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By email

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Dear Paul

Tackling the complexity and burden of regulation

I am writing to update you further to Feras Alshaker's letter dated 17 December 2025, which described ORR's continued work to reduce the administrative burden of regulation on Network Rail. This is in response to the Chancellor of the Exchequer's pledge, on 17 March 2025, to drive economic growth by cutting the administrative cost of regulation to businesses by 25% by the end of the current Parliament.

Progress to date

I welcome the continued collaboration between our teams to progress the quick win activities and actions from the workshops that ORR and Network Rail teams held, as set out in the [December 2025 update letter](#).

We now routinely identify and implement ways to maximise benefit and further reduce the administrative burden our interactions might create on Network Rail – with a focus on using existing Network Rail information and engagement wherever possible. A number of additional activities, including reviewing the frequency and scope of our engagement with the System Operator and transforming the previously updated Independent Reporter tracker to a Power BI dashboard, have also been completed and made a positive difference.



Quick wins

All previously identified quick wins and associated “follow-on” activities are either on track or have been completed and embedded as business-as-usual activities.

However, collectively we have made less progress than anticipated since the December letter on automated data sharing. With both organisations committed to the effective use of technology to enable growth, improve efficiency and deliver greater value and to the Department for Transport’s (DfT) Transport Data Action Plan (DAP), we anticipate this will yield further reduction in regulatory burden as Great British Railways (GBR) designs and implements its new processes and systems.

Workshops

Since the four workshops facilitated by consultants Arup in November 2025, our teams have been working collaboratively to implement the actions and identify future areas of development. Actions completed include:

- Reducing the frequency of route train performance meetings and, where possible, reusing existing Network Rail management reporting to reduce administrative burden. Further scheduling changes are planned with Network Rail for 2027 to align ORR meetings with GBR’s emerging structure;
- Improved internal ORR ways of working, to simplify engagement with Network Rail on cross-cutting activities;
- Ensuring key ORR/Network Rail meetings have updated and jointly agreed Terms of Reference to provide more structured and value-added engagement; and
- Improving early, two-way communication on asset management concerns, enabling more streamlined deep dive activities and avoiding ‘late surprises’ on authorisations and funding period 1 (FP1) planning.

For interoperability we have an agreed set of actions and are engaging with third party stakeholders to promote Railway Interoperability Regulations (RIR 2011) guidance and discuss any potential changes. DfT is currently undertaking a post implementation review of these regulations with industry stakeholders, with a planned completion date later in 2026.

Our recent reviews with ORR’s project leads - validated by your team – confirm changes in engagement and ways of working since the ORR/Network Rail



workshops have improved efficiency and reduced resource demands associated with our regulatory engagement, while allowing ORR to maintain effective regulatory oversight. Specific outcomes from our programme of work include more focused and structured engagement, improved co-ordination of information requests and greater use of existing management information and streamlined processes and outputs.

This also indicates immediate progress in resolving Arup's overarching recommendations made following the workshops between our teams - to improve awareness of regulatory processes and guidance; to better align key contacts; and to provide greater clarity on the escalation process between us.

Forward look

Embedding and realising the benefits of the activities already undertaken, and pursuing continuous improvement in day-to-day activity, remain important to meeting the objectives of this work.

The creation of GBR, within broader sectoral reform, will drive further reductions in regulatory burden – for example in the simplification of access planning.

We therefore need to embrace this as “business as usual” and focus our collective resources on setting GBR up for success, working with DfT Operator and DfT to streamline activities and engagement within the new system.

As such this will be my final letter on this initiative, but I know our teams will continue to constructively challenge each other to identify and embed new opportunities through their existing business forums – in line with the principles we have established.

Yours sincerely

Graham Richards
Director of Planning and Performance