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8 December 2025

Dear Alice,

### **Applications seeking capacity between Foxhall Junction and Wootton Bassett Junction**

Thank you for your letter of 7 November 2025 regarding the applications seeking capacity on the Great Western Main Line (GWML) between Foxhall Junction and Wootton Bassett Junction.

We appreciate the opportunity to provide Network Rail's final position and supporting information on these applications, as well as our current analysis of capacity, performance, and strategic considerations on this section of the network. Please note that this correspondence is underpinned by the separate final representations for the four existing applications issued to ORR as set out below. This letter should therefore be considered in parallel with those individual representations, which contain further detail relevant to each application.

#### **1. Comprehensive List of Applications**

The following applications are seeking capacity for services that utilise the section between Foxhall and Wootton Bassett Junctions:

- **First Greater Western (trading as Great Western Railway) 301st Supplemental Agreement** – to include rights between Bristol Temple Meads and Oxford, commencing May 2026.
- **Midland Central and Western Railway (MCWR)** – new contract for rights between Nottingham and Bristol Temple Meads, commencing December 2026.
- **First Rail Wales and Western (trading as Lumo) 4th Supplemental Agreement** – to include rights between London Paddington and Hereford, commencing December 2027.
- **First Rail Wales and Western (trading as Lumo) 3rd Supplemental Agreement** – to include rights between London Paddington and Paignton, commencing May 2028.

In addition to the final representations for each of these applications being appended to this letter, please see Appendix 1 for the specific details for each application, which includes the number of paths sought and entry into services dates.

## 2. Capacity Overview

The route section between Foxhall and Wootton Bassett Junctions is predominately a two-track railway and an intensively used mixed-traffic corridor on the GWML, accommodating long-distance passenger (up to 125mph) and regular freight services. Analysis indicates that, during most daytime hours, there is capacity for only one additional passenger path in each direction, in this section. Beyond that remaining hourly path, no further compliant regular paths have been identified. Any additional paths must also be compatible with adjacent high-utilisation sections, such as Didcot to Oxford, approaches to Bristol Temple Meads, the Melksham single line, the Severn Tunnel, and the Great Western Main Line, particularly between Reading and London Paddington.

Given the limited capacity opportunities and essentially four applications applying for the one remaining hourly available path, Network Rail wrote to the ORR on the 22 October 2025 with an “Early Indicator of Likely Congested Infrastructure” for this route section.

This assessment is based upon the existing December 2025 timetable plus those future services which already have access rights: Lumo’s London Paddington to Carmarthen services and Go-op Co-operative Limited’s Swindon to Taunton services.

Several of the proposed applications face significant pathing challenges both within and beyond this section. If ORR were not to direct in line with our representations on the four mentioned applications and multiple applications are approved in line with the aspirations, it will result in Network Rail being over committed in capacity it cannot facilitate and as a result major flexing or, but most likely, rejection of services when Part D of the Network Code decision criteria is applied. Full details and supporting analysis are provided in the sections that follow.

### **NETWORK RAIL CAPACITY ANALYSIS OVERVIEW**

This commentary provides a detailed examination of end-to-end, within Western Route, timetable validation for four operators - FGWL, Lumo Paignton, Lumo Hereford, and MCWR - across weekdays (SX), Saturdays (SO), and Sundays (SU), with particular focus on the operational complexities between Foxhall Junction and Wootton Bassett Junction.

FGWL’s validations are largely complete as part of the May 2026 timetable process, while Lumo and MCWR applications have been tested individually, with conflicts and challenges identified separately. The Foxhall Junction - Wootton Bassett Junction section emerges as a critical pinch point, with a variety of pathing, platforming, and retiming challenges affecting all operators. Please note that platforming at either end of the MCWR and Lumo services cannot be considered valid at this stage, as the necessary ECS (Empty Coaching Stock) information is not yet available to produce a definitive platform plan. Sundays present the greatest operational constraints, particularly for MCWR and Lumo services, due to platforming and freight conflicts.

### **First Greater Western Limited (FGWL) Commentary**

FGWL’s proposed paths have undergone end-to-end validation for both weekdays and Saturdays against the May 2026 base timetable, ensuring a high degree of operational robustness. Please note that the validation exercise has been undertaken based upon one train per hour in each direction, but as per Network Rail’s separate representations in respect of the FGWL 301st Section 22A. Predominately due to performance issues at Oxford, Network Rail is only supporting one train in each direction every two hours, contingent rights for three timetable periods with no presumption of continuity at this stage. Full details of FGWL’s proposed aspirations can be found in the final representation letter for the 301<sup>st</sup> SA.

