

Grand Central 35th Supplemental Industry Consultation Responses

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From: [REDACTED]@crosscountrytrains.co.uk>

Sent: 08 September 2025 10:22

To: [REDACTED]@networkrail.co.uk>

Cc: [REDACTED]@crosscountrytrains.co.uk>

Subject: FW: Grand Central - 35th SA Section 22A industry consultation - Bradford/Wakefield-London - responses by 08 September 2025 please

Hi Alexis,

Please remove my holding response I sent on 4th September 2025, we have had all enquiries answered by GC.

Therefore, due to no issues being raised at CrossCountry during the consultation period, we have no objections to your proposed supplemental agreement.

Kind Regards

Martin Haffner, Track Access Manager, CrossCountry

Mobile: [REDACTED]

Address: 5th Floor, Multistory, 18 The Priory Queensway, Birmingham, B4 6BS





Martin Haffner
Track Access Manager
CrossCountry
By email

31 October 2025

Grand Central Railway Company – 35th Supplemental Agreement

Dear Martin

Thank you for your email dated 08 September 2025.

We appreciate you providing confirmation that CrossCountry have no issues to raise in relation to Grand Central's proposed 35th Supplemental Agreement.

Yours sincerely,



William Etherington
Performance and Interim Planning Manager



Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
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Department
for Transport

Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Tel: [REDACTED]

Email [REDACTED]

24 September 2025

Alexis Xoufarides, Customer Manager
by email: [REDACTED]

Dear Alexis,

Grand Central - 35th SA Section 22A industry consultation - Bradford/Wakefield-London

Thank you for sharing the above track access application from Grand Central, and for providing the Department for Transport the opportunity to respond to this industry consultation.

The Government's view is that Open Access can provide benefits such as improved connectivity and choice for passengers but can also increase costs to taxpayers and create additional performance pressures. New Open Access services must genuinely add value for customers and the overall rail system and not inhibit the efficient operation of the network or divert significant revenue from existing operators – all of which are currently supported by the taxpayer in some form. The Secretary of State was clear on the importance of this in her 6 January letter to the Office of Rail and Road (ORR), and this remains the case.

Firstly, I would like to take this opportunity to highlight the letter from the Department to the ORR of 4 February 2025. Within that letter the Department reviewed nine Open Access applications received during the pre-election period and provided its assessments to the ORR. This included responses to a number of applications that sought to operate on the East Coast Main Line (ECML), and the Department highlighted numerous concerns regarding performance impacts and lack of available ECML capacity to accommodate additional Open Access services. These concerns over ECML capacity and performance remain relevant and would be exacerbated by new Open Access services being allowed to operate on the ECML.

One of the applications addressed in the 4 February letter was Grand Central's proposed 28th Supplemental Agreement, which itself sought to operate additional paths between London Kings Cross, Bradford, Wakefield and York. The similarities between Grand Central's proposed 28th and 35th Supplemental Agreements mean that the concerns raised previously regarding impacts to ECML performance and capacity also apply to this latest application from Grand Central.

Further, on 29 July 2025 ORR published decisions relating to five applications seeking to operate additional Open Access services on the ECML, including Grand Central's 28th Supplemental Agreement. Within this letter ORR acknowledged significant capacity limitations on the ECML and referenced the declaration of congested infrastructure in multiple places to begin from the start date of the ECML December 2025 timetable. Specific pinch points at York and the Welwyn viaduct were highlighted, with ORR writing: "*Network Rail advises against an increase in services above those planned in the December 2025 timetable in these two areas. Performance at York plays a key role on the ECML and also on trans-Pennine routes, into Birmingham and the West Coast Main Line (WCML). Welwyn is critical to the whole ECML due its proximity to London and the number of London King's Cross services.*" ORR also stated that "*We agree that the introduction of*

long-distance high-speed services above those specified in the ECML December 2025 timetable will apply further pressure to punctuality and reduce timetable resilience across the whole network.” ORR in turn rejected the proposed ECML elements of Grand Central’s 28th Supplemental Agreement, clearly concluding that *“We have not approved additional elements of the above applications which cannot be accommodated in the ECML December 2025 timetable, on the basis of insufficient capacity and potential performance impacts.”*

ORR’s conclusions on 29 July were clear that additional Open Access services beyond those already agreed as part of the December 2025 ECML timetable would have significant and wide-ranging performance and capacity implications for passengers and operators across the network, and specifically that additional Grand Central paths between London and Bradford, Wakefield and York could not be accommodated. The Department for Transport shares this view, and does not believe that any new information or proposed solution has been tabled since 29 July that would mitigate the serious concerns highlighted.

