



Emyl Lewicki
Head of Freight and Open Access
Office of Rail and Road
By email only

Gianmaria Cutrupi
Customer Manager
Network Rail Infrastructure Limited
By email only

30 January 2026

Dear Emyl,

Network Rail Infrastructure Limited Representations for a New Track Access Contract submitted under Section 17 of the Railways Act 1993 between Network Rail Infrastructure Limited and Grand Central Railway Company Limited

This letter provides the representations from Network Rail for a new Track Access Contract (TAC) submitted under Section 17 of the Railways Act 1993 between Network Rail Infrastructure Limited (we, Network Rail) and Grand Central Railway Company Limited (Grand Central).

The application was submitted by Grand Central to the Office of Rail and Road (ORR) on 19 December 2025, which included the submission of the Form P and a draft TAC. Grand Central aspire to run the following services from the Principal Change Date (December) in 2026 to the Principal Change Date (December) in 2033:

- Four (4) trains per day in each direction on weekdays (SX), up to four (4) on Saturdays (SO), and two (2) on Sundays (Su) between Newcastle and Brighton.
- One (1) train per day in each direction on weekdays, up to two (2) on Saturdays, and one (1) on Sundays between Birmingham New Street and Brighton.
- One (1) train per day in each direction on Sundays between Reading and Brighton.
- One (1) train per day in each direction on weekdays, up to one (1) on Saturdays, and one (1) on Sundays between Birmingham New Street and Newcastle.

The purpose of our representations is to provide ORR with Network Rail's position on this application (and the specific access rights within it) and will do so by providing facts, data and evidence to support our



position.

Network Rail can confirm that based on the facts, data and evidence outlined in our representations, it is not supportive of this application. Our rationale for not supporting this application is explained in the following sections.

Competing and/or Complex Track Access Applications

In line with ORR's letter of 24 April 2024 to the industry on 'Competing and/or complex track access applications for December 2024, May 2025, and December 2025 timetable changes', Network Rail has now submitted all of its final representations on those applications and ORR has directed on a majority of those applications.

As part of the 'Competing and/or Complex applications' workstream, Network Rail also submitted three relevant General Representations letters to ORR as follows:

- West Coast Mainline (WCML) General Representations dated 07 February 2025
- WCML General Representations dated 25 April 2025
- East Coast Mainline (ECML) General Representations dated 14 March 2025

Whilst this application was not part of that workstream, there are elements of the General Representations letters for the WCML and the ECML which are relevant to this application and, where applicable to particular sections of this letter, references and/or extracts from those letters will be made.

Interested Person(s)

We sent our Interested Persons letter to ORR on 29 December 2025. For the avoidance of doubt, Network Rail is not aware of any persons who would fall within the definition of "Interested Person" in paragraph 1 of Schedule 4 of the Railways Act 1993 in relation to this application.

Form P Application and Track Access Contract

Network Rail acknowledges that Grand Central have included a TAC with their application. As we do not support this application, we cannot agree with the terms drafted in the TAC.

Network Rail has performed an initial assessment of the Form P and associated documents submitted with this application.

Network Rail would like to highlight the following:

Form P

- In section 1.8, Grand Central listed the supporting documentation that has been submitted to ORR. Network Rail only received earlier versions of Grand Central's Timetable Report ("V1") and of the Application Timetable document. Following the submission of their track access application, Grand Central submitted their revised proposed timings via F3 Prints too.
- In section 3.2, Grand Central mentioned that "GC has not identified any safety risks outside those encountered via the normal operation of the railway and managed appropriately via GC's safety management system." Potential safety risks, including level crossings, have been outlined below in this letter.



- In section 3.3, Grand Central noted "[...] from discussions with Network Rail, and information publicly available that introducing new electric traction services on the ECML could result in an increased performance risk."

While we understand that this application is seeking to use diesel traction, we would like to note that introducing new electric traction services on some North West & Central Routes would also increase performance risks.

As stated in the General Representations on the WCML dated 25 April 2025, Network Rail has undertaken a comprehensive power supply modelling exercise to assess the impact of accommodating all outstanding access proposals for additional electric services against the track access rights already held by train operators (both passenger and freight) on the network's traction power supply capability.

As ORR will be aware, Network Rail is currently seeing an increased traction power demand across the network. This is due to a combination of aspirational new services using electric rolling stock in addition to a gradual introduction of electric, bi-mode, and tri-mode trains replacing services previously operated using diesel rolling stock. These actions, if uncontrolled (and without supporting investment) would lead to over demand on the overhead line power supply system and could result in Network Rail not being able to discharge its Network Licence Conditions and operate a safe and reliable railway. As stated in the General Representations on the WCML dated 25 April 2025:

*"Due to the nature of power capacity Network Rail may need to impose further operational controls and restrictions on the use of electric or bi-mode trains (which follow existing procedures) and/or may need to object to the introduction of further electric/bi-mode trains where there is not the requisite power capacity."*¹

Due to power capacity constraints on the WCML, Network Rail has been unable to fully accommodate all operator access proposals for the December 2025 timetable, and as a result issued an Early Indicator of Congested Infrastructure for the Weaver feeding area between Weaver Junction (Jn) and Crewe Neutral Section (all lines) on the WCML on 26 November 2025. Power supply upgrades are planned, but they are currently unfunded and not expected to be completed until 2031 at the earliest. Therefore, Network Rail cannot support additional rights for electric services in the affected area until these upgrades are completed.

