# Monitoring open access 2026 update

22 September 2026

# Contents

# Executive summary

ORR monitors and reports on rail markets, including passenger rail services. ORR also regulates access to the railway network through the approval of access contracts and, where appropriate, we determine the terms of access. This report provides an update on open access passenger services, focusing on:

- **Summary of new open access services and open access decisions** – in this year's report we provide an overview of newly launched open access services and recent open access applications and decisions;
- **Market outcomes since our last report** – we provide a data-driven summary of some the key metrics that relate to customer experience, informed by data available on the ORR data portal; and
- **What international market participants are saying** – we summarise the findings of a series of interviews that we conducted with industry in July 2026, seeking to understand the market perspective of companies involved with the launch of new cross-Channel rail services.

Open access services currently account for a very small proportion of the total passenger market. The three long-distance domestic open access operators (Grand Central, Hull Trains and Lumo), together with Heathrow Express, generated £257m of annual revenue (2024-2025 figures where available, 2023-2024 in the case of Hull Trains). Of this £257m, long-distance open access accounted for £163m. Together, all four operators accounted for 9.4 million (0.5%) of the total 1.83 billion passenger journeys on the GB network (2025-2026 figures).

The purpose of this report is to present an overview of current market outcomes and the passenger experience, rather than to comment on specific applications or comment on open access in the context of rail reform.

## New open access services and recent open access decisions

The open access market has seen the introduction of a number of new services since the publication of our previous open access monitoring report in September 2025.

Following our decisions in July 2025, three incumbent open access operators began running additional or extended services on the East Coast Main Line (ECML) in December 2025. These included:

- Grand Central running additional services between Wakefield Kirkgate and Bradford Interchange, and its direct London services started calling at Seaham for the first time;
- Hull Trains providing one additional daily northbound service between London King's Cross and Hull; and
- Lumo extending some of its existing London-Edinburgh services to Glasgow, to provide direct services to London from Glasgow on the ECML.

In May 2026, FirstGroup launched services between London and Stirling under the Lumo brand, using access rights that had been previously approved by ORR.

In June 2026, we [rejected an application from Alliance Rail] for track access rights to operate services between Marchwood and London Waterloo. At the time of publication, Alliance Rail has submitted a new application to operate services between Marchwood and London Waterloo, which we are currently consulting on with Network Rail.

# Our findings

## Market data

We report on a series of measures including punctuality, complaints, passenger satisfaction, and rolling stock age. Where we refer to 'contracted' operators, we are referring to DfT-contracted operators, whether publicly or privately owned. In summary, our main findings for 2025/26 are as follows:

*Performance and service recovery*

- On average, long-distance open access operators continued to see better performance than long-distance contracted comparators, with only marginally better performance on the 'Time to 3' metric (long-distance open access 68.7%, compared with long-distance contracted 68.5%) but a clearer finding based on other measures, including number of cancellations (2.3% for long-distance open access compared with 5.0% for long-distance contracted services)
- In the report we compare pre-pandemic (2018-2019) volume and revenue figures with the latest year of data available.

  - Since the pandemic, passenger numbers have recovered more strongly for long-distance domestic open access operators (34% above pre-pandemic levels, excluding the impact of services launched by Lumo, or 93% above pre-pandemic levels including Lumo) than for contracted long-distance operators (7% above pre-pandemic levels).

  - However, the stronger recovery for open access partly reflects changes in service levels. Since the pandemic, total train kilometres operated by open access services (excluding Lumo) has increased by 7%, compared with a 2% reduction for contracted long-distance operators.

  - Heathrow Express, the sole short-distance open access operator, has seen a less strong recovery in passenger numbers (at 26% below pre-pandemic levels) – although this service now faces increased competition since Heathrow stopping services were integrated into the Elizabeth line, with direct cross-London services reducing the need to interchange at Paddington.

- Passenger kilometres have also recovered more strongly for long-distance domestic open access operators (24% above pre-pandemic levels, excluding the impact of services launched by Lumo, or 119% above pre-pandemic levels including Lumo) than for contracted long-distance operators (2% below pre-pandemic levels). Again, some of this difference may be attributed to open access operators running more services. Heathrow Express has again seen a less strong recovery (23% below pre-pandemic levels).

- Revenue, expressed in inflation-adjusted terms, has also recovered more strongly for long-distance domestic open access operators (returning to pre-pandemic levels excluding the impact of services launched by Lumo, or 52% above pre-pandemic levels including Lumo) than for contracted long-distance operators (18% below pre-pandemic levels). Again, some of this difference may be attributed to open access operators running more services.

- Passenger numbers for Eurostar's international open access services initially lagged behind those of both domestic open access and contracted long-distance operators but had recovered to a similar extent as contracted long-distance operators by 2025-2026 (Eurostar is 9% above pre-pandemic levels, compared with contracted long-distance 7% above pre-pandemic levels). Revenue recovery for Eurostar was stronger than its passenger number recovery at 14% above pre-pandemic levels (in 2024-2025).

*Complaints and passenger satisfaction*

- The number of complaints per 100,000 journeys continued to be higher for open access than for contracted long-distance services (96 complaints per 100,000 journeys for open access compared to 72 for contracted long-distance). Complaints per 100,000 journeys saw an increase over the previous year for both types of operators, but more so for open access (up 30.4% compared with 3.1% for long-distance contracted services).

- Train performance (punctuality and reliability) was the primary reason for complaints from passengers using any long-distance operator on the East Coast Mainline (accounting for 21.6% of complaints for LNER, 29.7% for Grand Central, 28.5% for Hull Trains, and 16.5% for Lumo).

- However, survey evidence, published by Transport Focus and Rail Delivery Group, for all GB domestic operators shows that overall passenger satisfaction between July 2025 and June 2026 was higher for open access services on average, compared to long-distance contracted services, with all open access operators scoring near to or above the median satisfaction level.

## What international market participants are saying

Given the increasing interest and activity in potential competition for international passenger rail through the Channel Tunnel, in this year's report we undertook a series of discussions with infrastructure managers, existing operators and prospective operators in this market. During these discussions, we gathered views on current market conditions, opportunities, and barriers to entry.

While the market has been served by a single operator (Eurostar) for over 30 years, there is increasing interest from a number of prospective operators seeking to introduce competing services. Recent regulatory and industry developments, including ORR's October 2025 decision on access to Temple Mills International depot, have reflected both the potential for increased competition and the scope for future growth in international passenger rail services through the Channel Tunnel. The market participants we engaged with were London St Pancras High Speed, as infrastructure manager, together with the current operator Eurostar, and prospective operators Evolyn, Gemini, Trenitalia, and Virgin Trains. The views that we summarise in this report represent the positions of market participants.

Participants identified depot, track, and station-related access issues as among the most significant challenges affecting entry and expansion in the cross-Channel passenger rail market.

The evidence provided by market participants suggested that barriers are often interdependent. They highlighted how decisions relating to depot access, rolling stock procurement, financing, access rights, and station capacity can influence one another. As a consequence, several participants emphasised the importance of reducing uncertainty and enabling timely investment decisions wherever possible. The next few years will be key to the entry plans of the operators we approached. We will continue to work with applicants as they seek to implement their plans to introduce new international train services in the Channel Tunnel.

We welcome comments and suggestions from interested parties on our market monitoring. These can be submitted by email to competition@orr.gov.uk.

# 1. New open access services and recent open access decisions

1.1 Following our decisions in July 2025, three incumbent open access operators began running additional or extended services on the East Coast Main Line in December 2025. This included:

- Grand Central running additional services between Wakefield Kirkgate and Bradford Interchange and its direct London services started calling at Seaham for the first time;
- Hull Trains providing one additional daily northbound service between London King's Cross and Hull; and
- Lumo extending some of its existing London-Edinburgh services to Glasgow, to provide direct services to London from Glasgow on the ECML.

1.2 In April 2026, Go-op's track access contract lapsed after the operator did not satisfy the conditions precedent attached to the contract within the required timeframe.

1.3 In May 2026, FirstGroup also launched services between London and Stirling under the Lumo brand, using access rights that had been previously approved by ORR.

1.4 In June 2026, we rejected an application from Alliance Rail for track access rights to operate services between Marchwood and London Waterloo. We concluded that there remained concerns regarding capacity, performance impacts, and the deliverability of the proposal. At the time of publication, Alliance Rail has submitted a new application for services between Marchwood and London Waterloo, which we are currently consulting on with Network Rail.

1.5 In 2025 we commissioned SYSTRA to undertake research into total revenue abstraction caused by the operation of domestic open access rail services, in order to support our assessment of open access applications. We published the findings from this research in a report in February 2026.

(a) The report found that, while domestic open access operators generate new rail demand and benefits for passengers, they also abstract revenue from government-funded operators, with estimated abstraction from existing East Coast open access services at around £100 million per year in 2024/25.

(b) SYSTRA also found that, *"further long-distance open access services, to Stirling and Carmarthen, which have been approved by ORR but not yet launched, have the potential to add approximately £55m p.a. of additional abstraction to this total in 2024/25 prices…"*.

