Monitoring open access

2025 update

12 September 2025

Contents

Executive summary

Introduction

ORR monitors and reports on rail markets, including rail passenger services. Additionally, ORR has a role in approving access applications to run on the GB infrastructure operated by Network Rail, and this includes open access services. This report provides an update on open access passenger services, focusing on:

- **Market outcomes since our last report** – a data-driven summary of some of the key metrics that relate to the customer experience, informed by data which is publicly available on the ORR data portal; and
- **Other developments in the open access market** – in this year's report we provide an overview of recent open access applications and decisions.

Open access services currently account for a small proportion of the total passenger market. In 2024-25, domestic open access passenger services (the three long-distance operators Grand Central, Hull Trains and Lumo, together with Heathrow Express) accounted for 9 million (0.5%) of the total 1,729 million passenger journeys on the GB network.

Since our last annual monitoring report in 2024, open access has been the subject of considerable scrutiny – partly due to the four new access applications and seven proposals for increases to existing services and partly due to the debate on rail reform. The purpose of this monitoring report is not to comment on recent applications or comment on open access in the context of rail reform. Rather, the intention is to present an overview of current market outcomes and the passenger experience.

Our findings

Market data

We report on a series of measures including complaints, punctuality and rolling stock age. Where we refer to 'contracted' operators, we are referring to both currently contracted Train Operating Companies (TOCs) and formerly contracted TOCs that have now been nationalised. In summary, the main findings are:

- Punctuality is slightly better for open access than long-distance contracted services on average. Whether open access improved or deteriorated from the previous year depends on choice of metric (for Time to 3 open access improved, for Public Performance Measure (PPM) it deteriorated).

- Reliability is better for open access than long-distance contracted services on average. Open access saw a lower level of cancellations over the past year, and a larger year-on-year reduction than long-distance contracted services.
- The number of complaints per 100,000 journeys fell for both open access and contracted services, however, open access services saw more complaints (per 100,000 journeys) than contracted services.
- Consistent with our 2024 report, train performance (punctuality and reliability) and the facilities on board were the primary reasons for complaints from passengers using long-distance operators on the East Coast Mainline.
- Satisfaction with complaint handling is currently better for long-distance open access services than long-distance contracted services on average and is improving.
- Both passenger numbers and kilometres have recovered more strongly for long-distance open access operators than contracted long-distance operators. If Heathrow Express, the sole short-distance open access operator currently operating, is included in the passenger numbers and kilometres, then the recovery for open access operators overall is not as strong.

Developments in the open access market

In November 2024, we approved an application from Go-op Co-operative. This company was seeking track access contracts with Network Rail to run services between Taunton and key locations across Wiltshire and Somerset. We concluded that there was sufficient capacity on the lines that Go-op wished to access and the new service would provide new journey options for passengers.

In July 2025, we rejected applications from three companies seeking track access contracts with Network Rail to run services on the West Coast Main Line. We concluded there was insufficient capacity on the West Coast Main Line southern section for the introduction of any of the proposed services from East Coast Trains Limited (Lumo NW); the Wrexham, Shropshire & Midlands Railway Company Limited (WSMR); and Virgin Management Limited (Virgin). Additionally, we rejected an application from Hull Trains to run additional services on the East Coast Main Line, which would run to Sheffield, concluding that there was insufficient capacity and a low NPA ratio.

Also in July 2025, ORR approved applications from three incumbent open access operators to run additional or extended services on the East Coast Main Line. Additional services were approved for Grand Central and Hull Trains, whilst service extensions were approved for East Coast Trains Limited (Lumo).

We welcome comments and suggestions from interested parties on our market monitoring. These can be submitted by email to competition@orr.gov.uk.

1. Monitoring Activity

Introduction

1.1 Open access in the GB rail market allows independent train operators to run services on the national rail network. Open access operators with approved rights for domestic services comprise Grand Central, Hull Trains, Lumo, Heathrow Express and Eurostar (which is the only operator approved for both domestic and international services).

(a) First Group:

(i) Hull Trains operates services between London Kings Cross and Hull.

(ii) Lumo provides services between London Kings Cross and Edinburgh.

(iii) Grand Union Trains was approved to provide services between London Paddington and Carmarthen in December 2022. Additionally, it was approved in March 2024 to offer services between London and Stirling. Grand Union Trains was fully acquired by First Group in December 2024, so these services will run under the Lumo brand when they commence.

(b) Arriva:

(i) Grand Central connects London Kings Cross with destinations such as Sunderland and Bradford.

(c) Heathrow Express offers a rapid transit service between London Paddington and Heathrow Airport.

1.2 International passenger services are also run on an open access basis. Eurostar offers high-speed services between London and Paris, London and Brussels and London and Amsterdam.

1.3 A particular focus of our monitoring is on the passenger experience on the East Coast Main Line (ECML). As of today, it is the only long-distance route that currently sees significant head-to-head on-rail competition between contracted and open access operators. The ECML runs from London to Edinburgh, via the cities of Peterborough, York and Newcastle. It is one of the busiest railway lines in Great Britain.

1.4 The ECML's main operator is the Department for Transport operated London Northeastern Railway (LNER), whose services include regular long-distance express trains between London, the East Midlands, Yorkshire, the North East of England and Scotland. Throughout this report, we refer to LNER as a "contracted operator" along with all other non-commercial services.

1.5 We report on a range of quality metrics for the main long-distance operators on the ECML: Grand Central, Hull Trains, Lumo and LNER. We also look at outcomes for the other key long-distance publicly contracted operators, namely Avanti West Coast, Cross Country and East Midlands Railway. These contracted operators do not for the most part face on-rail competition from open access but, as long-distance services, may be expected to have similar passenger profiles to those travelling on the ECML. East Midlands Railway runs a mixture of long-distance inter-city services between London and cities in the East Midlands, as well as local short and medium-distance services. Where possible we also include data for Heathrow Express (the only other domestic open access operator with live operations) and other contracted operators.

1.6 We present data showing how open access operators, and the routes served by open access operators, are recovering in comparison to the wider rail industry. We present data on both volumes (number of journeys, passenger kilometres) and revenues (inflation adjusted).

1.7 As with our 2024 report, we present all data on a financial year basis. We present data for the most recent full financial year available i.e. 2024-25, other than in those cases where such data was not available to us at the time of analysis.

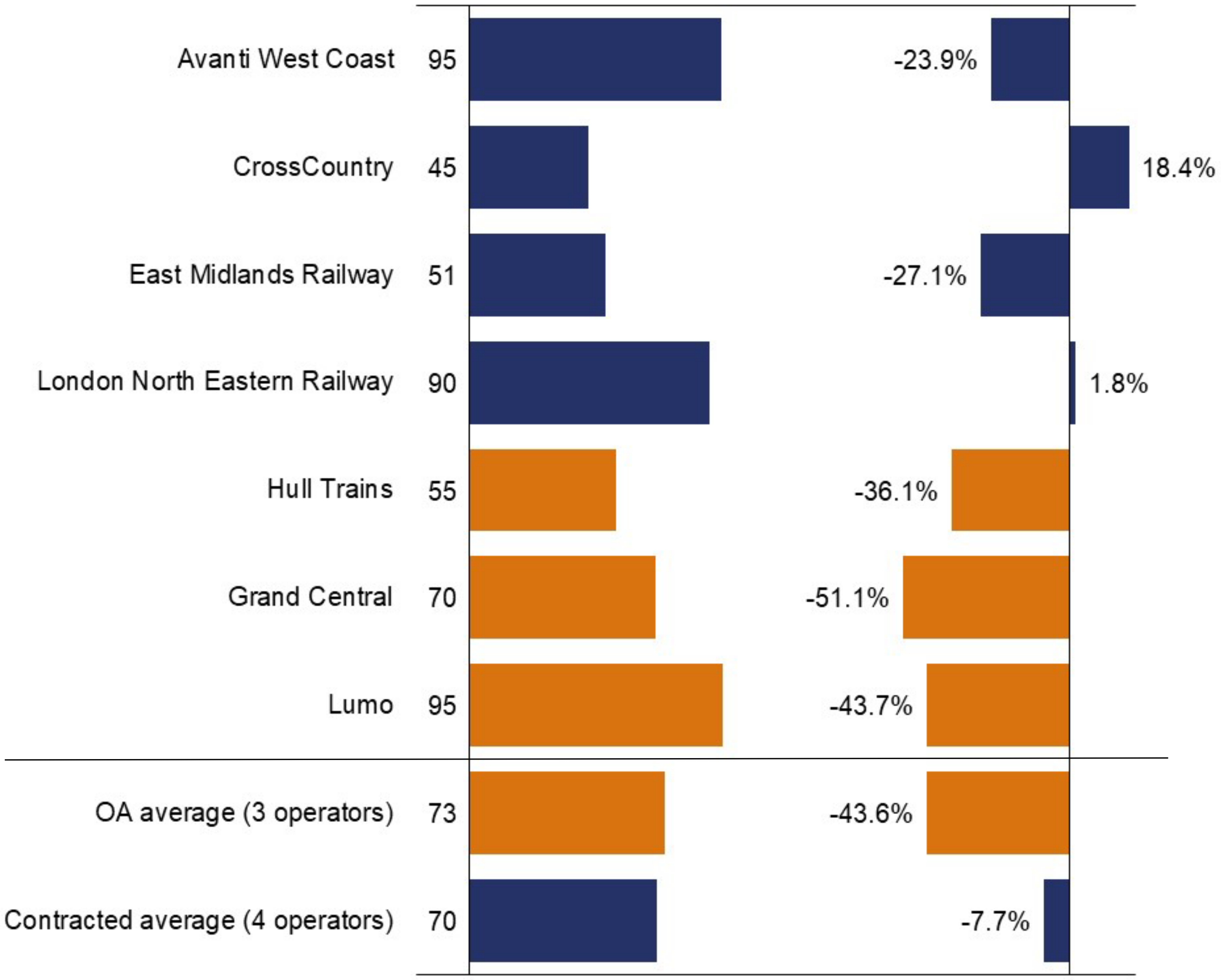
Passenger experience

1.8 We are interested in the impact of on-rail competition on passenger outcomes. The key variables which we have monitored as a proxy for quality relate to complaints, delay compensation claims, punctuality and reliability. We also report on the average age of rolling stock.

