunities to better serve our passengers and bring additional benefits and new direct services to underserved communities. First and foremost, we have secured an extension to our Track Access Agreement allowing us to place an order of brand-new tri-mode trains for both service groups in 2028. These new trains will provide new modern technology and improve the customer experience on the route through improved rolling stock quality, as well as provide additional seating capacity to the destinations we serve, which have seen significant demand growth following the introduction of Grand Central services.

¹ Applications for access to the East Coast Mainline (ECML) – Decision Letter (2016), para 62.

- 4.3. The 28th SA also seeks to provide a new direct service to London through the addition of calls at Seaham - proposed as a way of generating new business from a town that has reinvented itself since the demise of coal mining in the area. As it is the penultimate station on the northbound Grand Central journey it will have a minimal impact on journey time, at least for most services. The introduction of calls at Seaham would provide significant new journey opportunities, reducing journey times and the requirement to change trains, as well as making effective use of network capacity.
- 4.4. In addition to Seaham calls, on its West Riding Service Group Grand Central has long had an ambition to increase the service level to two-hourly. This was initiated by specifying 5 tpd London to Bradford (and return) in the original ESG Train Service Specification (TSS), which was only amended and removed when Grand Central could not commit to resourcing the number of units required for an additional service pair, at that time.
- 4.5. LNER's significant increase in services between London and Bradford (Forster Square) challenges Grand Central's market share on this flow too. The rights sought in the 28th SA application are to provide a better spread of London services throughout the day, including an earlier departure from King's Cross and later departure from Bradford (Interchange). They also seek to provide better opportunities for day trips within West Yorkshire, especially to Halifax and Bradford.
- 4.6. The application also seeks to make use of some existing Empty Coaching Stock (ECS) movements in order to convert them to useful passenger calls between Wakefield and Bradford. This would allow Grand Central to achieve better utilisation of its rolling stock and provide additional passenger benefits in the West Yorkshire area, again through the more efficient use of capacity.
- 4.7. Last but not least whilst not specific to the application due to the nature of the access rights already held, the proposed services and ESG timetable implementation seeks to provide a more credible service for Pontefract Monkhill, with the aim of making it more of a hub for four of the Five Towns. Grand Central, has, since the introduction of its West Riding Service Group (WRSG), provided a direct London service from Pontefract Monkhill and the implementation of the ESG timetable allows an enhanced Pontefract service (particularly on Sundays) to be provided.

5. ESG timetable specification and development

- 5.1. Grand Central became involved in the ECML ESG in 2019, with more substantial engagement from July 2020, in the middle of the Covid pandemic. That engagement continued until the ESG was wound up in February 2024, in anticipation of the resulting timetable being implemented in December 2024. At that time Grand Central was satisfied that its own services were TPR-compliant, in a standard pattern as far as resources and other paths would allow, and were likely to perform well once implemented. The only real concerns were with the two northbound services Monday to Saturday that were timed to reach Sunderland in 3h17. Whilst this fast journey time was welcome, it relied on punctual arrival and departure at York.
- 5.2. In April 2024, as documented in Network Rail's letter, the Industry PMO recommended deferral of implementation of the new timetable beyond December 2024. Rather than reconvene the ESG to oversee any further changes to the timetable the decision was taken to establish an Industry Task Force to continue development of the timetable. Despite Network Rail's statement in paragraph 4.3 of its letter that *"the Task Force (would) drive consensus on the outcome(s)..."* Grand Central was not fully represented on that group and was not consulted on changes made that affected its trains. This work continued until 31st January 2025 *"to further de-risk the transition of the ECML ESG timetable from development to timetable production."* In Grand Central's case quite the opposite occurred. Changes

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

were made to paths that did not reflect the requirements in the TPR to agree certain reductions in dwell times. Had that consultation taken place, Grand Central would have likely objected.

