

First Greater Western Limited (FGW) 115th SA - Industry Consultation Responses

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From: Chiltern Railways
Sent: 31 December 2025 15:27
To: Network Rail
Subject: GWR's 115th SA Industry Consultation Hi,

Whilst it looks as though there is no immediate impact on Chiltern as a result of the two additional passenger slots between Paddington<>Oxford, we will require some additional info on ECS movements and performance modelling before we can accept this application, please.

Please can GWR supply F3s for the intended ECS shunts from Oxford to the carriage sidings?

Please can we see outputs from the performance modelling also? Conscious that we have had to undergo a lengthy process to performance model a very small uplift in services into Oxford from Dec 26, so I'd like to ensure a consistent approach here please (noting it is positive to see that the Form P states modelling is ongoing.)

Many thanks,

Kind regards,

Network Development Manager, Chiltern Railways

Banbury Integrated Control Centre, Higham Way (off Merton Street), Banbury, Oxon, OX16 4RN

www.chilternrailways.co.uk

Chilternrailways

From: GTS
Sent: 15 December 2025 17:40
To: Network Rail
Subject: GWR's 115th SA Industry Consultation

Hi

Thank you very much for getting back to me so quickly. My comments are in red below. Happy to discuss further....

FGW 114th Supplemental

Given the challenges we have been given around extending our rights, I would like the same to be applied to GWR

- Contingent rights only extended if there is a firm plan for bringing them into use
- Detailed performance modelling to have been undertaken for any conversion to firm rights showing no deterioration, but an improvement in performance to GWR and us

Thanks for reaching out and sharing the comments received so far. In respect of your points concerning the 114th Supplemental, I can confirm that the following services are proposed for conversion from Contingent to Firm:

Moreton-in-Marsh to Evesham: This was originally a contingent extension of the Firm Oxford to Moreton-in-Marsh service and is now proposed to incorporate the extended leg (Moreton-in-Marsh to Evesham) as firm. Therefore, 1 x Oxford to Evesham Firm right.

Cardiff to Taunton to Exeter St Davids: Here, two round trips are extended from Taunton to Exeter. The services in question are:

- 2C71 (10:00 Cardiff to Exeter)
- 2C75 (12:00 Cardiff to Exeter)
- 2U18 (12:45 Exeter to Cardiff)
- 2U22 (14:52 Exeter to Cardiff)

None of these services impact the rail geography that GTS use and therefore will not be impacted by them.

Thank you for your response. I will let you know if I receive any further comments.

FGW 115th Supplemental

It is unusual to have two consecutive trains pass through Reading without stopping, on minimum headways, so we request sight of GWR's performance modelling to see if the peak crossing services (weaves), or Heathrow Express are impacted in any way and whether there is a headway risk that could cause a cascade of delay on the Main Lines

We would also like reassurance that our contingency plans have been considered and that this doesn't impinge on the number of TPH we are offered during disruption.

Further to my email earlier today, I can advise that the performance analysis GWR is undertaking is expected to be available during the currency of January, as per Section 3.1 of GWR's Form P.

In terms of contingency planning, Part H of the Network Code sets out a requirement for Network Rail, in consultation with the industry, to establish a Railway Operational Code (the "ROC"). The ROC has the objective of sustaining operation of train services on the network in accordance with the working timetable, as well as where necessary restoring operation in accordance with the working timetable, having regard to the needs of passengers and freight customers; the interests of safety and security; the efficient and economical operation of the network and of trains operating on it; and criteria published by the Office of Rail and Road. The ROC is to be kept under regular review, and covers such issues as notification of disruptive events; contingency plans; clearance of track blockages and assistance to failed trains; emergency timetabling procedures; control arrangements; train regulation; seasonal-preparedness; and other matters necessary or expedient to achieve its objective. Where there are disagreements, the decision criteria can be applied.

Thank you for your response.

GTS will need sufficient time to review the performance analysis before we are able to respond to the consultation. Until the analysis has been provided, and we have been given sufficient time to review the outputs, GTS object to this Supplemental Agreement.

I am familiar with Part H of the Network Code. GTS is unable to support this Supplemental Agreement, until we have received reassurance that our contingency plans have been considered and that this doesn't impinge on the number of TPH we are offered during disruption.