- In section 4.3, Grand Central stated that they have commissioned external, independent performance modelling of the key sections of the route, which is due to be completed in January 2026. We would like to have sight of the report, once it is available.
- In section 4.4, Grand Central stated that there is no impact on the maintenance and renewals activity. We highlighted the impact that this track access application would have on our maintenance activities in the 'Southern Region' section below.

In section 5.6 on consistency with the Long-Term Planning Process, Grand Central stated that it had evaluated its paths against the December 2025 timetable, taking into account forecasted adjustments for

¹ Network Rail, *Network Rail General Representations on Complex and/or Competing Applications Interacting on Location West Coast Main Line*, 25 April 2025, p. 15.



the May 2026 timetable. However, it does not consider the consistency of the proposal alongside the anticipated use of the network capacity during the period for which rights are sought, or constraints on network capacity. In this context, we would expect consideration of how the proposal is the best use of limited capacity in meeting stakeholder ambitions.

Track Access Contract

- *Company Number*

Network Rail would also like to highlight that Grand Central already have an existing TAC under the same company name and number (3979826). Network Rail would like clarification from Grand Central if this is an interim measure until new company names and numbers are created, or if Grand Central plan for all of what is requested in these applications to be part of one contract. If it is the latter, Network Rail would like the opportunity of viewing a draft of that proposed contract were ORR to direct on all or some of these applications. The consideration given to these applications as one or two separate contracts will be different.

- *Contract Commencement vs Service Commencement*

- We assume the applicant may plan to undertake driver training and testing before the services commence. ORR may wish to seek assurances from the applicant as to whether the proposed commencement date of the services is realistic, considering the rolling stock has not yet been confirmed, driver training/testing will need to commence, and the necessary vehicle and route acceptance need to be obtained in time.
- The 'Expiry Date' mentions two different dates. We assume that the correct date is the 'Principal Change Date in 2033', as indicated in the 'End Date' of Grand Central's Form P.
- It is usual practice for the 'Longstop Date' to be set for one year after the 'Effective Date'. Grand Central have not provided a justification for having a different date for the 'Longstop Date'. Therefore, Network Rail believes this date should be changed to correspond to the Principal Change Date in 2027.
- Clause 5.6: the reference to Schedule 12 must be removed, given that there is no Schedule 12 in this TAC.

- *Schedule 4*

- Clause 1.1: the Sustained Planned Disruption (SPD) Cost Thresholds need to be specified.
- Clause 4.2(B): the Estimated Bus Miles Payment Rate (EBMPR) needs to be specified.

- *Schedule 5*

- Table 2.1: the Timing Load needs to correspond to a specific rolling stock class.
- Clause 2.10: Grand Central proposed the following amended wording, "Services on Public Holidays will be operated as any other Weekday service."



- Clause 5.1(A): we would ask for clarification concerning the specific rolling stock classes.
- *Schedule 9*
 - Clause 1.(A): the Liability Cap needs to be specified.
 - Clause 1.(B)(I): the sum needs to be specified.
- *Schedule 11*
 - We would like to propose the inclusion of a Schedule 11, which will be a 'Relevant Schedule 4 and 8 Modifications'. This is to allow Network Rail and Grand Central to capture the required data once the services commence and then undertake a Schedule 8 recalibration. Network Rail invites Grand Central to agree a 'Start Date' and 'Backstop Date' as required in this schedule.

The Specified Equipment

General Route Clearance

In their drafted TAC, Grand Central have included in paragraph 5.1 of Schedule 5 of the TAC "Class 180, and/or Class 22x Diesel Multiple Unit [TBC]". We would ask Grand Central to engage with us on commissioning works to deliver the required capability and to undertake the Vehicle Compatibility process for the proposed routes where route clearance has not been achieved for their rolling stock yet. Any modifications to rolling stock would require re-certification. Grand Central should commission a full gauging study from a recognized gauging company for the complete route which could take a few months – depending on the availability of external suppliers – and then a complete compatibility analysis.

We have checked route clearance against the proposed rolling stock (Class 180 and 22x), so we would like to outline the following operational risks until route clearance is attained for the stock Grand Central ultimately intend to use:

- Class 180 are not cleared between Brighton-Wokingham Jn, Leamington Spa Jn-London Road Jn; they are cleared for Empty Coaching Stock (ECS) only between Nunnery Main Line Jn-Swinton South Jn. They are cleared everywhere else throughout proposed journey.
- Class 220 & 221 are cleared everywhere throughout proposed journey.
- Class 222 are cleared between Newcastle-Wichnor Jn, but only for platforms 1-5 at Newcastle. They are not cleared between Wichnor Jn-Brighton.

Vehicle Change

As specified in Part F of the Network Code, an Access Beneficiary is required to carry out Vehicle Change prior to introducing new rolling stock to its Specified Equipment table in Schedule 5 of the TAC. This is covered in the 'Definitions' section of Part F, which states:

““Vehicle Change” means, in relation to an Access Beneficiary:



- (a) any change to Specified Equipment (or, in the case of an Access Option Holder, any change to the type or performance)
- (b) specification of any vehicle specifically identified within an access option) including by way of: [...]

(iii) the inclusion in Specified Equipment of any railway vehicle which is not so included; or

which, in any case, is likely materially to affect the maintenance or operation of the Network or the operation of trains on the Network, but excluding any authorized variation”.

Therefore, Network Rail expects Grand Central to undertake Vehicle Change prior to the rolling stock being added to the Specified Equipment.

We would like to highlight to ORR that there have been numerous applications both directed by ORR or currently being considered by ORR which state the intention to use either Class 221s or Class 222s. ORR should consider whether there is enough rolling stock availability for any application directed in support of the requested access rights.