I would also like to take this opportunity to provide further specific comments on Grand Central’s proposed 35th Supplemental Agreement, as this application raises specific concerns regarding both impact to taxpayers and upon network performance.

Analysis undertaken by the Department suggests that this application would be borderline on the 0.3 ‘Not Primarily Abstractive’ (NPA) threshold set out in the ORR’s guidance. Given the number of additional services proposed by Grand Central, the overall level of abstraction would be particularly high, with LNER being the most significantly impacted operator and taxpayers being left to fill the significant shortfall in contracted operators’ revenues. At a time when the industry is required to significantly reduce its subsidy requirement, the Department therefore has serious concerns regarding the overall financial implications of this application and we would ask and expect that the regulator fully considers the impact to the funds available to the Secretary of State – including subsidy requirements to contracted operators as a result of the proposed services.

The Department remains concerned regarding capacity constraints on the ECML and the impact that Grand Central’s proposals would have upon the ability of contracted operators to develop and operate revenue-generative services that would benefit taxpayers through reducing net subsidy.

Ongoing work on the ECML upgraded timetable for December 2025 has highlighted particular constraints between London Kings Cross and Doncaster, and modelling undertaken suggests that additional paths beyond those already agreed would negatively impact performance. LNER’s increased service offering from Bradford Forster Square, which is already in operation, would also be impacted by an increase in Open Access services, where significant government investment has been made to deliver an increase from two to seven LNER services each day between King’s Cross and Bradford.

Wakefield Westgate and York are already well-served by multiple trains per hour to London, including three trains that arrive at King’s Cross at or before 0830 from Wakefield Westgate, and four trains that arrive at or before 0834 from York. I note that Grand Central highlight there are limited services arriving in London before 0830, which is due to capacity over the Welwyn viaduct being limited and an increase in services at peak times would degrade performance across the ECML more broadly.

The Secretary of State has been clear that Open Access will continue to play a role in the future GBR-managed railway but that this must not come at the cost of network performance, better experience for passengers or value for taxpayers. The Department is of the view that these proposals set out by Grand Central would have negligible benefits to passengers and significant detrimental operational impacts upon network performance if they were to be approved. For the reasons set out above, **the Department does not support this application.**

We would ask and expect that Network Rail carries out a thorough assessment of capacity and performance to fully understand the impacts that this proposal would have across the ECML, and that its findings are carefully considered by ORR as a decision is made regarding this application.

Please do not hesitate to get in touch if you have any questions about the Department's response or the points raised.

Yours sincerely,



Alex Szyjanowicz
Deputy Director, Rail Reform



Alex Szyjanowicz
Deputy Director, Rail Reform
Department for Transport
33 Horseferry Road
London
SW1P 4DR

5 November 2025

Grand Central 35th Supplemental Agreement

Dear Alex,

Thank you for your letter in response to Grand Central's proposed 35th Supplemental Agreement and please accept my apologies for the delay in responding. I have addressed your comments individually below.

We note your comments in relation to Grand Central's previous 28th Supplemental Agreement and the relevance of the Department for Transport's (DfT) previous comments to ORR in relation to 9 Open Access proposals.

We also note your comments in relation to the ORR's determination of a number of Open Access applications including Grand Central's 28th Supplemental Agreement, of which the additional London services were rejected on the basis of the timetable development work undertaken by Network Rail, citing capacity and performance concerns which meant services that could not be accommodated in the December 2025 timetable were not approved.