I will let you know if I receive any further comments.

Thanks very much.

Head of Industry Coordination



Floor 11, North Tower, 200 Aldersgate, EC1A 4HD.

From: Network Rail
Sent: Monday, December 15, 2025 15:10
To: GTS
Subject: RE: FGW 114th & 115th Supplemental Agreements

OFFICIAL

Hi,

Further to my email earlier today, I can advise that the performance analysis GWR is undertaking is expected to be available during the currency of January, as per Section 3.1 of GWR's Form P.

In terms of contingency planning, Part H of the Network Code sets out a requirement for Network Rail, in consultation with the industry, to establish a Railway Operational Code (the

“ROC”). The ROC has the objective of sustaining operation of train services on the network in accordance with the working timetable, as well as where necessary restoring operation in accordance with the working timetable, having regard to the needs of passengers and freight customers; the interests of safety and security; the efficient and economical operation of the network and of trains operating on it; and criteria published by the Office of Rail and Road. The ROC is to be kept under regular review, and covers such issues as notification of disruptive events; contingency plans; clearance of track blockages and assistance to failed trains; emergency timetabling procedures; control arrangements; train regulation; seasonal-preparedness; and other matters necessary or expedient to achieve its objective. Where there are disagreements, the decision criteria can be applied.

I hope this helps to answer your queries and please do get in touch if you have any further comments.

Kind regards,



Customer Support Manager



From: Network Rail
Sent: 15 December 2025 12:04
To: GTS
Subject: RE: FGW 114th & 115th Supplemental Agreements

Hi,

Thanks for reaching out and sharing the comments received so far. In respect of your points concerning the 114th Supplemental, I can confirm that the following services are proposed for conversion from Contingent to Firm:

- Moreton-in-Marsh to Evesham: This was originally a contingent extension of the Firm Oxford to Moreton-in-Marsh service and is now proposed to incorporate the extended leg (Moreton-in-Marsh to Evesham) as firm. Therefore, 1 x Oxford to Evesham Firm right.
- Cardiff to Taunton to Exeter St Davids: Here, two round trips are extended from Taunton to Exeter. The services in question are:
 - 2C71 (10:00 Cardiff to Exeter)
 - 2C75 (12:00 Cardiff to Exeter)
 - 2U18 (12:45 Exeter to Cardiff)
 - 2U22 (14:52 Exeter to Cardiff)

None of these services impact the rail geography that GTS use and therefore will not be impacted by them.

In respect of the 115th, we'll share your comments with GWR, and canvas GWR for comment which we will share with you once received.

Kind regards,



Customer Support Manager



From: GTS
Sent: 15 December 2025 10:50
To: Network Rail
Subject: FGW 114th & 115th Supplemental Agreements

Hi

I have received the following comments so far:-

FGW 114th Supplemental

Given the challenges we have been given around extending our rights, I would like the same to be applied to GWR:

- Contingent rights only extended if there is a firm plan for bringing them into use
- Detailed performance modelling to have been undertaken for any conversion to firm rights showing no deterioration, but an improvement in performance to GWR and us

FGW 115th Supplemental

It is unusual to have two consecutive trains pass through Reading without stopping, on minimum headways, so we request sight of GWR's performance modelling to see if the peak crossing services (weaves), or Heathrow Express are impacted in any way and whether there is a headway risk that could cause a cascade of delay on the Main Lines

We would also like reassurance that our contingency plans have been considered and that this doesn't impinge on the number of TPH we are offered during disruption.

Please can you provide an update on the above points. I will forward any further comments that I receive.

Thanks very much

Head of Industry Coordination



Floor 11, North Tower, 200 Aldersgate, EC1A 4HD.

From: CrossCountry
Sent: 18 December 2025 09:05
To: Network Rail
Subject: GWR's 115th SA Industry Consultation

Hi,

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

Kind Regards

Track Access Manager, CrossCountry
Address: 5th Floor, Multistory, 18 The Priory Queensway, Birmingham, B4 6BS



We care passionately | We make the difference | We do the right thing

From: Network Rail
Sent: 6 January 2026 09:35
To: Heathrow Express
Subject: GWR's 115th SA Industry Consultation

Hi,
Thank you once again for your comprehensive response regarding GWR's 115th Supplemental Agreement. We acknowledge your concerns, and although resolving the points you have raised may take some time to resolve due to pending information on performance modelling, we are committed to working closely with Heathrow Express and other involved parties to keep you informed at every stage.

