



Richard Turner
Customer Relationships Executive
Network Rail Infrastructure Limited
1 Holbrook Way
Swindon
SN1 1BD

Alice Kaiser
Office of Rail and Road
25 Cabot Square,
London
WC2B 4AN

29th August 2025

Network Rail Infrastructure Limited Representations for the 301st Supplemental Agreement submitted under Section 22A of the Railways Act 1993 for the Track Access Contract between Network Rail Infrastructure Limited and First Greater Western Limited dated 04 March 2016.

1. Purpose

- 1.1. This letter provides further representations from Network Rail Infrastructure Limited (NRIL) for the 301st Supplemental Agreement submitted under Section 22A of the Railways Act 1993 for the Track Access Application between Network Rail Infrastructure Limited and First Greater Western Limited (FGWL) dated 04 March 2016.
- 1.2. This representation builds upon the representations submitted by NRIL for this application on the 23 June 2025.
- 1.3. The purpose of this further representation is to provide ORR with updates following NRIL's capacity analysis, Timetable Pathing Analysis and Level Crossing analysis and will do so by providing facts, data, evidence to support our current position.
- 1.4. NRIL can confirm that for the reasons set out in this letter, NRIL is currently unable to support FGWL's 301st Section 22A and requires further work to be undertaken to help inform NRIL's final representations in this respect.

2. Background of the Application and Network Rail Representations

- 2.1. NRIL provided its initial representations on 23rd June 2025 detailing that we had not had sufficient time to work with FGWL on this application. NRIL also commented that due to the complexity of the interaction between the proposed access and existing services, along with the need to complete the evaluation of level crossing risk mitigations, operational considerations coupled with other live unsupported applications, NRIL commented that it was unable to make final representations in these areas, and that NRIL also needed to consider the effects on the resilience of the timetable, including firebreaks.

3. Review of Supplemental Agreement and Form P

- 3.1. NRIL noted that within FGWL's 301st SA, in Table 2.2 for Service Group EF01, footnote 1 which relates to the existing Saturday Bristol <> Oxford access rights EF01.221, is amended to change its expiry date to May 2026 instead of the December 2025. NRIL sought clarity from FGWL whether this is in fact part of

FGWL's 301st SA. NRIL commented at the time that we were internally consulting the rights to extend in their current form for a further timetable period commencing December 2025 in line with the interim approach. NRIL can confirm that these rights form part of the 109th Supplemental Agreement which is currently undergoing industry consultation. These rights are also within FGWL's 201st Section 22A application, sought as Contingent to the expiration of the Track Access Contract.

- 3.2. FGWL, on 1st July 2025, confirmed to ORR that in response to NRIL's representation and specifically paragraph 3.1 of NRIL's initial representations, FGWL is agreeable to take the interim approach forward as per NRIL's suggestion. NRIL would like to highlight that it has not seen a revised Form P and Supplemental Agreement issued to ORR.

4. Access Rights Sought in the Application

- 4.1. The rights sought in this application are for:

Timetable	Route (via Didcot west curve)	SX Services	SO Services
SCD 2026	Bristol Temple Meads to Oxford	8	8
SCD 2026	Oxford to Bristol Temple Meads	7	7
SCD 2027	Bristol Temple Meads to Oxford	16	16
SCD 2027	Oxford to Bristol Temple Meads	15	15