Complaints

1.9 Figure 1.1 below shows the complaints rate by Train Operating Company (TOC) for the most recent financial year and percentage change from the previous year. The orange bars refer to open access operators and the blue bars refer to contracted services.

Figure 1.1 Complaints rate by long-distance operator (number of complaints per 100,000 journeys), Great Britain, annual data April 2024 to March 2025 and percentage change from 2023-24



Source: TOC complaints rate data supplied to ORR. Available on ORR's data portal in [Passenger rail complaints statistics.]

1.10 Open access had a greater fall in the volume of complaints, however, open access saw slightly more complaints overall (i.e. had worse performance) than long-distance contracted services during 2024-25. Grand Central showed the strongest improvement.

Figure 1.2 Complaints rate, all operators (number of complaints per 100,000 journeys), Great Britain, annual data April 2024 to March 2025 and percentage change from 2023-24

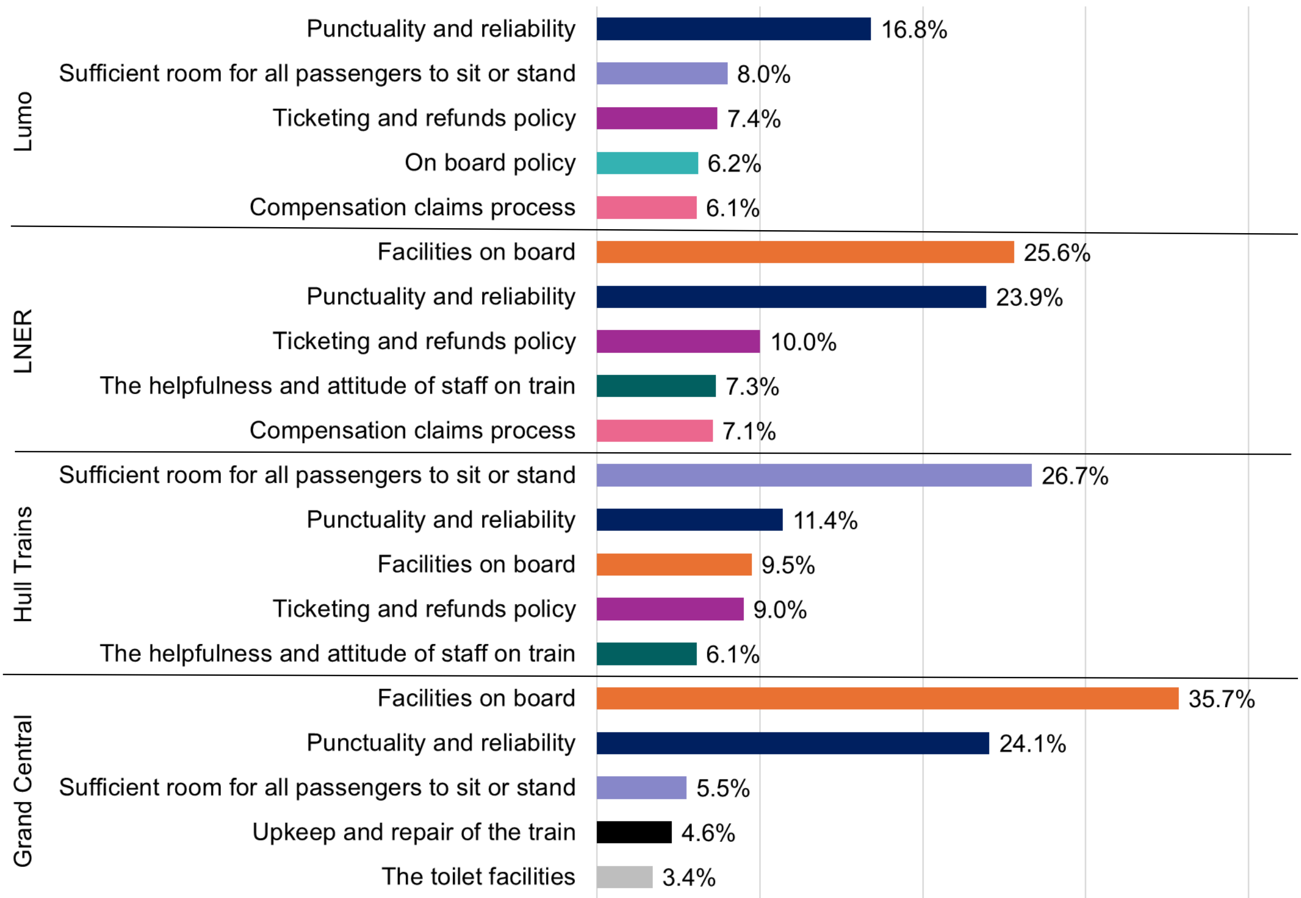
Source: TOC complaints rate data supplied to ORR. Available on ORR's data portal in Passenger rail complaints statistics.

1.11 Open access had a greater fall in the volume of complaints, however, across all operators, open access had a higher complaints rate than all contracted operators.

1.12 Complaints can result from a range of factors, including some events which are outside of the control of TOCs. Journey length may also be a factor; long-distance operators have historically tended to receive proportionately more correspondence about their services, meaning that we cannot draw strong conclusions from this data in isolation.

1.13 We report on the top five complaint categories for each ECML operator in Figure 1.3 below.

Figure 1.3 Top five complaints categories for long-distance operators on the East Coast Main Line, annual data from April 2024 to March 2025



Source: TOC complaints rate data supplied to ORR. Available on ORR's data portal in Passenger rail complaints statistics.

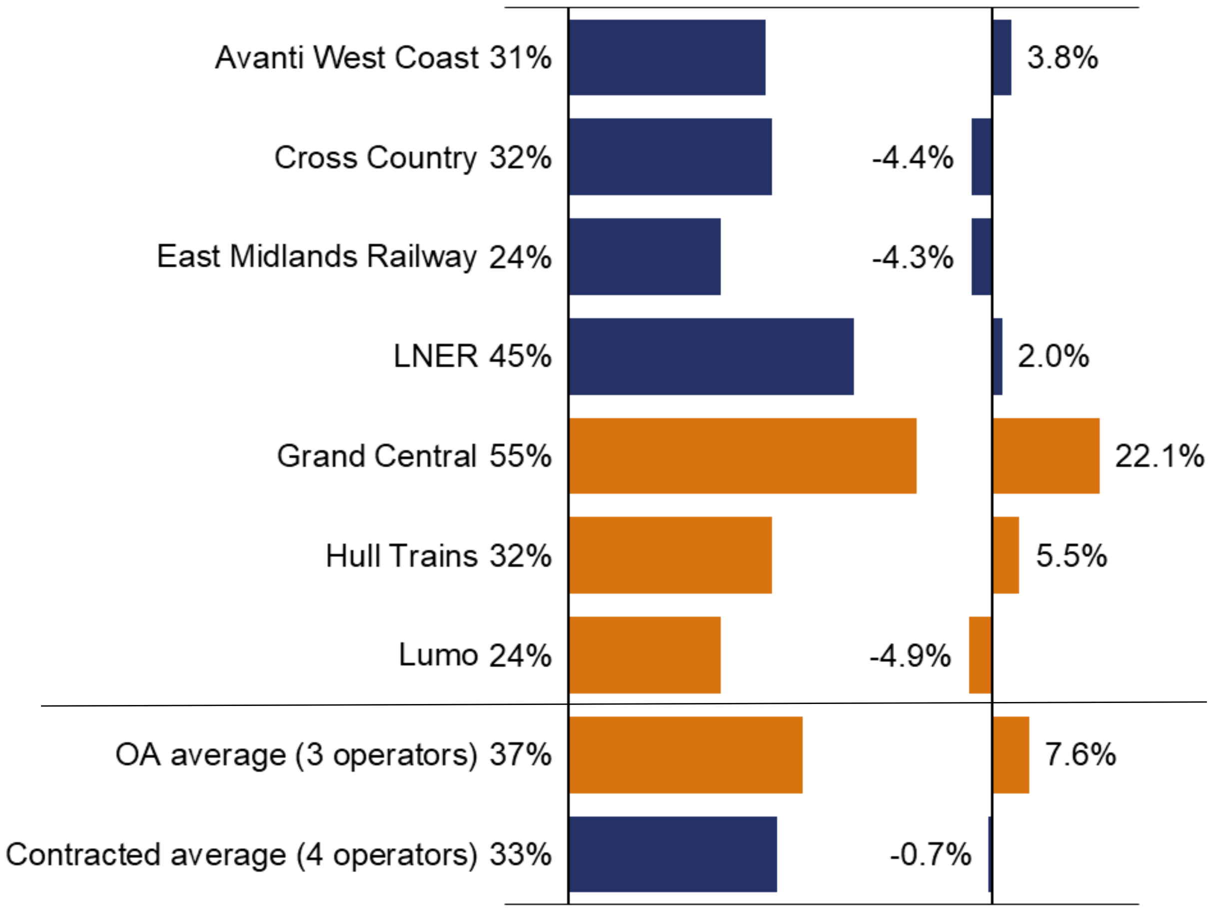
1.14 This data shows both the wide range of factors which impact on passenger satisfaction, as proxied by complaints categories, and also the consistent importance to passengers of punctuality and reliability. Consistent with our 2024 report, train performance (punctuality and reliability) is a key complaints category, being highest for Lumo and LNER. Train performance (punctuality and reliability) was also the second highest category for Hull Trains and Grand Central.

