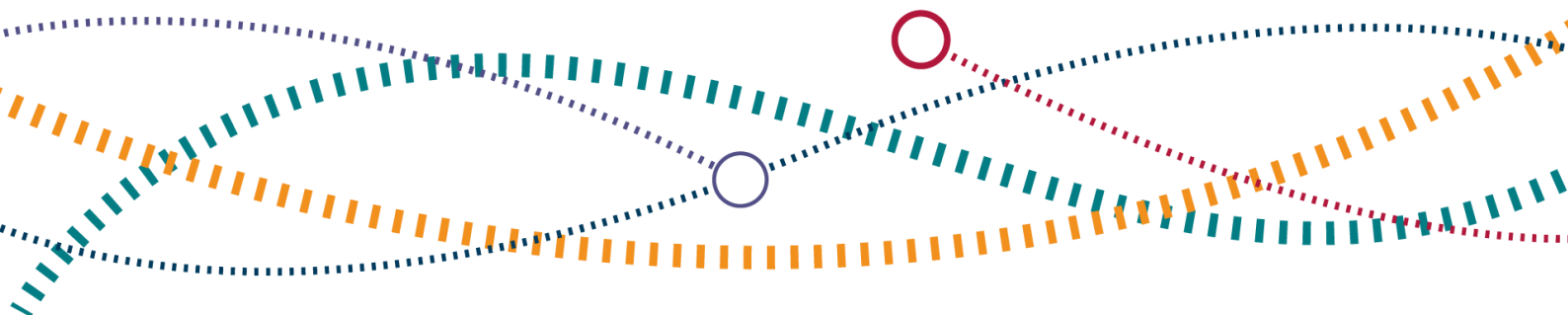




Rail industry compliance with timetable production milestones

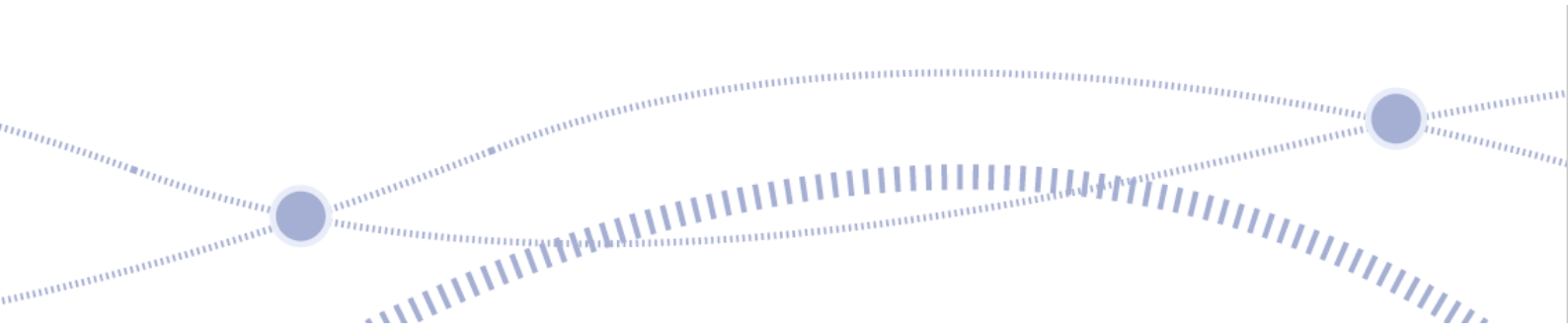
**Final May 2025 timetable change data. Current
December 2025 and May 2026 timetable change
data**

22 September 2025



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Context for this release

ORR monitors industry compliance with timetable production timescales by gathering data [Network Code](#). Operators need contractual rights to access the network and to receive higher priority in the production of the timetable. Operators can “bid” in expectation of receiving new or amended contractual rights. This is explained in more detail in the [access rights planning and use factsheet](#).

This report highlights key findings from our analysis of final data from the May 2025 timetable change. It also takes an initial look at data for the December 2025 and May 2026 timetable change.

Analysis of data from the preceding timetables is available on [our website](#).