Across both directions, FGWL paths are generally valid throughout, with only limited exceptions against the Lumo Hereford, Lumo Paignton and MCWR applications. Notably, in the down direction, there are three occasions where either a London Paddington to Paignton or an Oxford to Bristol Temple Meads service can be accommodated, but not both simultaneously. On Saturdays, most

services from Oxford are valid, though there are several that conflict with Lumo Paignton, Lumo Hereford and MCWR applications. FGWL has not proposed operating applicable services on Sundays. Overall, FGWL's validation status is strong, but the limited flexibility at Foxhall–Wootton Bassett for certain flows and the either/or accommodation alongside some other operators should be noted.

### **Lumo Paignton Commentary**

Lumo's applications for Paignton have been tested against the December 2025 timetable, revealing several operational complexities. For services towards Paignton, one train path is available both for the Foxhall Junction to Wootton Bassett Junction section and for onward travel, while another route is only valid within the Foxhall Junction to Wootton Bassett Junction section but not beyond. However, it is important to note that there are timetable rules non-compliances with other services at Paignton and Paddington station that makes the overall paths invalid. Additionally, a specific path to Exeter St Davids is available for travel through Foxhall Junction to Wootton Bassett Junction as well as for the remainder of the journey. There are two train paths that cannot be used concurrently with FGWL's Bristol Temple Meads to Oxford services. Furthermore, one service is incompatible with already approved Go-Op service. In the opposite direction, five paths are not valid through this route section, Foxhall Junction to Wootton Bassett Junction, and are also not suitable for the wider journey. A single path originating from Highbridge and Burnham is also invalid within this same section and for the broader route.

On Saturdays, Lumo Paignton services face a range of significant operational challenges. Many services to and from Paignton require multiple shunt moves at Paignton station, adding complexity to the day's operations. For services heading towards London Paddington, only one service benefits from a viable path, yet no platform is available at London Paddington for its arrival, which makes the path invalid. Two services can run between Wootton Bassett Junction and Foxhall Junction without issue, but three others encounter conflicts at these key junctions, which would necessitate the retiming of other services to achieve compatibility. Furthermore, all Lumo Paignton services towards London experience conflicts along the Western Route. In the opposite direction, whilst two services to Paignton could be considered to have viable paths, there are timetable rules non-compliances with other services at Paignton and Paddington station that make the overall plan invalid. Another two lack both a viable route and an available platform at Bristol Temple Meads, presenting an additional constraint. Overall, Saturday operations for Lumo Paignton are marked by platforming limitations, the need for complex manoeuvres at terminal stations, and persistent pathing conflicts at critical junctions and along major routes.

On Sundays, Lumo Paignton services face considerable operational challenges, particularly regarding platform availability and pathing conflicts. For services heading to London Paddington, it is necessary to undertake multiple shunt moves at Paignton, and although one service benefits from a viable path, there is no available platform at London Paddington for its arrival. Two services can traverse between Wootton Bassett Junction and Foxhall Junction without issue, but three others encounter conflicts at these areas, requiring the retiming of other services to enable their passage. Whilst some of the weekend services have a viable path, there are timetable rules non-compliances with other services at Paignton and Paddington station that make the overall plan invalid. Additionally, all Lumo Paignton services to London face conflicts along the Western Route. In the opposite direction, services bound for Paignton also demand multiple shunt moves at the terminus. Out of these, two services have viable paths, though no viable platforming, while a further two lack both a feasible route and an available platform at Bristol Temple Meads.

### **Lumo Hereford Commentary**

Lumo's application for Hereford has also been assessed against the December 2025 timetable, highlighting a range of complex operational issues. For Lumo Hereford, weekday services towards Hereford present no issues between Foxhall Junction and Wootton Bassett. Services from Hereford:

one available path is not valid within the Foxhall Junction to Wootton Bassett Junction section and presents conflicts across the entire end-to-end journey. One path is viable but would need a significant number of re-timings to other services along both the GWML, the South Wales Main Line and between Tram Inn and Hereford. Further work is needed on platforming at London Paddington. However, it is important to note that there are timetable rules non-compliances with other services at Hereford and Paddington station that makes all the overall paths invalid.

For Lumo Hereford services operating on Saturdays, validation against the December 2025 timetable reveals notable operational challenges in both directions. In the direction towards Hereford, one available path is not valid between Foxhall Junction and Wootton Bassett Junction and also presents conflicts along the entire route. Another potential path would necessitate substantial retiming of other services through this critical section and still faces further conflicts elsewhere on the network. Similarly, services originating from Hereford encounter comparable difficulties: one path is invalid within the Foxhall–Wootton Bassett section and is also in conflict for the end-to-end journey, while another option requires retiming of other services within the section and remains subject to additional conflicts beyond. Additionally, there are timetable rules non-compliances with other services at Hereford and Paddington station that makes all the overall paths invalid.

