



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

13 November 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 and 29 August 2025, respectively.
- 1.3. The purpose of this final representation is to provide ORR with updates following NRIL's capacity analysis, Timetable Pathing Analysis and Level Crossing analysis that has already been provided to ORR as well as provide ORR with NRIL's position following its Bristol May 2026 Performance Analysis. NRIL 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 party supportive of FGWL's 301st Section 22A on a one train every two-hour trial basis, and this representation sets out the basis for its position.

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.
- 2.2. NRIL provided further representations on 29 August 2025 detailing that while FGWL's proposed services meet Train Planning Rules (TPR) requirements as far as the Timetable Pathing Analysis work undertaken to date was concerned, until the development of the May 2026 Timetable Production Cycle is concluded, NRIL reserved its position in this respect. NRIL also commented on its concerns in respect of higher risk levels at Level Crossings and performance impacts. NRIL committed to conduct further performance work

before providing final representations in mid-November 2025.

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 confirmed that these rights formed part of the 109th Supplemental Agreement which was undergoing industry consultation at the time. These rights are also within FGWL’s 201st Section 22A application, sought as Contingent to the expiration of the Track Access Contract. The ORR has now approved the FGWL 201st SA and therefore these rights are now in place until the expiration of the Track Access Contract.

3.2. On 10 September, FGWL expressed its gratitude to NRIL for the significant work and detailed representations provided in relation to its application. FGWL acknowledged that NRIL has demonstrated timetable capacity in line with the Timetable Planning Rules, taking into account current passenger and freight levels, and is confirmed it is actively collaborating with NRIL to confirm this capacity within the May 2026 timetable, especially given potential increases in service aspirations at Oxford and Bristol Temple Meads. FGWL further commented upon the importance of thorough Level Crossing safety assessments being recognised, with FGWL committed to working closely with NRIL to address requirements at each location. Overall, FGWL appreciated and values the continued engagement and efforts of NRIL throughout this process.

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

5.1. In line with our commentary in the 29 August 2025 NRIL representation, NRIL has undertaken further performance analysis. The analysis highlights several operational challenges and performance risks associated with FGWL proposed services at Oxford.

5.2. Due to platform restrictions and in the absence of Platform 5 at Oxford Station, almost all originating and terminating FGWL services at Oxford require empty coaching stock (ECS) moves, which introduces complexity and risk to punctuality. The two main flows currently originating at Oxford—the 2L (Oxford to Didcot Parkway) and the new 1N (Oxford to Bristol Temple Meads)—both have tight turnaround times, often less than three minutes between ECS arrival and passenger service departure. This rapid turnaround increases the likelihood of delays, as any lateness in ECS arrival can directly impact the on-time start of subsequent services.

5.3. Additionally, the new FGWL services cross key junctions at Didcot North and Foxhall, often at similar times in both directions, which necessitates high punctuality to avoid conflicts and delays. At Bathampton Junction (Jn), the new Oxford services run mostly behind other FGWL and London Paddington services, which themselves have poor performance through this area, further compounding the risk.

5.4. NRIL can confirm that from a timetable capacity perspective, NRIL can accommodate all of the FGWL

services TPR compliantly; however, two trains departing Bristol Temple Meads would need to be diverted via Bristol Parkway vice Bath Spa in the hours of 12:00hrs-13:00hrs and 13:00hrs-14:00hrs as there are conflicts with freight services in these hours; the speeds of which provide a challenge to route these services via Bath. Should the ORR direct upon the whole of this application, Schedule 5 of the Track Access Contract would need to reflect two Bristol to Oxford services travelling via Bristol Parkway vice Bath Spa; however, should ORR support NRIL's position set out in this representation for one train every two hours in each direction, Schedule 5 would need to reflect one Bristol to Oxford service travelling via Bristol Parkway vice Bath Spa.

- 5.5. Overall, the analysis underscores that the increased volume and complexity of FGWL operations at Oxford, combined with infrastructure constraints and tight scheduling, present significant challenges to maintaining reliable performance.
- 5.6. NRIL wishes to reiterate the points raised in its previous submissions regarding this application, emphasising that Oxford remains a highly trafficked area on the Western route. The region accommodates a mix of long-distance and local passenger services, in addition to freight operations. With the introduction of East West Rail (EWR) Connection Stage 1 (CS1), traffic levels are expected to rise, and further increases are anticipated upon the completion of Connection Stages 2 (CS2) and 3 (CS3).
- 5.7. The EWR project is progressing in several phases. CS1, which involved reopening the Oxford to Bletchley (OXD) line, which has now been completed, with plans to introduce two Oxford–Milton Keynes trains per hour. CS2 consists of upgrade works on the Bletchley to Bedford Midland (BBM) line, aiming to launch an hourly Oxford to Bedford service by 2030. CS3 will bring substantial further improvements to both the BBM and OXD lines, facilitating Oxford–Cambridge services between 2035 and 2040, as part of the Government's Oxford-Cambridge Growth Corridor initiative.
- 5.8. Recent developments, such as the proposed Universal theme park and resort near Bedford, expected to open in 2031, are being assessed for their potential impact on passenger demand and the EWR programme. Ongoing evaluations are focusing on timetable capacity across the various project stages, recognising that Oxford is already a significant capacity constraint for the proposed East West Rail services. While the implementation of CS2 and CS3 will occur after the expiry of the current FGWL Track Access Contract in December 2028, ORR should note that NRIL will not be able to confirm the continuation of existing services once CS2 and/or CS3 are introduced.

