



██████████
Head of Passenger Track Access
Office of Rail and Road
By email only

██████████
Customer Manager
Network Rail Infrastructure Limited
By email only

21 September 2026

Dear ████████,

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 Alliance Rail 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") and Alliance Rail Limited ("Alliance Rail"). Our letter is sent in response to an invitation by the Office of Rail and Road ("ORR") on 20 August 2026 to make written representations in respect of this track access application.

The application was submitted by Alliance Rail to ORR on 19 August 2026, which included the submission of the Form P and a draft TAC. Alliance Rail aspire to run the following services from December 2027 to December 2034 in their draft TAC:

- Five (5) trains per day in each direction between London Waterloo and Marchwood on Weekdays (SX), Saturdays (SO) and Sundays (SUN);
- Nine (9) trains per day in each direction between Southampton and Marchwood on Weekdays (SX), Saturdays (SO) and Sundays (SUN);
- One (1) train per day in each direction between Eastleigh and London Waterloo on Weekdays (SX), Saturdays (SO) and Sundays (SUN);
- Two (2) trains per day in each direction between Eastleigh and Marchwood on Weekdays (SX), Saturdays (SO) and Sundays (SUN).

Where there are paragraphs in this letter which are commercially sensitive and would need to be



redacted, each such paragraph will have the words “**Commercially Sensitive – to be redacted**” at the start of each relevant paragraph and the text which needs to be redacted will be in red bold font.

Based on the facts, data and evidence outlined in this representation, Network Rail can confirm it is **not supportive** of this application at the current time due to several matters that remain unresolved or unclear, including related to capacity and timetable uncertainty, performance impact, infrastructure investment including level crossing safety and signalling and control strategy, and rolling stock acceptance including operational resilience and recovery, all of which are application critical and warrant further discussion between Network Rail and ORR before the application is considered for approval.

Other conditional requirements that could be resolved through funding and development include power supply capability, resource and staffing requirements including maintenance strategy, Marchwood Station access, environmental impact assessment, and Network Change.

Finally, matters of detail are highlighted and require attention including the Form P and TAC, Sectional Running Times (SRTs) and access planning.

With all of the identified assessments and likely interventions / physical works required and associated funding, the timescales to design and deliver these are unlikely to align with a proposed Dec 27 commencement, taking into account that all these activities need to be completed prior to driver training and train testing which usually takes a minimum of 6 months. Network Rail in this letter has highlighted the need for a set of conditions precedent to be included in Clause 3 of the Front End of the Track Access Contract. Currently Network Rail cannot identify the exact dates for the effective and longstop date for these reasons.

We hope that through continued engagement with Alliance Rail we can reach a final position on this application once the outputs from the Wessex Timetable Industry Working Group, set up to evaluate December 2027 re-cast timetable options, have been finalised and all dependencies have been fully considered.

Interested Persons

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 the application made by Alliance Rail.

Application Critical Matters

Capacity

A Wessex Timetable Industry Working Group for a proposed December 2027 re-cast timetable is in progress, which commenced on 22 July 2026. Network Rail has invited all Working Group members to actively participate in the development and evaluation of timetable options. Alliance Rail attended the first Working Group on 29 July 2026 and a number of subsequent meetings.

The capacity assessment is based on a proposed new off-peak standard hour timetable structure as

developed by SWR. This baseline has been used in order to account for all firm access rights currently held by SWR in a way which the current timetable does not, due to the fact that there are a number of SWR firm access rights which are dated to commence in December 2027. While the full new off-peak structure would require SWR to obtain some additional rights, these would affect line of routes outside the immediate geographical scope of this application. Therefore, in Network Rail's view, using the proposed Dec 2027 off-peak structure represents the most appropriate baseline to assess capacity under this application.

SX peak, SO and SUN assessments will also need to be completed, with appropriate baseline assumptions to be agreed under the Industry Working Group as associated work packages are being progressed.

The assessment gives consideration to timetable platform occupancy at all affected stations including Southampton Central and London Waterloo.

The ongoing capacity assessment is taking cognisance of the restrictions currently referenced in the test Statement of Compatibility (SoC). It is recognised that a SoC for passenger use may identify further restrictions that would have to be considered subsequently. The emerging findings from our assessment show that those restrictions introduce substantial limitations to available capacity between London Waterloo and Raynes Park Jn. This is because of the consequent need for the Class 769 trains to weave between the Main Fast lines and other adjacent lines. This would also introduce a substantial operational constraint and performance risk. Currently, trains using Main Suburban, Main Fast and Windsor lines operate mostly segregated from one another.