- 5.3. During this timetable development period it seems that services that had never been part of the ESG specification had been included in the new 'base' timetable. These include, for example, a new EMR service crossing Newark Flat Crossing every hour. This new base timetable was issued as the Prior Working Timetable (PWT) for the December 2025 bid. This is allowed by Part D of the Network Code only if it was done as part of an ESG or if all affected TOCs agree to the use of the new base timetable. That consent was not sought from Grand Central. The PWT should have therefore remained as the previous Working Timetable (WTT).
- 5.4. Network Rail's statement in 7.4 that *"The proposed ECML December 2025 timetable is the output of all the collaboration the industry has undertaken since the ECML ESG was formed in 2019"* misses the point. Whilst decisions were taken by the ESG (i.e. until February 2024) it did reflect true collaboration, at least by all those who engaged with the ESG. Beyond that date the process diverged both from the Network Code and what is required by the Access and Management Regulations. For example, an extract from the ECML Task Force DRAFT slide pack (dated 27/01/25) stated which services were 'expected' to be included or not included in the December 2025 timetable. Given this was circulated before the PDNS submission at D40, and clearly showed Grand Central services would be excluded it shows Network Rail already had prior intentions not to accommodate Grand Central's extra services.
- 5.5. Network Rail states in 6.2.2 that *"The rights sought for passenger train slots on the ECML were not included in the ECML ESG specification."* It is true that the original specification was altered to reflect more closely the actual rights that pertained as the ESG work drew to a close and capacity was treated as a scarce commodity. However, **the original Train Service Specification (TSS) for the ESG timetable included 5 trains per day (tpd) for Grand Central's London to Bradford service.** A copy of that original specification can be provided to ORR if required. The rights sought include this original intention but extend it to make more efficient use of rolling stock.
- 5.6. In April 2024, in response to the further deferral of the ECML timetable implementation, ORR invited all timetable participants across both ECML and West Coast Mainline (WCML) to submit any applications for additional or amended services that were proposed for December 2024, May 2025 and December 2025. Grand Central's plans at that time were not as well developed as we would have liked but had been under internal discussion for some time and were tied up very much with plans for a new fleet of trains. As well as submitting its track access application, at that time Grand Central made clear its intentions for the bid for the December 2025 timetable in the Advance Notification of Timetable Change for December 2025. Whilst this may not have been what Network Rail *wanted*, it is unfair to say it was not *expected*.

6. ORR Competing and / or Complex Track Access Application process

- 6.1. In response to ORR's competing applications process, and as requested by ORR, Network Rail submitted a High-Level Plan in June 2024, and a further detailed plan was published on Network Rail's website in August 2024 (and updated in January 2025). Network Rail made its initial representations on Grand Central's 28th SA on 28 June 2024 where an initial view of the application Form P and SA was provided. On 22 July 2024 Grand Central responded to the Network Rail initial representations. Further to this Network Rail issued a General Representation on the ECML to ORR dated 14 March 2025.
- 6.2. In our initial response to Network Rail's representations, we noted that Network Rail appeared to be more focused on the *"...process for assessing applications received, as opposed to the actual details of the*

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

application submitted and would welcome clarity from Network Rail in relation to the process going forward and how it proposes to assess Grand Central's application fully, alongside all other applications received."

- 6.3. Following these representations, Grand Central had little engagement from Network Rail in relation to any advance timetable work undertaken on its proposals. Indeed, in conversations held between Grand Central and the Head of Timetable Production Capacity Planning, System Operator, Grand Central specifically asked whether there had been any work undertaken by the Advance Timetabling Team (ATT) and how this would be fed into the Dec 2025 process. Whilst a specific action was taken away by Network Rail, no response was received nor was the level of work undertaken by the ATT confirmed in any subsequent conversation.
- 6.4. It is therefore extremely disappointing that Network Rail undertook little to no work to assess the capacity requirements of the additional services sought by Grand Central prior to the December 2025 timetable preparation period.
- 6.5. It is also clear that Network Rail have once again used the timetable process as the mechanism to determine available capacity, which provides little or no certainty for operators seeking to secure additional access rights or extend time limited rights, impacting on mobilisation and resource allocation timescales. This point was raised numerous times on the ORR led competing access rights industry calls.
- 6.6. Network Rail's final representations were issued on 26th June 2025 and provided to Grand Central by ORR on 27th June 2025. Network Rail's representations rely heavily on the outputs of the December 2025 timetabling process, again supporting the likelihood of Network Rail giving no consideration to Grand Central's proposals prior to the December 2025 timetable preparation period. Additionally, it is disappointing that Grand Central has been provided only 2 weeks to respond to these representations following Network Rail taking almost a year to provide any detailed feedback on the proposed capacity requirements of the Grand Central application.