(c) In March 2026 we wrote to DfT summarising and commenting on the SYSTRA research, concluding that *"The level of total abstraction identified by the SYSTRA report provides a helpful up to date reference point for our Board and for the Department when it makes representations about individual applications. It is also consistent with ORR's existing understanding of current and forecast revenue abstraction by open access operators."*

# 2. Monitoring Activity

2.1 Open access in the GB rail market allows independent train operators to run services on the national rail network. Open access operators with approved access rights for domestic services comprise Grand Central, Hull Trains, Lumo, Heathrow Express and Eurostar (which is the only operator approved for both domestic and international services).

(a) First Group:

(i) Hull Trains operates services between London Kings Cross and Hull.

(ii) Lumo provides services between London Kings Cross and Edinburgh, and, more recently, between London Kings Cross and Glasgow.

(iii) Grand Union Trains was approved to provide services between London Paddington and Carmarthen in December 2022. Additionally, it was approved in March 2024 to offer services between London and Stirling. Grand Union Trains was fully acquired by First Group in December 2024. Both of these services now run under the Lumo brand, with the London-Stirling route launching in May 2026.

(b) Arriva:

(i) Grand Central connects London Kings Cross with destinations such as Sunderland and Bradford.

(c) Heathrow Express offers a rapid transit service between London Paddington and Heathrow Airport.

2.2 International passenger services are also run on an open access basis. Eurostar offers high-speed services between London and Paris, London and Brussels, and London and Amsterdam.

2.3 A particular focus of our monitoring is on the East Coast Main Line (ECML). The ECML runs from London to Edinburgh, via the cities of Peterborough, York, and Newcastle. It is one of the busiest railway lines in Great Britain. The ECML's main operator is the publicly contracted (and funded) LNER, whose services include regular long-distance express trains between London, the East Midlands, Yorkshire, the Northeast of England, and Scotland. We report on a range of metrics for the three operational open access operators: Grand Central, Hull Trains, and Lumo; and for LNER.

2.4 We also look at outcomes for other publicly contracted operators. In many cases we focus on key long-distance comparators. We recognise that there are important operational and business model differences between all of the companies in our sample, for example, Avanti West Coast and Cross Country are important comparators because both operate long-distance services and, as such, may be expected to have similar passenger profiles to those travelling on the ECML. Additionally, East Midlands Railway runs a mixture of long-distance inter-city services between London and cities in the East Midlands, as well as a number of local and medium-distance services.

2.5 Where possible, we also include data for Heathrow Express (the only other domestic open access operator with live operations) and Eurostar.

2.6 We also present data showing how open access operators, and the routes served by open access operators, are recovering from the pandemic in comparison to the wider rail industry. We present data on both volumes (number of journeys, passenger kilometres) and revenues (inflation adjusted). We present all data on a financial year basis and for the latest year available (April 2025 to March 2026), unless otherwise stated. Where possible, we compare this data to the previous year (April 2024 to March 2025). Where we have calculated averages for contracted and open access operators, these may not correspond precisely to the average of the individual data points shown, due to rounding.

# Performance

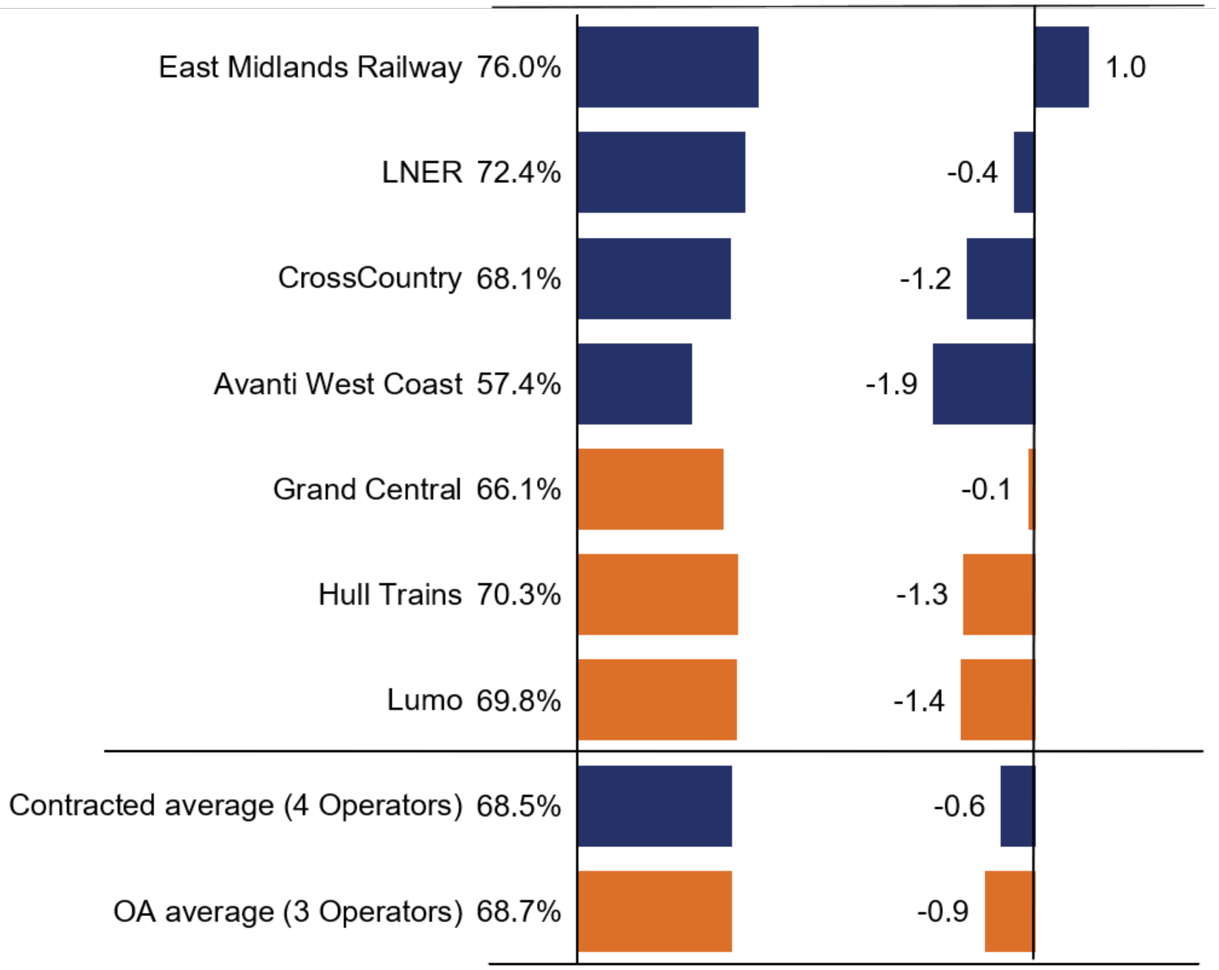
## Punctuality and reliability

2.7 The rail sector uses a range of measures to monitor and report train performance. The main success measures include Time to 3 and Cancellations. Other measures include On Time, PPM, Delay minutes and Average Passenger Lateness. In this document we report on Time to 3, PPM and Cancellations.

2.8 Figure 2.1 below shows performance as measured by the Time to 3 metric which captures the proportion of trains which arrived within three minutes of their scheduled arrival time.

2.9 On average open access services continued to perform slightly better than contracted operators on the Time to 3 metric, although a decline in Time to 3 performance brought open access and contracted performance closer together this year (open access 68.7%, long-distance contracted 68.5%) than in 2024/25.

**Figure 2.1 Time to 3 by long-distance operator, Great Britain, annual data, April 2025 to March 2026, with percentage point change from April 2024 to March 2025**