The assessment undertaken by Network Rail as part of the Industry Working Group up until 16th September 2026 has not been able to identify any useable capacity for paths within the proposed off-peak standard hour structure. The assessment has considered flexing of other services within the structure in order to optimise capacity use, without success.

The governing constraints that have so far prevented the identification of useable capacity (among potentially others) include:

- Requirement for weaving moves to align with Class 769 SoC restrictions of use between London Waterloo and Raynes Park Jn, introducing the need for crossing moves at intensively used junctions along that section.
- Suitable end-to-end path availability between London Waterloo and Southampton Central.
- Conflicts on the single line section with freight services between Totton Fawley Loops and Marchwood during some hours of the day.

Indicative results suggest that permissive working arrangements would be required at Southampton Central as platform capacity would have to be shared with GTR services, the operational viability of which would still have to be confirmed.

Alliance Rail have been invited to explore further options and feed back to the Industry Working Group in due course.

Assessment of SX peak, SO and SU paths under the Industry Working Group has not yet commenced.

This timetable analysis is expected to continue until at least D-55 for the December 27 timetable (20 November 2026) with further support likely to continue until Operators are expected to bid at D-40 (5 March 2027).

On 16 September 2026 (shortly before the finalisation of this letter), the Industry Working Group including Network Rail have been informed by South Western Railway that they are pausing to review the new off-peak standard hour timetable structure and keeping options open for December 2027. They reported that the SWR-led performance modelling of the current recast proposition (off-peak standard hour) showed material deterioration on several main-line service groups. The impact on activities under the Industry Working Group, including further assessments of capacity for this application, will need to be determined.

Network Rail expects to be able to provide an updated position regarding capacity for the access rights proposal as this Industry Working Group progresses.

Marchwood Port

Traffic from Solent Gateway is planned to be moved to Marchwood port. Options for retaining access to/from the port for freight traffic was discussed with Alliance at the site visit on 17 August 2026.

Commercially Sensitive – to be redacted

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Interacting Applications

Network Rail are aware of the following track access applications interacting with the geographic area of the Alliance Rail proposal:

Application	Status
SWR 49 th Supplemental Agreement	Approved by ORR
SWR 48 th Supplemental Agreement	Submitted to Industry
SWR May 27 Aspirations	Known to Network Rail
Grand Central Waterloo to Bristol Temple Meads	Submitted to Industry
Freightliner 31 st Supplemental Agreement	Submitted to ORR
DB Cargo 115 th Supplemental Agreement	Submitted to ORR
DB Cargo 117 th Supplemental Agreement	Submitted to ORR
GBRF 45 th Supplemental Agreement	Submitted to ORR
XC May 28 Aspirations	Known to Network Rail

All of these aspirations, up to December 2027, have been taken into consideration within the Industry Working Group.

Performance

Wessex performance has continued to worsen since the reintroduction of passenger services following COVID-19, with the On Time to 3 MAA currently standing at 82.5% and on a trajectory to reach its lowest (worst) level in at least a decade. A key concern is performance on the mainline between London Waterloo and Weymouth which is lower still, with an On Time to 3 MAA of 79.6%.

Aligned to the industries drive to improve national performance, the Route's ambition remains to achieve 90% On Time to 3 with incremental improvements required each year across the Whole System to achieve this position. Analysis completed indicates that delivering this ambition will require a 2.2 percentage point contribution from the operating plan (timetable), alongside improvements in the operational delivery of that operating plan, whilst also providing greater levels of resilience and recoverability than are achieved today. As the operating plan forms a key component of long-term performance improvement, any amendment to that plan should be supported by clear and objective evidence of its expected impact on performance, resilience and recoverability, and its effect on the ability of the Route to achieve its performance objectives.

Beyond headline performance measures, it is essential that detailed analytical work is undertaken to understand the implications of any proposed timetable changes. This will include path variance analysis and full timetable modelling to quantify the operational and performance impacts. Similar to the capacity analysis, performance assessment will form part of the Industry Working Group involving all access parties and therefore Network Rail expects to be able to provide an updated position as this progresses. For clarity, this does not suggest that the issues outlined in the Representations Letter in response to Alliance Rail's previous application are no longer relevant but rather that all future timetable aspirations and committed access rights are being considered together. Network Rail will share the relevant outputs of the Industry Working Group with the ORR.