Grand Central challenged Network Rail's decision not to include the additional London paths sought by Grand Central under its 28th Supplemental Agreement at a recent timetable dispute, and whilst Network Rail were not instructed to include Grand Central's services in the December 2025 timetable, the panel recognised that Network Rail did not act fully in accordance with Part D of the Network Code in developing the December 2025 timetable. Similarly, at the timetable hearing, Network Rail confirmed that some of the conflicts identified around the proposed Grand Central services may have been able to be resolved with some flexing of other services.

In addition to Network Rail not properly assessing the proposed additional services as part of the timetable development period, Network Rail also conducted no specific performance modelling of the additional Grand Central services, simply citing professional judgement that performance would further deteriorate in its rejection of the additional paths sought in the December 2025 timetable.

Grand Central remains confident that the services proposed in its 35th Supplemental Agreement can be accommodated within the construct of the December 2025 timetable, by utilising unused paths in the standard pattern timetable and is working to demonstrate to Network Rail and ORR that these paths can be accommodated. In addition to this, Grand Central has commissioned its own performance modelling work which shows the minimal performance impact of the proposed services

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and proposes mitigations to address this. This information will be shared with ORR as part of the 35th Supplemental Agreement submission.

We note your comments in relation to the NPA test that our proposed application would be borderline on the 0.3:1 threshold set by ORR. Grand Central remains confident that its proposals pass the NPA test and will supply ORR with the relevant information to support the application to ORR.

In relation to your comments that the number of services proposed would result in a particularly high level of abstraction, we note that since May 2025 LNER has introduced additional Bradford services to compete directly with Grand Central. It is disappointing that DfT is now stating that the introduction of more Grand Central services out of Bradford would impact these new LNER services given it has invested heavily to fund this increase having a direct impact on Grand Central's own existing services out of Bradford.

Grand Central welcomes this competition and believe it will drive significant benefits for passengers, however the introduction of these services has seen a deterioration of Grand Central's revenue between Bradford and London. The introduction of additional Bradford services would therefore partially offset this reduction but would be unlikely to see Grand Central exceed previous levels of revenue and therefore, specifically at Bradford we do not believe the services could be deemed as abstractive.

Of the remaining 8 destinations that Grand Central will increase service levels at, only 3 have direct competition (where Grand Central already operates services) with the remaining 5 locations, where Grand Central is the only provider of direct London services, seeing a 50% uplift in direct services to London providing significant benefits and plugging large gaps in the existing Grand Central timetable.

Additionally, following rejection of the 28th Supplemental Agreement, Grand Central has recognised concerns raised by ORR in relation to station calls at Peterborough and the NPA test and has therefore removed these from the application.

Whilst we welcome DfT comments that Open Access will continue to play a role in the future GBR managed railway, however it is disappointing that the DfT believes an increase in 50% of service levels at 5 locations which currently only receive a limited Grand Central service (4 returns per day) would present only negligible benefits to passengers. We will of course continue to work with Network Rail on demonstrating the paths can be accommodated with negligible operational impacts and with ORR to demonstrate the services bring significant benefits and pass the NPA test.

Yours sincerely,

A black rectangular redaction box covering the signature of William Etherington.

William Etherington
Performance and Interim Planning Manager

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

Chris Brandon
Head of Business Development and Programmes
Suite 2A, 20 George Hudson Street,
York
YO1 6WR

Alexis Xoufarides
Customer Manager,
Network Rail
George Stephenson House, York YO1 6JT

Cc: [REDACTED]

8th September 2025

Dear Chris

Grand Central – 35th Supplemental Agreement

Thank you for the opportunity to comment on Grand Central's 35th supplemental agreement.

LNER wishes to make the following points on this proposal:

1. The proposal indicates that all the proposed services are TPR compliant and use identified slots within the existing ESG timetable structure. How do the proposed services interact with the Congested Infrastructure declarations especially Huntingdon North Junction to New England North Junction and Doncaster Marshgate Junction to Leeds Copley Hill West Junction? The Congested Infrastructure is most likely to occur between the weekday hours of 06:00 and 21:00 which according to the two documents attached in the consultation of 'North East TT' and 'West Riding TT', the proposed services interact with the Doncaster and Peterborough area within this window. This leaves LNER with concerns regarding the performance impact of these proposed services especially within the stated areas.
2. A further performance concern is regarding flying over/near Welwyn Viaduct. Can you provide further information if these services will interact with this area, at which proposed timings there are appropriate gaps for flying, and what proposed performance impact this may have on the ECML?
3. LNER believes the application fails to meet the NPA test and would like to share additional detail with the ORR due to commercially sensitive information.