1.15 Facilities on board is another key complaints category that remains consistent with last year's report, being highest for Grand Central and LNER. Hull Trains' most complained about category remained sufficient room to sit and stand.

1.16 In Figure 1.4 below we compare passenger satisfaction regarding complaints handling. This figure shows open access scored higher on average on this metric. Open access services also showed a stronger percentage point improvement on average.

1.17 There was some variation within open access. Satisfaction with Grand Central and Hull Trains improved, whereas satisfaction with Lumo declined.

Figure 1.4 Passenger satisfaction with overall complaint handling by long-distance operator, Great Britain, annual data, April 2024 to March 2025 and percentage point change.



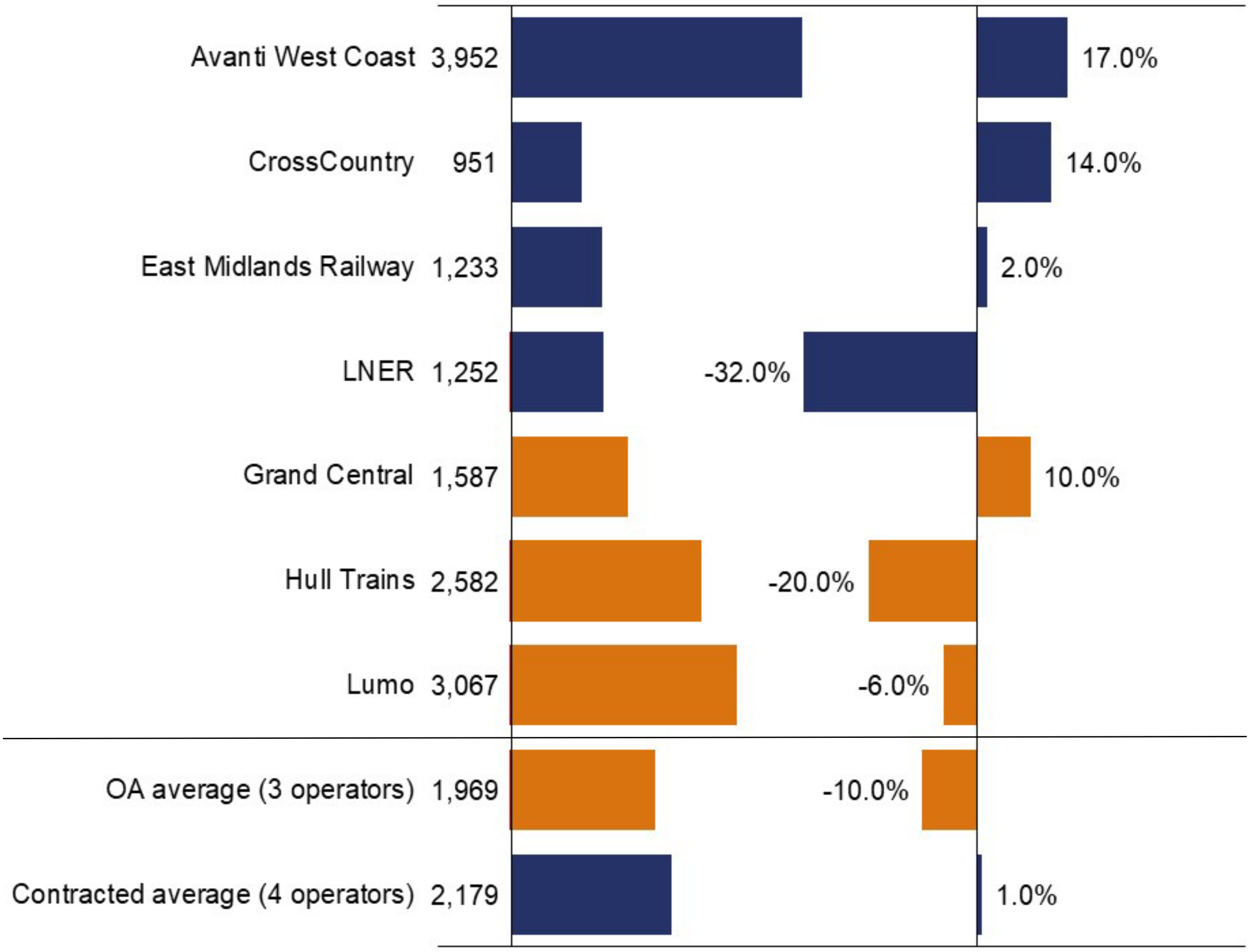
Source: TOC's passenger satisfaction (complaints handling) data supplied to ORR. Available on ORR's data portal in Passenger rail service complaints statistics.

Delay compensation

1.18 We collect data in each rail period on the volume of compensation claims. These relate to journeys which are delayed or cancelled which trigger eligibility for delay compensation and where delay compensation claimed has been received and closed (within given time limits). The number of delay compensation claims closed per 100,000 passenger journeys is presented below.

1.19 Any comparison of delay compensation claims volumes between operators should be undertaken with caution due to the application of varying compensation eligibility thresholds. Grand Central offers compensation after a 60 minute delay. LNER, Cross Country, Lumo and Hull Trains offer delay compensation after 30 minutes. East Midlands Railway and Avanti West Coast offer delay compensation after 15 minutes.

Figure 1.5 Delay compensation claims closed per 100,000 journeys by long-distance operator, Great Britain, annual data January 2024 to December 2024 and percentage change from 2023-24



Source: TOC complaints rate data supplied to ORR. Available on ORR's data portal delay compensation claims statistics.

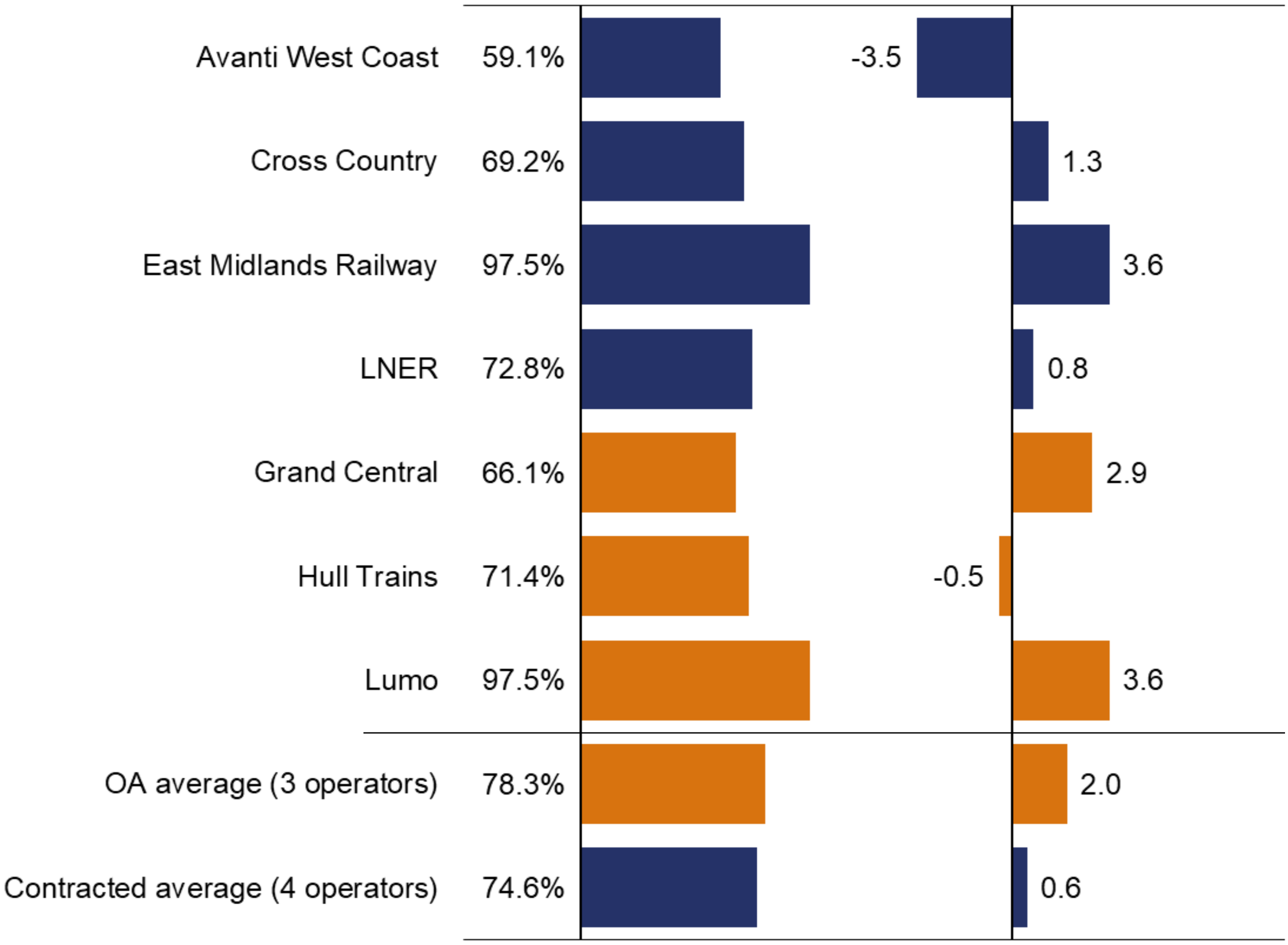
1.20 Long-distance contracted services had a higher number of closed complaints per 100,000 journeys for delay compensation, compared with open access – largely explained by the reduction in closed complaints within the year for open access.

