



NORTHERN

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(By email only)

26th August 2025

Dear Louise,

Northern Trains Limited response to Network Rail representations – 68th Supplemental Agreement

Thank you for inviting Northern Trains Limited (NTL) to comment on the written representations submitted by Network Rail (NR) regarding NTL's 68th Supplemental Agreement (SA). NTL's 68th SA is an access rights application seeking to amend various Schedule 5 tables in the North West to deliver the December 2025 timetable. The below constitutes NTL's response to the representations letter.

As stated in NR's representations letter, the 68th SA is not linked to any other application that NTL currently has for the December 2025 timetable change, nor did it form part of the original competing access rights applications request in May 2024 as none of the areas contained within this application were listed as part of the industry request.

NTL welcomes NR's stance that the majority of the rights sought in this application are supported as firm until the end of NTL's Track Access Contract. NTL has no further comments to make with respect to these rights.

Performance concerns on North West and Central Route

NTL note the ongoing performance concerns on the West Coast Main Line and NR's stance for new rights which interact with this location. NTL expects the same policy to be applied to other applications i.e. the rights are contingent. NTL counter proposes contingent rights for the +1 Carlisle to Preston Saturday service until the end of NTL's Track Access Contract with a view to review the performance in this area with NR so that NTL could in the future apply for a firm right. NTL believes that this approach strikes the balance between the performance concerns and NTL's ability to provide service continuity for passengers.

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Interaction with the LSWR application

NTL note in 6.2.4 that NR suggest that there should be a footnote against the Manchester Victoria <> Chester rights contained within Table 2.1 of ED10 – South Manchester – which states that the rights which have been requested (+1 Sunday right between Chester and Manchester Victoria and +2 rights between Manchester Victoria and Chester) should be for 1 year only with no presumed continuity. NTL does not support this approach suggested by NR. Firstly, if the rights are only supported for 1 year then NR should explicitly state that these are contingent rights and therefore should appear within Table 2.2 of Schedule 5 for ED10, not within 2.1 with a footnote. It should also be noted that the LSWR service, if directed, is not proposed to start until December 2026, therefore it does not stand to reason that the 3 NTL rights should be supported for 1 year only, when the LSWR services will not be operating during that period. Secondly, NTL does not believe that NR has sufficiently demonstrated why these 3 rights should be dated to expire in December 2026 as opposed to firm until the end of NTL's Track Access Contract (December 2027). It is noted that at the time of the application made by LSWR that they did not currently have the required operating licence, nor the rolling stock required to operate the proposed service. The 3 rights applied for by NTL have been accommodated within the December 2025 timetable and NTL's resource plan. Obtaining the rights as firm until the end of NTL's Track Access Contract will provide service continuity and longer-term operational certainty. A final minor point is that LSWR are proposing 6 return services on Sunday not the 8 stated in NR's representations letter. NTL believe that the 8 return services applies to weekdays and Saturdays.

If you require any further information, please do not hesitate to contact me.

Yours Sincerely,



Track Access Manager

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