7. December 2025 Priority Date Notification Statement (PDNS)

- 7.1. Grand Central submitted its PDNS for December 2025 on 7th March 2025.
- 7.2. As Network Rail point out, the PDNS did not fully align with the access rights sought. Given, it was now clear that Network Rail would be utilising the December 2025 timetable preparation period to assess Grand Central's application, Grand Central bid a compliant timetable which it felt had the least impact on other services in order to ensure the maximum chance of receiving Network Rail support and could be accommodated within the published PWT.
- 7.3. Regarding specifically the LDHS services, a breakdown of what was included in the PDNS is as follows:
 - 2x Bradford Interchange – London Kings Cross return services (EWD)
 - 1x Bradford Interchange – London Kings Cross return service (SU)
 - 1x York – London Kings Cross return service (EWD)
- 7.4. Following a review of resource and unit diagrams, anticipated platform workings and interactions with other services in the PWT, Grand Central did not include the additional late evening service from London to Wakefield Kirkgate within its PDNS submission. Grand Central recognises that following its PDNS

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

submission it should have further reduced the access rights request within the application and would be willing to do this as required.

- 7.5. We note in paragraph 2.4.2, bullet four of Network Rail's representations that it is recognised that Grand Central requested an update to the Timetable Planning Rules (TPR) to reduce turnaround times at Bradford Interchange to 20 minutes on services from London. Network Rail continue to state that whilst this change has been incorporated, *"...Two of the turnarounds proposed by Grand Central are shorter than the required 20 minutes"*.
- 7.6. All turnarounds from London to Class 1 or Class 2 passenger services have at least 20 minutes turnaround in the offered timetable.
- 7.7. Grand Central also sought inclusion of a further reduction to turnaround times at Bradford Interchange for turnarounds from passenger to ECS and ECS to passenger to 10 minutes and 15 minutes respectively. This change has also been accepted into the TPRs.
- 7.8. Whilst it is clear that Network Rail has used the timetable preparation period in order to support its final representations, it is disappointing that this view was formed so early in the timetable preparation period, with very limited rationale.
- 7.9. As detailed in para 5.4 of this letter, Network Rail had already shown the intent to not include the additional services in the Dec 2025 timetable through the draft publication of slides to the ECML Task Force. Following submission of the PDNS on 7th March 2024, Grand Central received on 31st March advance notice of Network Rail's intent to reject the additional ECML paths sought. Having considered Grand Central's timetable bid for only 3 weeks, Network Rail notified us of the intent to reject simply on the basis of performance grounds. Network Rail provided no detailed analysis, therefore providing little opportunity for Grand Central to adequately respond to Network Rail's proposed rejection. The letter provided no details of whether the paths bid were TPR compliant nor any details that the paths could not be accommodated on compliance with the rules.
- 7.10. Grand Central sought clarification on this point alongside proposing additional measures to mitigate the perceived performance risk. In a further response from Network Rail, it was confirmed that *"...many of the proposed paths are broadly compliant with the established headline planning rules"* and in relation to the performance mitigations proposed, committed to *"...undertake a more detailed assessment of the proposed flexing options to confirm whether any revised proposal could partially mitigate concerns"*. Following the receipt of this response, Grand Central received no further communication from Network Rail prior to the publication of the New Working Timetable at D-26.

8. Congested Infrastructure

- 8.1. Paragraph 3.4 lists the three route sections that have been declared by Network Rail as congested infrastructure. What the letter does not mention is that all three routes are, as set out in the Declarations of Congested Infrastructure (DoCI), likely congested only on Monday to Friday between 06.00 and 21.00.
- 8.2. Grand Central's 28th SA is seeking 2 return London to Bradford journeys both Saturdays excepted (SX) and Saturdays only (SO) along with one additional return trip on Sundays. Only the SX services are affected by the DoCI – that is just 4 of the 10 paths sought.
- 8.3. It is also noted that proposed services between Wakefield Kirkgate and Bradford Interchange do not overlap at all with the DoCI for Marshgate Jn to Copley Hill West Jn.