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. Notwithstanding the performance challenges NRIL has in respect of FGWL's application, 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. 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 5.5

withstands.

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

7.1. Live Interacting Locations Matrix - Oxford

Operator/Application/Type	WCML south	Birmingham	BHM-Derby	Derby-Sheffield	Sheffield	ECML&Leeds	Oxford	Gloucester	Cardiff
CrossCountry 38th SA 22a		x	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 34th SA 22a	x	x	x	x	x	x	x	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)
- FGWL 13th Section 22A – North Filton
- TFW 52nd Cardiff <> Bristol Temple Meads

7.3. ORR is aware that NRIL has issued an Early Indicator of Likely Congestion in relation to the Great Western Main Line between Didcot and to the west of Swindon, specifically between Foxhall Junction (MLN1: 53m and 55ch) and Wootton Bassett Junction (MLN1: 82m 72ch).

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.

9. An assessment of FGWL's turnarounds at Oxford and any associated ECS moves which run close to up/down through services at Oxford (XC/Freight)

9.1. Due to platform restrictions at Oxford, ECS moves are required for almost all the originating and terminating FGWL services. Of the two current flows that originate at Oxford, the 2L – Oxford to Didcot Parkway services have poor On Time starts, with an originating On Time performance of 70.1 %. Most of these services have less than 3 minutes between the ECS arriving at Oxford and the 2Ls departing.

9.2. The new FGWL 1N services increase the need for ECS moves at Oxford. Similar to the 2Ls, the new 1N – Oxford to Bristol Temple Meads services have 3 minutes or less between the ECS arriving at Oxford and the 1Ns departing.

10. The impact of FGWL's additional Oxford workings which cross at Didcot North Jn and Foxhall Jn

10.1. Both Directions of the new FGWL services cross off/onto the Great Western Mainline at Foxhall Jn at similar times to each other. Usually, the Oxford to Bristol Temple Meads services would cross across all lines to the Down Main (DM) and the Bristol Temple Meads to Oxford services would cross from the Up Main to the West Curve. However, there are two different Oxford to Bristol Temple Meads services than move onto the Relief line instead of the DM, which means that the Bristol Temple Meads to Oxford would cross in front of them. High punctuality is required of the Bristol Temple Meads – Oxford 1Ns so that there is no impact to the 1Ns in the opposite direction.

11. The impact of FGWL's additional Oxford workings at Bathampton Jn and proximity to trains routed to/from Westbury

11.1. In the Down Direction: The new 1N – Oxford to Bristol Temple Meads services run mostly behind 1C – London Paddington to Bristol Temple Meads/Weston-super-Mare/Taunton which run behind the 1F – Portsmouth Harbour to Cardiff Central services after Bathampton. These services in May 2025 have poor

performance through this area.

11.2. In the Up Direction: The new 1N – Bristol Temple Meads to Oxford services run mostly behind the 2C – Gloucester to Westbury/20 – Gloucester to Weymouth services until they move off the Great Western Mainline at Bathampton Jn. These services in May 2025 have poor performance at Bathampton Jn, which drops at the next mandatory TIPLoc after they cross over towards Westbury.

11.3. In summary, based upon the performance risk assessment coupled with the absence of Platform 5 at Oxford, NRIL is unable to fully support the aspirations in this application. However, as stated in our letter dated 23rd June 2025, NRIL has identified a direct Bristol-Oxford connection via Swindon as a strategic consideration, based on analyses including the Oxfordshire Rail Corridor Study (2020) and the Greater Bristol Rail Network Strategic Study (2023). NRIL is supportive to trialling this service, contingent on capacity being sufficient and performance and freight requirements being met. Accordingly, NRIL would support operating one train every two hours in each direction from May 2026 to December 2027, under Contingent rights for three timetables starting in May 2026. A performance review would be conducted before making a further decision regarding Firm rights or an increase in service to an hourly frequency.

12. Level Crossings:

12.1. NRIL's review identified thirteen 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 previously provided to ORR 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.

12.2. As NRIL has previously advised, there are a number of crossings, such as Causeway, Stocks Lane, Appleford, Upper Studley, and Christian Malford, where maximum protection levels have already been reached, meaning no further action can be taken to mitigate the 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.

