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23 June 2025

Dear Alice,

Network Rail Representations for the proposed 301st Supplemental Agreement to the Track Access Contract between Network Rail Infrastructure Limited and First Great Western Limited dated 04 March 2016.

1. As directed in your letter to Network Rail Infrastructure Limited (NRIL) dated 02 June 2025, this letter provides NRIL's initial representations in respect of First Great Western Limited's (FGWL) Section 22A application to the Office of Rail and Road (ORR) on 27 May 2025 to operate the following weekday (SX) and Saturday (SO) services initially from the Subsidiary Change date (SCD) in 2026:

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

- 1.1 NRIL has not had the opportunity to work on this application with FGWL due to time constraints; however, since NRIL were made aware of the application formally on 27 May 2025, analysis commenced on the application to assess the impact it would have on the network. This letter serves as our initial response to the application. 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 is not yet able to make final representations in these areas. NRIL will also need to consider the effects on the resilience of the timetable, including firebreaks.

2. Interested Persons

- 2.1 NRIL is not aware of any persons categorised by the definition of "Interested Persons" in paragraph 1 of Schedule 4 of the Railways Act 1993 in relation to the 301st SA application made by FGWL.

3. Review of Supplemental Agreement and Form P

- 3.1 NRIL note 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 their expiry date to May 2026 instead of the December 2025. NRIL would like clarity from FGWL whether this is in fact part of FGWL's 301st SA. NRIL would also comment that it is currently consulting internally with NRIL the existing Schedule 5 Table 2.2 Bristol <> Oxford Contingent rights for a further timetable period commencing December 2025 in line with the interim access rights policy. While the internal consultation is still progressing, it is hoped that NRIL will be able to support Contingent rights one-timetable period commencing December 2025.
- 3.2 NRIL note that in the Annex that details the proposed marked-up Schedule 5 tables accompanying FGWL's 301st application, in Schedule 5 Table 4.1 for Service Group EF01, the entry in the Regular Calling Pattern for Oxford to Bristol Temple Meads should be reordered as, "Swindon, Chippenham, Bath Spa".

4. Oxford Performance

- 4.1 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 2024 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 is, therefore, likely to be the most impacted by delay causing incidents.

	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

- 4.2 In both timetables, Oxford performance by hour, throughout the day, shows steady morning peak performance (up to 1000) before performance decreases slightly with no recovery of performance until 2100.
- 4.3 In December 2023 Reactionary 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 Reactionary 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.
- 4.4 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.

5. Capacity

- 5.1 Swindon to Wantage Road is a key constraint. This two-track area accommodates a lot of mixed traffic with

passenger and freight services. Particular challenges are around the time it takes some freight services (on occasions up to 15 minutes) to run between regulating points. There are limited options to retime these services due to the capacity available, both on this route and connecting routes such as the Melksham single line and Didcot Parkway to Oxford. NRIL would also like to point out that planning additional traffic through these locations is a challenge, particularly in the Up direction.

5.2 Oxford is a busy geographic area on the Western route with long-distance and local passenger operators, plus freight. Traffic will increase with the commencement of East West Rail (EWR) under CS1 and will increase further with the completion of CS2 and CS3.

5.3 The EWR project context is as follows:

- EWR Connection Stage 1 (CS1) is the reopening of the OXD (Oxford to Bletchley) line, which has now been completed, with 2 Oxford-Milton Keynes trains per hour planned to be introduced later in 2025.
- EWR Connection Stage 2 (CS2) is a package of upgrade works on the BBM (Bletchley to Bedford Midland) line, funding for which was announced in the 2024 Budget, to allow introduction of an hourly Oxford to Bedford service by 2030.
- EWR Connection Stage 3 (CS3) includes further significant upgrade works on both the BBM and OXD lines, promoted by EWR Co, to support introduction of Oxford-Cambridge services in 2035-2040. This is a key element of the Oxford-Cambridge Growth Corridor promoted by the Government.