Network Rail and industry roles

Network Rail is responsible for creating timetables for passenger and freight services. Train operators (passenger and freight) make requests to Network Rail for ‘space’ in the timetable. For details on how the rail industry produces timetables, please see our report on the [timetable development process](#).

Note on Network Code milestones

Effective timetable production is critical importance to operators, customers, and funders, and prior to the December 2024, Network Rail were not in compliance with Network Code deadlines.

As part of the periodic review 2023 (PR23), ORR set Network Rail a requirement to return the timetable process to Network Code compliance by December 2024: [PR23 final determination: settlement document for the System Operator](#).

The previous iteration of this report, published April 2025, shows that Network Rail and industry returned to using the Network Code milestones by December 2024. This report shows that the timescales for producing the May 2025 timetable were also met by both rail operators and Network Rail.

Access Rights

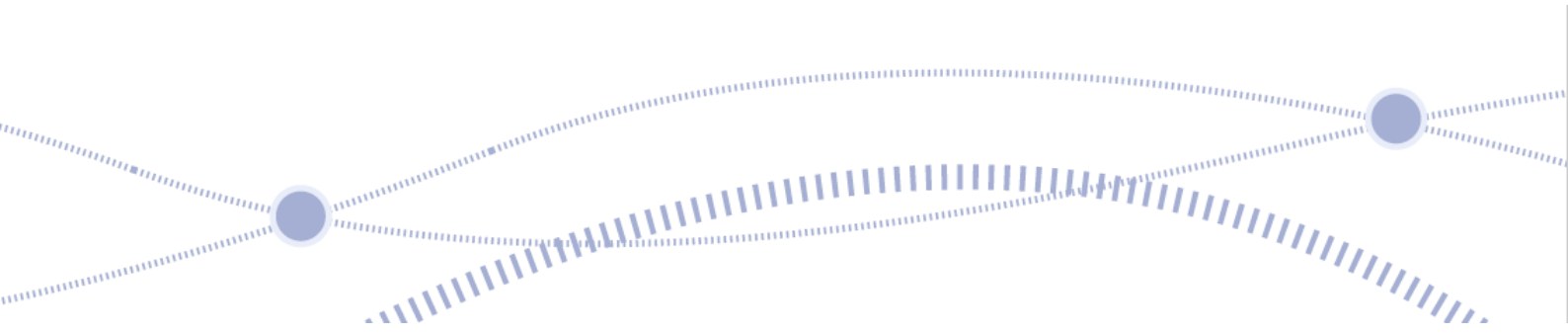
ORR publishes data and [reports on rail access](#) rights after each timetable change through the access regulatory information dashboard and accompanying access rights planning

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and use factsheet. These are helpful companion documents for comparing when operators had access rights in place against when Network Rail published the draft timetable at D-26 (26 weeks before the timetable change).

The [access rights planning and use factsheet](#) (published July 2025) shows that a high number of operators submitted applications for additional or different capacity use after D-12; within 12 weeks of the May 2025 timetable change.

D-12 is an important milestone as their network licence requires Network Rail to provide train operators with access to the timetable information at 'not less than 12 weeks before' the timetable change. Train operators are also tied to D-12 in order to meet [their commitment](#) to make tickets available for sale 12 weeks in advance of travel.



May 2025 timetable change

The data below is current as of 22 September 2025.

D-40 date – Timeliness of passenger and freight operator timetable bids to Network Rail