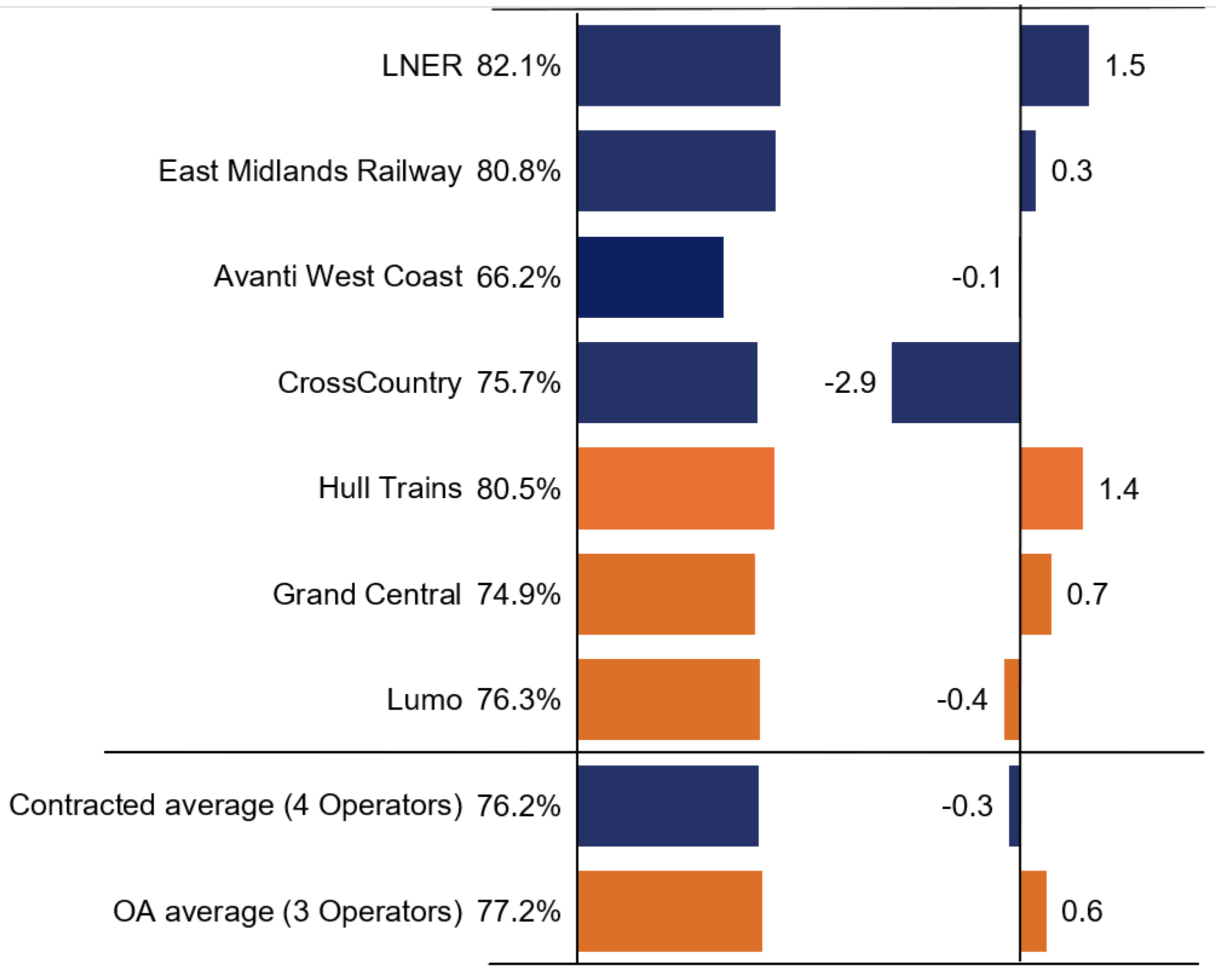



Source: ORR data portal in [Passenger rail performance statistics.](Passenger rail performance statistics.)

2.10 In figure 2.2 below we additionally report on the Public Performance Measure (PPM), which for long-distance services shows the proportion of trains calling at all station stops and arriving at their destination on time or less than ten minutes after the scheduled arrival time.

2.11 Figure 2.2 shows a slightly higher performance for open access operators compared with long-distance contracted services. There was a slight improvement compared to the previous year for open access operators and, a slight deterioration in PPM for contracted operators.

**Figure 2.2 PPM by long-distance operator, Great Britain, annual data, April 2025 to March 2026 and the percentage point change from April 2024 to March 2025**

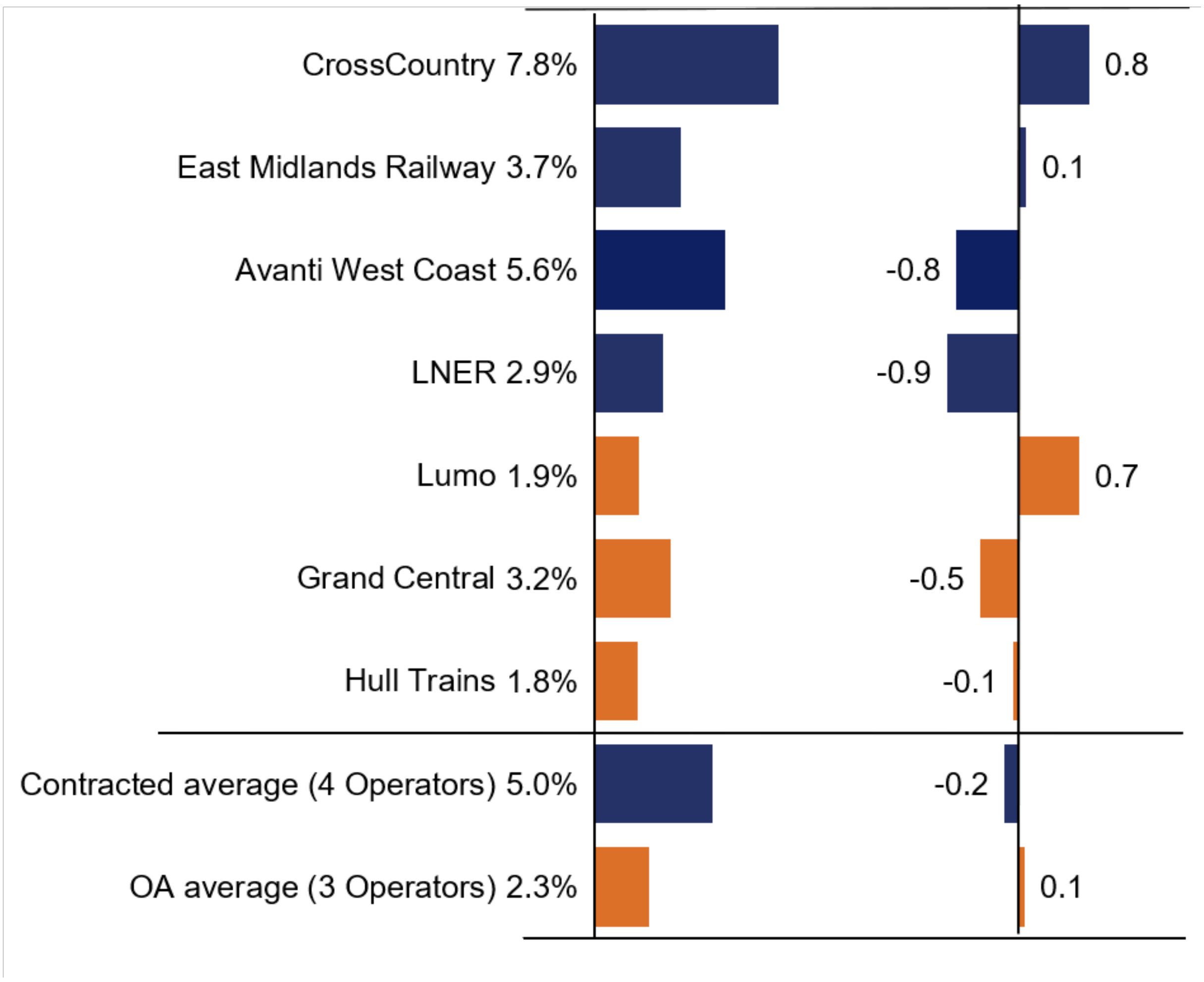



Source: ORR data portal in [Passenger rail performance statistics.](Passenger rail performance statistics)

2.12 A further measure of performance is train cancellations. Figure 2.3 shows the proportion of trains cancelled as a percentage of trains planned, based on a score that weights full cancellations as one and part cancellations as a half. A lower cancellation score indicates better reliability.

2.13 The overall cancellation rate in the last year for long-distance contracted operators (5.0%) was more than double that of open access (2.3%). These rates were similar to the previous year.

**Figure 2.3 Cancellations attributable to each long-distance operator, Great Britain, annual data, April 2025 to March 2026, with percentage point change from April 2024 to March 2025**



