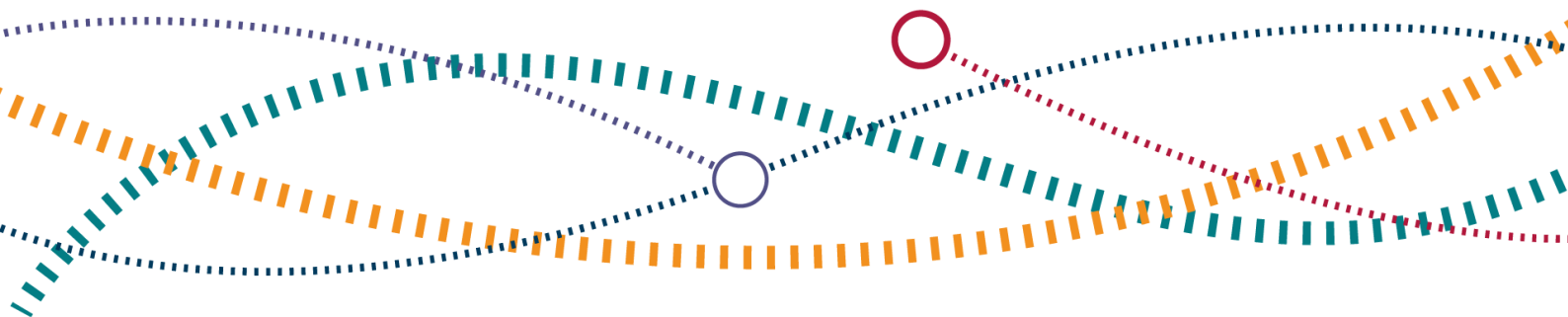




Rail industry compliance with timetable production milestones

Final December 2025 timetable change data.
Current May 2026 timetable change data.

27 February 2026



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Context for this release

ORR monitors industry compliance with timetable production timescales by gathering data from Network Rail and train operators on milestones in the [Network Code](#). Operators need contractual rights to access the network and to receive higher priority in the production of the timetable. Operators can “bid” in expectation of receiving new or amended contractual rights. This is explained in more detail in the [Regulatory Access Dashboard Factsheet](#).

This report highlights key findings from our analysis of final data from the December 2025 timetable change. It also takes a first look at data for the May and December 2026 timetable change.

Analysis of data from the preceding timetables is available on [our website](#).

Network Rail and industry roles

Network Rail is responsible for creating timetables for passenger and freight services. Train operators (passenger and freight) make requests to Network Rail for ‘space’ in the timetable. For details on how the rail industry produces timetables, please see our report on the [timetable development process](#).

Note on Network Code milestones

As part of the periodic review 2023 (PR23), we set Network Rail a requirement to return the timetable process to Network Code compliance by December 2024: [PR23 final determination: settlement document for the System Operator](#).

In October 2023, ORR set Network Rail a requirement to return to the industry agreed timescales for producing the timetable by December 2024. This was because of the importance of effective timetabling to operators, customers and funders. A previous iteration of this report, published April 2025, showed that Network Rail and industry returned to using the Network Code milestones by December 2024. This report shows that the timescales for producing each subsequent timetable have been met by Network Rail, with small numbers of operators not meeting the bid dates on occasion.

Access Rights

ORR produces [reports on Rail access](#) rights through the Rail Access Rights Factsheet and accompanying Access Rights Dashboard. These are helpful companion documents when looking at when operators had access rights in place against when Network Rail published the draft timetable at D-26 (26 weeks before the change).

The updated Regulatory Access Dashboard Factsheet (set to be published February 2026) will show that as with recent previous timetable changes, a high number of operators submitted applications for additional or different capacity use within 12 weeks of the December 2025 timetable change (at D-12).

The December 2025 timetable change was an extraordinary reconfiguration of rail services across all of Great Britain. Substantial changes were seen on services across the East Coast Mainline, with a number of significant changes elsewhere.

For December 2025, 21 applications for access rights were submitted after D-12, introducing the potential risk for operators with timetabled services not having the rights to use the network, and passengers not having access to these services.

D-12 is an important milestone as the Network Code required Network Rail to publish the new timetable at 'not less than 12 weeks before' the timetable change. Industry are also tied to D-12 in order to meet [their commitment](#) to make tickets available for purchase to customers 12 weeks in advance of travel.

Industry had not finalised all of its desired capacity with Network Rail before tickets went on sale, which created avoidable risks for completing the timetable. Despite this, Network Rail and operators submitted the required evidence to ORR in time for it to make the necessary decisions so that the timetable could be legally implemented for passengers and freight.

December 2025 timetable change

The data below is current as of 26 February 2026.

D-40 date – Timeliness of passenger and freight operator timetable bids to Network Rail

- The D-40 date specified by the Network Code was 7 March 2025.
- All operators bar one submitted bids for the December 2025 timetable change on or before 7 March 2025.
- Devon and Cornwall Railways submitted their bid three days past the D-40 deadline, on the 10 March 2025.
- 10 operators submitted their bid before the D-40 deadline of 7 March 2025.