Timetable Capacity

Network Rail has completed two high-level assessments of the Grand Central aspirational timetable paths aligned to this access application. The first review took place in June 2025, following Grand Central sharing their aspirations with the industry, against the in-development December 2025 timetable. Network Rail completed a subsequent high-level review against the May 2026 timetable in January 2026, following Grand Central’s submission of their Section 17 application for access rights. A summary of the findings of both assessments is included below.

May 2026 Timetable Assessment

Network Rail has conducted a high-level review of Grand Central’s aspirations between Newcastle and Brighton against the May 2026 timetable. This assessment covered weekdays, Saturdays, and Sundays.

None of the aspirational services included in this application were identified as being compliant against the May 2026 timetable. 24 of the 33 Grand Central services also seek to travel through congested infrastructure between Northallerton Longlands Jn and Newcastle King Edward Bridge South. 16 of these 24 services have at least one conflict in the congested infrastructure area.

In addition to this, the aspirational Grand Central services seek to utilise the same paths as other services present in the May 2026 timetable, including:

- Govia Thameslink Railway services between Copyhold Jn and Brighton (access rights held)
- Govia Thameslink Railway services between Redhill and Brighton (part of their 72nd Supplemental Agreement)
- South Western Railway services between Reading and Wokingham, and through Guildford (access rights held)
- CrossCountry services between Reading and York (hold some rights, but there is a proposed May 2026 uplift)

There is an increase in planned CrossCountry services from May 2026 between Reading and York, which



will require an uplift in their access rights and currently that application has not been to industry consultation or submitted to ORR, but is being discussed with Network Rail. These additional paths are reflected in the timetable offered at the development date D-26. These reflect the 2 train per hour (tph) Birmingham-York CrossCountry services which were part of the ECML Event Steering Group (ESG) specification:

- 5 SX, 5 SO, and 0 Su trains from Birmingham to York²
- 1 SX, 1 SO, and 1 Su trains from Birmingham to Newcastle
- 5 SX, 3 SO, and 0 Su from Newcastle to Birmingham
- 4 SX, 4 SO, and 0 Su from York to Birmingham
- 6 SX, 5 SO and 3 Su from Birmingham to Reading
- 6 SX, 4 SO and 0 Su from Reading to Birmingham

The following amount of Grand Central proposed services included in this application conflict with CrossCountry services that are additional in the May 2026 timetable when compared to the December 2025 timetable:

- 3 Grand Central SX services running between Brighton-Newcastle and 2 Grand Central SX Newcastle-Brighton.
- 3 Grand Central SO services running between Brighton-Newcastle and 2 Grand Central SO Newcastle-Brighton.

The CrossCountry paths have also been assessed by Timetable Change Risk Assessment Groups (TCRAG); the capacity for the CrossCountry services to run in and out of Birmingham New Street was an assumption of the December 2022 Concept Train Plan. For clarification, as stated, although these services are in the New Working Timetable (NWTT) for May 2026, they do not currently have access rights.

December 2025 Timetable Assessment

Capacity Planning previously conducted a high-level review of Grand Central's aspirations between Newcastle and Brighton in June 2025, shortly after Grand Central's proposal was shared with Network Rail and the industry.

Each service had capacity issues identified across each route the aspirations pass through, including Birmingham, York, and Reading to Brighton. There are also performance concerns on the ECML and at key locations that the aspirations would pass through.

The review involved reviewing the weekday proposals against an extract of the December 2025 timetable.

There were a number of challenges and concerns with this application. These were:

- There are Grand Central aspirations that are attempting to utilise the same paths as CrossCountry services in the December 2025 timetable; in particular, these are the first 2 Southbound services from Birmingham New Street. At the time of conducting this review, both CrossCountry services were bid into the December 2025 timetable, but only one was offered. However, the CrossCountry service that could not be accommodated was due to conflicts against another service in the

² 1 of the 5 additional SX access rights replaces a contingent right expiring in the Subsidiary Change Date in 2026.



timetable not related to Grand Central. There are multiple other instances where the Grand Central aspirations are targeting the same capacity utilised by existing freight across the network.

- ECML capacity – relevant to all Grand Central services that run to/from York, except 1Z01 (0733 Birmingham New Street – Brighton) & 1Z12 (20:46 Brighton – Birmingham New Street):
 - This application runs through the congested infrastructure declared between Newcastle and Northallerton.³
 - Evidence from the ECML General Representations letter of 14 March 2025 and relevant Annexes should also be drawn on for the purposes of this application:
 - Performance narrative is included for ECML Long Distance High Speed (LDHS) services and York specifically:

“Annex L sets out the significant performance constraints of adding more services over and above the Event Steering Group (ESG) specification at Welwyn in the South, and through York and further North. Network Rail will reflect on applicable performance constraints further in our representations on individual applications.”⁴
 - These Grand Central aspirations were not included in the ECML ESG, December 2025 timetable and would be additional to the specification recommended by the ECML Industry Task Force progressed through the December 2025 Development Period.
- There was limited information regarding ECS/ancillary moves which presents a risk to the working at origin and destination locations.
- The proposed flexes to other services provided by Grand Central often involved significant impact to other operator services and in some cases were not Timetable Planning Rules (TPR) compliant.
- When assuming a Class 22x proxy to review this application, there are instances where the timings proposed cannot be achieved, once Sectional Running Times (SRTs) and engineering allowances are taken into account. Any missing running times would need to be modelled and consulted as per the industry process before these services could operate.
- The turnarounds at Redhill appear to be based on minimum values and would require further information to support if these timings are achievable to understand their potential impact to performance. Similarly, there were performance concerns at Reading. To support periods of perturbation platforms 7 and 8 are kept as clear as possible for recovery, which would be impacted by this application and the proposed flexes.

