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

13 November 2025

Dear Alice,

Network Rail Representations for the proposed 113th Supplemental Agreement to the Track Access Contract between Network Rail Infrastructure Limited and First Great Western Limited dated 04 March 2016.

1. Purpose

- 1.1 Further to your correspondence addressed to Network Rail Infrastructure Limited (NRIL) dated 22 October 2025, this letter sets out NRIL's initial representations concerning First Greater Western Limited's (FGWL) Section 22A application submitted to Office of Rail and Road (ORR) on 22 October 2025. This application seeks to establish the rights necessary for the enhanced service to North Filton and to incorporate North Filton station into the EF10 calling patterns within Schedule 5 Table 4.1.
- 1.2 Upon the opening of North Filton station, it is anticipated that the clockface pattern for SX and SO Bristol Temple Meads - Filton Abbey Wood services will be adjusted in one direction, with all such trains extended to and from North Filton as passenger services.
- 1.3 Effective from the same date, additional Bristol Temple Meads - North Filton services will be scheduled to extend operating hours on both SX and SO, along with the introduction of a Sunday service which will include 15 round trips.
- 1.4 As stated in the application, at all times and on all days, service frequency will not exceed one train per hour in each direction.

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 113th Section 22A application made by FGWL.

3. Review of Supplemental Agreement and Form P

- 3.1 The access rights sought under FGWL's 113th Section 22A do not equate to the same level of service bid by FGWL. NRIL notes that FGWL outlines within its Form P that service frequency will be no more than one train per hour in each direction, which is reflected in Table 2.1 for EF10 in Annex 1 of the Supplemental Agreement. However, in the May 2026 Priority Date Notification Statement (PDNS), FGWL bid for two trains per hour which NRIL understands to be Option A and Option B, equating to 34 SX in each direction between Bristol Temple Meads and North Filton, which doubles the total number services sought in this application. Therefore, the access rights sought under FGWL's 113th Section 22A do not equate to the same level of service bid by FGWL.
- 3.2 NRIL also notes that the FGWL bid in its current form does not include a call at North Filton station resulting in NRIL being

unable to validate a compliant timetable and one of the key amendments in this application is adding North Filton Station in table 4.1 – Calling Patterns of schedule 5.

- 3.3 FGWL's decision to include both timetable options A and B, which doubles the one train per hour in each direction requirement set out in the Form P, has complicated validation and risks decisions being based upon inaccurate assumptions, since only one option will operate.
- 3.4 NRIL's preference is to assess a single timetable option. Whilst the 113th application is seeking rights, NRIL needs to understand what services the access rights are for within the May 2026 timetable to provide its position on the access rights sought in the application.
- 3.5 NRIL observes that the Form P does not currently reference the future requirement for North Filton to be designated as a monitoring point within Appendix 1 of Schedule 8 in relation to service Group EF10. Nevertheless, as is sometimes the norm, a recalibration would generally occur approximately one year following the commencement of services calling at North Filton to accurately reflect revenue and passenger volumes. However, NRIL would like the opportunity to discuss with FGWL the inclusion of a Schedule 8 relevant modification to be added to the contract just as soon as sufficient performance data has been collated to enable a Schedule 8 recalibration.

4. Performance

- 4.1 As commented within Section 3 of this letter, our analysis has been predicated upon the introduction of a two-train per hour service in each direction as per FGWL's bid for the May '26 Timetable currency. The analysis highlights tighter scheduling, particularly around minimum headway values, presenting notable performance risks—especially at vital junctions such as Filton West Junction, Dr Day's Junction, and Bristol East Junction. Ensuring punctuality remains key to preventing cascading delays.
- 4.2 The proposed Option B schedule variant further intensifies pressure on the Relief Lines, as reduced timetable flexibility and increased crossing moves heighten the risk of disruption. Platforms 1 and 3 at Bristol Temple Meads remain the primary choices, but more frequent use of Platform 3 under Option B, along with new scheduled services at Platforms 9, 10, and 11, will necessitate additional crossing moves, thereby increasing operational complexity at the junctions.
- 4.3 Maintaining efficient train formation and timely departures is essential, particularly as some Option B services originate from empty coaching stock moves shortly after other services have cleared the platforms. The Up direction on the Relief Line faces increased risk due to the rise in scheduled services and critical crossing moves at Narrowways Hill Junction and Dr Day's Junction, while the Down direction contends with similar challenges, compounded by close running ahead of planned extensions that another operator intends to introduce in the May '26 timetable currency as well as adjustments to existing services to fit the new timetable paths.
- 4.4 Overall, while North Filton's performance is solid in the Up direction, the Down direction is more vulnerable to delays given the higher service frequency within FGWL's bid that are restricted to minimum headways, and more intricate platforming and crossing requirements. Therefore, knowing what option FGW is pursuing will allow NRIL to undertake a more accurate assessment of the potential impacts and risks to performance, especially in the Down direction where it is more vulnerable to delays.