For Lumo Hereford services on Sundays, both paths are viable; however, platforming at Hereford and London Paddington is not possible.

### **Midland Central Western Railway (MCWR) Commentary**

MCWR's individual paths have been assessed against the December 2025 timetable, on Western Route south/west of Oxford, with detailed analysis of conflicts and challenges. Weekday services towards Nottingham see one path fully valid, on Western Route only, through the Foxhall Junction to Wootton Bassett section and onward to the Oxford area, three valid only in this route section but not beyond, and others requiring significant retiming or rendered unviable by freight (MoD) conflicts. Services from Nottingham mirror this pattern, with only one path viable within the Western route geography only, several valid only in the pinch-point section, and others unviable due to conflicts with freight or lack of onward route capacity. On Saturdays, similar issues persist, with some paths requiring retiming and others blocked by conflicts elsewhere on the Western Route. Sundays are particularly problematic: platforming at Bristol Temple Meads is not viable, and major retiming is required, especially on approach to Oxford, often clashing with freight paths. No MCWR path is viable on Sundays, on Western Route, without heavy retiming, and platform availability remains a critical constraint.

Capacity information provided in our letter of representation on the MCWR application, and included as an appendix, dated 21 March 2025, remains relevant in addition to the above analysis specific to the pinch point between Foxhall Junction and Wootton Bassett Junction and the Western Route. MCWR aspirations are shown to consistently conflict with other existing, and repeating, patterns of services across their end to end journey, off of Western Route.

### **3. Performance Considerations**

Performance on the Western route remains a key challenge. While there have been recent improvements in asset reliability, the performance targets are ambitious, and additional services present a material risk of reversing positive trends. Long-distance service groups on this route remain among the poorest performers, all below the 80 % Western route target. Introducing further services heightens the risk of increased delays and reduced network flexibility.

0-3 Moving Annual Average (MAA) for the passenger service groups up to close of Period 8, 2025/26, that operate between Foxhall Junction and Wootton Bassett Junction are:

Route	0-3 MAA Percentage
London Paddington – Bristol	69.4 %
London Paddington – South Wales	65.7 %
London Paddington – Cotswolds	68.6 %

#### 4. Freight and Strategic Growth

This corridor serves as an essential freight route, enabling crucial east–west connections between London, the West of England, and South Wales, alongside important north–south links from Westbury to the South Midlands via Oxford. It supports a wide array of freight movements, such as intermodal traffic to the Wentloog terminal, aggregate shipments from Mendip, Tytherington, and South Wales, and waste transfers from West London to Avonmouth. The line further accommodates fuel trains from Pembrokeshire and Network Rail’s own engineering services. Anticipated growth includes increased scrap metal shipments to Port Talbot’s new electric arc furnace and up to three additional daily construction trains supporting the proposed South-East Strategic Reservoir near Abingdon, Oxfordshire.

Despite Network Rail’s bold targets for expanding freight volumes, the corridor faces significant capacity constraints. The parallel Berks & Hants line, which could serve as a diversion, is heavily utilised by long-distance passenger services to the South-West and by ‘jumbo’ aggregate trains travelling from Mendip to London. This intensive use restricts the potential for rerouting freight traffic, further limiting operational flexibility and presenting challenges to accommodating projected freight growth within the region.

#### 5. Comparative Summary of Applications

All four applications face significant capacity and performance constraints:

- FGWL 301st Supplemental: partly supported on a contingent right trial basis for three timetable periods with no presumption of continuity, aligned with strategic regional connectivity ambitions and subject to robust performance review and conditional on funding for safety improvements.
- MCWR Section 17: Not supported, with insufficient operational detail and significant unresolved pathing issues for the total journey.
- FRW&W 4th Supplemental: Not supported in its current form due to timetable inflexibility and unresolved operational risks.
- FRW&W 3rd Supplemental: Not supported in its current form due to unresolved platforming and timetable inflexibility and unresolved operational risks.

Across these applications, safety - particularly at level crossings - remains a core concern. Network Rail’s support for the FGWL 301st proposal is conditional upon its commitment to finance essential level crossing mitigations. Moreover, Network Rail recommends that, should more than one application be approved impacting the same crossings, the required £1.75 million Level Crossing contribution be apportioned fairly between all affected operators.

Please be advised that the £1.75 million Level Crossing contribution is applicable solely to those crossings jointly affected by both the FGWL 301st Supplemental and other services to Bristol Temple Meads, as may be determined by ORR. For crossings located west of Bristol Temple Meads, which are impacted exclusively by applications such as the FRW&W 3rd Supplemental, Network Rail seeks separate funding arrangements and asks ORR to consider this when directing upon applications. In such instances, it is the position of Network Rail that the entirety of the mitigation costs should be

borne by the responsible operator, as cost-sharing would not be practicable under these circumstances.