Given the potentially significant impact on performance and the economic analysis outcomes, LNER formally objects to this proposal.

Yours sincerely,



Olivia Richardson
Track & Station Partnership Manager



Olivia Richardson
Track & Station Partnership Manager
LNER
West Offices
Station Rise
York
YO1 6GA

31 October 2025

Grand Central 35th Supplemental Agreement

Dear Olivia,

Thank you for your letter in response to Grand Central's proposed 35th Supplemental Agreement and please accept my apologies for the delay in responding. I have addressed your comments individually below.

We note your comments in relation to Network Rail's declaration of congested infrastructure (DoCI).

Grand Central's 35th SA is seeking 2 return London to Bradford journeys both Saturdays excepted (SX) and Saturdays only (SO) along with one additional return trip on Sundays. Given the timeframe referenced in the DoCI only the SX services are affected – that is just 4 of the 10 paths sought.

Whilst all 4 of the SX Bradford to/from London paths impinge on the Huntingdon to Peterborough DoCI, only one of them impinges on the Marshgate Jn to Copley Hill West Jn DoCI – the lunchtime Up departure from Bradford Interchange – which is routed via Hare Park Jn. Although it follows a stopping Northern train from Fitzwilliam to Doncaster, it has a TPR-compliant path through the route section declared congested (Hare Park Jn to Marshgate Jn) and does not delay any other trains on this section.

The other 3 SX West Riding paths sought are all routed via Shaftholme Jn and Pontefract Monkhill: they do not impinge on the Marshgate Jn to Copley Hill West Jn DoCI at all.

Finally, whilst the early morning SX York to London service does pass through the Huntingdon to Peterborough DoCI, the evening northbound service SX does not depart Kings Cross until 21:00 so is outside the time window for the likely time of congestion.

Grand Central notes that Network Rail's own Code of Practice for Declaration of Congested Infrastructure (March 2024) states in section 2.2.5 that “..... (declaration) does not suspend normal access-related engagement with train operators.” In other words, Network Rail must still attempt to find paths for any valid bids submitted. In addition to this the DoCI in each instance states “*This Declaration does not mean that all new requests for access on the designated infrastructure will be automatically rejected because the route is not equally busy at all times of the day or week.*”.

We therefore remain confident our additional services can be accommodated as proposed. In relation to your specific concern around performance, Grand Central has commissioned its own performance

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modelling which will be shared with ORR in support of the application and to demonstrate the minimal impact these additional services will have.

You also raise concerns in relation to the flighting of trains over / near Welwyn Viaduct. Grand Central has bid TPR complaint paths and will continue to work with Network Rail through the May 2026 timetabling process. Whilst we appreciate there are concerns over the flighting of trains over Welwyn Viaduct, by applying the existing margins between Woolmer Green and Digswell Jn (and vice versa) it is possible to construct a timetable with 18 (certainly) and 20 (possibly) trains per hour. As mentioned above, Grand Central will provide details of its own performance modelling to ORR and Network Rail in order to further demonstrate the minimal impact of the additional services.

It is disappointing that LNER has, once again, commented it does not believe the additional services would pass the NPA test. Grand Central has significant market share at a number of stations it serves between Bradford and Doncaster, providing much needed direct services to London and are seen as a significant benefit to passengers and stakeholders in West Yorkshire. These additional services would provide additional connectivity for communities which continue to be underserved. It is therefore disappointing that LNER cannot recognise the additional benefit these services will bring to those communities.

It is also disappointing that following its own launch of additional Bradford to London services in competition with Grand Central (which has served Bradford since 2010) it is unwilling to acknowledge the benefits of additional competition that it was so keen to introduce itself.

Grand Central will of course provide its own detailed analysis which will demonstrate the application passes the ORR's Not Primarily Abstractive test.

Yours sincerely,

A solid black rectangular box used to redact the signature of William Etherington.