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

- 8.4. Whilst all 4 of the SX Bradford to/from London paths impinge on the Huntingdon to Peterborough DoCI, only one of them impinges on the Marshgate Jn to Copley Hill West Jn DoCI – the lunchtime Up departure from Bradford Interchange – is routed via Hare Park Jn. Although it follows a stopping Northern train from Fitzwilliam to Doncaster **it has a TPR-compliant path through the route section declared congested** (Hare Park Jn to Marshgate Jn) and does not delay any other trains on this section.
- 8.5. **The other 3 SX West Riding paths** sought are all routed via Shaftholme Jn and Pontefract Monkhill: they **do not impinge on the Marshgate Jn to Copley Hill West Jn DoCI at all**.
- 8.6. Finally, whilst the early morning SX York to London service does pass through the Huntingdon to Peterborough DoCI, the evening northbound service SX does not depart Kings Cross until 21:00 so is outside the time window for the likely time of congestion.
- 8.7. Grand Central notes that Network Rail's own *Code of Practice for Declaration of Congested Infrastructure* (March 2024) states in section 2.2.5 that “..... (declaration) does not suspend normal access-related engagement with train operators.” In other words, Network Rail must still attempt to find paths for any valid bids submitted. In addition to this the DoCI in each instance states “*This Declaration does not mean that all new requests for access on the designated infrastructure will be automatically rejected because the route is not equally busy at all times of the day or week.*” In the response letter Network Rail seems to make it clear that it did suspend all work on finding paths through areas declared congested, **including at weekends**. If this was not the case, we would request that Network Rail please explain what work was carried out on the bids submitted by Grand Central for the December 2025 timetable to assure itself that capacity does not exist for the additional paths.
- 8.8. Grand Central also notes that the General Representation letter, which is referenced in 6.3, commented on the increasing level of TSAR (time signal at red) when the number of trains across Welwyn Viaduct rises above 16 per hour. However, it does not seem to recommend a hard limit of 16 tph. If Network Rail wanted to enforce this, it could have included a Planning Restriction to this effect in section 5.3 of the TPR but has chosen not to. Without inclusion in the TPR it is very difficult for train operators to assess whether their own bid is compliant or not. By applying the existing margins between Woolmer Green and Digswell Jn (and vice versa) it is possible to construct a timetable with 18 (certainly) and 20 (possibly) trains per hour. Network Rail now appears to be arbitrarily rejecting bids on the grounds of performance even though they are completely compliant with the TPR.

9. Capacity

- 9.1. The following is Grand Central's response to section 6.2 of Network Rail's letter and to other references to capacity elsewhere in the letter.
- 9.2. The issue of whether there is any spare capacity for additional LDHS services on the ECML is at the heart of the application made by Grand Central – and those by other train operators. Grand Central's application made in May 2024 was carefully constructed to use, to the maximum extent possible, only slots in the ESG timetable structure that were not already occupied in the final ESG-agreed draft timetable published early in 2024.
- 9.3. Network Rail's letter presents no analysis of hour-by-hour usage of the ESG timetable structure. Grand Central carried out its own analysis of the December 2025 New Working Timetable for Monday to Friday. There are essentially 8 LDHS (excluding King's Lynn services) arrival and departure slots at King's Cross

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

in each off-peak hour, with reductions to 6 or 7 in peak hours to allow for an enhanced Great Northern service.

9.4. The 8 standard off-peak departure slots are xx:00, 03, 10, 17, 30, 33, 40 and 47. The xx:17 slot is, in some hours, moved earlier to xx.14 or 15. There is also one additional off-peak xx:44 departure at 10:44. and one evening peak extra at 18:42.

9.5. Our analysis shows that the only standard departure slots not used between 0700 and 2159 are as follows, with a note against those proposed for Grand Central use.

Table 9.1: Available standard hour departure slots

Hour / Path	Comment
0700	
0817	
0900	<i>Proposed Grand Central Bradford path (the 0917 path being taken by HT)</i>
1000	
1517	<i>Proposed Grand Central Bradford path (probably departing 1515 to avoid conflict)</i>
(2054)	Replaces 2048 path which is used by GTR
2100	<i>Proposed Grand Central York path</i>
2124	
(2154)	Replaces 2148 path which is used by GTR

9.6. Whilst only 8 slots each hour are generally used for arrivals there are 9 available each off-peak hour. It appears that when the ninth slot, at xx:17, is used, the xx:44 slot is not used. Other than that, the unused arrival slots between 07:00 and 22:00 are shown in table 9.2 below.