5. Capacity - Possible Interactions with Other Applications from 20th May 2024

- 5.1. Capacity Analysis has been undertaken which takes into consideration the FGWL Bristol <> Oxford services as well as aspirations of another operator at Bristol Temple Meads.
- 5.2. Following the work undertaken by NRIL, NRIL can advise that the Bristol to Oxford services would primarily use Platforms 11 to 15 at Bristol Temple Meads. These services will arrive between xx:10 and xx:20 and will shunt via Bristol West Junction to free up platforms due to a turnaround time of approximately 55 minutes before departing again between xx:10 and xx:20. Although the plan works, this will require significant re-platforming of other services to provide suitable platform capacity, although no major retiming's are necessary.
- 5.3. The train paths for the Bristol to Oxford services follow the 2Cxx Gloucester to Westbury/Weymouth services to Bathampton Junction, the 1Lxx Cardiff Central to Paddington services from Wootton Bassett Junction to Foxhall Junction, and either freight or 1Pxx Paddington to Oxford services from Didcot North Junction 2.
- 5.4. For the Oxford to Bristol services, the paths follow the 1Pxx Oxford to Paddington services from Oxford, the 1Gxx Paddington to Cheltenham Spa services from Foxhall Junction to Swindon, and there is a clear path between Swindon and Bristol Temple Meads.
- 5.5. The platforming summary for Oxford indicates that the services typically use Platform 4 at Oxford and shunt into the Oxford Turn Back Line, then shunt back onto Platform 4. Two out of fifteen schedules depart from Platform 3 instead due to Platform 4 being occupied. The standard plan at Oxford involves 2-3 minutes to detrain, shunting to the sidings for around 20 minutes, and then arriving back in the platform for around 2-3 minutes before departure. The Capacity Analysis is available upon request.
- 5.6. NRIL is satisfied from the work undertaken to date from a capacity perspective based upon the timetable pathing analysis that FGWL's proposed services are Train Planning Rules (TPR) compliant. However, NRIL is unable to provide certainty in this area for the May 2026 timetable production cycle and NRIL will furnish an update as soon as it is able to qualify this point.

6. Complex and Competing Applications

- 6.1. ORR's position in its letters to Industry of 24 April, 1 November 2024, and 07 May 2025, stated that it may not make decisions on access rights notified after 20 May 2024 until it makes directions on those applications submitted in time. It is worth noting that NRIL has already outlined in its final representation to ORR that it is unable to support a number of access rights sought under the 20th May 2024 Interacting Access Rights applications; therefore, if ORR were to direct in line with what FGWL has submitted in this application, the assessments in connection with the FGWL 301st S22A could be impacted.

6.2. NRIL is anticipating growth in traffic and, therefore an increase in access rights sought for services from a mix of existing operators and aspirant open access operators within the geography of the Western route.

6.3. NRIL is aware of competing aspirations for capacity on Western, in particular an hourly path between Swindon and Didcot Parkway. Analysis undertaken to date confirms that there remains potential for this area of the network to support one additional service in each direction per hour.

6.4. Current analysis of the proposed paths for both May 2026 and May 2027 has demonstrated that the Oxford <> Bristol corridor paths sought by FGWL are TPR compliant and can be accommodated within the timetable, but NRIL's assertion in Paragraph 5.6 withstands.

7. Submitted track access applications interacting with the geographic area of the FGWL proposal:

7.1. Interacting Locations Matrix - Oxford

Operator/Application/Type	WCM south	Birmingham	BHM-Derby	Derby-Sheffield	Sheffield	ECM&Leeds	Oxford	Gloucester	Cardiff
CrossCountry 38th SA 22a		x	x	x	x	x	x	x	x
DBC 79th SA 22a			x			x	x		x
DBC 81st SA 22a		x	x	x	x	x	x	x	x
DBC 84th SA 22a							x		
DCR 2nd SA 22a	x	x	x	x		x	x		
FLHH 24th SA 22A	x						x		
FLHH 25th SA 22A	x	x	x	x	x	x	x	x	
FLHH 27th SA 22A	x	x	x	x	x	x	x	x	x
FLHH 28th SA 22A	x	x	x	x	x	x	x	x	x
FLIM 21st SA 22A		x	x	x	x	x	x		
FLIM 22nd SA 22A	x	x	x	x	x	x	x		
FLIM 24th SA 22A	x	x	x	x	x	x	x		
FLIM 25th SA 22A	x	x	x		x	x	x		x
FLIM 26th SA 22A	x			x	x	x	x		x
GBRf 25th SA 22a	x	x	x	x	x	x	x		
GBRf 34th SA 22a	x	x	x	x	x	x	x	x	x
GWR 201st SA 22a							x	x	

7.2. In addition to applications submitted to ORR by 20 May 2024 as part of the “Competing and/or complex track access applications for December 2024, May 2025 and December 2025 timetable changes” workstream, ORR will be aware that there have been several applications submitted since then where some of the aspirations utilise part of the same geography as the rights in this FGWL application, namely;