³ The initial analysis for the declaration of congested infrastructure for the ECML has been published on the Network Rail website. The next and final report is the Capacity Enhancement is due to be published in mid-March 2026 on the Network Rail website. The initial analysis is available at: [Congested-Infrastructure-Capacity-Analysis-1.1.pdf](#)

⁴ Network Rail, *Network Rail General Representations on Complex and/or Competing Applications interacting on Location ECML Kings Cross - Edinburgh and Leeds*, 14 March 2025, p. 9



- If the same weekday timings were applied to Sundays, it was also identified that some of these aspirations would be foul of Section 4 possession opportunities, as published in the Engineering Access Statement.

It is noted that Grand Central have been invited to the May 2027 South West Mainline (SWML) Working Group, due to their potential interaction with services on the SWML. The SWML Working Group is currently paused, but the comments noted above off the SWML Working Group geography would remain valid.

Future Aspirational Services

It is necessary for us to consider other future services with Firm Rights, as well as current and live applications which this application interacts with. Several of the proposed Grand Central services seek to utilise the same sections of the network as the following future aspirations. In some cases, conflicts have been identified between the aspirational path associated with each application or future services with Firm Rights without solutions being found at this time; these are listed in the table below.

This table identifies only where the aspirational paths associated with other applications conflict with aspirational paths in Grand Central's application; no additional commentary on the listed applications is included in this letter.

Future Aspirational Services	Interacting Location	Number of Conflicting Grand Central Services		
		SX	SO	Su
First Rail Stirling, Cardiff Central to York	Birmingham to York	6	4	3
First Rail Wales & Western, London Paddington to Carmarthen ⁵	Reading New Jn to Didcot North Jn	1	0	0
First Rail Wales & Western, London Paddington to Paignton	Reading New Jn to Didcot North Jn	1	1	0
First Rail Wales & Western, London Paddington to Hereford	Reading New Jn to Didcot North Jn	None		
Alliance Rail, Cardiff to Edinburgh	Birmingham to Newcastle	1	1	2
Midland Central and Western Railway, Bristol to Nottingham	Oxford North Jn to Didcot North Jn	None		
Great Western Railway, 115 th Supplemental Agreement	Reading New Jn to Didcot North Jn/Oxford	None		
Chiltern Railways, London Marylebone to Oxford Cowley	Oxford North Jn and Kennington Jn	2	0	0
CrossCountry, Reading to York services	Reading to York	5	5	0

Timetable Performance: Key Location Performance Analysis

We undertook a key location performance analysis for this application, using the May 2025 timetable.

⁵ First Rail Wales & Western London Paddington to Carmarthen services have Firm Rights to run from the December 2027 timetable.



Performance data and commentary relevant to key locations have been shared below. This evidence demonstrates that performance is an existing challenge in these locations prior to the inclusion of Grand Central. Grand Central services which would travel through multiple areas of current poor performance, adding increased pressure to these locations through reducing recovery opportunities and increasing the risk of transporting delay across the network. Additionally, all paths were shown to have conflicts with other services in the base timetable. Therefore, they pose a high risk of importing delay into the timetable.

Newcastle

Performance at Newcastle in May 2025 is above the national On Time Working Timetable (WTT) performance, **61.4%** Nationally compared to **62.6%** at Newcastle.⁶

Newcastle Performance by hour in May 2025, throughout the day, shows steady performance through the morning to afternoon where performance drops from 63.4% On Time between 1200-1259 to 55.2% On Time between 1300-1359. Performance stays stable not rising more than 2% throughout the afternoon, with one dip at 1900-1959 dropping to 48%, with recovery from 2100.

Congestion delay shows that Newcastle itself, suffers the most reactionary delay attributed to late running services.

York

Performance at York in May 2025 is below the national On Time WTT performance, **61.4%** Nationally compared to **46.8%** at York. This location had an On Time WTT % of **46.8%** with **Grand Central performing at 40.8%**.

York Performance by hour in May 2025, throughout the day, shows steady performance up to the morning peak where performance drops from 69.8% On Time between 0600-0659 to 42.5% On Time between 1100-1159. Performance stays stable not rising more than 4% throughout the afternoon, with one dip at 1400-1459 dropping to 37.8%, and no recovery until 2300-2359.

Congestion delay shows that York itself, suffers the most reactionary delay attributed to late running services.

Doncaster

Performance at Doncaster in May 2025 is below the national On Time WTT performance, **61.4%** Nationally compared to **57.1%** at Doncaster. This location had an On Time WTT % of **57.1%** with **Grand Central performing at 39.6**.

Doncaster Performance by hour in May 2025, throughout the day, shows steady performance up to the morning peak where performance drops from 80.9% On Time between 0600-0659 to 62.9% On Time between 0700-0759. Performance stays stable in the morning until 1100-1159 where it drops further to 51.1% with gradual recovery in the late evening.

Congestion delay shows that Doncaster itself, suffers the most reactionary delay attributed to late running services.

Sheffield

Performance at Sheffield in May 2025 is below the national On Time WTT performance, **61.4%** Nationally

⁶ The May 2025 timetable is the most recent complete timetable that can be used as a Performance benchmark. This should be supplemented with the ECML December 2025 Performance modelling conclusions.



compared to **49.6%** at Sheffield.