We acknowledge that GWR's performance modelling will not be available until the end of the month, which is after the consultation has closed; however, comments on this will still be considered part of the consultation and will be shared with the ORR as part of the normal process for industry consultation.

The trains that GWR is considering for retiming include 1W33 Pad-Great Malvern, 1C24 London Paddington to Bristol Temple Meads and 1C90 London Paddington to Penzance, but these are part of the performance modelling that is being undertaken and more information will be known when this is published.

The proposed flighting of services to account for the proposed 16:59hrs London Paddington to Bristol Temple Meads is:

London Paddington departure	Headcode	Destination
1655	1T71	Heathrow (Unchanged)
1657	1W33	Great Malvern
1659	1C23	Bristol Temple Meads (fast to Bath Spa)
1701	1C24	Bristol Temple Meads
1703	1C90	Penzance
1705	1K22	Newbury (Unchanged)

With regards to platform and station capacity at London Paddington, we have asked GWR to provide information to support the comment in the Form P and we will share this information with you when available.

If you have any further queries please don't hesitate to get in touch.

Kind regards,



Customer Support Manager



From: Heathrow Express
Sent: 05 January 2026 11:57
To: Network Rail
Subject: FW: GWR's 115th SA Industry Consultation

Dear,

Thank you for issuing the industry consultation on GWR's proposed 115th Supplemental Agreement under Section 22A of the Railways Act.

Heathrow Express has reviewed the consultation material, including the draft Supplemental Agreement, Form P and the notional AM and PM timings. While we note that Network Rail has not yet had the opportunity to review the application and that it is therefore being progressed under Section 22A, we have several material concerns regarding the completeness of the information provided at this stage and these are set out below:

Performance evidence

Form P confirms that performance modelling is still being undertaken by GWR and is not expected to be available until January, after the consultation closes. Given that the application seeks firm peak rights from December 2026, performance impacts are a central consideration for other operators on the GWML, including Heathrow Express. In the absence of this modelling, it is not possible for consultees to assess whether the performance risk is tolerable or how any adverse impacts would be mitigated, as required by sections 4.3 and 6 of Form P.

Paddington platforming and station capacity

The application asserts that suitable platforming arrangements at London Paddington have been identified, but no supporting platform occupation analysis or platform graphs have been provided. Given the well-known constraints at Paddington in the high peak, and the interaction with other peak departures and arrivals, Heathrow Express would expect this evidence to be available as part of the consultation material, particularly where firm rights are being sought.

Consequential retiming of other services

Form P explicitly acknowledges that "several other services will be retimed around" the proposed 16:58 Paddington–Bristol service, including the existing 16:58 departure from Paddington (1W33). However, the consultation documentation does not set out which services are affected, the nature or scale of those retimings, or their operational and performance consequences. Without a clear description of these consequential changes, supported by timetable and platforming analysis, it is not possible to understand the wider impacts of the proposal on other operators' services.

Section 22A status

We note that this is a Section 22A application and that Network Rail has not yet reviewed or agreed the proposal. In that context, Heathrow Express considers that the absence of the above evidence is particularly material. While we recognise that Section 22A allows an application to be progressed where terms are not yet agreed, meaningful industry consultation still requires sufficient information for affected operators to assess impacts properly. At present, that threshold has not been met.

Given the above, Heathrow Express is unable to confirm that it has no objection to the proposal based on the information currently provided. We would welcome sight of the performance modelling, Paddington platforming analysis, and a clear description of all consequential retimed services once available, and we reserve our position pending review of that further material.

Please treat this response as part of the consultation record.

Kind regards

Planning & Performance Manager
heathrowexpress.com



From: Transport Focus
Sent: 12 December 2025 12:44
To: Network Rail
Subject: FW: GWR's 115th SA Industry Consultation

Hi

Thanks - happy to accept this proposed SA for the additional peak-time services between Oxford and London, and the fast London-Bristol service, along the lines of those in place pre-Covid - with the small caveat of provided they don't have a negative impact on the performance of other, existing services.

Best regards

Rail technical advisor

Transport Focus
The independent transport user watchdog