Punctuality and reliability

1.21 Figure 1.6 below shows performance as measured by the Time to 3 metric which captures the proportion of trains which arrived within three minutes of their scheduled arrival time. There was a higher performance for open access compared with contracted services.

1.22 Open access operators showed stronger relative improvement since the previous year.

Figure 1.6 Time to 3 by long-distance operator, Great Britain, annual data, April 2024 to March 2025, with percentage point change from April 2023 to March 2024

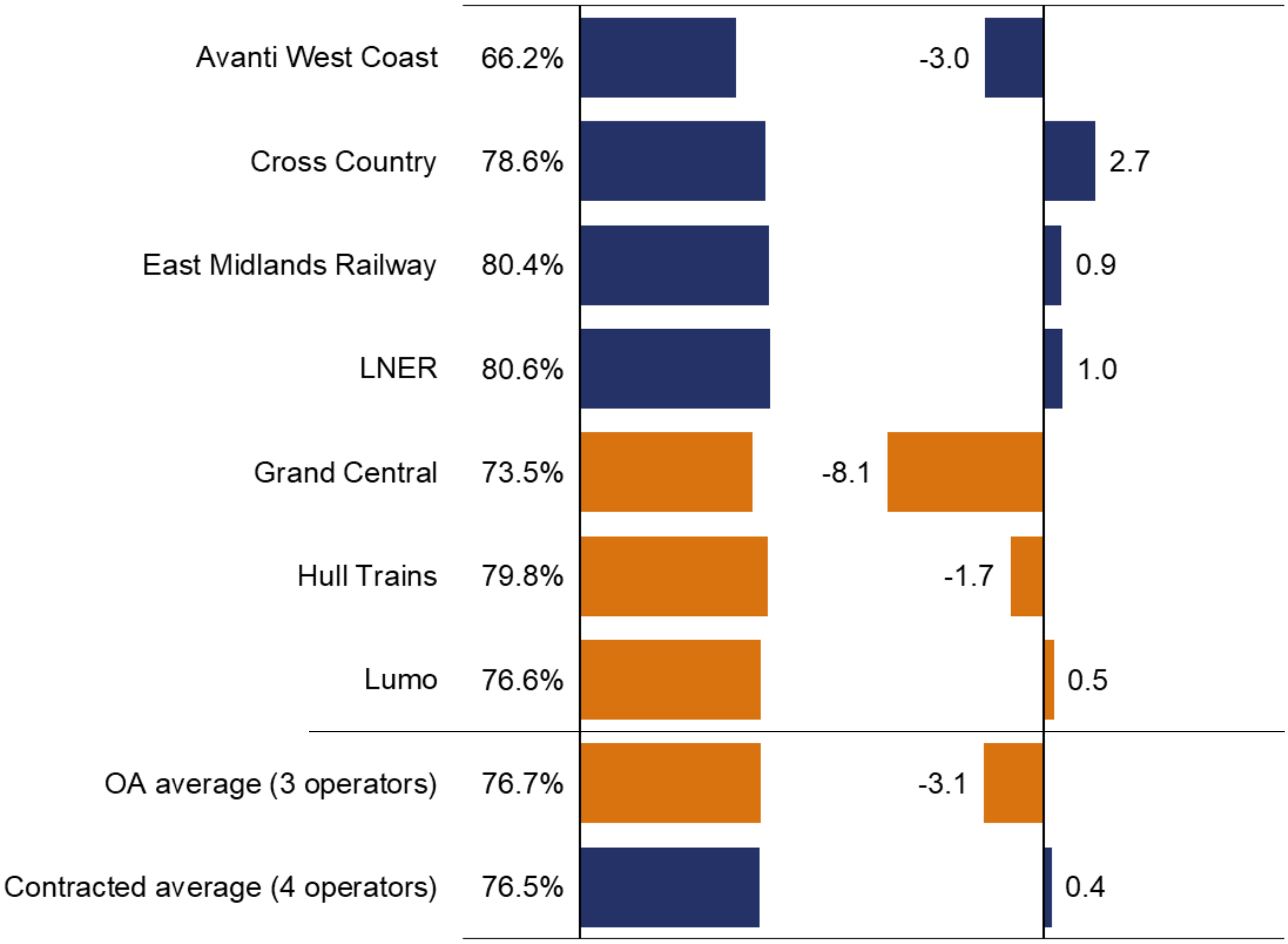


Source: ORR data portal in [Passenger rail performance statistics.]

1.23 Figure 1.7 below reports on the Public Performance Measure (PPM), which for long-distance services shows the proportion of trains arriving at their final destination on time or less than ten minutes after the scheduled arrival time.

1.24 Figure 1.7 shows there was a fractionally higher performance for open access operators compared with long-distance contracted services. There was a slight improvement for contracted operators and, in contrast to the results on a Time to 3 basis, a deterioration in PPM for open access operators.

Figure 1.7 PPM by long-distance operator, Great Britain, annual data, April 2024 to March 2025 and the percentage point change from April 2023 to March 2024

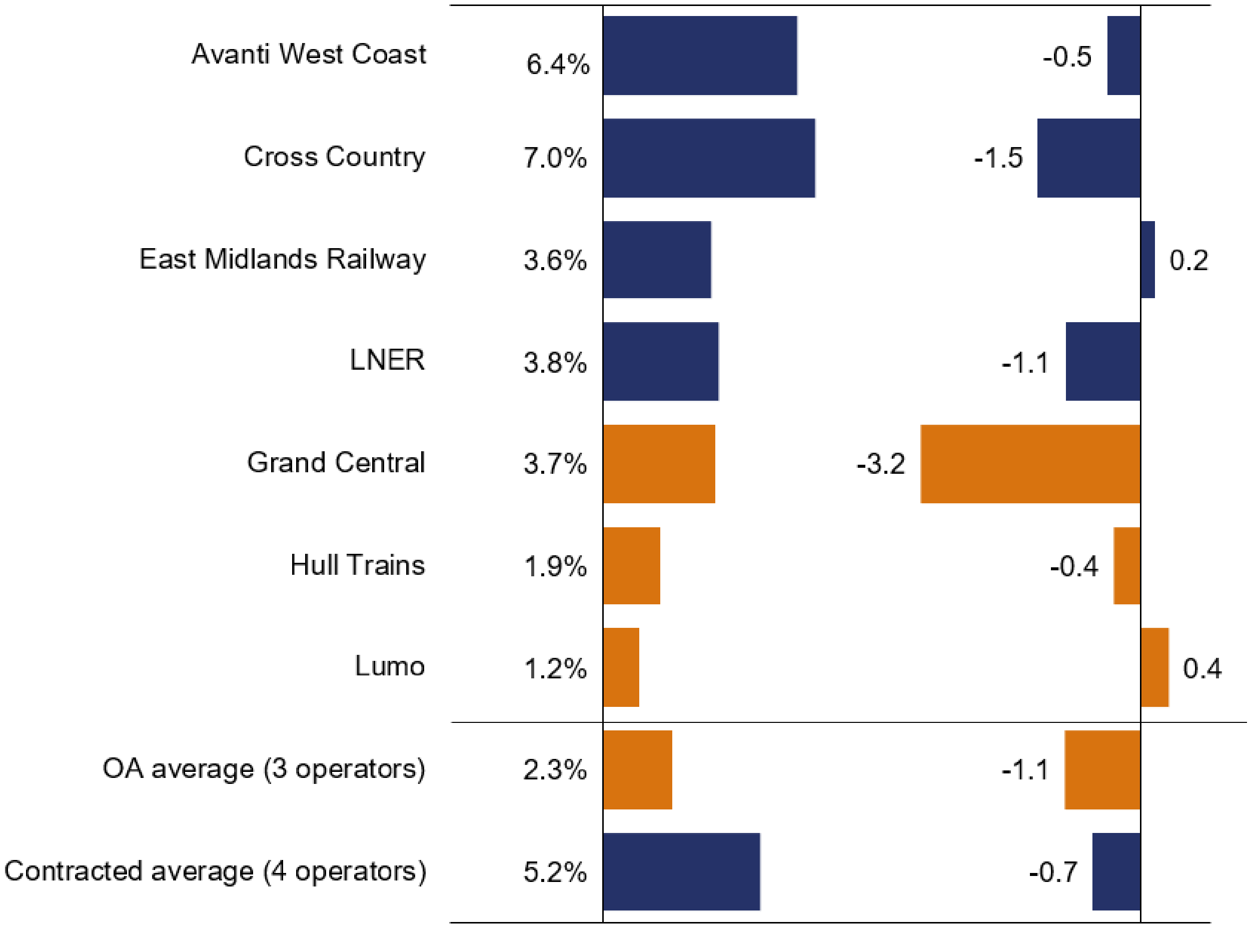


Source: ORR data portal in Passenger rail performance statistics.