Sheffield Performance by hour in May 2025, throughout the day, shows steady performance up to the morning peak where performance drops from 66.8% On Time between 0700-0759 to 42.2% On Time between 1000-1059. Performance stays stable not rising more than 8% throughout the day, with one dip at 1800-1859 dropping to 34.7%, with little recovery in the evening.

Congestion delay shows that Sheffield itself, Dore Station Jn to Sheffield and Meadowhall to Sheffield suffers the most reactionary delay attributed to late running services.

Derby

Performance at Derby in May 2025 is below the national On Time WTT performance, **61.4%** Nationally compared to **50.8%** at Derby.

Derby Performance by hour in May 2025, throughout the day, shows steady performance up to the morning peak where performances drop from 83.9% On Time between 0600-0659 to 39.8% On Time between 1200-1259. Performance stays stable not rising more than 11% throughout the afternoon, then drops to 32.1% 1700-1759 with recovery starting from 2000-2059.

Congestion delay shows that Derby <> Sheet Stores Jn, Derby to Ambergate Jn and Derby itself suffers the most reactionary delay attributed to late running services.

Burton-On-Trent

Performance at Burton-On-Trent in May 2025 is below the national On Time WTT performance, **61.4%** Nationally compared to **47.1%** at Burton-On-Trent.

Burton-On-Trent Performance by hour in May 2025, throughout the day, shows steady performance through the morning peak where performance drops from 60.3% On Time between 0800-0859 to 53.5% On Time between 0900-0959. Performance drops throughout the morning until 1200-1259 where it drops to 44.7%. Performance drops further from 1700 where it drops to 33.1% and doesn't rise above 38.3% until 2200.

Congestion delay shows that Clay Mills Jn to Wichnor Jn suffers the most reactionary delay attributed to late running services.

Birmingham New Street

Performance at Birmingham New Street in May 2025 is below the national On Time WTT performance, **61.4%** Nationally compared to **44.3%** at Birmingham New Street.

Birmingham New Street Performance by hour in May 25, throughout the day, shows steady performance up to the morning peak where performance drops from 54.5% On Time between 0700-0759 to 38% On Time between 1200-1259. Performance rises to 49.2% at 1400-1459 then drops down to a low of 33.7% at 1700-1759 with no recovery until 2300-2359.

Congestion delay shows that Birmingham New Street itself, Galton Jn <> Birmingham New Street suffers the most reactionary delay attributed to late running services.

Birmingham New Street – Additional Information

Apart from the limited Reading to Brighton services proposed by Grand Central, all the other proposed services pass through Birmingham New Street, spanning more than one route. Network Rail has noted below that there are specific performance concerns at Birmingham New Street and the Grand Central



services which use Birmingham New Street have either arrived from or are travelling onwards to Western and Eastern Regions. This means that minor delays at Birmingham New Street can escalate quickly across the journey and there is potential for this to be exported or spread onto other Regions. Vice versa, any delays on other routes can be transported into Birmingham New Street and potentially onwards onto the route where the through service is travelling towards.

At Birmingham New Street, the Grand Central paths are proposed to arrive and depart via the Derby Lines into the high-numbered platform on the South side of the station. They have a reversal move in the platforms at New Street, generally in the A end of the platform. In the Weekday timetable that has been looked at, in Birmingham most of the paths in the Northbound direction have interactions at New Street with the Reading to Newcastle CrossCountry service that is reversing at the same time. The two services cannot share one platform even if they were both short enough to allow permissive work, as the times prevent this. As the first service that arrives also is the first to depart, it would be prevented from departing by the second service blocking the A end of the platform. In the majority of the time, there is not another free platform when the Northbound service is in New Street, meaning that it cannot be accommodated.

In the Southbound direction the turnarounds are shorter on the services, meaning that they are easier to accommodate and in the majority of cases have a platform to turnaround in. However, minor TPR non-compliances would need to be resolved to produce a compliant platforming plan. It should also be noted that these services are operating on the minimum reversal time for 22x units from the North West & Central TPRs.

As well as there being performance concerns around Birmingham New Street, Network Rail would also like to highlight that there is uncertainty around capacity at Birmingham New Street and the impact of wider timetable changes in the future. Camp Hill is a new line of route opening on Central Route which brings with it the introduction of new services and stations, which are planned to run in the December 2025 timetable.

In the 'Competing and Complex Applications for the December 2024, May 2025 and December 2025 Timetable Changes' workstream that concluded earlier in the year, the Birmingham area was a highlighted area for focus, as per ORR letter of 24 April 2024.

There is an increased risk to performance as a result of services being planned with minimum dwell times at Birmingham New Street. Minimum dwells reduce the opportunity to recover from delays or mitigate against the impact of other performance challenges at this major station, increasing the chances of transporting delay across the end-to-end route. In the May 2025 timetable, 56.0% of three-minute minimum dwells by other long-distance passenger operators at Birmingham New Street over-dwelted. The complexities of operations in the station throat at Birmingham New Street increase the risks of additional delay if a planned departure is missed.

Oxford

Performance at Oxford in May 2025 is above the national On Time WTT performance, **61.4%** Nationally compared to **62.3%** at Oxford.

Oxford Performance by hour in May 2025, throughout the day, shows steady performance through the morning peak where performance drops from 68.4% On Time between 0900-0959 to 40.8% On Time between 1000-1059. Performance stays stable not performing more than 64.4% throughout the afternoon, with recovery from 2100.



Congestion delay shows that Oxford to Didcot North Jn and Didcot North Jn to Oxford, suffers the most reactionary delay attributed to late running services.