5. Capacity

- 5.1 NRIL requests that FGWL specify which option or the intended timetable it plans to operate during the May '26 Timetable Change period before NRIL can provide additional comments regarding capacity, beyond the analysis NRIL has undertaken as commented under section 4.

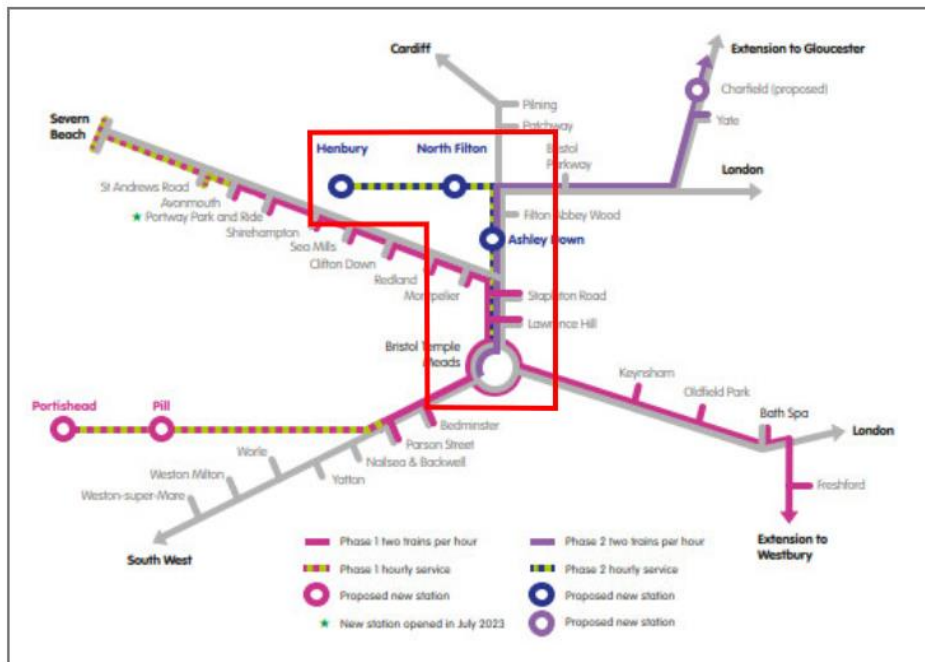
6. Submitted track access applications interacting with the geographic area of the FGWL proposal:

- 6.1 ORR will be aware that there have been several applications submitted where some of the aspirations plan to interact with Bristol Temple Meads namely;
 - Midland, Central, Western Railway (MCWR) (Nottingham <> Bristol Temple Meads)
 - Lumo (London Paddington <> Paignton)
 - Transport for Wales Cardiff Central <> Bristol Temple Meads
 - FGWL 301st Bristol Temple Meads <> Oxford
- 6.2 NRIL is currently assessing the MCWR application for Bristol Temple Meads with respect to May 2026; however, this evaluation is challenged by the absence of confirmation regarding the timetable FGWL intends to operate.