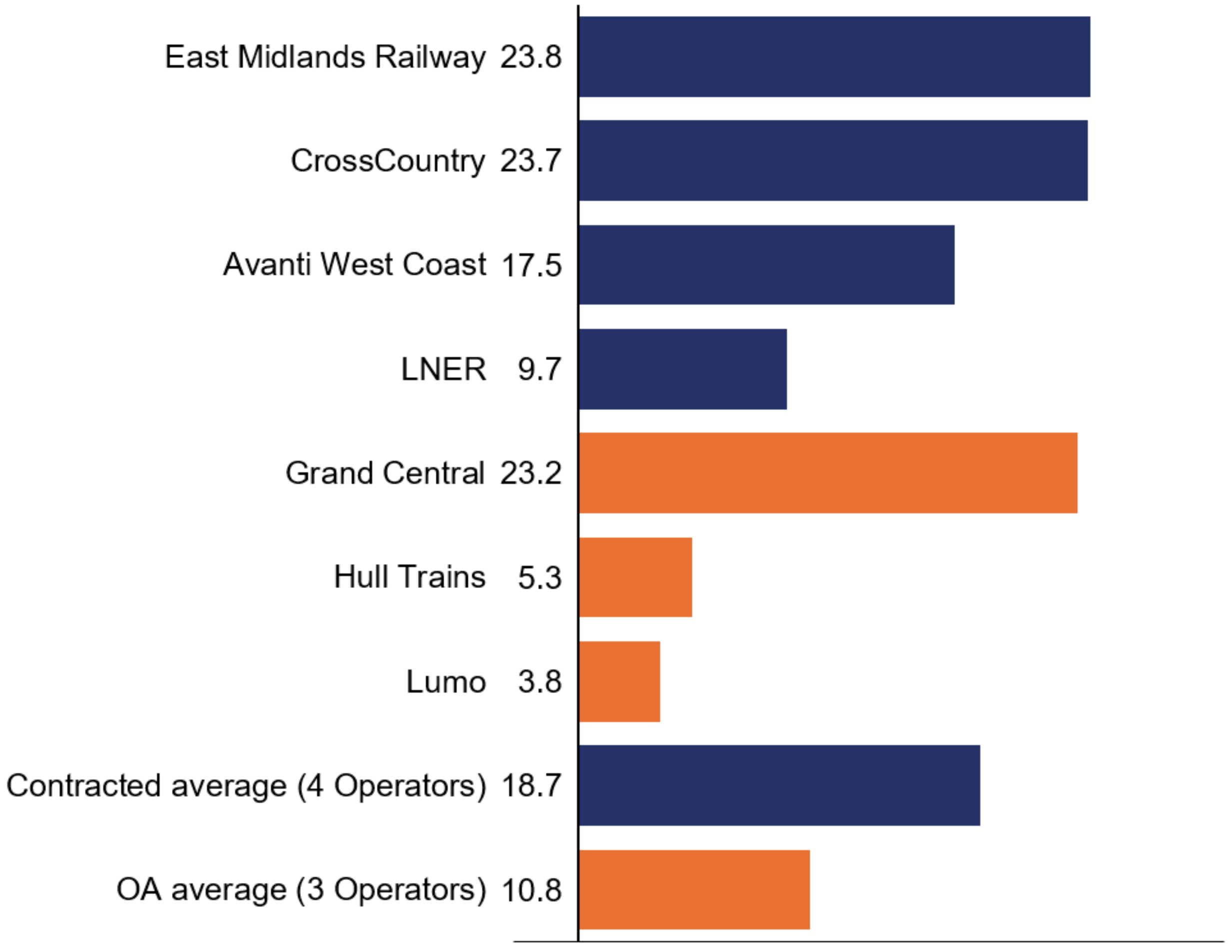

Source: ORR data portal in [Passenger rail performance statistics.]

## Rolling stock age

2.14 The age of operators' train fleets provides evidence on investment levels, and potentially another indicator of service quality, both in terms of performance and passenger experience, although it is an indicator that needs to be interpreted with care. For example, while new rolling stock may be more technologically advanced, existing trains can be refurbished during their lifetime to improve comfort for passengers.

2.15 Figure 2.4 shows the average age of the operators' fleets as of March 2025 (the most recent year end for which information was available to us on this metric at the time of analysis). The rolling stock age of the open access operators was lower overall.

**Figure 2.4 Average age of rolling stock in years by long-distance operator, Great Britain, 31 March 2025**




Source: ORR data portal in Rail infrastructure and assets statistics.

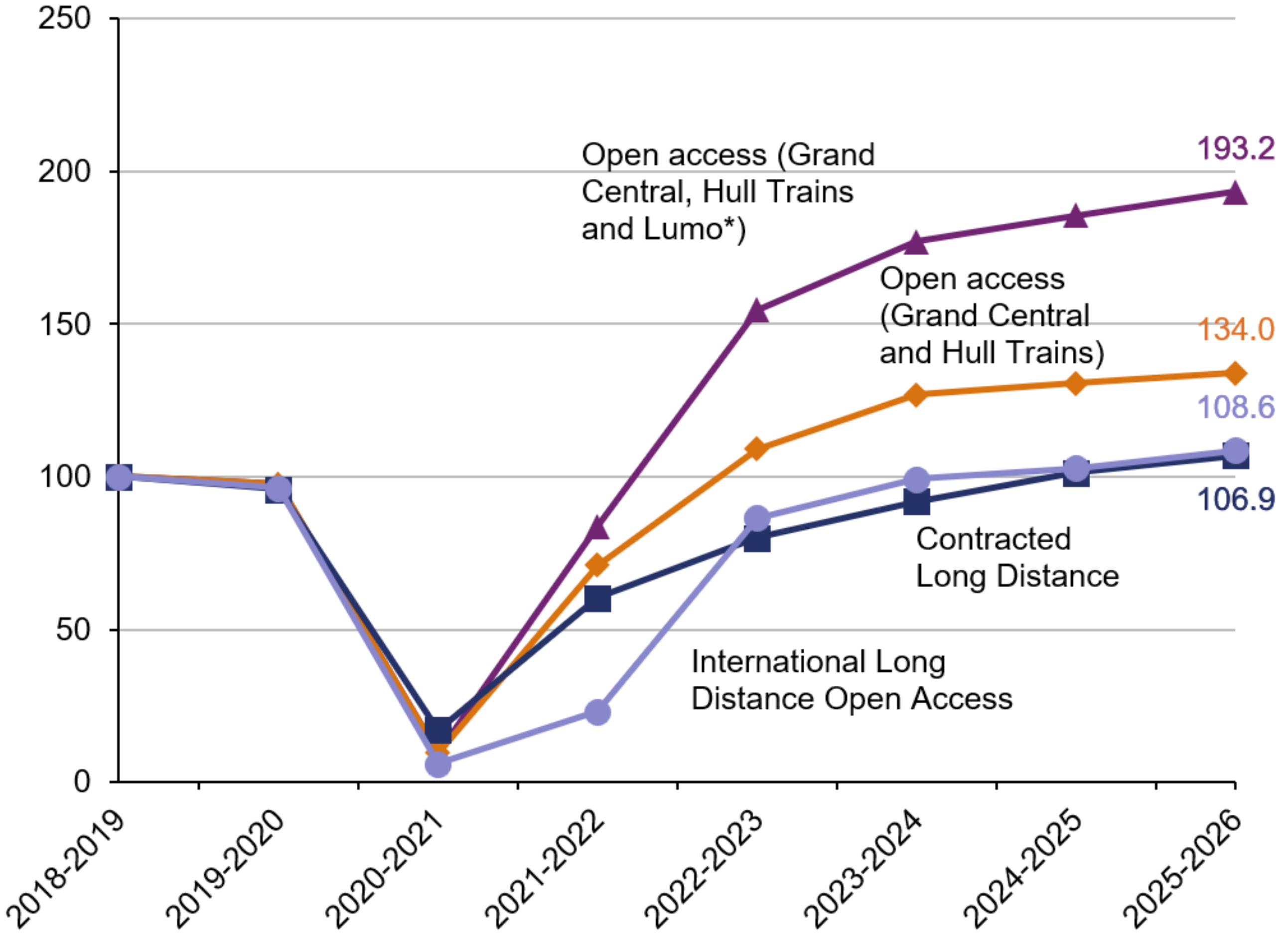
# Post-pandemic recovery in rail demand

2.16 In Figure 2.5 we present data on the number of passenger journeys made by customers of the long-distance contracted operators and long-distance open access operators. We also present data on international long-distance open access journeys operated by Eurostar. This data includes all Eurostar passenger journeys that use the Channel Tunnel and either originate or terminate in the UK.

2.17 In the latest year (April 2025 to March 2026), domestic open access passenger services (the three long-distance operators Grand Central, Hull Trains and Lumo, together with Heathrow Express) accounted for 9.4 million (0.5%) of the total 1.83 billion passenger journeys. Of this, the three long-distance operators accounted for

4.9 million passenger journeys and Heathrow Express accounted for 4.6 million passenger journeys.

**Figure 2.5 Number of passenger journeys (indexed, 2018-2019=100), long-distance open access (domestic and international) and long-distance contracted, Great Britain, annual data, April 2018 to March 2026.**




Source: ORR data portal in [Passenger rail usage statistics.](#) Eurostar data from [Getlink](#).
* Annual Lumo data begins in financial year 2021-2022.