Gatwick Airport

Performance at Gatwick Airport in May 2025 is below the national On Time WTT performance, **61.4%** Nationally compared to **45.1%** at Gatwick Airport.

Gatwick Airport Performance by hour in May 2025, throughout the day, shows steady performance through the morning where performance drops from 59.4% On Time between 0600-0659 to 41.1% On Time between 1000-1059. Performance doesn't recover a lot throughout the late morning and afternoon and drops further at 1700 to 35.4% with no recovery in the evening.

Congestion delay shows that Gatwick Airport itself suffers the most reactionary delay attributed to late running services.

Brighton

Performance at Brighton in May 2025 is above the national On Time WTT performance, **61.4%** Nationally compared to **71.3%** at Brighton.

Brighton Performance by hour in May 2025, throughout the day, shows steady performance throughout the entire day not dropping lower than 63.9% between 0400-2259.

Congestion delay shows that Brighton itself suffers the most reactionary delay attributed to late running services.

Southern Performance

It appears that the proposed Grand Central services would have to use the crossovers at Earlswood North Jn to be compliant in the timetable (e.g. 1Z04 and 1Z07). These crossovers are not used in the WTT except during overnight periods to avoid interaction between slow and fast line services between Stoats Nest Jn and Gatwick Airport. Therefore, the use of these crossovers increases performance risk. Earlswood is also a junction not used during periods of high rail temperatures to avoid failure; we would either increase the performance risk in these periods by using the crossovers, or trigger delays through regulation policies which would reduce the requirement to use the crossing by routing the services accordingly, leading to non-compliant paths.

Performance Information

The Network Performance Board has published a Performance Restoration Framework (PRF), which includes as one of its five priorities having an Operating Plan that works. This means not just train paths which are validated, but also a plan that is robust to minor perturbation and minimises the spread of delay across the network.

In addition, the Secretary of State (SoS) has made clear that improving industry performance to deliver 90% T-3 and under 2% cancellations overall is a Government priority. Existing long-distance services which operated on this corridor are currently significantly adrift of these levels, illustrating the challenge of making such an operation compatible with and supportive of the industry direction of travel. Applicants should demonstrate how their proposals can be made compatible with this objective.

We would expect to see evidence that there are plans to address or cover the following items:



- Strategic allowances in the timetable plan to enable effective recovery from minor perturbation
- An understanding of the impact of platform occupation and measures to mitigate if necessary
- Opportunities for greater standardisation of timetable patterns
- Plan to deliver trains into service right time and supporting information about depot and maintenance strategy for rolling stock
- Location and level of contingency cover for rolling stock and traincrew diagrams proposed
- Proposed strategy for diversion route learning, retention and use, should the ECML become unavailable
- Proposed strategy for fitter coverage and rescue and recovery arrangements
- Engagement with Station Facility Owners (SFO) to understand risks and constraints relating to passenger handling and dispatch, and mitigations agreed or proposed as necessary
- Proposed approach to working with industry to manage disrupted customer flows, including adoption of integrated train service recovery and ticket acceptance arrangements to be used during disruption

Additional Performance Information

A performance assessment for the North of England was included in the 'General Representations on Complex and/or Competing Applications Interacting on Location ECML Kings Cross - Edinburgh and Leeds' (Annex L), provided by Network Rail to ORR on 14 March 2024. The assessment identifies York station as a critical point on the network that contributes to the delivery of high-performance outcomes across both the East Coast Mainline and cross-Pennines services towards Birmingham. Data shows that during the December 2024 timetable long-distance services caused congestion and further delays to other services at York. Furthermore, the final round of ECML timetable performance modelling saw On Time punctuality drop at York by 4.4 percentage points. Any quantum of services above that included in the ECML ESG quantum would further increase the pressure that York station is under and add further risk to the successful delivery of performance outcomes in the future.

Noting that ORR requested performance improvement plans from Wales & Western and Eastern Regions, Grand Central's aspirations would be additional to the quantum that has previously run in all these locations indicated above. Therefore, they are likely to deteriorate performance and reduce resilience. Performance risks would be carried across multiple Routes and Regions.

We would like to see how the new ECML December 2025 Timetable performs, which does not include the additional hourly path that CrossCountry used to run prior to the lockdowns imposed in 2020 by the Coronavirus disease (COVID). Once we have some performance data which demonstrates the actual performance of the ECML December 2025 timetable, then we will consider that additional cross-country path running each hour.

Timetable Development

Key dates for timetable development, such as consultation dates and deadlines for Timetable Planning Rules, including Sectional Running Times, and Engineering Access are available within the 'Calendar of



Milestone dates' documents, which can be found on the Network Rail website ([Operational Rules - Network Rail](#)). Regular forums take place as part of this process and active engagement in these is necessary to develop the detail underpinning a timetable bid.

Eastern Region

Track Access Rights

The ECML ESG timetable does not include the directed and unused LNER (London North Eastern Railway) Firm Rights, as stated in paragraph 5 of Network Rail's ECML General Representations letter to ORR dated 14 March 2025. The December 2025 ECML timetable does not include the 8 LNER Firm Rights Monday to Saturday and the 7 Firm Rights Sunday Only between London King's Cross and Leeds via Wakefield or Micklefield, as directed by ORR in 2016.

The specification for the LNER service to/from London King's Cross had been reduced from 6.5tph to 6tph with agreement from the Department for Transport (DfT) in 2021. This reduction retained the 0.5tph London King's Cross-Middlesbrough service, albeit as far as York, with the 0.5 tph London King's Cross-Leeds service being descoped.