1.25 A further measure of performance is train cancellations. Figure 1.8 shows the proportion of trains cancelled as a percentage of trains planned, based on a score that weights full cancellations as one and part cancellations as a half. A lower cancellation score indicates better reliability.

1.26 The overall cancellation rate in the last year for open access (2.3%) was less than half that of long-distance contracted operators (5.2%) and decreased by a greater number of percentage points, compared to long-distance contracted services.

Figure 1.8 Cancellations attributable to each long-distance operator, Great Britain, annual data, April 2024 to March 2025, with percentage point change from April 2023 to March 2024



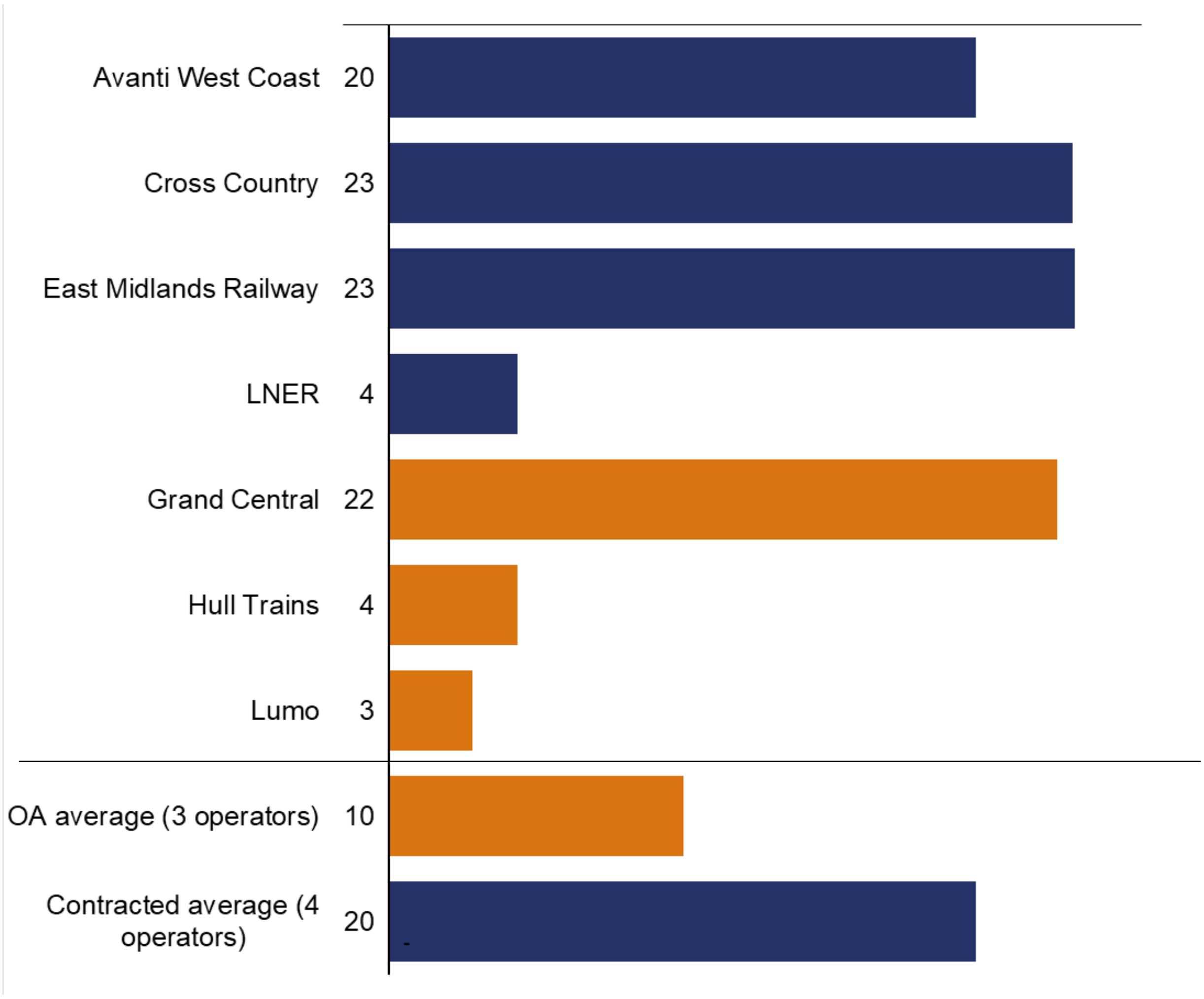
Source: ORR data portal in [Passenger rail performance statistics.]()

Rolling stock age

1.27 The age of operators' train fleets provides another possible indicator of service quality, although it is an indicator that needs to be interpreted with care. For example, while new rolling stock may be more technologically advanced, existing trains can be refurbished during their lifetime to improve comfort for passengers, making the impact of rolling stock age on passenger satisfaction potentially ambiguous. New trains may also experience reliability problems early in their life.

1.28 The data below shows the average age of the operators' fleets as of March 2024 (the most recent year end for which information was available to us on this metric at the time of analysis). The rolling stock age of the open access operators was lower overall. In part, this reflects the newness of the operators in question and their choice of rolling stock on entry.

Figure 1.9 Average age of rolling stock in years by long-distance operator, Great Britain, 31 March 2024



Source: ORR data portal in [Rail infrastructure and assets statistics]

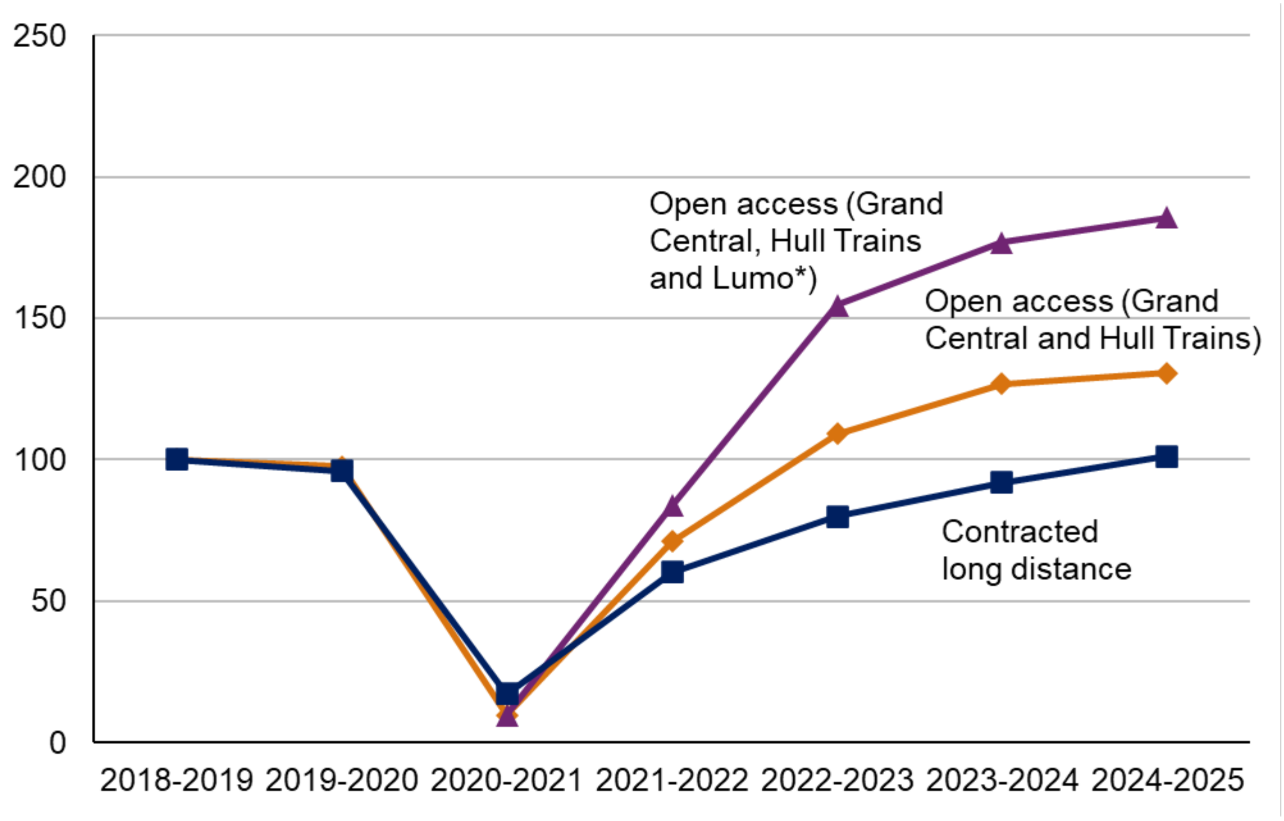
Post-pandemic recovery in rail demand

1.29 We begin by presenting data on the number of passenger journeys made by customers of the long-distance open access operators. This includes Grand Central and Hull Trains, who have both been active for a number of years, together with Lumo, whose first services ran in October 2021, and long-distance contracted operators (Avanti West Coast, Cross Country, East Midlands Railway and LNER).

1.30 In 2024-25, domestic open access passenger services (the three long-distance operators Grand Central, Hull Trains and Lumo, together with Heathrow Express) accounted for 9 million (0.5%) of the total 1,729 million passenger journeys.