5.4 Recent announcements concerning development of a Universal theme park and resort near to Bedford, with an anticipated opening of 2031, means consideration is currently being given to its impact on passenger demand and any implications for the EWR programme.

5.5 Current assessments are being undertaken as part of the EWR project to understand timetable capacity for the different configuration stages. Oxford is a known capacity constraint on accommodating the services proposed through East West Rail.

We acknowledge that implementation of CS2 and CS3 is outside of the duration of the FGWL Track Access Contract that has been extended to commencement of December 2028 under the 108th Supplemental Agreement. However, parties will need to be mindful that NRIL will not be able to confirm whether the services would be able to continue at the point CS2 and/or CS3 are introduced. While current assessments are ongoing as part of EWR project, the outputs will not be available to inform further representations on this application.

6. Competing Aspiration

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

6.2 NRIL is aware of competing aspirations for capacity on Western, in particular an hourly path between Swindon and Didcot Parkway where we believe there is only potential for one new hourly service in this section; therefore, a choice is likely required between competing aspirations.

6.3 Analysis undertaken to date indicates that there remains potential for this area of the network to support one additional service in each direction per hour, but this will involve considerable flexing of freight paths in some hours to accommodate one additional train per hour. The scale of flexing required - whether this exceeds allowances under the flexing windows available to NRIL and whether this would result in freight services diverting is not known at this stage; this will form part of the analysis as set out under section 5.6 of this letter.

6.4 Current analysis of the proposed paths for both May 2026 and May 2027 has demonstrated that there are multiple timetabling conflicts that require resolution across the entire Oxford <-> Bristol corridor; NRIL can confirm that at the date of this letter there are no confirmed solutions for accommodating all of these services at this time. Further to the analysis, which is shortly to commence, will involve, but is not limited to: understanding the number of minimum Timetable Planning Rules margins required, such as turnarounds, junction margins and dwell times.

6.5 NRIL would also comment that it is aware of another operator's plans to increase services into and out of Bristol Temple Meads at May 2026. Analysis, taking account of this aspiration coupled with FGWL's, is underway and following completion of this work, performance analysis will follow. The overarching outputs are expected and can be shared with ORR in mid to late August.

6.6 We note that Oxford is one of the locations identified in the ORR's letter of 24 April 2024 to the industry on 'Competing and/or complex track access applications for December 2024, May 2025 and December 2025 timetable changes'; therefore, NRIL's expectation would be that the ORR would wait to determine upon this application until such time that the ORR has directed all interacting access rights applications alongside final representations on this application.

7. Complex and Competing Applications

7.1 FGWL's aspired paths present unresolved conflicts against multiple schedules aligned to Section 22A and Section 17 applications submitted to ORR by 20 May 2024, in line with their letter to industry dated 24 April 2024. ORR previously indicated to Industry that decisions would be made on the applications submitted by 20 May 2024 prior to any future complex/competing aspirations. It is worth noting that NRIL has already outlined 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 positively direct upon these access rights, the assessments in connection with the FGWL 301st S22A could be impacted.

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

8.1 Interacting Locations Matrix - Oxford

Operator/Application /Type	Application status	WCML South	Birmingham	BHM-Derby	Derby-Sheffield	Sheffield	ECML & Leeds	Oxford	Gloucester	Cardiff
CrossCountry 38th SA 22a	Live		x	x	x	x	x	x	x	x
DBC 79th SA 22a	Live			x			x	x		x
DBC 81st SA 22a	Live		x	x	x	x	x	x	x	x
DBC 84th SA 22a	Live							x		
DCR 2nd SA 22a	Live	x	x	x	x		x	x		
FLHH 24th SA 22A	Live	x						x		
FLHH 25th SA 22A	Live	x	x	x	x	x	x	x	x	
FLHH 27th SA 22A	Live	x	x	x	x	x	x	x	x	x
FLIM 21st SA 22A	Live		x	x	x	x	x	x		
FLIM 22nd SA 22A	Live		x	x	x	x	x	x		
FLIM 24th SA 22A	Live	x	x	x	x	x	x	x		
FLIM 25th SA 22A	Live	x	x	x		x	x	x		x
FLIM 26th SA 22A	Live	x			x	x	x	x		x
GBRf 25th SA 22a	Live	x	x	x	x	x	x	x		
GBRf 34th SA 22a	Live	x	x	x	x	x	x	x	x	x
FGWL 201st SA 22a	Live							x	x	

