

Gareth Clancy
Head of Access and Licensing



Jake Kelly & Hannah Linford
North West & Central Regional Managing Director
& Director, Capacity Planning, System Operator
Network Rail

20 January 2026

Dear Jake and Hannah

Firebreaks and performance on the West Coast Main Line (WCML)

I am writing to request further information from Network Rail on access to the West Coast Main Line, specifically at the south end on the fast lines. This is so ORR can weigh its duties and take timely decisions for all operators.

When considering applications for use of the fast lines on the West Coast South for December 2025, we placed an emphasis on the comprehensive representations and evidence provided by Network Rail on 7 February, 8 May and 20 June 2025. ORR considered this information robust evidence for applications containing requests for capacity on the WCML from December 2025. In summary, these representations set out that use of paths labelled as 'firebreaks' would have a detrimental impact on performance on a route which is focussed on improving performance metrics whether that is punctuality or reliability.

Network Rail also set out that an additional right could be allocated to Avanti for Manchester to London from December 2025. We expect to receive a new application for long term rights shortly related to this train (the 07.00 Avanti). To consider this application and others we have already received we need Network Rail to respond to the following:

Pre-December 2025 timetable introduction

1. Please set out your assessment of using one or more of the 9 firebreak paths (in each direction) using punctuality, reliability, primary and reactionary delay metrics. Please provide the same for the 07.00 Manchester to London path used by Avanti.
2. What was the modelled impact, including cumulative delay on later services, of including a train in each of the 9 firebreak paths (in each direction, up and down) referred to in the February 2025 representations?

3. Please provide your assessment of how the inclusion of a train in the 07.00 path differed from use of a 'firebreak' path according to punctuality, reliability, primary and reactionary delay measurements.
4. Please provide the modelling used to conclude that 9 firebreak paths was (and whether it continues to be) the optimum number. Please set out what consideration was given to the impact of operating services in some of these paths and the outcome of that.

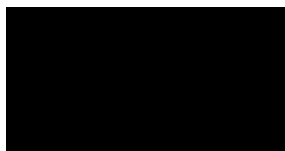
Post-December 2025 timetable introduction

5. Please provide your performance assessment of the 07.00 using punctuality, reliability, primary and reactionary delay metrics (as of 11 February 2026) since the December 2025 timetable introduction.
6. Please explain Network Rail's current view on the use of 'firebreak paths' on the West Coast (south) and how these align with industry processes for train planning.

Please provide the pre-December 2025 information by 4 February 2026 and the post December assessment by 18 February 2026.

If a meeting would help Network Rail prepare a timely response, I can arrange one. This letter will be published on the ORR website.

Yours sincerely



Gareth Clancy