12.3. NRIL has requested that, should ORR direct in line with what FGWL is seeking in this application, ORR include as a condition to the decision a total contribution of £1.75 million pounds 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.

12.4. NRIL can confirm that should ORR direct in line with NRIL's representation or in line with FGWL's full application, the services may be able to proceed for a short period of time providing interim mitigations can be delivered, prior to the Level Crossing interventions, pending confirmation of funding streams from FGWL that align with our earlier representation - specifically, a total of £1.75 million pounds designated for risk mitigations and potential closures.

12.5. NRIL notes that driver training services are scheduled to begin in December 2025: there is minimal evidence suggesting that adding passengers will significantly elevate risk levels to a point that would require cessation of operations. Nevertheless, the incremental risk associated with progressing from training services to a two-hourly service, and subsequently to an hourly service, is considered manageable only in the short term. To facilitate the commencement of services, FGWL's commitment to provide funding for the outlined mitigations is required, and this funding should be in place ahead of the May 2026 timetable introduction. This approach enables NRIL to expedite mitigation delivery and minimise the duration of elevated risk.

12.6. During the period between service initiation and completion of mitigation measures, ongoing risk

monitoring at these crossings would take place. Interim risk management actions may be implemented as necessary, which could include but not limited to safety awareness events and updates to signage. It is important to acknowledge that these interim measures will not fully address the risk increase associated with the new services and are intended as temporary risk management until more comprehensive mitigations are implemented.

12.7. NRIL has reviewed Level Crossing mitigations and the impact of a two-hourly return service. While reducing service frequency lessens the increased risk, some risk remains at all affected crossings, and existing mitigations have not changed. No available mitigations fully restore previous risk levels, so further action is needed. NRIL maintains that, regardless of hourly or two-hourly service, there will be an increased and ongoing risk. However, services may operate before mitigations are in place if funding is secured and committed to limit risk as much as reasonably practicable for the shortest period of time possible.

13. **Conclusion**

13.1. This representation sets out NRIL’s formal assessment of the proposed Bristol Temple Meads <> Oxford services, highlighting both the challenges and strategic opportunities associated with the scheme. The performance analysis for the new 1N services has highlighted potential performance issues—particularly in the Oxford area and on the Bathampton to Bristol corridor. The performance concerns identified in the May 2026 timetable remain a significant factor in NRIL’s reservations regarding the full implementation of this application.

13.2. Alongside these operational considerations, NRIL’s review has revealed a considerable increase in risk at thirteen level crossings affected by the new services, with risk modelling showing no reductions. Some crossings, such as Wantage Road and Grove, will require substantial investment and collaborative approaches for diversion or closure, whereas others are already protected to their fullest extent and cannot be further mitigated without major interventions.

13.3. Despite these concerns, NRIL recognises the strategic importance of establishing a direct Bristol-Oxford link, as supported by recent corridor studies. Therefore, NRIL is prepared to support the trial introduction of these services on a two hourly basis, subject to strict conditions for three timetable periods commencing May 2026. Specifically, should ORR direct in line with NRIL’s representation or in line with FGWL’s full application, NRIL requests that ORR places a condition upon FGWL in its directions providing a total contribution of £1.75 million pounds to fund essential safety improvements and risk reduction measures.

13.4. Interim mitigation measures—such as but not limited to enhanced signage and public safety campaigns—may be implemented during the trial period, though these are acknowledged as temporary solutions pending more robust interventions.

13.5. Ultimately, while NRIL cannot fully endorse the application in its current form, it is willing to support a trial of the Bristol <> Oxford connection on a two hourly Contingent right basis for three timetable currencies commencing May 2026 through to commencement of December 2027 Timetable Change as per the below table with no presumption of continuity. This is on the proviso that FGWL secures the necessary funding for mitigation ahead of the proposed May 2026 timetable.

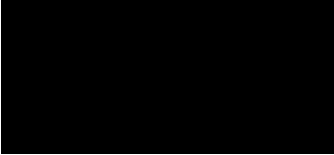
Timetable	Route (via Didcot west curve)	SX Services	SO Services
SCD 2026	Bristol Temple Meads to Oxford	8	8
SCD 2026	Oxford to Bristol Temple Meads	7	7

13.6. NRIL believes the approach outlined above seeks to balance the imperative for strategic growth and improved regional connectivity with NRIL’s commitment to performance reliability and safety.

13.7. Following ORR’s letter dated 7 November 2025 concerning applications for access rights between Foxhall Junction and Wootton Bassett, and the requirement to submit representations by 8 December 2025 for

three other applications, NRIL notes that it may update or supplement this representation if additional information arises during the preparation or finalisation of these letters. NRIL will communicate any such updates to ORR as they occur.

Yours sincerely,



Richard Turner

Head of Franchise Management - Western