The ECML Programme Board on 21 March 2021 noted the recommendation from East Coast Route to defer the 0.5tph London King's Cross-Leeds service, including the conditional outcome of journey time reduction between London Kings Cross and Leeds, to a post-ECML ESG (December 2025) future timetable change.

On 11 July 2025, ORR published its determination of LNER's 34th and 35th Supplemental Agreements submitted under Section 22A of the of the Railways Act 1993. In this, ORR granted only 5 access rights in each direction between London King's Cross and Leeds, as replacement for those described above, from the completion of the infrastructure work necessary to enable these services. These rights replaced the rights mentioned in the first paragraph of this section.

Work undertaken for the ESG has shown definitively that this 0.5 tph London King's Cross-Leeds service uplift cannot be accommodated alongside the other ESG outputs. As such, the service cannot run in this timetable or future timetables, alongside the other industry-endorsed aspirations without additional infrastructure and associated development activity, which is currently unfunded and uncommitted. As of 14 March 2025, Network Rail formally declared congested infrastructure on relevant routes between Huntingdon North Jn and New England North Jn (Peterborough) and Doncaster Marshgate Jn and Leeds Copley Hill West Jn.

ECML Proposed December 2025 Timetable

As referred to in the ECML General Representations letter dated 14 March 2025, in February 2024 the ESG closed following an ECML Programme Board endorsement on 17 January 2024 to deploy the new ECML Timetable in December 2024, subject to the outputs of the completed performance modelling.

The DfT later accepted a recommendation from the Industry Timetable Assurance Project Management Office (PMO) to funders that the ECML ESG Timetable should be deferred from the December 2024 Timetable Change.

An ECML Industry Task Force commenced in June 2024 as an independently led executive-level cross-industry meeting that provides strategic direction for the work programme. The Task Force developed solutions to the problems of the new ECML timetable, drives consensus on the outcome(s), and delivers recommendations for industry funders and specifiers.



On 17 October 2024 the Independent Chair of the Task Force wrote to the DfT to advise that the Task Force met on 10 October 2024, reviewed the considerations, issues, risks, and recommended proceeding with the implementation of the new timetable for ECML in December 2025. This was on the basis that the timetable is deliverable and meets the Task Force objectives that were set. Concerns were noted from GB Railfreight (representing themselves and other Freight operators), ScotRail, and Transport Scotland. The Task Force recommendation was accepted by the DfT and subsequently endorsed by the Secretary of State in December 2024.

The Task Force had worked collaboratively up to 31 January 2025 to further de-risk the transition of the ECML ESG timetable from development to timetable production. The December 2025 timetable commenced on 14 December 2025, following the Timetable Preparation Period.

Network Rail can confirm Grand Central's application was not included in any of the Timetable work referred to above, as these aspirations were shared after completion of the work. Key concerns associated with the addition of the aspirational paths aligned to Grand Central's application include lack of capacity for the proposed paths through the station throat at York, loss of freight paths on the ECML, and performance risks from running directly in front or behind CrossCountry services. Additionally, the proposed Grand Central services departing Newcastle are proposed to run 4 minutes behind LNER services, both of which call at Durham, Darlington, Northallerton, and York.

North West & Central Region

Network Rail East West Rail Project Team

East West Rail (EWR) Connection Stage 2 and 3 (introduction of new services from Oxford to Bedford Midland and eventually through to Cambridge) are still in development with significant infrastructure enhancements and disruptive works expected.

The EWR project context is as follows:

- EWR Connection Stage 1 (CS1) is the reopening of the OXD (Oxford to Bletchley) line, which has now been completed, with 2 Oxford-Milton Keynes trains per hour planned to be introduced.
- EWR Connection Stage 2 (CS2) is a package of upgrade works on the BBM (Bletchley to Bedford Midland) line, funding for which was announced in the 2024 Budgets, to allow introduction of an hourly Oxford to Bedford service by 2030.⁷
- EWR Connection Stage 3 (CS3) includes further significant upgrade works on both the BBM and OXD lines, promoted by EWR, to support introduction of Oxford-Cambridge services in 2035-2040. This is a key element of the Oxford-Cambridge Growth Corridor promoted by the Government.

The OXD and BBM are both Network Rail infrastructure, managed by Central Route west of Bicester, and West Coast South Route east of Bicester. They interface with Network Rail's Western Route at Oxford and East Midlands Route at Bedford.

⁷ Connection Stage 2 level crossing risk mitigations are geared to support an uplift of 1tph. Other level crossing risk assessments or barrier down time prohibit significant increase of services beyond this point (this is proposed to be addressed at Connection Stage 3).



The capacity upgrades planned under the Oxford Phase 2 project, which are due to be completed in 2029, are a critical enabler for EWR CS2. Globally, when all planned works in the area (EWR CS2, Bridge BFO 1B rebuild, EWR CS3 – especially at Bedford/Bedford St Johns – and Oxford Phase 2) are considered, there is likely to be significant disruption through the 2026-2033 period along the OXD and BBM lines, and at Oxford and Bedford stations. The Grand Central proposal may be more viable once Oxford Phase 2 is delivered and if EWR CS3 timescales or scope changes.

Railfreight

These additional passenger services would run through sections of route declared as congested on the ECML, which would restrict freight capacity. This, matched into aspirations for an "8th long distance" path and mitigations already being proposed to remove further freight from the ECML by gauge clearing the Stillington Branch in the future and diverting around a routing at Newcastle (incompatible with trailing weight restrictions for existing traffic), would curtail freight aspirations.