- Midland, Central, Western Railway (MCWR) (Nottingham <> Bristol Temple Meads)
- Grand Central (Newcastle <> Brighton)
- Lumo (London Paddington <> Paignton)
- Lumo (London Paddington <> Hereford)

8. Performance

8.1. In December 2023 performance at Oxford was above the national On Time WTT performance, 65.2% Nationally compared to 68.6% at Oxford. This location had an On Time WTT percentage 63.3% for FGWL. Comparably in June 24 at Oxford is above the national On Time WTT performance, 61.9% Nationally compared to 64% at Oxford. This location had an On Time WTT percentage 59.8% for FGWL. While FGWL has lower performance compared to other operators, it should be noted that FGWL has the most services operating at Oxford in both timetables and are therefore likely to be the most impacted by delay causing incidents.

8.2. In both timetables Oxford performance by hour, throughout the day, shows steady morning peak performance (up to 10:00) before performance decreases slightly with no recovery of performance until 2100.

	On Time %	Time to 3 %	Time to 5 %	Recorded WTT Points
0000 - 0059	58.5 %	79.9 %	88.6 %	790
0100 - 0159	72.5 %	79.8 %	82.8 %	233
0300 - 0359	95.5 %	97.3 %	98.2 %	110
0500 - 0559	89.4 %	94.4 %	97.0 %	677
0600 - 0659	78.0 %	90.8 %	94.5 %	1,889
0700 - 0759	71.8 %	85.0 %	90.5 %	1,958
0800 - 0859	67.1 %	84.2 %	90.7 %	1,872
0900 - 0959	75.0 %	86.4 %	91.9 %	2,014
1000 - 1059	46.5 %	67.6 %	79.2 %	1,551
1100 - 1159	54.4 %	71.7 %	81.9 %	1,755
1200 - 1259	59.5 %	72.7 %	81.4 %	1,666
1300 - 1359	58.6 %	75.4 %	83.6 %	1,750
1400 - 1459	60.3 %	75.7 %	84.6 %	1,536
1500 - 1559	61.6 %	78.9 %	85.8 %	2,138
1600 - 1659	56.3 %	74.3 %	82.1 %	1,920
1700 - 1759	60.8 %	74.8 %	82.6 %	1,813
1800 - 1859	60.6 %	74.7 %	83.1 %	1,856
1900 - 1959	57.0 %	72.7 %	81.7 %	1,823
2000 - 2059	59.3 %	72.2 %	80.3 %	1,589
2100 - 2159	71.5 %	84.2 %	89.3 %	1,679
2200 - 2259	73.0 %	86.8 %	91.6 %	1,623
2300 - 2359	72.3 %	85.7 %	90.3 %	949

8.3. In December 2023 Congestion delay shows that south of Oxford, Didcot North Jn <> Oxford services linking to the Western Mainline (MLN1) suffered the most reactionary delay attributed to delay caused by a late running service. The most prominent services involved are FGWL services impacting other FGWL services but also impacting other operator services. The FGWL Hereford to London Paddington 1P service frequently impacted the FGWL Oxford to Didcot Parkway 2L services. Similarly in June 2024 Congestion delay showed that south of Oxford > Wolvercote Jn, Didcot North Jn <> Oxford services suffered the most reactionary delay attributed to delay caused by a late running service.

8.4. In summary, both timetables at Oxford shows steady performance across the day with a slight dip post morning peak, but performance levels stay relatively stable.

8.5. NRIL's Performance and Simulation Team (P&ST) has carried out Timetable Pathing Analysis which has resulted in the Timetable Pathing Commentary as shown in Appendix A against the proposed introductions of the Bristol <> Services and a summary is provided below. To avoid any misunderstanding regarding operational compliance and performance reporting, please note the following clarification concerning the wording in the Timetable Pathing Commentary.

8.6. In examples such as: "1D61: Runs 1 minute (m) behind 1L62. In Dec '24 this 1L had an OT of 63.9% at Swindon..." Key Point:

- The phrase "Runs 1m behind" refers to the service operating on minimum headway plus one minute behind the leading service.
- This timing should not be interpreted as reflecting a plan that is non-compliant with TPRs. All plans referenced are TPR compliant.
- The performance figures—such as the Time to 1 On Time percentage stated ("63.9% at Swindon")—are provided for context and do not indicate that the planning or operational arrangements fail to meet regulatory or safety standards.
- This clarification aims to ensure that readers do not misconstrue that service performance is

based on plans that do not adhere to required headways or compliance rules.