William Etherington
Performance and Interim Planning Manager



Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
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Chris Brandon

From: [REDACTED]@Londontravelwatch.org.uk>
Sent: 28 August 2025 11:05
To: Alexis Xoufarides; Chris Brandon
Cc: [REDACTED]
Subject: RE: Grand Central - 35th SA Section 22A industry consultation - Bradford/Wakefield-London - responses by 08 September 2025 please

Dear Alexis

Thank you for your e-mails.

Having reviewed the documentation, London TravelWatch would ask whether there is sufficient capacity at King's Cross station and on the East Coast Mainline more generally for the proposed additional services. Whilst we would welcome these services, we would not wish this to be detrimental to existing services.

This is particularly the case as we note from Form P that Network Rail is aware of Grand Central's proposals but is unable to support them and that work will continue to demonstrate the services can be accommodated.

We also note from the ORR's current consultation on train performance targets for 2026 to 2029 that the ECML timetable change in December 2025 is expected to worsen punctuality and that Network Rail expects that the timetable change will lead to a decline in performance in the first 24 months and result in a sustained reduction in performance in punctuality.

We would welcome comments on this.

Many thanks

Kind regards

Trevor

Trevor Rosenberg
Policy and Advocacy Officer

London TravelWatch, Europoint, 5-11 Lavington Street, London, SE1 ONZ

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**LONDON
TRAVELWATCH**





Trevor Rosenberg
Policy and Advocacy Officer
London Travelwatch
By email

31 October 2025

Grand Central Railway Company – 35th Supplemental Agreement

Dear Trevor,

Thank you for your response to Grand Central's proposed 35th Supplemental Agreement to its Track Access Contract, and please accept my apologies for the delay in providing a response.

In relation to your comments on King's Cross capacity, Grand Central has undertaken the necessary timetable modelling to confirm that the services can be accommodated. We have bid these services as part of the May 2026 timetable process and are working with Network Rail on the proposals, however we have no concerns over the services at King's Cross.

In relation to your points around performance, we are aware of the proposed performance trajectories and the current anticipation that performance will deteriorate on the whole on the ECML. The paths Grand Central are proposing to utilise are based on existing gaps in the standard pattern timetable that will be implemented for December 2025. Additionally Grand Central has commissioned its own performance modelling which will be supplied to ORR in support of the application.

Yours sincerely,



William Etherington
Performance and Interim Planning Manager

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
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From: [REDACTED] northernrailway.co.uk>

Sent: 08 September 2025 14:42

To: [REDACTED] networkrail.co.uk>

Cc: [REDACTED] northernrailway.co.uk>

Subject: RE: Grand Central - 35th SA Section 22A industry consultation - Bradford/Wakefield-London - responses by 08 September 2025 please

Afternoon Alexis,

Northern are concerned that the new 0900 London to Bradford will directly take the path of our 1134 Huddersfield to Bradford service when that is reinstated in 2027 post Huddersfield reconfiguration as part of TRU. Northern cannot support anything which would not enable us to run our base timetable, which we have currently altered to accommodate the TRU possessions. We require assurances from NR that the capacity exists in the long term for this additional service and not just perceived capacity due to the engineering works.

Kind regards,

Kate

Northern Trains



Kate Oldroyd
Track Access Manager
By email

31 October 2025

Grand Central Railway Company – 35th Supplemental Agreement

Dear Kate,

Thank you for your response to Grand Central's proposed 35th Supplemental Agreement to its Track Access Contract, and please accept my apologies for the delay in providing a response.

Recognising your concerns, GC will work with Network Rail and Northern to ensure that both services can be accommodated, and we are confident that a solution will be identified that won't affect Northern's 1134 Huddersfield to Bradford Interchange service, when the service is reinstated in 2027.

From a train planning perspective; GC will be both flexible, and accommodating, in ensuring that the aforementioned service can be successfully reinstated in 2027.

Yours sincerely,



William Etherington
Performance and Interim Planning Manager



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From: [REDACTED]@transportfocus.org.uk>

Sent: Tuesday, August 12, 2025 11:31 AM

To: [REDACTED]@networkrail.co.uk>

Subject: Re: Grand Central - 35th SA Section 22A industry consultation - London <> Cleethorpes - responses by 08 September 2025 please

Hi Alexis

Thanks for this proposed Track Access Contract amendment to allow for additional services between London and Wakefield Kirkgate/Bradford Interchange.