Granting rights for additional passenger traffic through sections of congested infrastructure would negatively impact freight growth without confirmation of contingent capacity for freight, or suitable freight diversionary capacity and capability on the only other route that would be available for current gauge-constrained traffic.

Southern Region

Depot/Stabling

We understand that Grand Central would like to use Tyne Yard as their engineering base, and Central Rivers and Hove Yard to stable their units. Should there be an intention to berth in Brighton station overnight, this will have an impact on Network Rail's ability to maintain the infrastructure and fix defects within the station area or require Govia Thameslink Railway to move trains out of the station area with the same consequences.

Safety Requirements

Grand Central's application would introduce certain safety issues that would need to be explored:

- Understanding whether the rolling stock is fitted with standard or dual strength Automatic Warning System (AWS) receivers and if the former, confirmation that the operator is aware of the risk of AWS wrong side failure and how they plan to mitigate this
- Assessment of the impact on level crossing safety including barrier down time, especially on the North Downs route where there are known issues
- There is a risk that the proposed services would increase Fatalities and Weighted Injuries (FWI) for level crossings beyond a tolerable level at Farnborough North, North Camp, and Ash

Service Management

We would like to understand the arrangements for managing trains to time, during disruption and for service recovery, this will include:



- Plans for running fast/skip stops, curtailing short and diversionary route knowledge, e.g. via Horsham/Arun Valley or Keymer Jn/Lewes, noting that Class 220/221 are not currently cleared on either line
- Plans for failed trains, including the nearest rescue set, assisting loco arrangements, fitter response, and emergency couplers
- Arrangements with other operators to conduct trains in emergencies
- Plans for stranded trains
- Dispatch arrangements and agreements with station operators where this is undertaken by a third party
- Details of any bespoke stop car marks at stations
- The assessment the operator has made of the impact of our standard access arrangements (possession and line blockage access), as we anticipate these being disruptive to the operation of these services

Weekend Possessions

We cannot accept weekend possession access as it would be too disruptive to Southern Region's possessions. The length of distance might mean that Network Rail would need to accommodate late running, which we cannot accept based on the possession and overnight works impact.

Sussex Route has Engineering Access Statement (EAS) Section 5 cyclic plans between Redhill and Gomshall, and between Earlswood and Three Bridges/Balcombe Tunnel Jn that would impact 1Z09. We need to understand how Grand Central intend to plan around this access and in particular the impact on its last and subsequently first passenger services and associated ECS.

Other than 1Z04 and 1Z09, as the proposed Grand Central services would be running daytime, due to the length of the journey these services are going to be heavily impacted by Section 7 possessions on the weekends. The Brighton Maintenance Delivery Unit carries out inspection and regular maintenance in the Brighton station throat and platforms on Friday and Saturday nights under Section 4 opportunities.

Western Route

Infrastructure Capacity

The indicative timings fall into the same hourly paths that CrossCountry use for their Newcastle-Reading services. Some of these paths are overlaid on services that CrossCountry have stated that they plan to re-introduce through their project Hydra process and their proposed 45th Supplemental Agreement.

These paths would run through very busy infrastructure between Tackley and Reading on Western Route, and whilst these services fall into the current CrossCountry pattern, there is limited opportunity for flexes to align with paths beyond Reading onto the North Downs.



Level Crossing Risk

Network Rail is also aware of the CrossCountry 45th reinstatements, has anticipated them for some time, and already evaluated their impact on the crossings north of Oxford as part of previous risk assessments. Since Grand Central's application seeks to use the same train paths as the CrossCountry 45th, it may be prudent for ORR to wait for the CrossCountry 45th Supplemental Agreement before determining upon this application, considering that Network Rail cannot support both applications due to the limitations related to level crossings north of Oxford.

Network Rail is currently unable to approve the sale of any further access rights at Sandy Lane, Yarnton Lane, and Tackley level crossings (located north of Oxford level crossings) beyond those assessed as part of the December 2019 north of Oxford level crossing risks assessments, which includes the CrossCountry 45th Supplemental Agreement. Before supporting additional access rights, Network Rail requires that all three level crossings either be closed or that appropriate safety measures are implemented to reduce the associated risks. We would like to highlight that ongoing discussions with third parties about risk mitigation measures could help us reconsider this restriction; however, since it is still unclear what specific measures will be agreed upon, we cannot review or change the current restriction at this time. We will reassess our position once negotiations are complete.

It is understood that on most days, freight traffic uses existing timetable paths lightly enough to allow short-term use of those paths. Nevertheless, for further access rights to be granted, Network Rail expects an equivalent reduction in rights elsewhere across the Oxford level crossings. To clarify, the restriction applies only to the sale of new access rights; although there is available capacity and not all Working Timetable paths are frequently used, if all access rights were exercised simultaneously along with any new ones, it would result in an unacceptably high number of services operating north of Oxford level crossings.

Conclusion

Based on the evidence and analysis provided throughout our representations, Network Rail cannot support Grand Central's Section 17 application. This application presents numerous, significant concerns relating to capacity, timetable robustness, performance risk, rolling stock and route compatibility, level crossing safety, and the management of engineering access.

In particular, this application seeks access through areas already declared as congested, conflicting directly with other aspirations. If approved, it would materially degrade the performance and reliability of both passenger and freight services.

For these reasons, Network Rail must conclude that the application does not represent the best use of network capacity and cannot be supported.

Please do not hesitate to contact me if there is any further information you require.

Yours sincerely,



Gianmaria Cutrupi
Customer Manager
System Operator



List of Appendices

Appendix A – Long-Term Planning Process - Strategic Planning Commentary