## 6. Conclusion

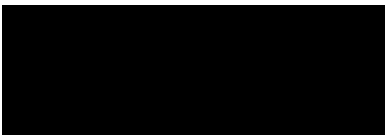
Network Rail acknowledges the GWML between Foxhall Junction and Wootton Bassett Junction is a route of strategic significance, serving both freight and passenger operations.

However, there are substantial challenges regarding capacity constraints and safety that must be addressed. Recent actions include the submission of an early warning indicating congestion on this section, which highlights the necessity for prudent management and careful consideration of new applications. Owing to current infrastructure limitations, the corridor can only accommodate one application per hour in each direction, underscoring the importance of prioritising proposals that best align with operational and safety imperatives.

Of all the applications reviewed, only the FGWL 301st Supplemental is conditionally supported. This support is granted on a provisional, trial basis and is contingent upon thorough performance reviews and the applicant's commitment to funding essential safety improvements. Network Rail's stance is firmly rooted in its statutory duties to uphold safety, maintain reliability, and support future growth. Network Rail remains dedicated to collaborating with ORR, applicants, and industry partners to ensure that the allocation of capacity, safety requirements, and the strategic ambitions for this vital corridor are managed in a balanced, transparent, and evidence-based manner.

Should you require any further information, or wish to discuss our analysis in more detail, please do not hesitate to contact me.

Yours sincerely,



**Daniel Round**  
**Head of Strategic Planning and Wales & Western Sale of Access Rights representative**

Copy to:

Marcus Jones, Western Route Director, Network Rail  
Nick Millington, Wales & Borders Route Director, Network Rail  
Chris Rowley, Capacity Planning Director, Network Rail  
Chris Curtis, Timetable Industry PMO Director  
Rupert Walker, Chair, Network Rail Sale of Access Rights Panel  
Andy Wylie and Stuart Jones, First Rail Wales & Western  
Rob Holder, First Greater Western Limited  
Ian Walters, SLC Rail for Midland Central and Western Railway  
Benjamin Rule, East West Rail  
Will Saltmarsh, Edward Sexton, Andrew Seddon, Department for Transport  
Gareth Clancy, Emyl Lewicki, Louise Bielby, David Reed, ORR

## Appendix 1: details of services through the Foxhall Junction to Wootton Bassett junction seeking access rights

<i>From</i>	<i>To</i>	<i>Via</i>	<i>Description</i>	<i>Morning Peak</i>	<i>Evening Peak</i>	<i>Off-Peak</i>	<i>Weekday</i>	<i>Saturday</i>	<i>Sunday</i>
Bristol Temple Meads	Oxford	Didcot west curve	Class 80x	-	-	-	8 (SCD 2026), 16 (SCD 2027)	8 (SCD 2026), 16 (SCD 2027)	-
Oxford	Bristol Temple Meads	Didcot west curve	Class 80x	-	-	-	7 (SCD 2026), 15 (SCD 2027)	7 (SCD 2026), 15 (SCD 2027)	-
London Paddington	Paignton	Bristol Temple Meads	Class 802	0	1	3	4	4	3
London Paddington	Paignton	Bristol Parkway	Class 802	0	1	0	1	0	0
Paignton	London Paddington	Bristol Temple Meads	Class 802	0	0	5	5	3	3
Paignton	London Paddington	Bristol Parkway	Class 802	0	0	0	0	1	0
London Paddington	Exeter	Bristol Temple Meads	Class 802	0	0	1	1	1	1
Highbridge and Burnham	London Paddington	Bristol Temple Meads	Class 802	0	0	0	0	1	1
Highbridge and Burnham	London Paddington	Bristol Parkway	Class 802	1	0	0	1	0	0
Paignton	Bristol Temple Meads	-	Class 802	1	0	0	1	1	1
London Paddington	Hereford	Bristol Parkway	Class 802	0	0	2	2	2	1
Hereford	London Paddington	Bristol Parkway	Class 802	0	0	2	2	2	1
Nottingham	Bristol Temple Meads	East Midlands Parkway, Loughborough, Leicester, Kettering, Market Harborough, Bedford, Stewartby, Bletchley High Level, Bicester Village, Oxford Parkway, Oxford, Swindon, Chippenham, Bath Spa	Class 221 or Class 222	-	-	-	8	8	8
Nottingham	Bristol Temple Meads	East Midlands Parkway, Loughborough, Leicester, Kettering, Market Harborough, Bedford, Stewartby, Bletchley High Level, Bicester Village, Oxford Parkway, Oxford, Swindon, Chippenham, Bath Spa	Class 221 or Class 222	-	-	-	8	8	8