The overarching consideration must remain the ability of the railway to achieve its agreed performance targets. Any proposal that introduces a detrimental performance impact, particularly on the Wessex Main Line, would not be supported.

Infrastructure

The line between Totton to Marchwood is a goods only line in the Sectional Appendix, and as such Network Rail is not currently funded to operate it as a passenger line. A number of activities would be required to bring it into passenger service. This conversion from a goods line to a passenger line would constitute an enhancement and would require Network Change in accordance with Part G of the Network Code.

As such a fully funded plan would be required from the applicant for each of the activities below.

Network Rail has not been provided with a detailed scope of proposed works to evaluate by Alliance Rail, and so Network Rail has sought to use the information currently available to aid Alliance Rail in understanding what may be required. However, it should be noted that given this detailed work has not been commissioned, Network Rail's conclusions on the level of funding required cannot be reached until such information is provided. The work completed as part of the Restoring Your Railways Waterside Line project has some relevance in understanding considerations in relation to Alliance Rail's proposal, however it should be noted this is several years old and was for a different level of service and across a larger geography. Where applicable, Network Rail has drawn on this work in reaching its views.

Notwithstanding these qualifications, Network Rail outlines its current views below.

Track and Structures

The goods line from Totton-Marchwood operates a very low frequency freight service (1-2 trains per week). It is consequently maintained with minimal interventions required. The introduction of passenger services and an increase to approximately 1tph in each direction would require investment to address track condition prior to any services operating as well as maintenance requirements in order to manage safety risk in line with relevant standards.

Given that the line speed is not proposed to be increased, Network Rail's engineers consider that a heavy refurbishment of affected mileages would be sufficient to enable a passenger service. High level estimates of this work have been provided to Alliance Rail & ORR.

An increased inspection regime would likely also be required, as well as a review of lineside fencing.

A structural engineering assessment would be required which may lead to works being required.

Level Crossings & Signalling

Alliance Rail state in their Form P¹ "Level crossing risks on the branch line have been evaluated as part of the extensive studies undertaken with no significant risks (for an hourly service) highlighted [...] although Alliance is still looking to upgrade this crossing to full barriers.". Network Rail's level crossing specialists have reviewed the proposal in line with level crossing risk assessment methodology and consider that interventions would be required at Marchwood Level Crossing and Jacob's Gutter Lane Level Crossing.

Marchwood Level Crossing is currently a manually operated gated crossing. Network Rail does not believe that the crossing can be left as it currently operates due to the additional risk of operating a manually gated crossing with the intended increase in frequency of service over the busy road crossing the services would introduce. This will require an upgrade to a full barrier system (CCTV or Obstacle Detection (OD)). A benchmark estimate based on other schemes for the level crossing only has been provided to Alliance Rail & ORR. However, it should be noted that Network Rail has not had sight of a specific proposal for review from Alliance Rail for their proposed intervention at Marchwood Level Crossing to upgrade and therefore is not able to comment on the consequent signalling works that would be required in view of the new level crossing.

Jacob's Gutter Lane Level Crossing would not require a full upgrade. However, it has been identified, in discussion with Alliance Rail, that an additional pedestrian gate should be provided at the site, as well as a member of staff to support with engagement with the local school for an interim period after any introduction of passenger services. A high-level estimate of both elements has been provided to Alliance Rail and ORR.

Rolling Stock

The "Class 769 DC/diesel bi-mode".² rolling stock intended to be used by Alliance Rail needs to go through the Vehicle Acceptance process, as well as securing gauge clearance and a Statement of

¹ Alliance Rail Southern, *Application to the Office of Rail and Road for a Passenger Track Access Contract, or an Amendment to an Existing Contract*, 19 August 2026, p. 5.

² Alliance Rail Southern, *Track Access Contract (Open Access)*, 19 August 2026, p. 68.

Compatibility (SoC) for use in passenger operation. There is already a SoC for test operations (in ECS only) subject to a number of restrictions which impact upon the proposed services. Alliance Rail state in their Form P that they are “aware that the Class 769... still has a small number of potential infrastructure interventions to address”³. Network Rail notes that 42 location-specific restrictions are listed on the existing SoC including prohibitions, speed restrictions and restrictions preventing trains from passing trains on adjacent lines.