1.31 We present data for the seven financial years from 1 April 2018 to 31 March 2025. We present data for Lumo separately from the other two open access operators, given that it commenced operations part-way through the years spanned by our comparison. The contracted long-distance figure is then disaggregated by the East Coast and West Coast operators.

Figure 1.10 Number of journeys (indexed, 2018-19=100), long-distance open access and long-distance contracted, Great Britain, annual data, April 2018 to March 2025.



Source: ORR data portal in Passenger rail usage statistics.
* Annual Lumo data begins in financial year 2021-22.

1.32 Figure 1.10 shows that:

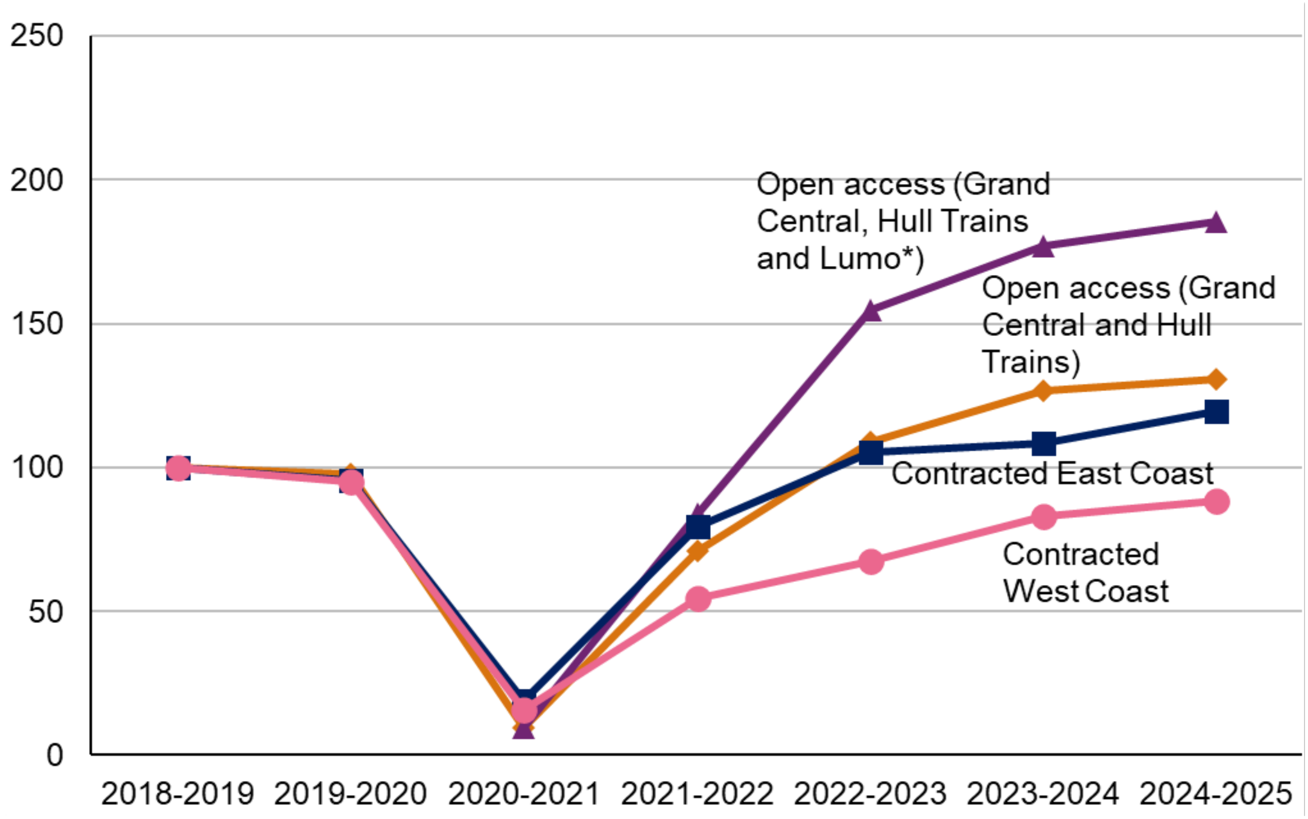
(a) both contracted and open access long-distance operators saw a very significant drop in passenger journeys caused by the pandemic, volumes falling over 80% below the 2018-19 peak year;

(b) both classes of operator saw a marked recovery of passenger journeys in each of the years following 2020-21, this being particularly true for open access;

(c) long-distance open access has recovered to approximately 75% above pre-pandemic levels as of 2024-25, however, long-distance contracted operators have only recovered to pre-pandemic levels in this same timeframe; and

(d) relative to long-distance contracted services, open access excluding Lumo appeared to see a greater flattening of the rate of growth during the 2024-2025 year, but is still over 25% above pre-pandemic levels.

Figure 1.11 Number of journeys (indexed, 2018-19=100), long-distance open access and long-distance contracted (East and West Coast), Great Britain, annual data, April 2018 to March 2025.



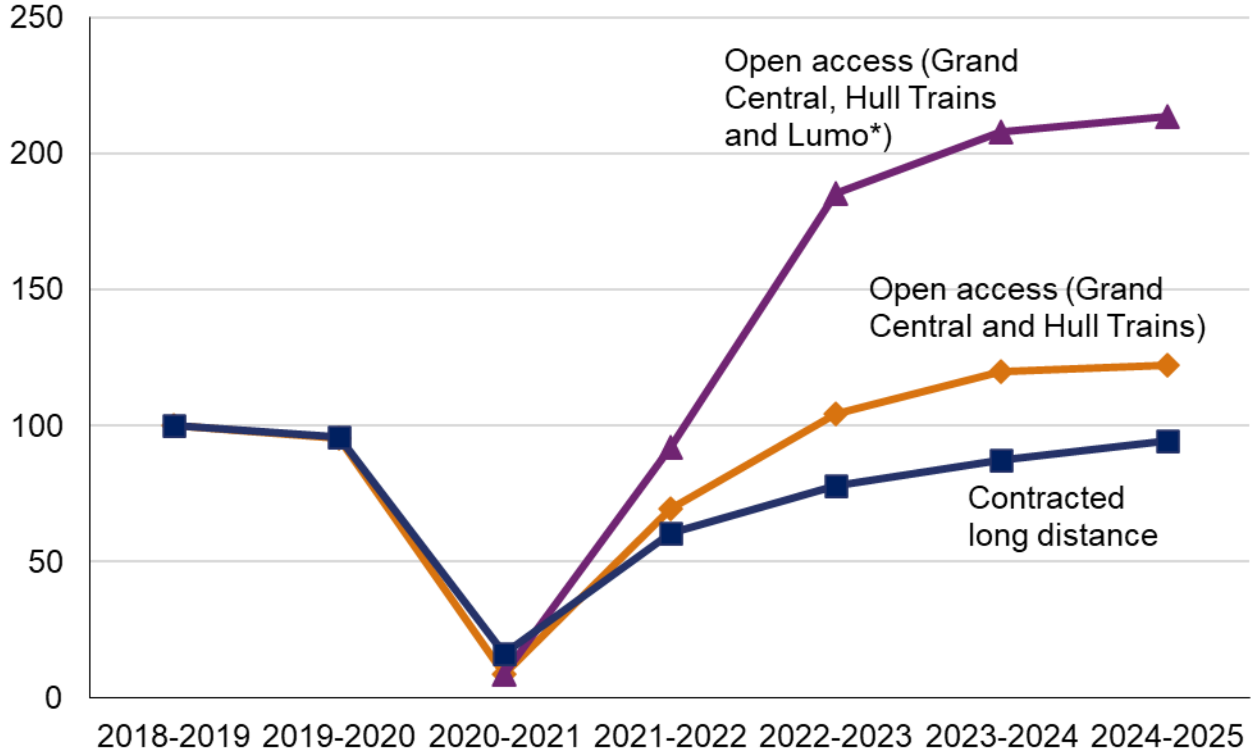
Source: ORR data portal in [Passenger rail usage statistics]

* Annual Lumo data begins in financial year 2021-22.

1.33 Figure 1.11 disaggregates the contracted operators by East and West Coast. East Coast operators, including long-distance contracted services, overall made a stronger recovery following the pandemic than operators on the West Coast.

1.34 We repeat the comparison of growth before and after the pandemic in the charts below using an alternative volume measure, namely total passenger kilometres. The results of this comparison are broadly similar to that using simple journey data, as shown in Figure 1.12. The contracted long-distance figure is then disaggregated for the East Coast and West Coast operators in Figure 1.13.