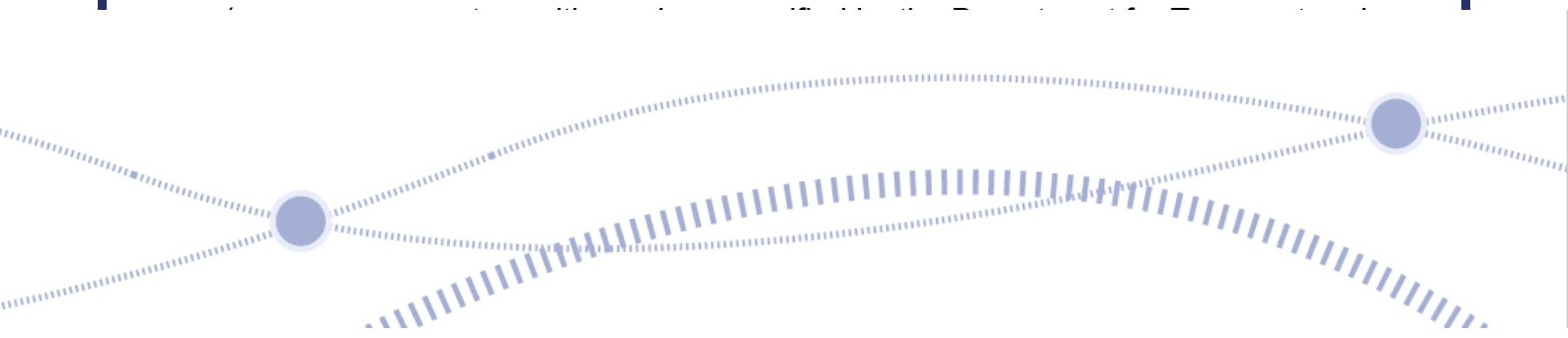
- All operators on Network Rail’s infrastructure submitted their proposed new timetables (“bid”) by the Network Code milestone 9 August 2024 (D-40).
- No operators submitted “bids” before the D-40 date.

D-26 date – Timeliness of Network Rail providing operators with the timetable

- Network Rail provided all operators with their draft timetables in line with the agreed Network Code milestone of 15 November 2024 (D-26).
- Network Rail received 436 revised bids across 15 operators before D-26, with over 90% of these coming from freight operators.
- Revisions to a bid between the original bid date and provision of the timetable (revised access proposals) are an expected part of the timetable development process. The revisions listed did not raise any concerns for Network Rail.
- The latest date of revised bid was 12 November, from Greater Anglia. Network Rail was still able to publish a draft timetable for Greater Anglia by D-26.

D-22 date – Appeals intention

- Seven operators indicated to Network Rail they intended to appeal the draft May 2025 timetable by the 13 December 2024 deadline (D-22).
- Different types of operators indicated to Network Rail they had an intention to appeal



devolved administrations and GB Railfreight). No open access operators indicated their attention to appeal.

- Four operators subsequently submitted appeals related to the May 2025 timetable to the Access Disputes Committee* (ADC). These were Govia Thameslink Railway, XC Trains (CrossCountry), Transport for Wales and GB Railfreight. The fact there was not seven appeals submitted reflects work done by Network Rail to address the matter or a change in an operators' position.

*This is based on data from the [ADC website](#) which lists its determinations.

Cases linked to the May Timetable can be found under references:

- TTP2568;
- TTP2569;
- TTP2570; and
- TTP2571

Timetable appeals are referred to the [independent ADC](#) in the first instance to resolve issues on behalf of industry. Once an ADC Hearing Chair has made his/her determination, parties may choose to appeal against that determination to ORR. For more information on timetable appeals (disputes) the ADC has produced a [historical report](#).

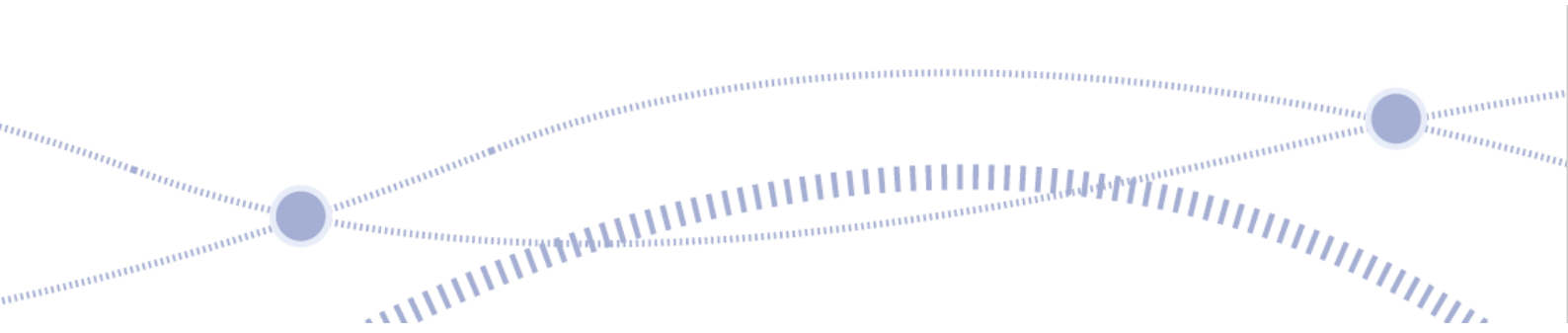
Train Operator Variation Requests (TOVRs)