2.18 Figure 2.5 shows that:

(a) all these operators saw a marked recovery of passenger journeys in each of the years immediately following the pandemic (i.e. after 2020-2021), this being most marked for domestic open access;

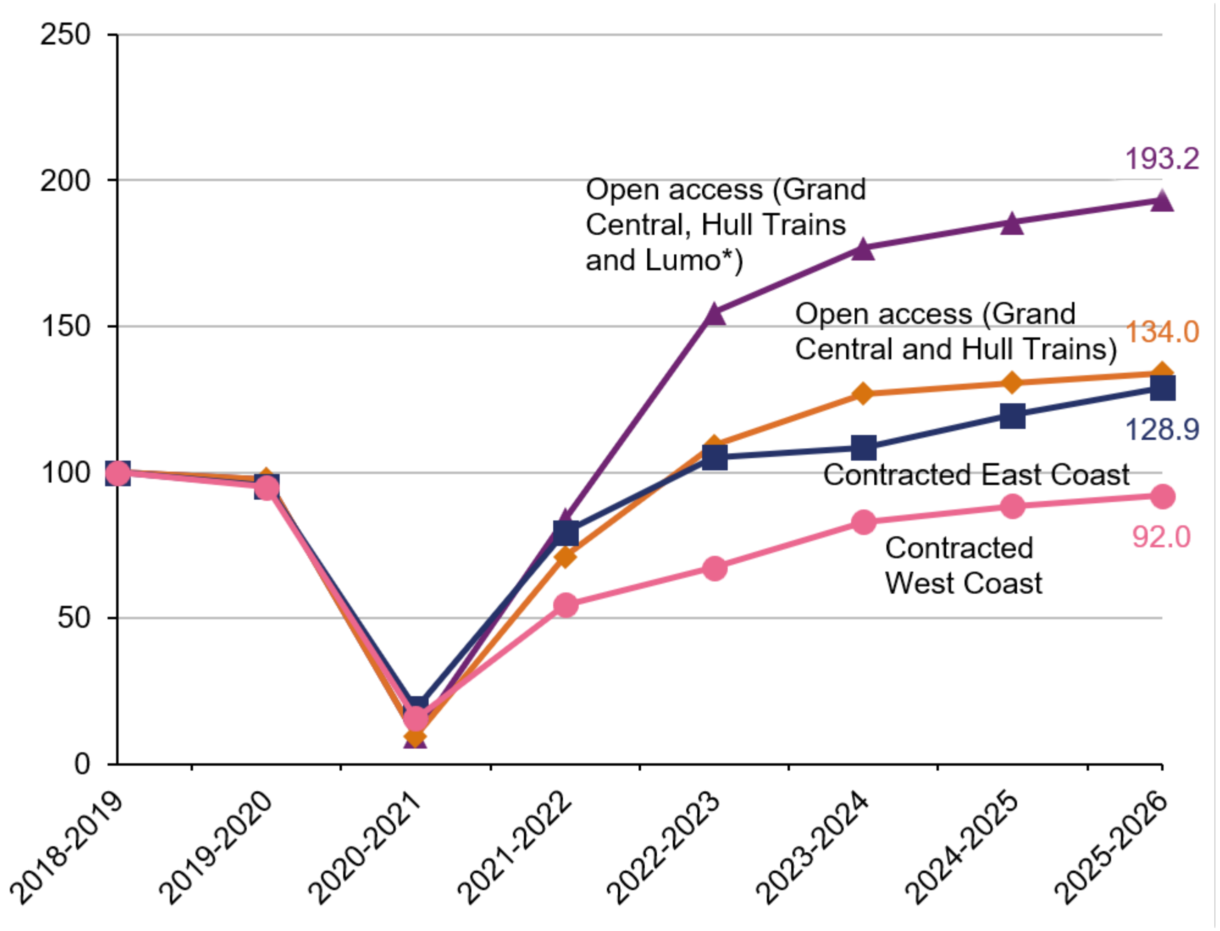
(b) in the latest year, domestic long-distance open access passenger journeys have increased by 34%, excluding the impact of the launch of Lumo's operations, compared with pre-pandemic levels (2018-2019), or by 93% when including Lumo;

(c) long-distance contracted operators have increased to 7% above pre-pandemic levels in this same timeframe; and

(d) international open access passenger journeys increased by 9% in the latest year, compared with pre-pandemic levels, having initially lagged domestic services, potentially due to international travel restrictions persisting longer than domestic restrictions.

2.19 However, the stronger recovery for open access may partly reflect changes in service levels. Since the pandemic, total train kilometres operated by open access services (excluding Lumo) has increased by 7%, compared with a 2% reduction for contracted long-distance operators.

**Figure 2.6 Number of passenger journeys (indexed, 2018-2019=100), long-distance (domestic traffic only) open access and long-distance contracted (East Coast vs West Coast), Great Britain, annual data, April 2018 to March 2026.**



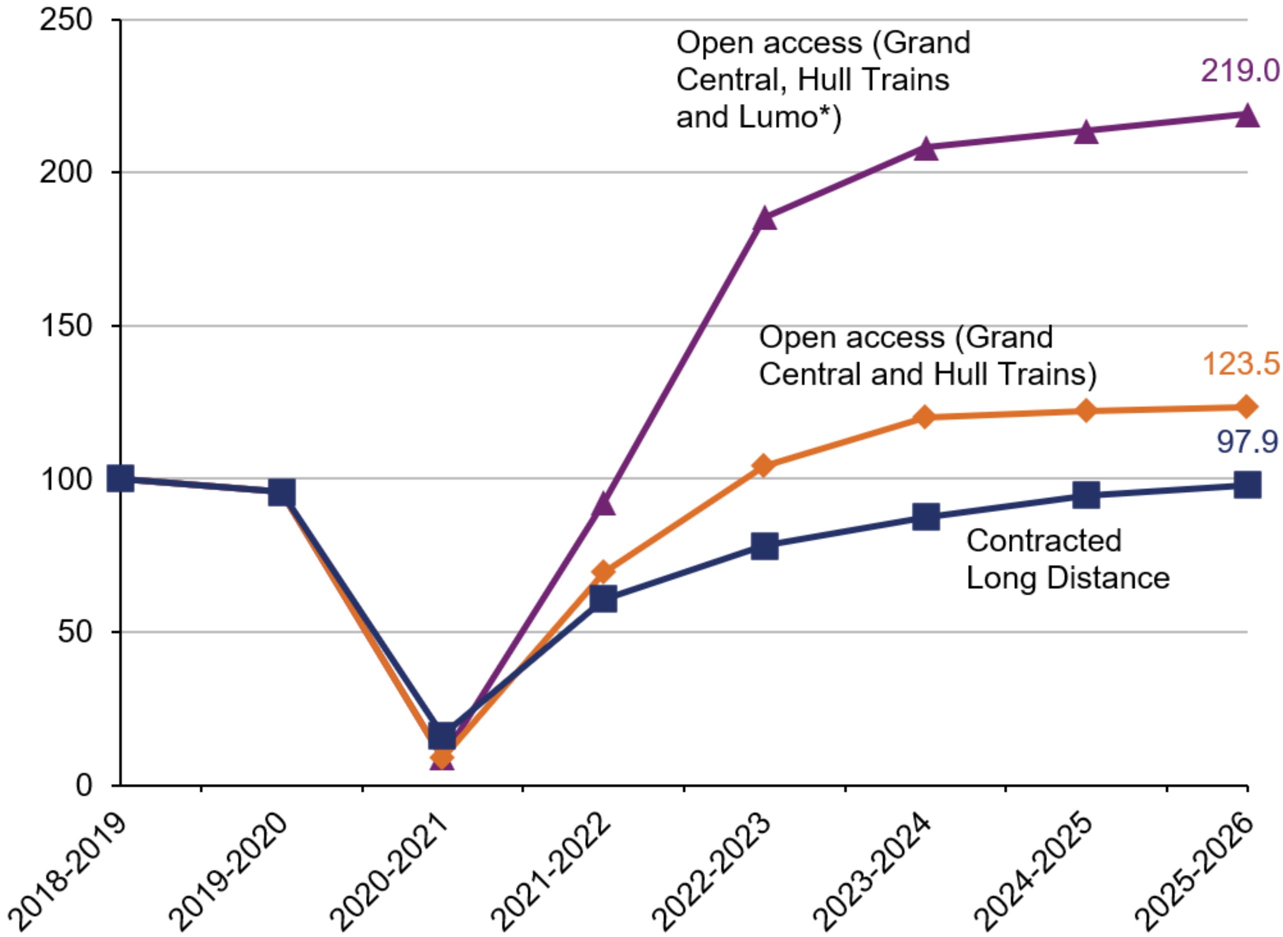
Source: ORR data portal in Passenger rail usage statistics
* Annual Lumo data begins in financial year 2021-22.

2.20 Figure 2.6 disaggregates the contracted operators by East and West Coast. East Coast operators, including long-distance contracted services, overall made a stronger recovery following the pandemic than operators on the West Coast.

2.21 We repeat the comparison of growth before and after the pandemic in the charts below using an alternative volume measure, namely total passenger kilometres. The results of this comparison are broadly similar to those obtained using journey data, as shown in Figure 2.7 – open access passenger km, excluding the impact of the launch of Lumo's operations, have increased by 24% compared with pre-pandemic levels (2018-2019) or by 119% when including Lumo's impact. The corresponding figure for contracted long-distance services is 2% below pre-pandemic levels.

2.22 However, the stronger recovery for open access may partly reflect changes in service levels. Since the pandemic, total train kilometres operated by open access services (excluding Lumo) has increased by 7% compared with a 2% reduction for contracted long-distance operators.