As commented on the previous GC track access consultation, we would support additional services to Bradford in principle. The evidence shows that competition provided through open access operators can be good for passengers, along with additional journey options. However, care is needed to ensure it does not have negative impact on other passengers, for example taking up additional capacity compromising service resilience.

Best regards

Martin

Martin Clarke

Rail technical advisor

[REDACTED]

Transport Focus

The independent transport user watchdog



Martin Clarke
Transport Focus
By email

31 October 2025

Grand Central Railway Company – 35th Supplemental Agreement

Dear Martin,

Thank you for your response to Grand Central's proposed 35th Supplemental Agreement to its Track Access Contract.

Please accept my apologies for the delay in response. We appreciate your support for the additional services.

We note your comments in relation to compromising service resilience. We have worked hard to identify paths that sit within the standard pattern of the revised December 2025 timetable and will be sharing our own performance modelling work in support of the application with ORR.

Yours sincerely,



William Etherington
Performance and Interim Planning Manager

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Chris Brandon

From: [REDACTED]@westyorks-ca.gov.uk>
Sent: 18 August 2025 13:47
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Grand Central - 35th SA Section 22A industry consultation - Bradford/Wakefield-London

Good afternoon, Alexis, and thanks as ever for including West Yorkshire in this consultation.

On the face of it, from WYCA's point of view, there are very real attractions to the additional services proposed to be introduced in (if I understand correctly) May 2026; in particular:

- Addressing longstanding gaps in the existing Bradford service – above all, a later last train from Bradford and an earlier first one from King's Cross would be especially welcome; and
- An earlier first train Wakefield – York and a later last one in the opposite direction on the increasingly popular route via Castleford, complementing rather than competing with TP's offer on that axis.

As such, in principle there would be good reason for us in the Combined Authority to welcome the application.

However, it would be helpful if a couple of queries could be clarified:

- To what extent is the application consistent with the ORR's recent ruling on several open-access TOCs' applications for additional paths – especially on the core ECML between Doncaster and KGX? My understanding was that they were generally not allowing additional trains in particular into and out of KGX itself, and that the services approved under that application for the most part are extensions of trains with existing paths over the southerly ECML – for example, the useful extension to/from Bradford of GC services currently only operating south of Wakefield (or conversion to passenger service of existing ECS workings). I am of course aware that several sections of the ECML have been formally declared as "congested infrastructure".
- Linked to this, to what extent is NR satisfied that any performance impacts from the services proposed under this application would be acceptable?
- Assuming that the application is able to proceed, three more detail-oriented queries on stopping patterns:
 - Would the trains between Wakefield K and York stop at intermediate stations such as Normanton and/or Castleford? We would suggest that doing so would be valuable, especially as they would form earlier first trains into York and later last ones, as against the TP service.
 - One of the additional Bradford – KGX train pairs is shown as not stopping at Low Moor; is this due to pathing difficulties? We would feel, not least in the interests of consistency and simplicity, that it would be desirable for all GC's trains to stop there.
 - As GC will be aware, WYCA is particularly keen for GC services to go wherever possible via Pontefract rather than via Hare Park Junction – we note that under these proposals, an imbalance by direction at Pontefract would be created: at present three out of four daily trains in each direction go this way; whereas in future four would call southbound but five northbound. Again, we assume this is a pathing constraint, but if it were possible for more (ideally all) to go via Pontefract Monkhill, this would be ideal from WYCA's point of view.

We assume that before any approval is given, the ORR will have to be satisfied that the NPA and any other appropriate tests will have to be satisfied.

On a separate matter (and one not directly related to this application, I should say!), we would be interested to know GC's views on potentially stopping at Elland station once it is completed – something we'd be very happy to pick up offline.