Train and freight operators can request a variation to the base timetable after it is published at 26 weeks before the timetable starts (D-26). This is called a Train Operator Variation request, or 'TOVR.' Network Rail will either accept, reject or modify the request.

Freight operators will often identify space in the timetable and use TOVRs to demonstrate their services can operate without undermining network performance, before applying for contractual rights.

TOVRs are an important part of the timetable production process and can allow capacity to be used effectively. TOVRs provide flexibility in the timetable production process by allowing additional or amended services from passenger and freight operators to be included in the timetable after the base timetable is published.

However, having a high number of TOVRs (passenger or freight) can create instability. TOVRs made within 12 weeks of the timetable entering operation can impact on the release of final timetables to train and freight operators and subsequently passengers.



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We are currently collecting data on the total number of TOVRs made by operators. A higher number of TOVRs might suggest more work would be required to finalise the draft timetable. However, as it does not take into account the complexity of each TOVR or the number of services affected, the data is limited in what it can tell us about the impact of TOVRs on timetable production and information to passengers. We plan to develop our analysis further in future.

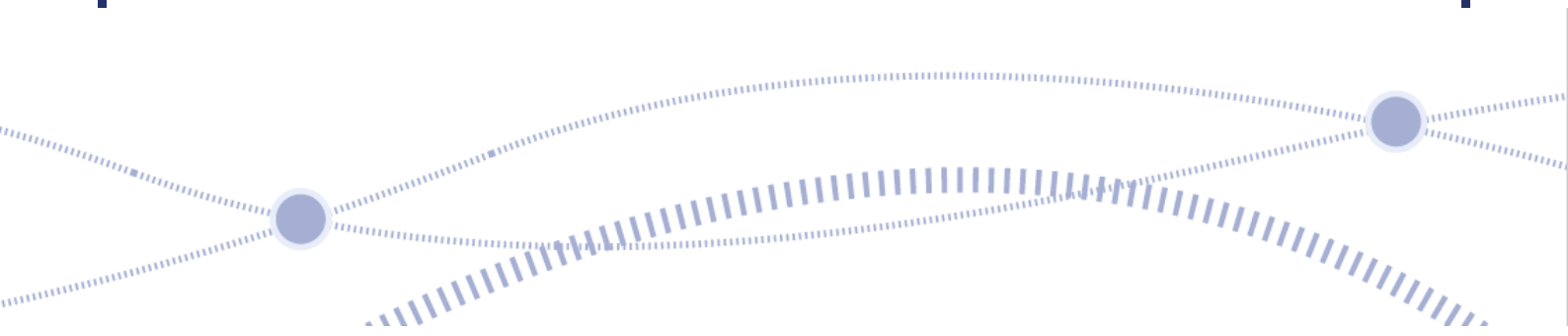
- A total of 696 Train Operator Variation Requests (TOVRs) were made in the 26 weeks before the May 2025 timetable came into operation, compared to 1,572 for December 2024 and 1,935 for June 2024.
- For May 2025, 421 of these TOVRs were made with less than 12 weeks to the timetable change. This accounts for 60% of the total.

Freight Operators

- We (and industry) expect freight operators to have a high number of TOVRs because of their business model, which relies on identifying and bidding for unused capacity in the base timetable. Nonetheless, TOVRs can introduce complexity in finalising the timetable.
- 337 (48%) of TOVRs for May 2025 were requested by freight operators. This significantly decreased from December 2024 where 1,272 TOVRs were requested by freight operators, accounting for 81% of the total of all TOVR requests.
- The amount of TOVRs submitted by freight operators with more than 8 weeks to the timetable change has also decreased in volume, in addition to as a proportion of the total number of all TOVRs from 500 (71%) in December 2024 change to 210 (62%) in May 2025.
- This may suggest a robustness in the submission of TOVRs from freight operators which has allowed them to make earlier requests to Network Rail.