8.2 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 that 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)

9. Railfreight

9.1 NRIL has concerns over freight growth and our ability to meet regulatory targets, particularly on the Great Western mainline between Oxford and Bristol. NRIL would also like to note the future capacity required to serve the arc furnaces TATA are building at Port Talbot to retain UK steel manufacture. From an aspirational perspective, an hourly freight path each way would service foreseeable requirements.

9.2 Our initial capacity analysis suggests conflicts between several freight services and FGWL's Bristol <> Oxford services that may require agreement from a freight operator to divert some of its services via Chipping Sodbury at Wootton Bassett Jn to release paths via the mainline (MLN1) to Bristol Temple Meads; the capacity analysis

currently underway will provide a definitive view in this respect.

10. Strategic Planning

10.1 We have identified a direct connection between Bristol and Oxford (via Swindon) as a high strategic priority in numerous strategic studies including the Oxfordshire Rail Corridor Study (2020)¹ and the Greater Bristol Rail Network Strategic Study (2023)². remains of the view that there is a strong strategic case for this 'missing link' service to be delivered.

10.2 We are in favour of delivering this connectivity 'missing link' as soon as possible to deliver benefits for passengers so long as capacity is viable, deliverable and balances the needs of performance and freight growth. We reserve our position on this application until such time that all assessments have been concluded.

10.3 FGWL has engaged NRIL in development of the concept train plan including these services and work continues in this respect. This work hasn't concluded at this current time and further work is needed to determine whether these services can be accommodated on the network. These services have, however, been factored into our Oxfordshire corridor timetable development and we are confident that they fit with committed and planned EWR services for CS1.

11. Maintenance

11.1 NRIL is satisfied that there are no operational challenges with the access rights sought and is satisfied that the rights sought do not preclude NRIL from having adequate access to the infrastructure. NRIL also note that there are no conflicts with these services against the Engineering Access Statement (EAS).

12. Level Crossings

12.1 13 level crossings have been identified that interact with this application. All Level Crossing Risk Model (ALCRM) modelling has been completed and shows an average increase in calculated risk of 16 % ; this varies per crossing, ranging between an 11 % and 26 % increase in risk. No crossings are calculated as having a decrease in risk as a result of this application. Cost Benefit Analysis (CBA) and Gross Disproportionality Testing (GDT) has not yet begun, but this will identify the reasonable practicability of ensuring that all risk increases will be kept within tolerable levels, and we will provide a report as soon as this is completed.

13. Conclusion

13.1 NRIL is supportive of a direct connection between Bristol and Oxford (via Swindon) but remains mindful that there are a number of assessments and dependencies that require further consideration before NRIL is able to offer a fully informed view of this application. These dependencies are: capacity analysis and performance analysis which NRIL believes it will be in a position to share with ORR mid to late August; Level Crossing analysis: NRIL expects to be in a position to share the outputs also in mid to late August. In the meantime, NRIL will continue to work with FGWL to facilitate the development of its application.

13.2 NRIL is aware that this representation letter does not contain all the information needed for ORR to determine on this application; however, we will keep the ORR abreast of developments and where support can be offered, this will be communicated without delay.

Yours sincerely

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Richard Turner
Customer Relationships Executive

¹ Oxfordshire Rail Corridor Study [Oxfordshire Rail Corridor Study](#)

² Greater Bristol Rail Network Strategic Study [Greater Bristol Rail Network Strategic Study](#)