With thanks and best regards,

Mick

Michael Sasse

Rail Development Manager

West Yorkshire Combined Authority

Tel. [REDACTED]



Michael Sasse
Rail Development Manager
West Yorkshire Combined Authority
By email

31 October 2025

Grand Central Railway Company – 35th Supplemental Agreement

Dear Michael,

Thank you for your response to Grand Central's proposed 35th Supplemental Agreement to its Track Access Contract, and please accept my apologies for the delay in providing a response.

We appreciate the recognition that the additional proposed Bradford to London services would address significant gaps in the Grand Central timetable, and this is the primary purpose of our application to achieve a near 2 hourly service with 6 return services per day, allowing Grand Central to more efficiently utilise its rolling stock. We also note your comment in relation to the proposed Wakefield to London via York service, recognising that this would complement the existing direct Wakefield to York service.

In relation to your specific queries raised I have addressed these individually below.

To what extent is the application consistent with the ORR's recent ruling on several open-access TOCs' applications for additional paths – especially on the core ECML between Doncaster and KGX?

Grand Central participated in the ORR's competing access rights application process and had its proposals for additional services between Bradford and London rejected when that process concluded. Grand Central maintains that the proposed services can be accommodated in the structure of the proposed December 2025 timetable and has amended the application to address some of the issues raised within the ORR's decision. Whilst some sections of the route have been declared congested, this does not prevent Network Rail from offering train paths if they can be accommodated. Our proposals make use of effectively unused slots in the December 2025 standard pattern timetable.

Linked to this, to what extent is NR satisfied that any performance impacts from the services proposed under this application would be acceptable?

A key reason that the paths associated with our previous application (28th Supplemental Agreement) were rejected in the December 2025 timetable was on the basis of performance grounds. However, at this time, Network Rail was unable to provide any detailed performance analysis to support their decision making. Grand Central has subsequently had its own independent performance analysis undertaken on the proposals which will be share with ORR in order to demonstrate the paths can be accommodated with minimal performance impact.

Would the trains between Wakefield K and York stop at intermediate stations such as Normanton and/or Castleford? We would suggest that doing so would be valuable, especially as they would form earlier first trains into York and later last ones, as against the TP service.

Grand Central Railway Company Limited
Suite 2A, 20 George Hudson Street,
York, YO1 6WR

Thank you for these specific comments. Whilst we have given consideration to including additional station calls, at this stage they have not been included in our timetable development work. Should the application be successful we would certainly be open to looking at additional station stops in order to develop the service further.

One of the additional Bradford – KGX train pairs is shown as not stopping at Low Moor; is this due to pathing difficulties? We would feel, not least in the interests of consistency and simplicity, that it would be desirable for all GC's trains to stop there.

The statement above is correct; it was not possible to include a Low Moor station stop on the two paths in question (1247 Bradford-London and 1513 London-Bradford), as a result of pathing difficulties (noting the busyness of the Bradford-Halifax corridor).

However, assuming that the application is successful – GC will endeavour to rectify this during future timetable development phases, to ensure that GC is providing a consistent service offering for Low Moor.

As GC will be aware, WYCA is particularly keen for GC services to go wherever possible via Pontefract rather than via Hare Park Junction – we note that under these proposals, an imbalance by direction at Pontefract would be created: at present three out of four daily trains in each direction go this way; whereas in future four would call southbound but five northbound. Again, we assume this is a pathing constraint, but if it were possible for more (ideally all) to go via Pontefract Monkhill, this would be ideal from WYCA's point of view.

From December 2025 Grand Central will be operating a more balanced service to / from Pontefract, including the addition of some services calling on a Sunday. As you point out, we are constrained from a pathing perspective but have worked hard to introduce additional calls. We will continue to monitor the Pontefract service from the introduction of the December 2025 timetable and will continue to work with Network Rail to identify opportunities in future timetables.

We assume that before any approval is given, the ORR will have to be satisfied that the NPA and any other appropriate tests will have to be satisfied.

We will of course provide the necessary evidence to the ORR in relation to this application.

On a separate matter (and one not directly related to this application, I should say!), we would be interested to know GC's views on potentially stopping at Elland station once it is completed – something we'd be very happy to pick up offline.

I understand initial conversations have been held and we will be happy to pick up discussion further outside of this consultation.

Yours sincerely,



William Etherington
Performance and Interim Planning Manager

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