**Figure 2.7 Total passenger kilometres (indexed, 2018-2019 = 100), long-distance open access and long-distance contracted, Great Britain, annual data, April 2018 to March 2026.**

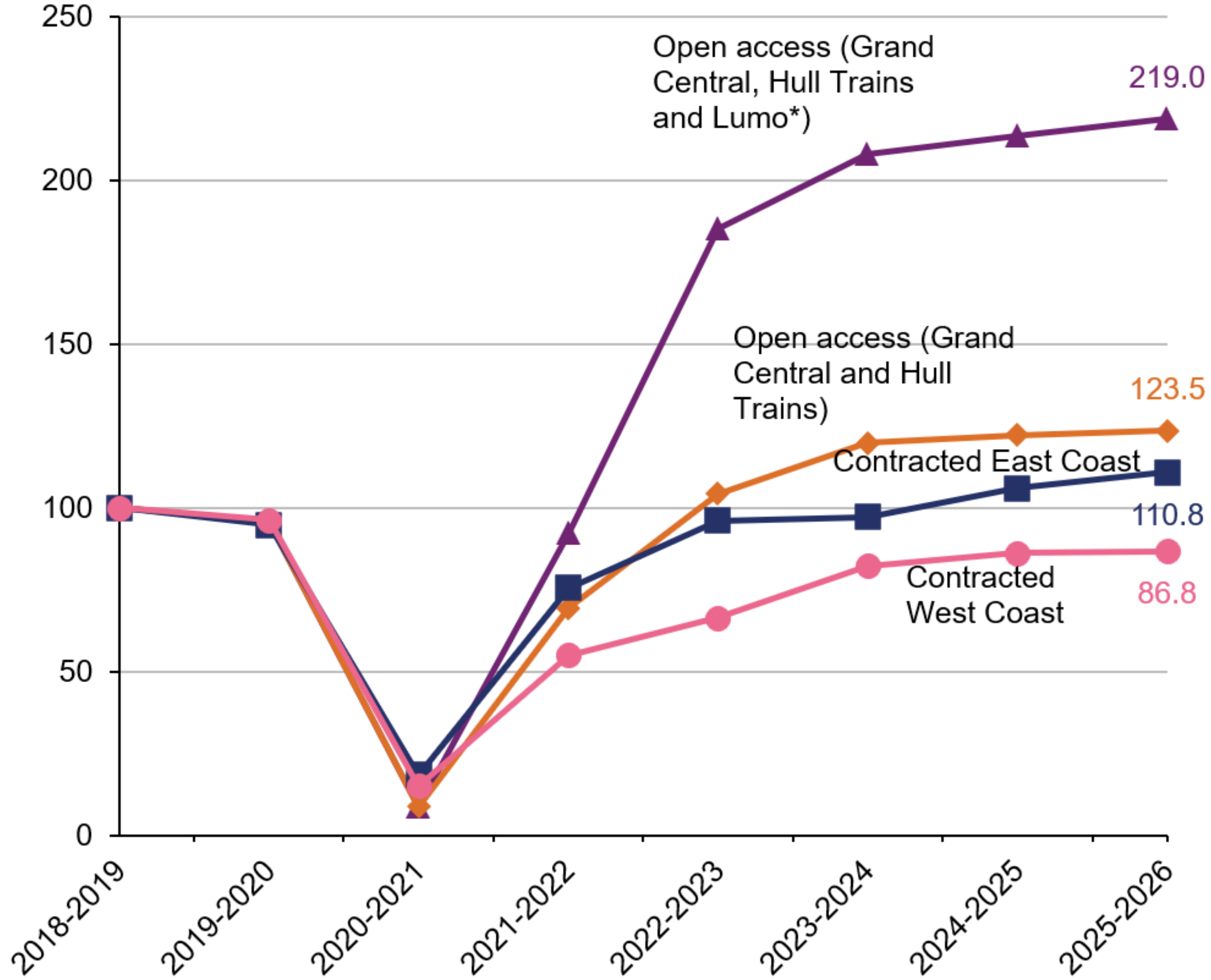



Source: ORR data portal in Passenger rail usage statistics

* Annual Lumo data begins in financial year 2021-22.

2.23 In Figure 2.8 we again disaggregate long-distance operators by East and West coast.

**Figure 2.8 Total passenger kilometres (indexed, 2018-2019 = 100), long-distance open access and long-distance contracted (East Coast vs West Coast), Great Britain, annual data, April 2018 to March 2026.**

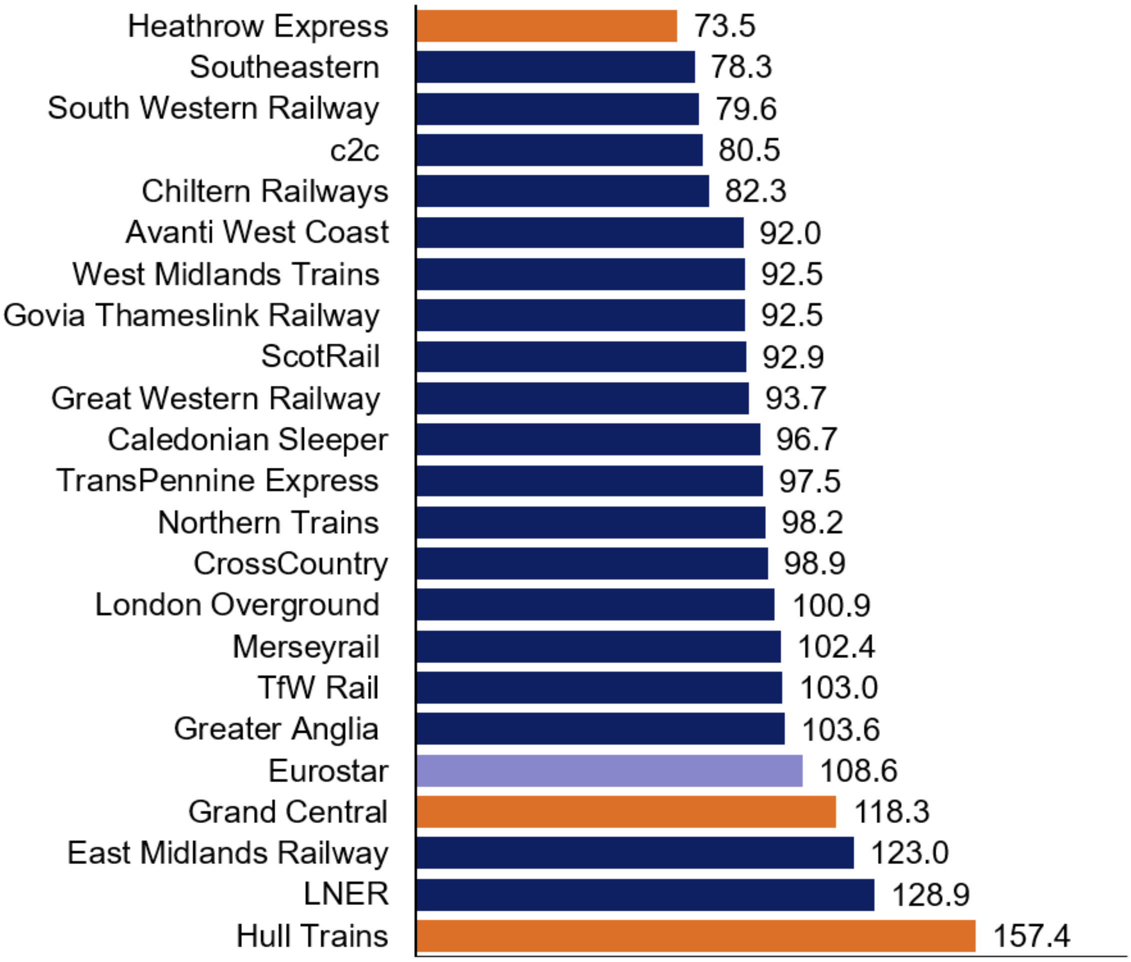



Source: ORR data portal in [Passenger rail usage statistics]
* Annual Lumo data begins in financial year 2021-22.

2.24 As with the disaggregation of passenger journeys to East and West Coast Main Lines, there has been a stronger return to pre-pandemic passenger kilometres on the East Coast following the pandemic.