D-26 date – Timeliness of Network Rail providing operators with the timetable

- Network Rail provided all operators with their draft timetables in line with the agreed Network Code milestone of 13 June 2025 (D-26).
- The December 2025 timetable had a lower number of revised access proposals between D-40 and D-26 than the May 2025 timetable. The revised access proposals came from 17 different operators (passenger, freight and open access).
- The number of freight revised access proposals was much higher than for passenger and accounted for 90.8% of all revised access proposals.
- Revisions to a bid between the original bid date and provision of the timetable (revised access proposals) are an expected part of the timetable development process.
- It is not possible at this stage to indicate if the revised access proposals are indicative of the quality of initial bids, or if they are reactionary to the publication of

the draft timetable by Network Rail and subsequent need for access rights or flexibility.

D-22 date – Appeals intention

- Eight operators notified Network Rail of their intention to appeal aspects of the draft December 2025 timetable by the 11 July deadline (D-22). This is the same as the number of operators who indicated to Network Rail they might appeal the May 2025 timetable.
- Eight operators subsequently submitted appeals related to the December 2025 timetable to the Access Disputes Committee* (ADC). These were First Trenitalia West Coast Rail, Freightliner Intermodal, XC Trains, Grand Central, Govia Thameslink Railway, Arriva Rail London, GB Railfreight and Transport for Wales Rail.
- The types of operators appealing to the ADC included operators with services specified by the Department for Transport, Welsh Government and Rail for London, and Freight operators.

*This is based on data from the [ADC website](#) which lists its determinations.

Cases related to the December 2025 timetable can be found under the following references:

- | | | |
|-----------|-----------|-----------|
| - TTP2690 | - TTP2687 | - TTP2684 |
| - TTP2689 | - TTP2686 | - TTP2683 |
| - TTP2688 | - TTP2685 | |

Timetable appeals are referred to the independent [Access Dispute Committee](#) (ADC) in the first instance to resolve issues on behalf of industry. Once an ADC Hearing Chair has made their determination, parties may choose to appeal against that determination to ORR. For more information on timetable appeals (disputes) the ADC has produced a [snapshot of current disputes](#).

Train Operator Variation Requests (TOVRs)

Train and freight operators can request a variation to the base timetable after it is published at 26 weeks before the timetable starts (D-26). This is called a Train Operator Variation request, or 'TOVR'. Network Rail will either accept, reject or modify the request.

Freight operators will often identify space in the timetable and use TOVRs to obtain timetable slots for up to 12 months. This can be helpful for operators to be able to provide services at a short notice, cater to customers who only require services for a short-term period, as well as to demonstrate that their services can operate without undermining network performance, before applying for firm contractual rights.

TOVRs are an important part of the timetable production process and can allow capacity to be used effectively. TOVRs provide flexibility in the timetable production process by allowing additional or amended services from passenger and freight operators to be included in the timetable after the base timetable is published.

However, having a high number of TOVRs (regardless of operator type) can create instability. TOVRs made within 12 weeks of the timetable entering operation can impact on the release of final timetables to train and freight operators and subsequently passengers.

We are currently collecting data on the total number of TOVRs made by operators. A higher number of TOVRs might suggest more work would be required to finalise the draft timetable. However, as it does not take into account the complexity of each TOVR or the number of services affected, the data is limited in what it can tell us about the impact of TOVRs on timetable production and information to passengers. We plan to develop our analysis further in future.

- The volume of TOVRs submitted by Freight operators has decreased sharply from 1,675 in June 2024 to 337 in May 2025, before increasing to 777 in December 2025. Despite this increase, the volume of Freight TOVRs remains 54% lower than in June 2024.
- The smaller number of TOVRs submitted for December 2025, is at least, in part, a consequence of number of firm rights which were approved and directed by ORR ahead of the December 2025 timetable change.
- As a proportion of the total number of TOVRs submitted to Network Rail, Freight operators share of the total follows a similar pattern:
 - 86.6% (June 2024)

Office of Rail and Road | Rail industry compliance with timetable production milestones - December 2025 and May 2026

- 80.8% (December 2024)
- 48.4% (May 2025)
- 69.8% (December 2025)
- We (and industry) expect freight operators to have a high number of TOVRs because of their business model, which relies on identifying and bidding for unused capacity in the base timetable. Nonetheless, TOVRs can introduce complexity in finalising the timetable, particularly if submitted close to the Timetable commencement date.
- Freight operator submitted TOVRs continue to account for the majority across three of the four timetable changes, but the downward trajectory from 2024 to 2025 suggests that there is a decline in TOVR use by Freight operators.
- The May 2025 timetable shows an unusual balance between Freight and other operator types, driven by a low overall TOVR total (696) rather than a structural shift.