Franchised Passenger operators

- Of the passenger operators, TransPennine Express and ScotRail had some of the highest number of TOVRs for the May 2025 timetable change. These operators also had more TOVRs than other passenger operators in the December and June 2024 timetable changes.

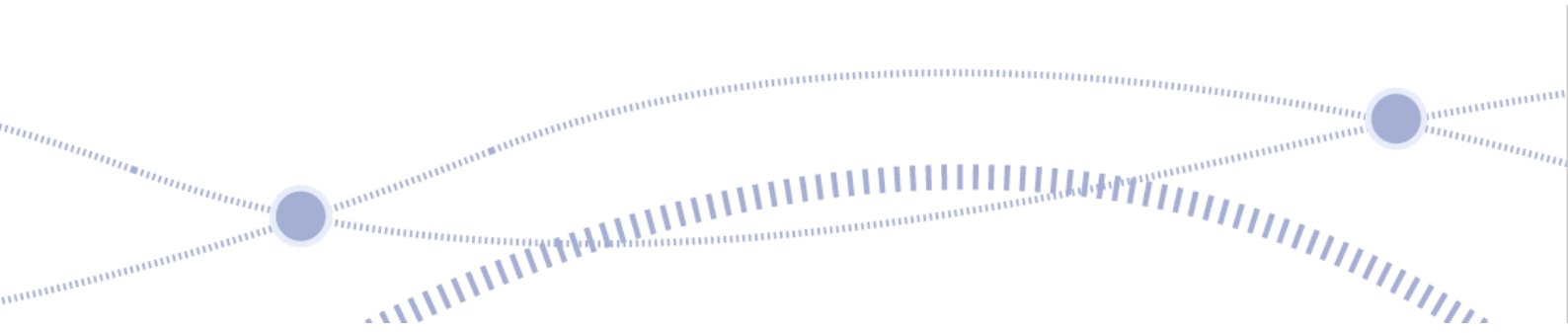


Office of Rail and Road | Final May 2025 timetable change data. Current December 2025 and May 2026 timetable change data

- Passenger operators have accounted for a greater proportion of the total of all TOVRs submitted for the May 2025 timetable change than in previous years.
- For May 2025, 350 passenger operator TOVRs were made (50% of the total of TOVR requests from all operator types). This is an increase in both quantity and proportion of the total number of TOVRs from all types of operator.
- For December 2024, 274 passenger operator TOVRs were made (17% of the total)
- For June 2024, 233 passenger operator TOVRs were made (12% of the total).
- Of the 350 passenger operator TOVRs for May 2025, 212 of these were made less than 12 weeks before the timetable change.

Open Access operators

- Open access operator TOVR requests remain low, with only seven submissions for May 2025 which all came from Grand Central.
- Of the seven TOVR requests, four were submitted with less than 12 weeks until the Timetable change.