Table 9.2: Available standard hour arrival slots

Hour / Path	Comment
0723	
0823	<i>Proposed Grand Central arrival at 0824 from York to form 0900 to Bradford Int</i>
1144	(But see note above about additional arrival at 1117)
1336	(But there is an additional arrival at 1317)
1444	
1536	<i>Proposed Grand Central Bradford path</i>
1644	(May be needed for ECS for GN evening peak services)
1736	
1814	
2044	<i>Proposed Grand Central Bradford path to use the 2017² slot instead – see note above</i>
2114	(But there is an additional arrival at 2100)

9.7. The following comments relate to paragraphs 6.2.1 to 6.2 of Network Rail's representations.

9.8. **6.2.1** - Grand Central is not clear what the relevance of the proposed ECML December 2025 timetable is to capacity. As noted above we have found there is capacity within the December 2025 timetable structure for most, if not all, of the additional paths we are seeking.

² May need to be retimed to 20.24 to avoid New Measurement Train (Monday Only)

- 9.9. **6.2.2** – Grand Central has addressed the relevance of the ECML ESG specification in paragraph 5.3 of this letter. We have also questioned the relevance of congested infrastructure to some elements of the application as set out in paragraph 8.7. In any case Grand Central made TPR compliant bids which Network Rail acknowledged the broad compliance of many of the paths as set out in Paragraph 7.7 of this letter.
- 9.10. **6.2.3** – We believe we have demonstrated above that there is at least potential capacity available for all the additional paths sought. If there is competition for these slots from other applicants for rights this should have been stated in the timetable offer and in Network Rail's latest response to ORR. We can find no mention of competing applications for rights. In that case we would have expected Network Rail to have applied the Decision Criteria as outlined in section 4.6 of Part D of the Network Code, and for Grand Central to have been invited to provide some input to that process. That has not happened.
- 9.11. **6.2.4** – The additional paths sought would indeed be new services from December 2025. The paths are, however, included in the New WTT as 'rejected' paths though many of them are 'clean' for most of the route covered. Please note introduction of some of the new services that operate only in the West Riding use ECS paths that will be in operation in the December 2025 timetable as ECS moves only. Calls at Seaham, in the quantum requested, are included in both the May 2025 and December 2025 timetables. The calls are shown as unadvertised pending approval by ORR. We could implement any or all of these at about eight weeks' notice once approved.
- 9.12. **6.2.5** – Our analysis mentioned above suggests that the additional Grand Central London services would **not** exceed the number of trains over the Welwyn Viaduct in any other standard hour. We would therefore urge Network Rail to advise where the route-stipulated quantum is documented: it is not included in the December 2025 TPRs. Network Rail has cited the performance risk associated with this yet has conducted no performance work in relation to the additional Grand Central services, nor has it supported Grand Central in developing its own performance modelling work to demonstrate the impact of the proposed services, see paragraph 10.1 later in this letter.
- 9.13. **6.2.6 and 6.2.7** – Please see separate response on the ESG specification, process and timetable, and separate responses on Performance and Congested Infrastructure. Section 5, Section 10 and Section 8 of this letter.

10. Performance

- 10.1. Given the submission of access rights applications in May 2024 for May/December 2025 it is very disappointing that those proposals were not tested for performance impacts in the performance modelling exercise carried out in Autumn 2024. Grand Central sought inclusion of its services as an additional scenario and were denied that.
- 10.2. It was also worrying to us that so many conclusions were drawn from that exercise when it did not report on performance on the route between Stevenage and Kings Cross – the very route section that gave rise to most of the reasons given for intended rejection of Grand Central's additional services in Network Rail's letter to Grand Central on 31st March 2025. Furthermore, the modelling was limited to Monday to Friday and reported on punctuality only between 14.00 and 19.00, completely ignoring the morning peak. As it transpires, most of the additional paths sought by Grand Central would not have been included in the model's scope anyway. It is therefore hard to understand how any conclusions about the performance of Grand Central's additional paths can be drawn from this modelling.

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

- 10.3. In view of the above Grand Central has commissioned its own RailSys performance modelling exercise on a smaller geographic base but including the offered SX timetable for all relevant ECML services. The intention is to calibrate the base timetable and then rerun a scenario that includes all the additional paths for which we are seeking rights. We expect the results of this exercise to be available at the end of the first week of August when we will look to share the conclusions of the analysis.
- 10.4. In order to inform and support our own performance modelling Grand Central sought data from Network Rail's Advance Timetable Team. This request was denied, on the basis of the lack of relevance of the initial Network Rail modelling to our own modelling scope, given the initial modelling considered only 1400 – 2000 and the modelling being based on a development timetable to which the December 2025 timetable will look very different.
- 10.5. Grand Central will continue with its own modelling exercise but would welcome clarification from Network Rail of how the likely performance impact of any changes within the December 2025 timetable on the ECML have been assessed.