Timeliness of freight operator submissions

- For December 2025, 261 (of 777) submissions were made with **less** than 12 weeks to the timetable change, accounting for 33.6%. This is similar in terms of absolutes, but not with the percentage of freight operator TOVRs received with less than 12 weeks to the timetable change for May 2026 (204 of 337, 60.5%).
- These numbers show that early submissions of TOVRs have increased as the amount of TOVR's submitted by freight operators with more than 12 weeks to the timetable change has increased as a proportion as well as a value, from 133 (39%) in May 2025 to 516 (66%) in December 2025.
- This may suggest a continued qualitative robustness in the submission of TOVR's from freight operators which has allowed them to make earlier requests to Network Rail, despite an increase in volume of requests.

Public service operators

- Passenger operator TOVR submissions decreased in both total volume and share of all operator submissions in December 2025. December recorded 336 TOVRs, representing 30% of all TOVR submissions, compared with the May 2025 timetable change, which saw 350 TOVRs and accounted for 50% of total submissions.

Office of Rail and Road | Rail industry compliance with timetable production milestones - December 2025 and May 2026

- Passenger operator submissions rose from 233 in June 2024 to a peak of 350 in May 2025, before falling slightly to 336 in December 2025. This indicates gradual growth over the period, followed by a modest decline in the most recent change.
- However, passenger operator TOVRs as a proportion do not follow the same upward pattern. Passenger operators accounted for:
 - 12% (June 2024)
 - 17% (December 2024)
 - 50% (May 2025)
 - 30% (December 2025)
- The spike in May 2025 is an outlier which was driven by a substantially lower total TOVR volume that period (696).

Timeliness of passenger operator submissions

- Passenger operator timeliness declined between May and December 2025. Although overall volumes fell, both the number and proportion of TOVRs submitted within 12 weeks of the timetable change increased (from 212 / 61% in May to 241 / 72% in December), indicating greater reliance on late requests.
- This decrease in timeliness introduced significant risk and suggests that 241 trains had changes requested after the point at which passengers should have been able to buy tickets.
- Of the passenger operators, Southeastern and South Western Railway had some of the highest number of TOVRs for the December 2025 timetable change at 85 and 81 respectively. Notably, 92.9% of Southeastern and 96.3% of South Western Railway's TOVR submissions were submitted less than eight weeks before the timetable change.
- ScotRail has consistently had some of the highest numbers of TOVRs as a proportion of passenger operator TOVRs across the last passenger timetable changes. However, the proportion of TOVRs from Scotrail has trended downwards across the last 4 timetable changes, from a high of 29.2% down to 15.2% in December 2025.

Open Access and Other operators

- There were no TOVR requests from open access operators or other operators for December 2025.

May 2026 timetable change

The data referenced below is current as of 26 February 2026.

D-40 date – Timeliness of passenger and freight operator timetable bids to Network Rail

- The D-40 date specified by the Network Code was 8 August 2025.
- All operators bar one submitted bids for the May 2026 timetable change on or before 8 August 2025.
- Direct Rail Services submitted their bid two days past the D-40 deadline, on the 10 August 2025.
- Nine operators submitted their bid before the D-40 deadline of 8 August 2025.

D-26 date – Revised access proposals

- Network Rail issued all operators with their draft timetables on 14 November 2025, which is in line with the D-26 as required by the Network Code.
- The May 2026 timetable shows a significantly lower number of revised access proposals submitted between D-40 and D-26 when compared with both May and December 2025, with a total of 66 revised access proposals. The revised access proposals came from 11 different operators, including public service passenger operators, freight operators and other operators.
- There were no revised access proposals from open access passenger operators.
- The number of revised access proposals submitted to Network Rail by D-26 has shown a declining trend across the last three timetable productions, with a substantial decrease for the May 2026 change.
 - May 2025: 436 revised access proposals
 - December 2025: 292 revised access proposals

– May 2026: 66 revised access proposals

- While revisions between the original bid and the draft timetable are a normal and expected part of the timetable development process, the continued downward trend may indicate improved quality and robustness in initial bids submitted by operators.
- The distribution of revised access proposals has shifted significantly. While freight operators accounted for around 90% of revisions for both the May 2025 and December 2025 timetables, this fell to 48.5% for May 2026.
- This indicates a substantial change in who is generating mid-process timetable revisions, with freight operators submitting far fewer revisions and passenger and open access operators now accounting for the majority of changes between D-40 and D-26.

D-22 date – Appeals intention

- Five operators notified Network Rail of their intention to appeal aspects of the draft May 2026 timetable by the 12 December deadline (D-22). This is a decrease from the number of operators who appealed both the May and December 2025 timetables.
- Operators with services specified by the Department for Transport, Welsh Government and freight operators told Network Rail they might appeal elements of the December timetable.

*This is based on data from the [ADC website](#) which lists its determinations.

Cases related to the May 2026 timetable can be found under the following references:

- TTP2761
- TTP2762
- TTP2763
- TTP2764
- TTP2765

Next publication date

Final data for the May 2026 timetable change will be published [on the ORR website](#) in September 2026, along with an initial view of data for the December 2026 timetable change.

Updated data tables and charts will also be available.



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