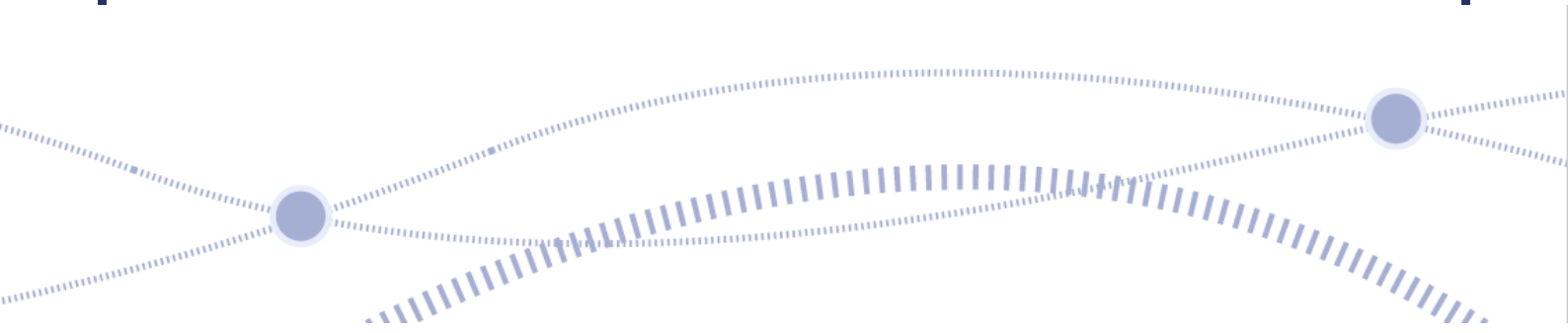
December 2025 timetable change

The data referenced below is current as of 22 September 2025.

D-40 date – Timeliness of passenger and freight operator timetable bids to Network Rail

- The D-40 date specified by the Network Code was 7 March 2025.
- All operators bar one submitted bids for the December 2025 timetable change on or before 7 March 2025.
- Devon and Cornwall Railways submitted their bid three days past the D-40 deadline, on the 10 March 2025.
- Ten operators submitted their bid before the D-40 deadline of 7 March 2025.

D-26 date – Timeliness of Network Rail providing operators with the timetable

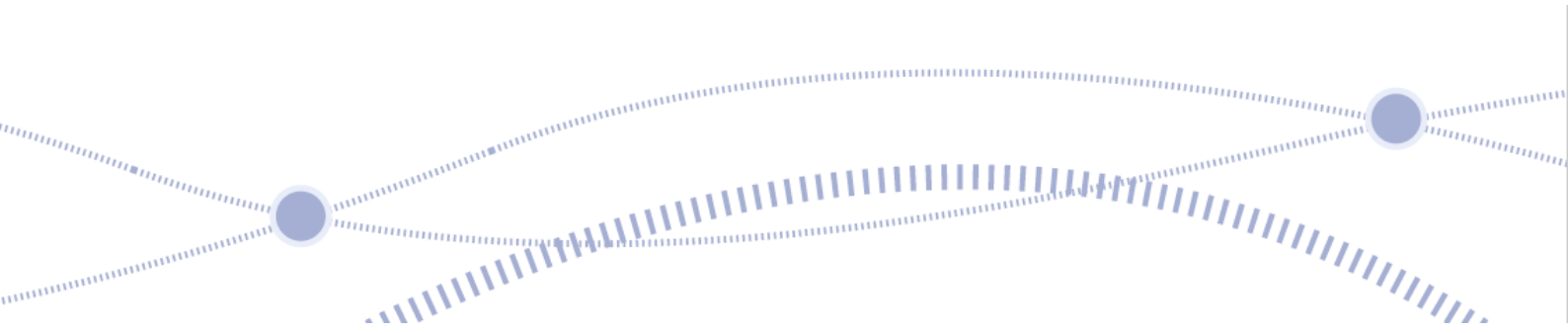
- Network Rail provided all operators with their draft timetables in line with the agreed Network Code milestone of 13 June 2025 (D-26).
 - The December 2025 timetable had a lower number of revised access proposals between D-40 and D-26, at a value of 296, compared to 436 for May 2025. The revised access proposals came from 17 different operators (passenger, freight, and open access).
 - The number of freight revised access proposals continues to be much higher than for passenger and accounted for 91% of all revised access proposals for December 2025 and 90% for May 2025.
 - Revisions to a bid between the original bid date and provision of the timetable (revised access proposals) are an expected part of the timetable development process.
 - It is not possible at this stage to indicate if the revised access proposals are
- 

the draft timetable by Network Rail and subsequent need for access rights or flexibility.

D 22 date – Appeals intention

- Seven operators indicated they intended to appeal aspects of the draft December 2025 timetable by the 11 July deadline (D-22). This is the same as the number of operators who indicated to Network Rail they might appeal the May 2025 timetable.
- Operators with services specified by the Department for Transport, Welsh Government and Rail for London, Freightliner Intermodal and GB Railfreight told Network Rail they might appeal elements of the December timetable.
- Eight operators subsequently lodged appeals related to the December 2025 timetable with the Access Disputes Committee*. This is more than the initial number of operators who had indicated that they might appeal, and significantly more than the number that appealed the May 2025 timetable.