11. Seaham Calls

- 11.1. Grand Central welcomes Network Rail's partial support for Seaham calls in up to 4 Sunderland trains a day in each direction.
- 11.2. We assume the requirement for contingent, rather than firm, rights is owing to uncertainty over station working at Sunderland once Nexus Tyne & Wear Metro services move to 6 tph 07.00 to 19.00 Mondays to Fridays. We would welcome sight of the text that has been redacted in order to confirm that this is the case.
- 11.3. Grand Central has sought rights for 4 calls a day precisely because we see issues with the two Sunderland afternoon arrivals that later head back to London. We believe that the other four northbound trains Monday to Saturday can accommodate Seaham calls.
- 11.4. Grand Central suspects that Network Rail's reluctance to support rights beyond December 2026 is because of the difficulty in accommodating a four minute dwell before southbound departures once the Metro 6 tph service starts. Grand Central is currently working to gain internal approval to reduce the minimum dwell between ECS and passenger service, in the same direction, from four minutes to two. Once this has been confirmed we will seek a change to the TPR Station Planning Rules for Sunderland to reflect this. We calculate that this two minute reduction will be sufficient to accommodate any southbound service calling at Seaham as long as it has originated from either Tyne Yard or Pelaw Goods Loop. The first southbound service on Sunday will unfortunately not be able to call at Seaham if it is to gain its current ECML path at Northallerton. However, all other Sunday services should be able to call at Seaham.
- 11.5. In view of the above, if contingent rights are granted only until December 2026, Grand Central will seek to firm up these rights once a new timetable has been agreed that accommodates both a 6tph Metro service and southbound calls at Seaham for at least 4 Grand Central trains a day.
- 11.6. We are also disappointed that Network Rail has not discussed with Grand Central its concerns about limiting calls at Seaham to 5-car trains. Firstly, the platforms at Seaham are not that short. The TPR list them as having a usable length of 115m. Grand Central's Class 180s only have a crew door at each end of the unit, so all passenger doors will fit comfortably on the platform. In fact, the crew doors should as

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

well since a Class 180 is just over 117m long. The units also have full selective door opening (SDO) which works with two units coupled together as well. Alternatively, one unit can be locked out of use.

11.7. Grand Central has well-established procedures for operating 10-car 180s at short platforms. We will update these to include the correct number of doors to open at Seaham once rights to call there are granted.

11.8. We are not aware of any other reasons that might preclude 10-car working at Seaham. If there are none, we would expect Network Rail to withdraw the requirement to limit Seaham calls to 5-car trains, at least for Class 180s.

12. Peterborough calls (5.5.6)

12.1. Grand Central welcomes Network Rail's partial support for additional Peterborough calls. Given the comments in 5.5.6 we would expect any decision to grant rights for these calls should make it clear that they are contingent only on successfully passing a one year review period. After that we would expect to have support for firm rights where the performance impact has been either neutral or positive.

13. West Riding 'local' services (5.5.4)

13.1. Grand Central welcomes Network Rail's support for the conversion of some ECS paths to passenger trains.

13.2. The quantum of new passenger services sought between Wakefield Kirkgate and Bradford Interchange is two each way each day of the week. If rights for any new London trains are granted it is likely that, on reaching Bradford Interchange, any additional train will form a passenger train back to Wakefield. The other passenger working will be a conversion from an existing ECS working.

13.3. In the event that rights are not granted for the early evening (expected to be at 16.56) southbound service from Bradford, Monday to Saturday, all the way to London, we would wish this service to be given firm rights as a passenger service as far as Wakefield Kirkgate.

13.4. We expect both morning 'local' services from Wakefield to Bradford to be conversions from existing ECS moves via Horbury Jn.

14. Depot location(s) for new fleet

14.1. Grand Central can confirm that servicing of units will take place in one of three locations each night: Tyne Yard (Arriva Traincare), North London and West Yorkshire. The location for routine maintenance has not yet been confirmed but is likely to be one of the above.

14.2. Whilst the London and West Yorkshire locations may not be the same as now, we do not expect any ECS moves to be on sections of route that have currently been declared congested.