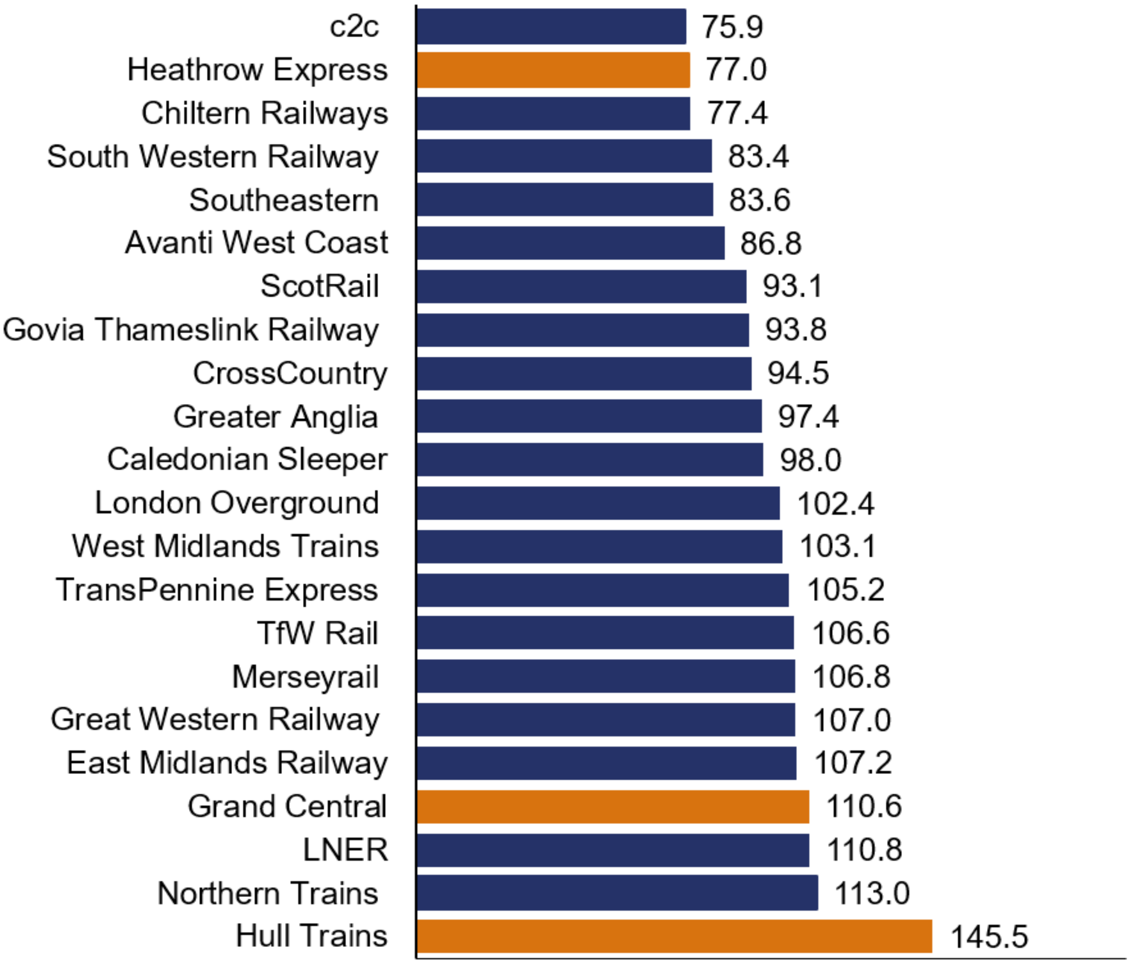
2.25 In Figures 2.9 and 2.10 below, we compare 2018-2019 and 2025-2026 journey numbers and passenger kilometres for all operators, across all market segments (i.e. not just long-distance) who were active in both those years, with data for open access operators highlighted.

**Figure 2.9 Number of journeys, Great Britain, annual data 2025-2026 compared with 2018-2019 (indexed 2018-2019 = 100)**




Source: ORR data portal in Passenger rail usage statistics. Eurostar data from Getlink.

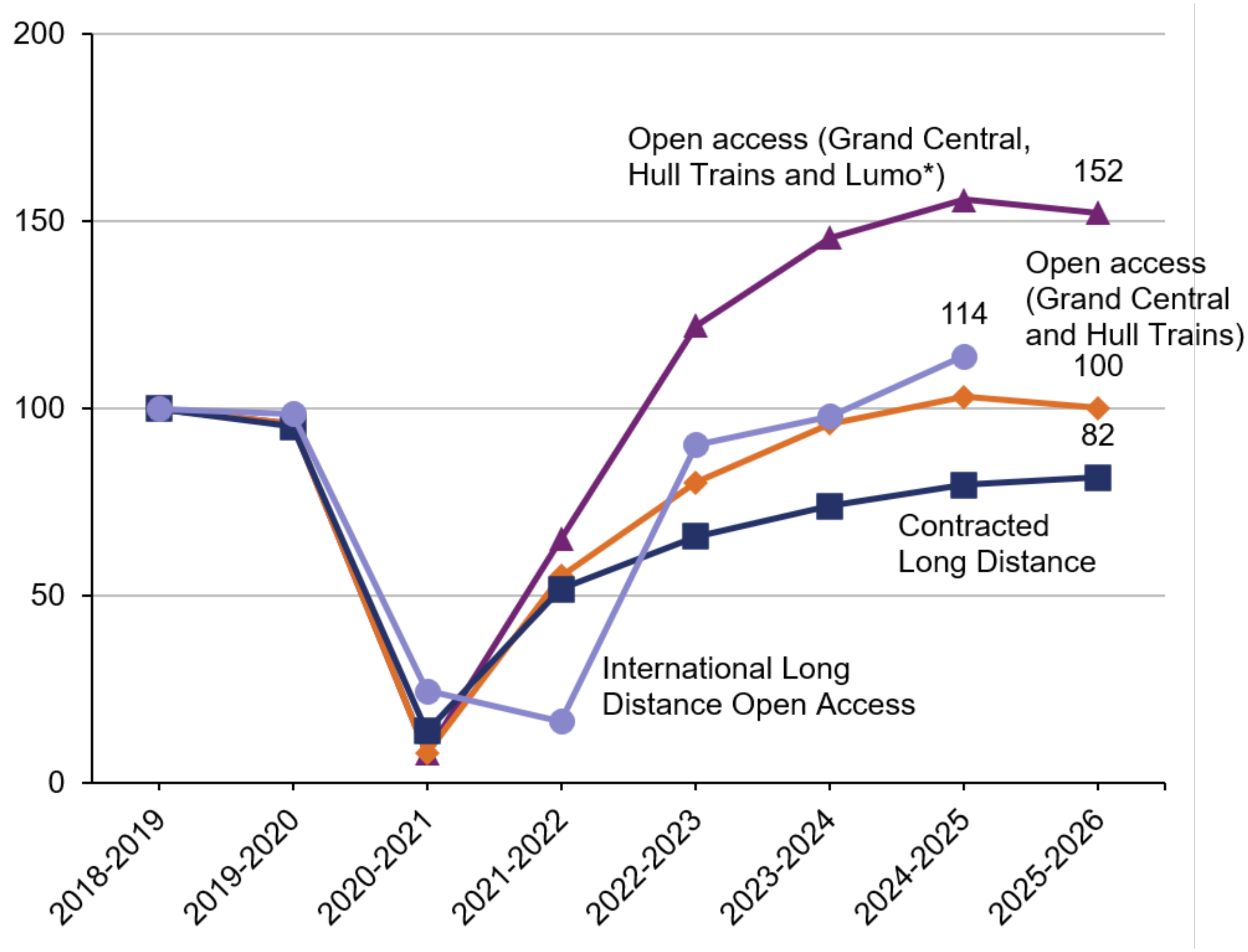
**Figure 2.10 Number of passenger kilometres, Great Britain, annual data, 2025-2026 compared with 2018-2019 (indexed, 2018-2019 = 100)**




Source: ORR data portal in Passenger rail usage statistics

2.26 In Figure 2.11-2.12 below we repeat the comparisons of post-pandemic recoveries for passenger revenue and passenger revenue per km data. We have not included data on individual company revenues given the commercial sensitivity around these figures. We will publish company-specific revenue data for 2025-2026 in the next release of our Rail industry finance (UK) statistics publication.