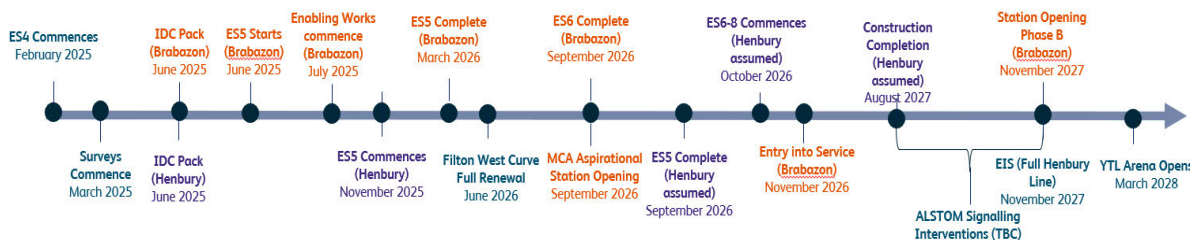
7. Strategic Planning

- 7.1 MetroWest Phase 2 aims to introduce passenger services between Bristol Temple Meads and Henbury providing a vital link between the Filton Enterprise Area, North Fringe, Temple Quay Enterprise Zone, and Bristol City Centre. The programme is funded by the West of England Mayoral Combined Authority.

7.2 The scheme includes upgrading the Henbury line to support passenger trains (currently freight-only) and opening of two new stations at North Filton and Henbury (Ashley Down was delivered in September 2024). The image below illustrates:



7.3. Programme



8. NRIL position on FGWL 113th Section 22A application

8.1 NRIL recognises the strategic importance of expanding passenger services under MetroWest Phase 2, including the conversion of the Henbury line and the introduction of new stations at North Filton and Henbury. However, before NRIL can comment on whether it supports the FGWL 113th Section 22A application, NRIL requires a comprehensive, confirmed, and diagrammed timetable from FGWL that includes calling at North Filton. This is essential to fully assess the impact on network capacity and performance, particularly at critical junctions and platforms in the Bristol area where increased service frequency may exacerbate congestion and delay risks.

8.2 NRIL needs to conduct a performance assessment of a proposed timetable, focusing on pinch points such as the Down direction at North Filton. The final performance assessment and working group with operators is expected to see final outputs available from early February 2026, ready to inform bids for December 2026 timetable change on 6th March 2026 (PDNS). This workstream is dependent upon FGWL confirming the timetable plan that FGWL intends to operate. Only with this level of detail and assurance can NRIL comment on whether it can support the application. Therefore, NRIL is unable to provide its final representations on this application until FGWL has provided a comprehensive and confirmed timetable and the necessary assurance has been undertaken. However, should ORR direct upon this application, NRIL would request that Contingent rights for the period between 9th November 2026 and 13th December 2026 are awarded to cover the last period (Period J) of the May 2026 timetable currency to enable NRIL to undertake further work on this application as referenced above.

9. Conclusion

9.1 Performance and Capacity Considerations: The introduction of additional services and the application of more stringent scheduling requirements present considerable challenges for network performance and capacity, especially at critical junctions and platforms. While the Up direction at North Filton exhibits strong performance, the Down direction remains vulnerable to delays due to higher service frequency and complex operations. To address these challenges, NRIL recommends that FGWL provides to NRIL the timetable that FGWL intends to operate, which NRIL would expect to see a call at North Filton; this is to enable NRIL to accurately assess the performance, capacity, and operational impacts upon the timetable. NRIL fully supports

the strategic objectives of MetroWest Phase 2, including the commissioning of new stations and the conversion of the Henbury line for passenger use, recognising their significance in enhancing regional connectivity and promoting economic growth.

9.2 Timetabling Assurance and Next Steps: A confirmed and comprehensive timetable from FGWL, including clear intentions for calling at North Filton, is crucial for NRIL to conduct the necessary assessments. This will help to determine whether performance can be reliably achieved and that the network can accommodate the proposed enhancements without compromising reliability. By establishing a clear understanding of timetabling intentions, all stakeholders can work together to maximise the benefits of these developments and ensure long-term sustainability and success for the Bristol rail network.

9.3 Until the above is achieved NRIL is unable to provide its final representations on this application.

Yours sincerely



Richard Turner

Head of Franchise Management - Western