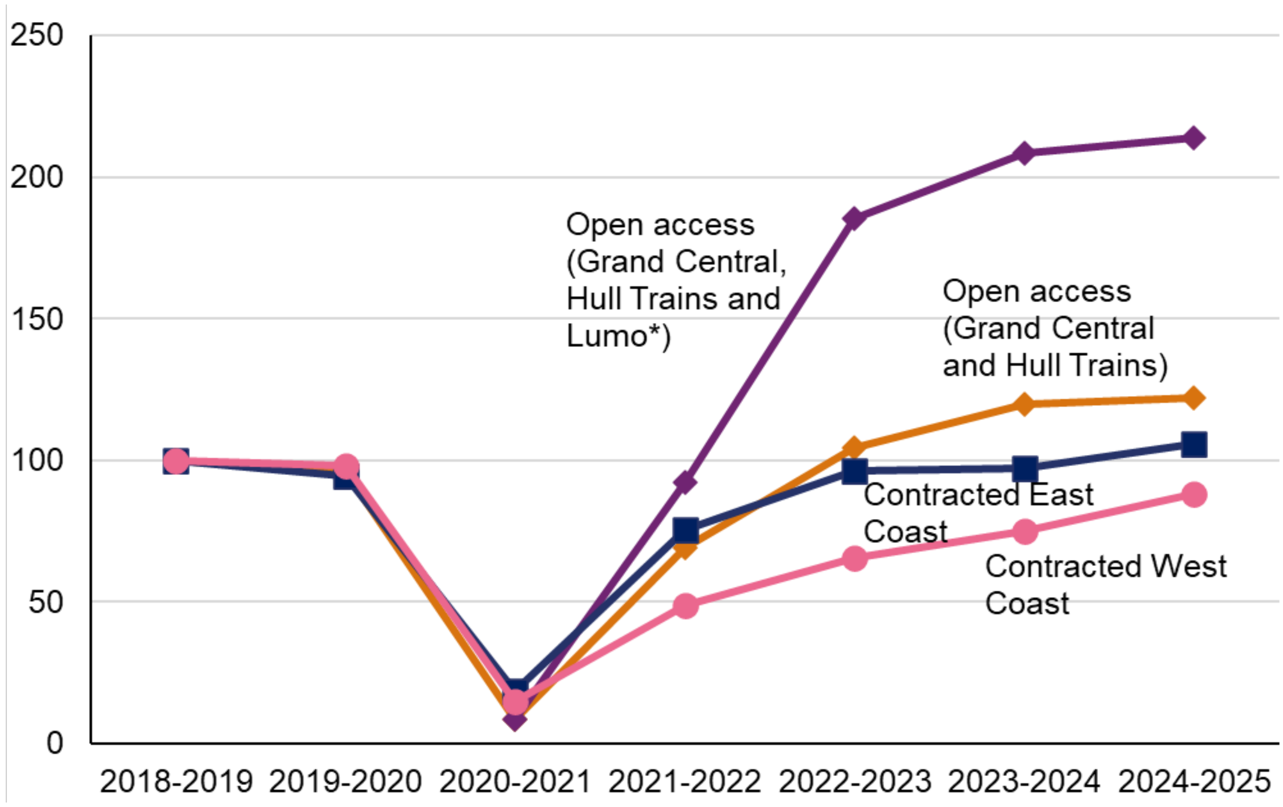
Figure 1.12 Total passenger kilometres (indexed, 2018-19 = 100), long-distance open access and long-distance contracted, Great Britain, annual data, April 2018 to March 2024.



Source: ORR data portal in [Passenger rail usage statistics]
* Annual Lumo data begins in financial year 2021-22.

1.35 In Figure 1.13 we again disaggregate long-distance operators by East and West coast.

Figure 1.13 Total passenger kilometres (indexed, 2018-19 = 100), long-distance open access and long-distance contracted (East and West Coast), Great Britain, annual data, April 2018 to March 2024.



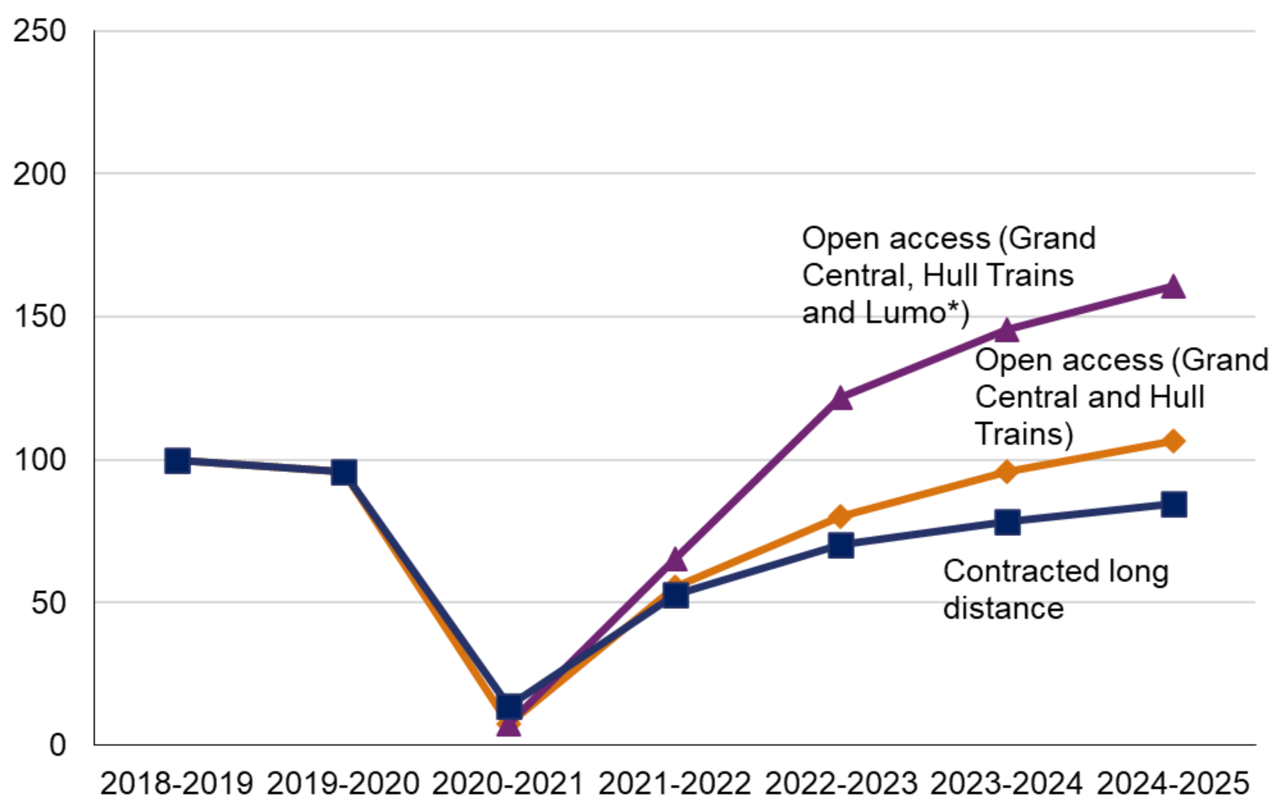
Source: ORR data portal in [Passenger rail usage statistics]

* Annual Lumo data begins in financial year 2021-22.

1.36 As with the disaggregation of passenger journeys to East and West Coast Main Lines, there has been a stronger return to growth on the East Coast following the pandemic.

1.37 In Figure 1.14 below we repeat the comparisons of post-pandemic recoveries using passenger revenue data.

Figure 1.14 Revenue (real terms, indexed, 2018-19 = 100), long-distance open access and long-distance contracted, Great Britain, annual data, April 2018 to March 2024.



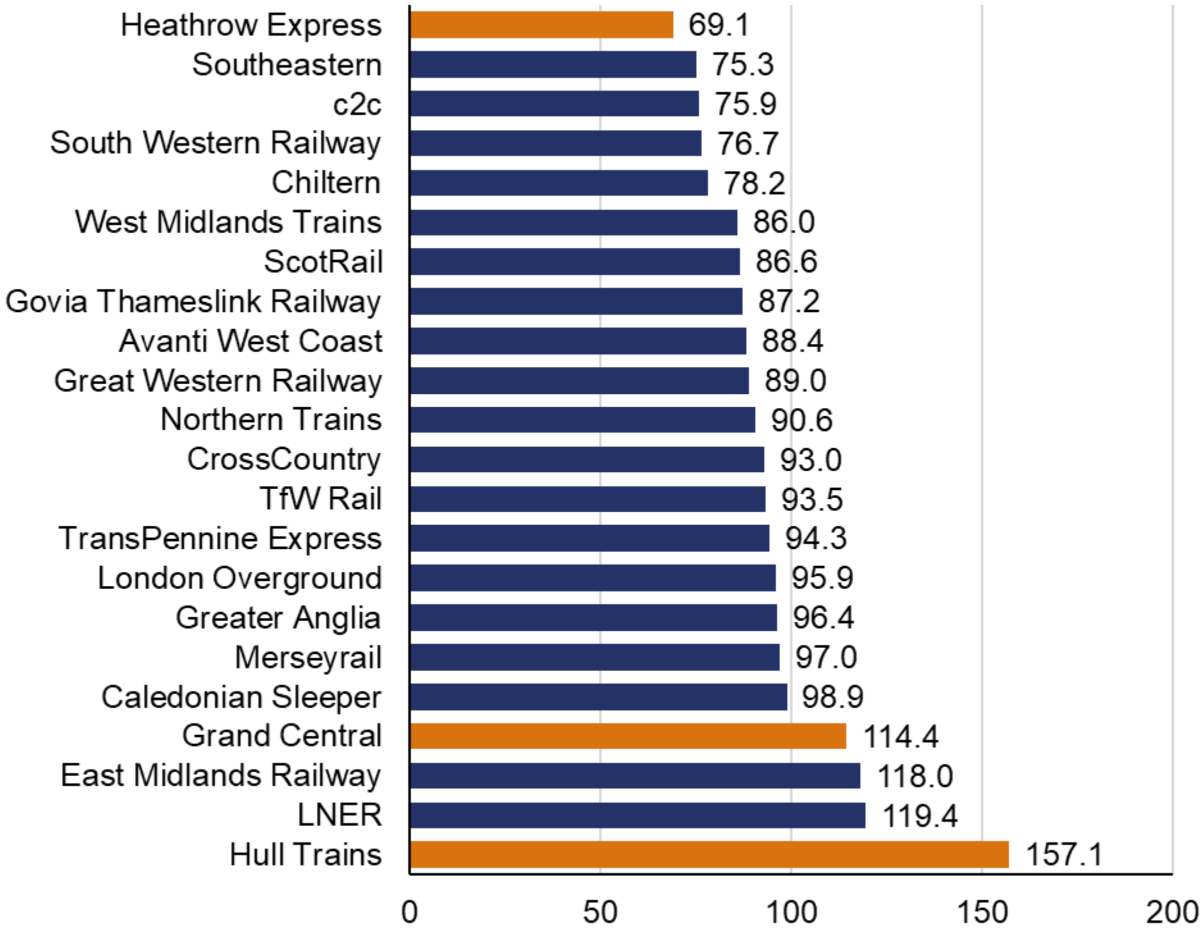
Source: Lennon data

* Annual Lumo data begins in financial year 2021-22.