For the avoidance of doubt, these and any additional restrictions identified for the passenger SoC would need to be resolved, as Network Rail does not consider that a passenger service would be acceptable with such restrictions. Given the busy and complex network in the London Waterloo-Surbiton area, complex routing of such a service to avoid restriction would introduce unacceptable operational and performance risk.

Depending on the nature of the issue at each location listed, resolution would likely necessitate infrastructure works that the applicant would be required to fund.

Funding will need to be agreed for signage to operationally facilitate a power change at Totton by the driver.

Network Rail would need to understand plans for recovery from fleet failures and maintaining driver route knowledge.

Conditional Matters

Power Supply Capability

A full power supply assessment is required for all services as there may be insufficient power available for the services proposed. Results of this assessment will be fed into the Wessex Timetable Industry Working Group.

As referenced above, the SRTs that have been developed from London Waterloo - Totton assume DC traction. Consequently, no analysis has been undertaken on the performance or capacity implications of any interim or permanent proposition to use 769s in diesel mode. Network Rail would expect these to be deficient in comparison with DC SRTs.

Resource and Staffing Requirements

The proposal would require 24/7 signalling operation at Marchwood, with an increase of 6 full-time employees. Additionally, a full ergonomics assessment for Marchwood Signal Box is required. A high-level cost estimate for both elements has been provided to Alliance Rail and ORR.

An increase in current levels of Mobile Operations Manager (MOM) (for an initial 3 months) and Maintenance Response coverage will also be required to cover the extension to Marchwood. A high-level cost estimate for both elements has been provided to Alliance Rail and ORR.

³ Alliance Rail Southern, *Application to the Office of Rail and Road for a Passenger Track Access Contract, or an Amendment to an Existing Contract*, 19 August 2026, p. 6.

Timescales for the recruitment and training of staff may not support the proposed implementation date.

Marchwood Station Access

Network Rail would need to be assured that any plans for Marchwood station are compliant with relevant standards and if carried out by Alliance Rail, this will need full assurance of delivery via a formal Asset Protection process – this will incur costs which Alliance Rail will need to account for.

Uniquely, Alliance Rail as an open access operator plan to become the Station Facility Owner at Marchwood station. Network Rail would need to understand any exposure to ongoing liability for Marchwood station in the event that Alliance Rail services cease to operate at this station. A Station Licence will need to be obtained by Alliance Rail from the ORR in order for NR to lease the station to Alliance Rail as Station Facility Owner. Alliance Rail will need to demonstrate they can competently manage the station including operation and maintenance. Timescales to obtain this Licence and register the station with the ORR would likely depend on quality of application and resource availability within ORR.

Alliance Rail would also need to enter into a station access agreement with Network Rail for permission to use London Waterloo station.

Network Rail expects there to be charges associated with leasing this station to Alliance Rail which Alliance Rail will need to account for.

Environmental Impact Assessment

Given the current line status, an environmental impact assessment will be required. The Marchwood line would need to be incorporated into the Seasonal Treatment Plan and a Vegetation Management Plan. A high-level cost estimate for both elements has been provided to Alliance Rail and ORR.

Network Change

As mentioned earlier, a Network Change process would need to be completed for these changes at the appropriate timescales to enable operations to commence in December 2027. Network Rail would expect Alliance Rail to be the proposer of this change and be liable for any resultant compensation claims.

Matters of Detail

Form P Narrative

Alliance Rail's Form P indicates that they are "seeking to introduce 5 new daily services (each way) between London Waterloo and Marchwood and 9 new daily services between Southampton Central and Marchwood [...]. An additional number of start and end of day services will also be timetabled to operate between Eastleigh and Waterloo (2) and Eastleigh and Marchwood (2)."⁴ There appears to

⁴ Alliance Rail Southern, *Application to the Office of Rail and Road for a Passenger Track Access Contract, or an Amendment to an Existing Contract*, 19 August 2026, p. 2.

be a slight numerical discrepancy as Alliance Rail's draft TAC states that the sought services between Eastleigh and London Waterloo is 1 train per day in each direction on Weekdays, Saturdays and Sundays.⁵ The industry working group is working on the SX quantum as stated in the TAC.

Track Access Contract

Network Rail acknowledges the TAC that Alliance Rail have included with their application. As Network Rail does not support this application, Network Rail cannot agree with the terms drafted in the TAC.