15. Unused LNER Firm Directed Rights

15.1. The access rights for LDHS services granted to VTEC (now LNER) in 2017 included 8 tpd in each direction between London and Leeds for LNER (then VTEC) to operate a fast two-hourly service. Along with the other LNER enhancements that are now included in the December 2025 timetable that equates to approximately 6½ trains per hour (tph) throughout the day from roughly 06:30 to 20:30. However, the

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

rights for the additional Leeds paths, in particular, were granted from May 2021 by which date Network Rail had promised to deliver a fourth track between Woodwalton Jn and Huntingdon. That track has still not even been funded, let alone delivered, so it is not surprising that some rights could not be delivered.

- 15.2. It was assumed that up to 2 tph would be available off-peak for open access services. The number of firm rights now is higher than it was in 2017 after Lumo were granted rights for 5 tpd to/from Edinburgh. Hull Trains has rights for 8 tpd (7 in the other direction) and Grand Central 10 tpd – 4 to/from Bradford, 6 to/from Sunderland. Given an early start and late finish for some of these services, 2 tph would give about 32 departure slots a day for these 23 services. That is broadly in line with Grand Central's finding that there are 9 unused departure slots in the 16 hours between 06:00 and 21:59.
- 15.3. In the initial ESG timetable work attempts were made to accommodate the Leeds fast trains two-hourly. The departures from Kings Cross were broadly in the xx.00 slots not used by Grand Central, though this did not work throughout the day. Of those even hour '00' departures only the 10.00 remains unused in the December 2025 timetable. The 08.00 is allocated to Grand Central to fulfil its firm rights for a Sunderland departure between 07.45 and 08.30; two are used by Hull Trains (12.00 and 14.00); two are used by LNER for departures to Aberdeen (16.00) and Hull (18.00); the 20.00 provides the last Grand Central departure to Bradford Interchange.
- 15.4. However, the additional departure slots that Grand Central is seeking access rights for do not occupy any of the slots initially designed for the fast Leeds services.
- 15.5. So although there is a quantum of slots still available for allocation within the original timetable structure, no more than one of them can be linked directly to the non-use of LNER's firm directed rights for additional services to Leeds.

16. Conclusion

- 16.1. Grand Central has sought to comply fully with the ORR's competing applications process as set out in April 2024. It is therefore disappointing that Network Rail made little or no attempt to fully assess the services proposed prior to the December 2025 timetable preparation period. Information was provided to Network Rail in line with the prescribed timescales, yet we have been provided no evidence that any Advance Timetable work was undertaken with a view to it being further considering during the December 2025 timetable preparation. Indeed, Network Rail suggested to the ECML Task Force that Grand Central services would not be included in the December 2025 timetable in January 2025.
- 16.2. Grand Central submitted a TPR compliant bid in order to further demonstrate the available capacity within the PWT and anticipated December 2025 timetable, however within 3 weeks Network Rail notified of its intent to reject the proposals citing nothing more than anticipated performance risk, before formally rejecting the bid for the LDHS paths on 13th June 2025.
- 16.3. Grand Central has demonstrated at a high level that additional capacity continues to exist for paths that would be compliant with the TPR in some hours. Grand Central also submitted a TPR compliant bid for services that could be accommodated with the PWT and indeed some of the paths continue to remain 'clean' within the timetable but marked as rejected.
- 16.4. We appreciate the partial support from Network Rail in relation to the Seaham calls, the introduction of local services between Wakefield and Bradford and the introduction of additional Peterborough calls, however we remain disappointed that Network Rail's objection to the additional LDHS paths being granted access rights are based on the Declarations of Congested Infrastructure, which apply only

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

partially to the services proposed, and on the basis that the services have not been included in the December 2025 timetable for which Grand Central services were rejected on the basis of anticipated performance risk a lack of inclusion in the ESG specification, but for which it appears no detailed analysis of the paths has actually been undertaken.

16.5. Grand Central would be prepared to provide further December 2025 timetable analysis as required and will look to share the outputs of its own performance assessment of the proposed services as soon as the results are available.

Yours sincerely,

A black rectangular box used to redact the signature of Chris Brandon.

Chris Brandon
Director – Grand Central



Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

Registered office: 1 Admiral Way, Doxford International Business Park, Sunderland, SR3 3XP
Registered in England no. 03979826