1.38 The broad trajectory of revenue recovery has been very similar to that for journeys and passenger kilometres. The extent of revenue recovery appears to be greater for open access than long-distance contracted operators, albeit less strikingly so than with the volume measures.

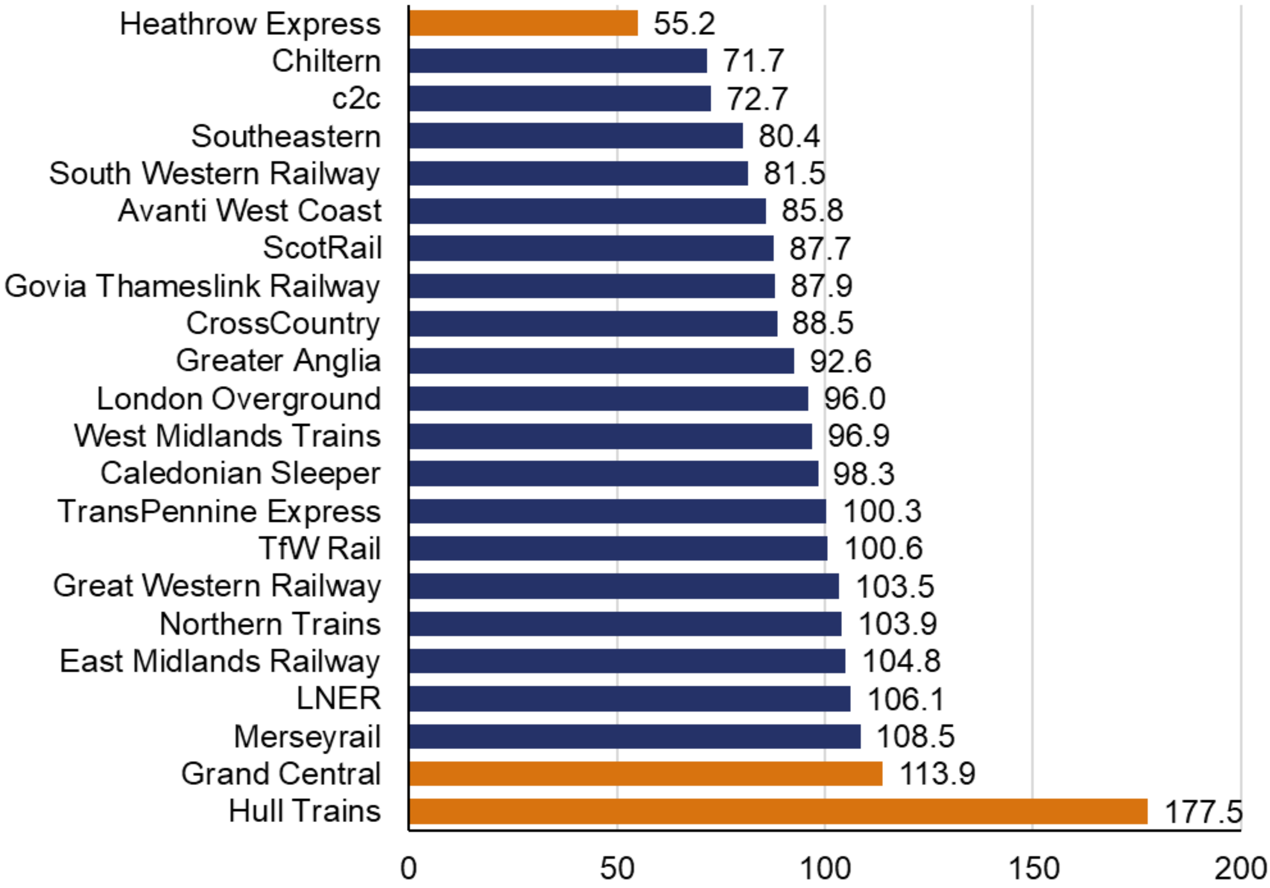
1.39 In Figures 1.15 and 1.16 below, we compare 2018-19 and 2024-25 journey numbers and passenger kilometres for all operators, across all market segments (i.e. not just long-distance) who were active in both those years, with data for open access operators highlighted. We have not included data on individual company revenues given the commercial sensitivity around these figures. We will publish company-specific revenue data for 2024-25 in the next release of our Rail Industry Finance publication.

Figure 1.15 Number of journeys, Great Britain, annual data 2024-25 compared with 2018-19 (indexed 2018-19 = 100)



Source: ORR data portal in [Passenger rail usage statistics]

Figure 1.16 Number of passenger kilometres, Great Britain, annual data, 2024-25 compared with 2018-19 (indexed, 2018-19 = 100)



Source: ORR data portal in Passenger rail usage statistics

1.40 Overall, the available post-pandemic data (Figure 1.10 to Figure 1.16) point towards a recovery in demand that is:

(a) Stronger for long-distance open access services than their long-distance contracted equivalent in terms of revenue, passenger numbers and passenger kilometres.

(b) Considerably stronger in volume rather than inflation-adjusted revenue terms, as shown in Figures 1.10-1.13 compared with Figure 1.14.

(c) Much stronger for long-distance open access operators than for the short-distance open access operator, Heathrow Express, however, the relatively slow recovery by Heathrow Express may be attributable in large part to the opening of the Elizabeth Line in May 2022.

2. Developments in the open access market since our last report

Summary of Open Access Decisions

2.1 In November 2024, we approved an application from Go-op Co-operative. This company was seeking track access contracts with Network Rail to run services between Taunton and key locations across Wiltshire and Somerset. We concluded that there was sufficient capacity on the lines that Go-op wished to access and the new service would provide new journey options for passengers.

2.2 In July 2025, we rejected applications from three companies seeking track access contracts with Network Rail to run services on the West Coast Main Line. We concluded there was insufficient capacity on the West Coast Main Line southern section for the introduction of any of the proposed services from East Coast Trains Limited (Lumo NW); the Wrexham, Shropshire & Midlands Railway Company Limited (WSMR); and Virgin Management Limited (Virgin). Additionally, we rejected an application from Hull Trains to run additional services on the East Coast Main Line, which would run to Sheffield, concluding that there was insufficient capacity and a low NPA ratio.

2.3 In July 2025 we also approved applications from three incumbent open access operators to run additional or extended services on the East Coast Main Line. Additional services were approved for Grand Central and Hull Trains, whilst service extensions were approved for East Coast Trains Limited (Lumo).

2.4 Figure 2.1 sets out a summary of past decisions on 'wholly new open access operations' from the past 10 years, including since our last report. It does not include the decisions ORR has made on supplementals for additional services. We also took decisions on open access applications over 10 years ago, but these are not included due to limitations in the comparability of records.

Figure 2.1 Table of decisions on new open access applications over the past 10 years

Date of decision	Applicant	Route	Outcome	Rationale
August 2015	Great North Western Railway Company	Blackpool North to London Euston	Approved	Passenger benefits and acceptable NPA ratio.
May 2016	Great North Eastern Railway Company	Edinburgh Waverley to London King's Cross	Declined	Low value for money/ lack of available capacity against other potential uses
May 2016	Great North Eastern Railway Company	Cleethorpes/West Yorkshire to London King's Cross	Declined	Level of abstraction/ lack of available capacity against other potential uses
May 2016	East Coast Trains	Edinburgh Waverley to London King's Cross	Approved	Passenger benefits and acceptable NPA ratio
June 2018	Great North Western Railway Company	Blackpool North to London Euston	Approved (though the service did not launch)	Acceptable NPA ratio
August 2018	Grand Southern	Southampton Central to London Waterloo	Declined	Lack of available rolling stock
January 2021	Grand Union Trains	London to Carmarthen (6 trains per day subset)	Declined	Unacceptably high absolute level of abstraction

Date of decision	Applicant	Route	Outcome	Rationale
November 2022	Grand Union Trains	London to Carmarthen	Approved	Acceptable NPA ratio and passenger benefits
November 2024	Go-op Co-operative	Services in the South West	Approved	Acceptable NPA ratio and passenger benefits.
July 2025	Virgin Management	London Euston to Preston/Rochdale, Liverpool and Birmingham	Declined	Insufficient capacity
July 2025	Wrexham, Shropshire and Midlands Railway	London Euston to Wrexham	Declined	Insufficient capacity
July 2025	East Coast Trains (Lumo)	London Euston to Rochdale	Declined	Insufficient capacity
July 2025	Hull Trains	London Kings Cross to Sheffield	Declined	Insufficient capacity and low NPA ratio

This publication is available at orr.gov.uk

Any enquiries regarding this publication should be sent to us at orr.gov.uk/contact-us