*This is based on data from the [ADC website](#) which lists its determinations.

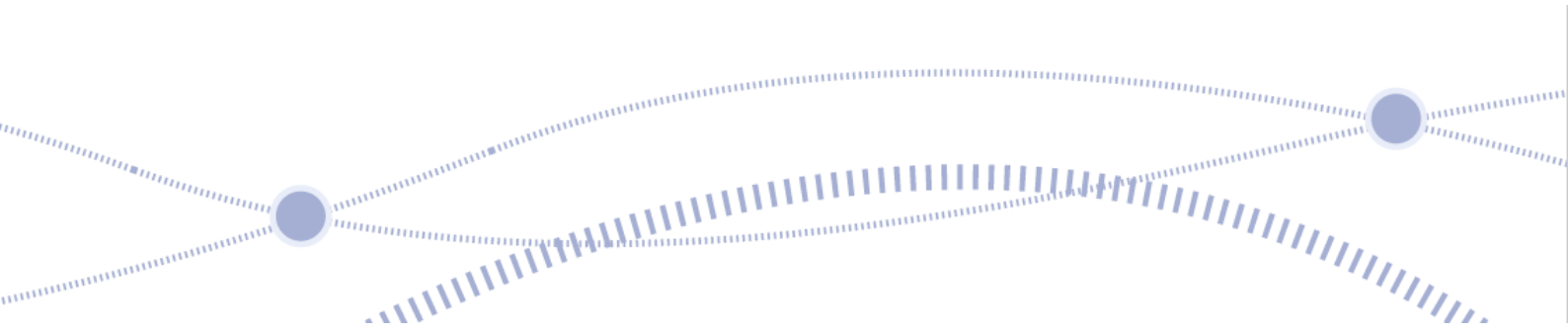


May 2026 timetable change

The data referenced below is current as of 22 September 2025.

D-40 date – Timeliness of passenger and freight operator timetable bids to Network Rail

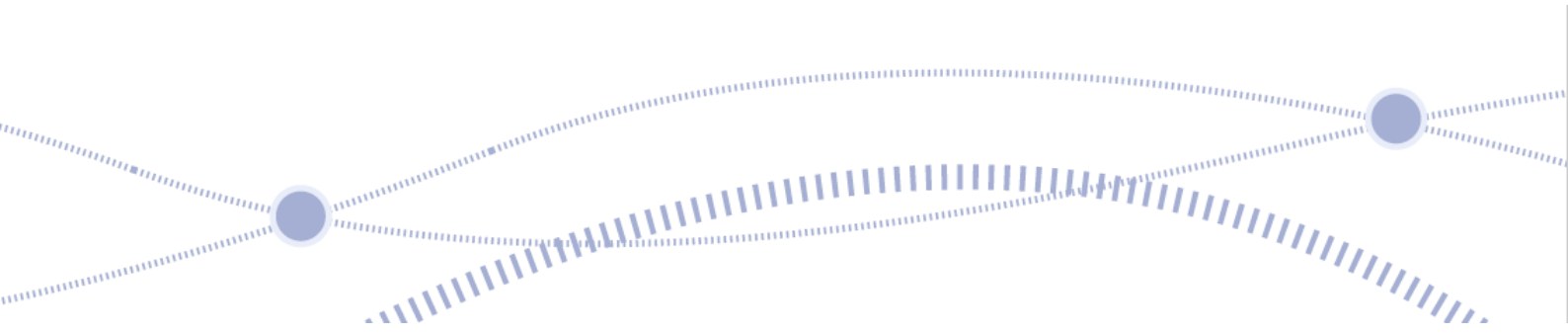
- The D-40 date specified by the Network Code was 8 August 2025.
- Nine operators submitted bids before the D-40 date, the earliest of which was Sheffield Super Tram who submitted a bid 16 days early.
- One operator, Direct Rail Services, did not meet the D-40 date and submitted two days late.



Next publication date

Final data for the December 2025 timetable change will be published [on the ORR website](#) in March 2026, along with an updated view of data for the December 2025 timetable change.

Updated data tables and charts will also be available.





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