Key findings from the submitted Track Access Contract which the ORR and the applicant need to take into consideration are as follows:

- *Company information*
 - Alliance Rail's company registration number would need to be added.
- *Contract commencement vs Service Commencement*
 - The Expiry Date would need to be added.
 - The Longstop Date would need to be added.
 - The Effective Date would need to be added.
- *Schedule 1*
 - Network Rail's Southern Region contact details would need to be added.
- *Schedules 4 & 8*
 - All reference data for Schedule 8 Appendix 1, Sustained Planned Disruption (SPD) and Sustained Poor Performance (SPP) Cost Thresholds would need to be calculated and specified.
 - The Payment Rate of the Estimated Bus Miles for the Train Operator (EBMPR) would need to be specified.
- *Schedule 5*
 - 'Morning Peak', 'Evening Peak' and 'Off Peak Times' references should be removed from Table 2.1.
 - Peak Definition shall be deleted as Peak is not relevant to these services based on the drafting of the contract.
 - A footnote should be added to table 2.1 for the Passenger Train slots to commence in the proposed timetable change.

⁵ Alliance Rail Southern, *Track Access Contract (Open Access)*, 19 August 2026, p. 59.

- Schedule 7
 - All relevant charges will need to be calculated in accordance with Schedule 7.
- Schedule 9
 - The Liability Cap would need to be specified.
- Schedule 11
 - Network Rail 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 the applicant to capture the required data once the services commence and then undertake a Schedule 8 recalibration. Network Rail invites the applicant to agree a 'Start Date' and 'Backstop Date' as required in this schedule.

Network Rail notes that the current draft Track Access Contract contains the standard model conditions precedent provisions.

At this stage, Network Rail does not have sufficient information regarding the final specification, operational requirements, infrastructure impacts and associated mitigations arising from the proposed services to identify all conditions precedent that may be required, nor the duration necessary for their discharge.

A number of assessments remain outstanding and are dependent upon further detail being provided in relation to the proposed operation. These assessments include, but are not limited to, infrastructure capability, maintenance requirements, signalling impacts, level crossing risk, operational resource requirements, asset condition considerations and any associated funding arrangements.

Should ORR be minded to direct approval of the application, Network Rail requests the opportunity to engage further with ORR and the applicant to determine the appropriate conditions precedent, longstop date, implementation timescales and funding mechanisms necessary to facilitate the proposed services in a safe and efficient manner.

If ORR were to direct in line with this application Network Rail would like the opportunity to discuss and list such conditions precedent as are necessary to ensure that:

- all required infrastructure interventions and mitigations have been identified and delivered;
- appropriate funding arrangements are in place for both capital and ongoing operational costs;
- all necessary operational, safety and regulatory approvals have been obtained; and
- any station, signalling, level crossing and asset management interventions have been appropriately addressed.

As stated, these are the high-level points made in the review of the TAC and therefore Network Rail invites ORR and the applicant to review and take into consideration these points.

Train Planning Rules and Sectional Running Times

Sectional Running Times (SRTs) for Class 769s were consulted on 8th May 2026 and approved SRTs have been published with effect from the May 2027 timetable. The SRTs are subject to confirmation of route clearance (see Specified Equipment section above). Where the SoC identifies restrictions that

prohibit the use of Class 769 vehicles, associated values have not been published. These SRTs assume operation under DC traction London Waterloo - Totton, a power changeover, and diesel operation from Totton - Marchwood. Any other diesel operation (in areas currently identified for DC operation) would require a new assessment of SRTs and associated impact on the timetable.

Access Planning

The Engineering Access Statement for 2027 will be finalised at the beginning of February 2027. Any changes to the engineering access statement/strategy to support delivery of this proposal will require consultation within development timescales.

Conclusion

On the basis that the infrastructure is not currently suitable for passenger operations, that there is no confirmed funding package or delivery programme for the infrastructure works required to support the proposed services, and that significant safety and operational concerns remain unresolved, particularly in relation to level crossings, signalling arrangements and rolling stock compatibility, Network Rail is unable to support Alliance Rail's application for a Track Access Contract and the associated access rights sought at this time.

Furthermore, Network Rail is not currently in a position to reach a definitive view on the capacity and performance implications of the proposal, as the relevant assessments remain subject to the ongoing Wessex Timetable Industry Working Group timetable development process. However, during the assessment work undertaken to date Network Rail has been unable to identify any useable capacity for the proposed services. Once that work has concluded, Network Rail will be better placed to assess the proposal's capacity and performance impacts.

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

Yours sincerely,

A solid black rectangular box used to redact the signature of the Customer Manager.

Customer Manager
System Operator