8.7. **Colour Scheme Key** - For ease of reference, the following colour scheme is used within the Timetable Pathing Commentary grid:

- Blue: No identified risk
- Light Yellow: Observation
- Yellow: Small or unquantifiable risk
- Orange: Notable Risk
- Red: Major risk or Conflict

8.8. This key should be included with the grid in all distributions to ensure consistent understanding of the risk classifications.

8.9. Key risks for Oxford to Bristol services are the fast formation of some services from ECS. This shows a general risk around the number of ECS movements at Oxford due to lack of south facing platform capacity. Some services run close behind 1D services through Didcot, and 1Gs through Uffington. Some services follow poorly performing services through North Somerset Jn.

8.10. Key risks for Bristol to Oxford services are following 20 services around Bathampton Jn. These services are not stand out good performers. Multiple services run close behind 1L services from Swindon. The risk varies depending on the performance of the preceding service and headway between the two services. At Oxford, services often have fast reoccupations behind departing ECS services, with short dwells before departing as ECS themselves.

8.11. ORR will be aware NRIL's Wales and Western Region is at Level 2 of the Regulatory escalator regarding performance delivery within the region, and this has been subject to an ORR investigation. Therefore, the below information is provided for, against the FGWL 301st Section 22A, should be read with this in mind.

8.12. In summary, based upon the performance risk assessment work undertaken to date, NRIL is unable to support the aspirations in this application at this stage. Therefore, owing to the concerns that the Timetable Pathing Analysis has demonstrated, NRIL will shortly be undertaking further performance work and this workstream is expected to take around 8 weeks.

9. Level Crossings:

9.1. NRIL's review identified 13 level crossings that would be affected by the proposed FGWL services. Risk modelling shows an average increase in risk at these crossings, with no decreases, and the Level Crossing Mitigations and Alternatives Risk Assessment (Appendix B) outlines potential mitigations and alternatives. Notable crossings like Wantage Road and Grove require collaboration and funding for viable diversions or closures, while others such as Canalside 1 and Bathampton may need upgrades including footbridges or Overlay Miniature Stop Light (OSML) systems, each with substantial associated costs.

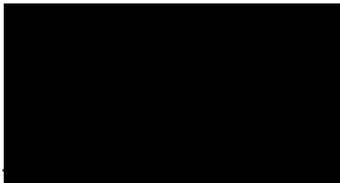
9.2. There are a number of crossings, such as Causeway, Stocks Lane, Appleford, Upper Studley, and Christian Malford, maximum protection levels have already been reached, meaning no further action can be taken to mitigate risk. In cases where no alternative routes exist, negotiations and improvement works are planned, although some, including Tuckwells and Kennington, present additional challenges due to

infrastructure limitations or pending development projects.

9.3. NRIL requests that, should ORR direct in line with what FGWL are seeking in this application, ORR include as a condition to the decision a total contribution of £1.75 million on FGWL to help fund mitigation measures. The Level Crossing Risk mitigation workstream demonstrates that risk management is a critical component of introducing new services, requiring investment in infrastructure improvements, legal negotiations, and ongoing risk reduction efforts to ensure safety at affected crossings.

10. **Conclusion**

10.1. In this letter, NRIL states that while FGWL's proposed services meet TPR requirements as far as the Timetable Pathing Analysis work undertaken to date is concerned; however, until the development of the May 2026 Timetable Production Cycle is concluded, NRIL reserves its position in this respect. There are also concerns about higher risk levels at Level Crossings and performance impacts. NRIL will conduct further performance work before providing final representations and this work is anticipated to take around 8 weeks, after which NRIL will review the outputs of this with a view to furnishing ORR with another representation for this application in early November 2025.



Richard Turner

Customer Relationships Executive

Appendices

Appendix A - Performance and Simulation Team (P&ST) Timetable Path Commentary
Appendix B - Level Crossing Mitigations and Alternatives Risk Assessment