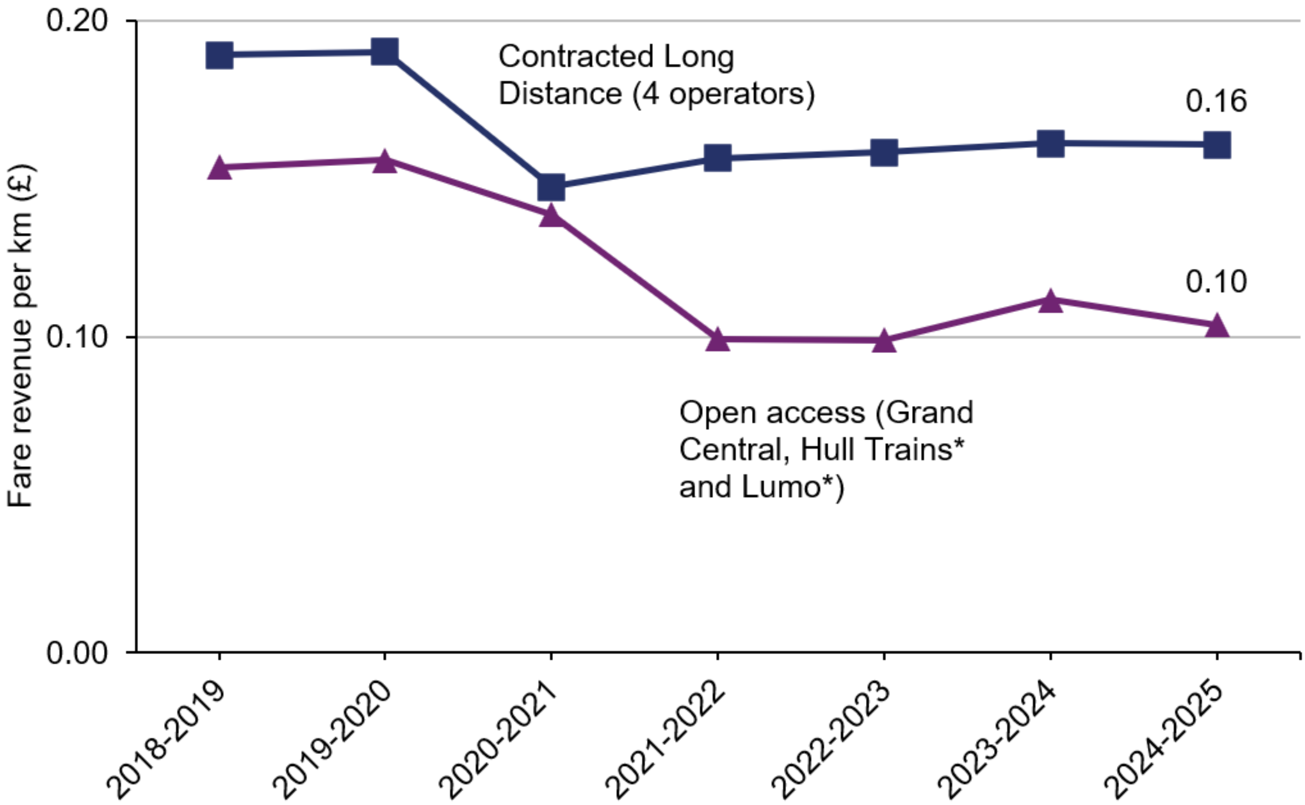
**Figure 2.11 Revenue (real terms, indexed, 2018-2019 = 100), long-distance open access (domestic and international) long-distance contracted, Great Britain, annual data, April 2018 to March 2026.**




Source: Lennon data and ORR data portal in [Rail industry finance statistics](#)
* Annual Lumo data begins in financial year 2021-2022.
* International Long Distance open access operator Eurostar revenue data is only available up to 2024-2025. This data does not include any revenue originating from the inter-continental Thalys services that Eurostar acquired in 2022, however it may include a small amount of revenue from other Eurostar services that do not originate or terminate in the UK.

2.27 The broad trajectory of revenue recovery has been very similar to that for journeys and passenger kilometres. The extent of revenue recovery is greater for open access than long-distance contracted operators, albeit less pronounced than with the volume measures. Once again, some of the revenue growth for open access services may be attributed to the introduction of new open access services, rather than the recovery of existing ones. International open access services stand out in this regard, as their revenue recovery has been stronger than their passenger volume recovery relative to pre-pandemic levels – Eurostar's 2024-25 real terms revenues were 14% above pre-pandemic levels.

**Figure 2.12 Fare revenue. £ per km (real terms, April 2024 to March 2025 prices), long-distance open access, long-distance contracted, Great Britain, annual data, April 2018 to March 2025.**




Source: ORR data portal in [Passenger rail usage statistics]() and [Rail industry finance statistics]()
* Hull Trains revenue data is only available up until 2023-2024.
* Annual Lumo data begins in financial year 2021-2022.

2.28 Fare revenue per km for contracted long-distance operators has stabilised and is still below pre-pandemic levels. Fare revenue per km for open access operators dropped more significantly post-pandemic, in part due to the launch of Lumo services (since historically on average, other things being equal, the longest distance services have tended to earn the lowest fare revenue per km), but has stabilised since 2021-2022. Open access operators consistently recorded lower passenger revenue per km than contracted long-distance operators.

2.29 Overall, the available post-pandemic data (Figure 2.5 to Figure 2.12) point towards a recovery in demand that is:

(a) Stronger for long-distance open access services than their long-distance contracted equivalent in terms of revenue, passenger numbers, and passenger kilometres (albeit some of this may be attributed to the introduction of new open access services, rather than from passengers returning to existing services).

(b) Stronger for domestic long-distance open access services than their long-distance international equivalent in terms of revenue and passenger numbers (when including Lumo).

(c) Considerably stronger in volume rather than inflation-adjusted revenue terms, as shown in Figures 2.5 to Figure 2.8 compared with Figure 2.11. This has led to a decrease in the real fare revenue per km for all observed types of operators, as seen in Figure 2.12.

(d) Much stronger for long-distance open access operators than for the short-distance open access operator, Heathrow Express – although this service now faces increased competition since Heathrow stopping services were integrated into the Elizabeth line, with direct cross-London services reducing the need to interchange at Paddington.

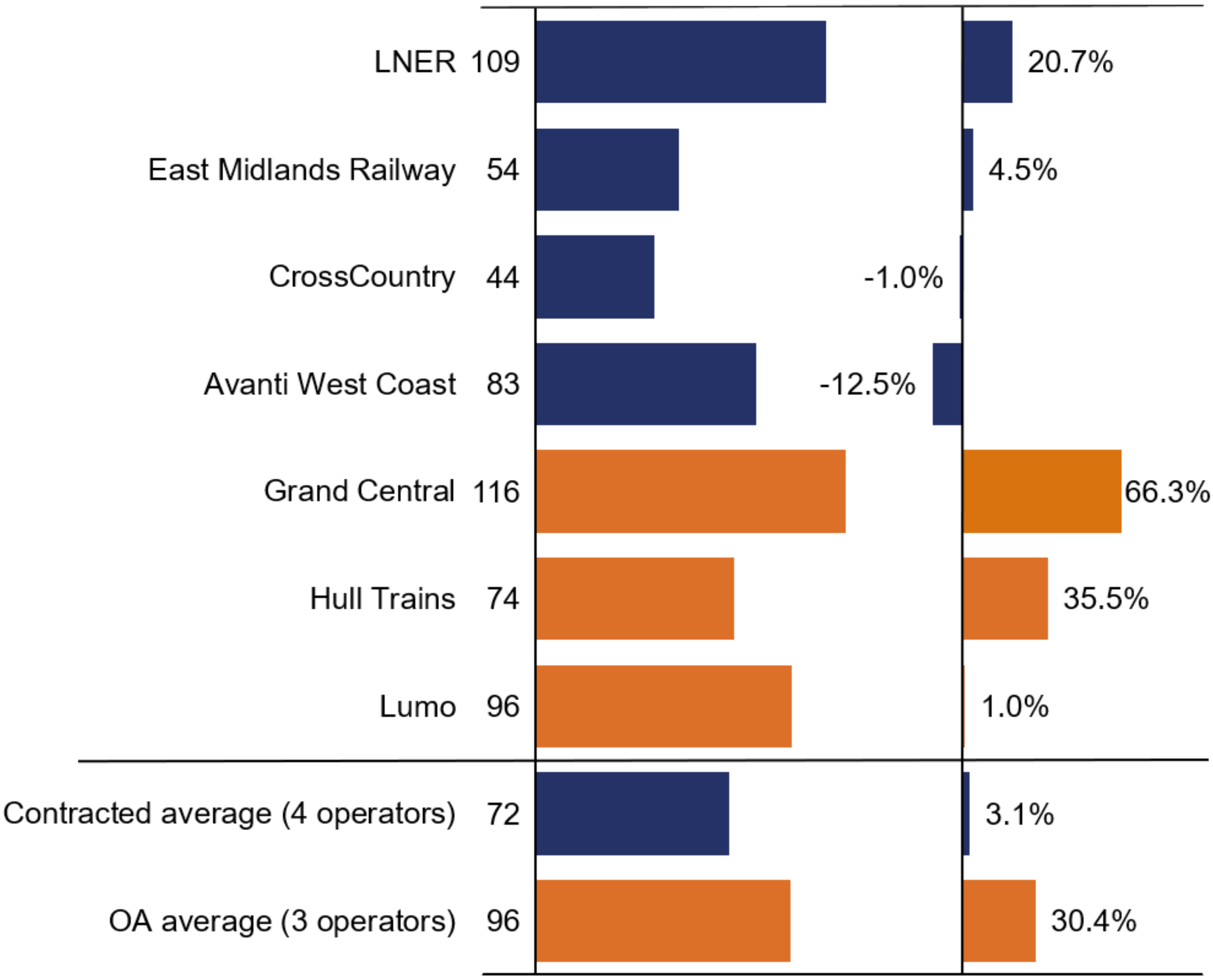
# Passenger Experience

2.30 We are interested in the impact of on-rail competition on the passenger experience. We report on the number and types of complaints for operators. In addition to the metrics reported last year, we also report on passenger satisfaction, following the October 2025 launch of Transport Focus's Rail Customer Experience Survey (RCXS).

## Complaints

2.31 Figure 2.13 below shows the complaints rate by Train Operating Company (TOC) for the latest year (April 2025 to March 2026) and percentage change from the previous year (April 2024 to March 2025).

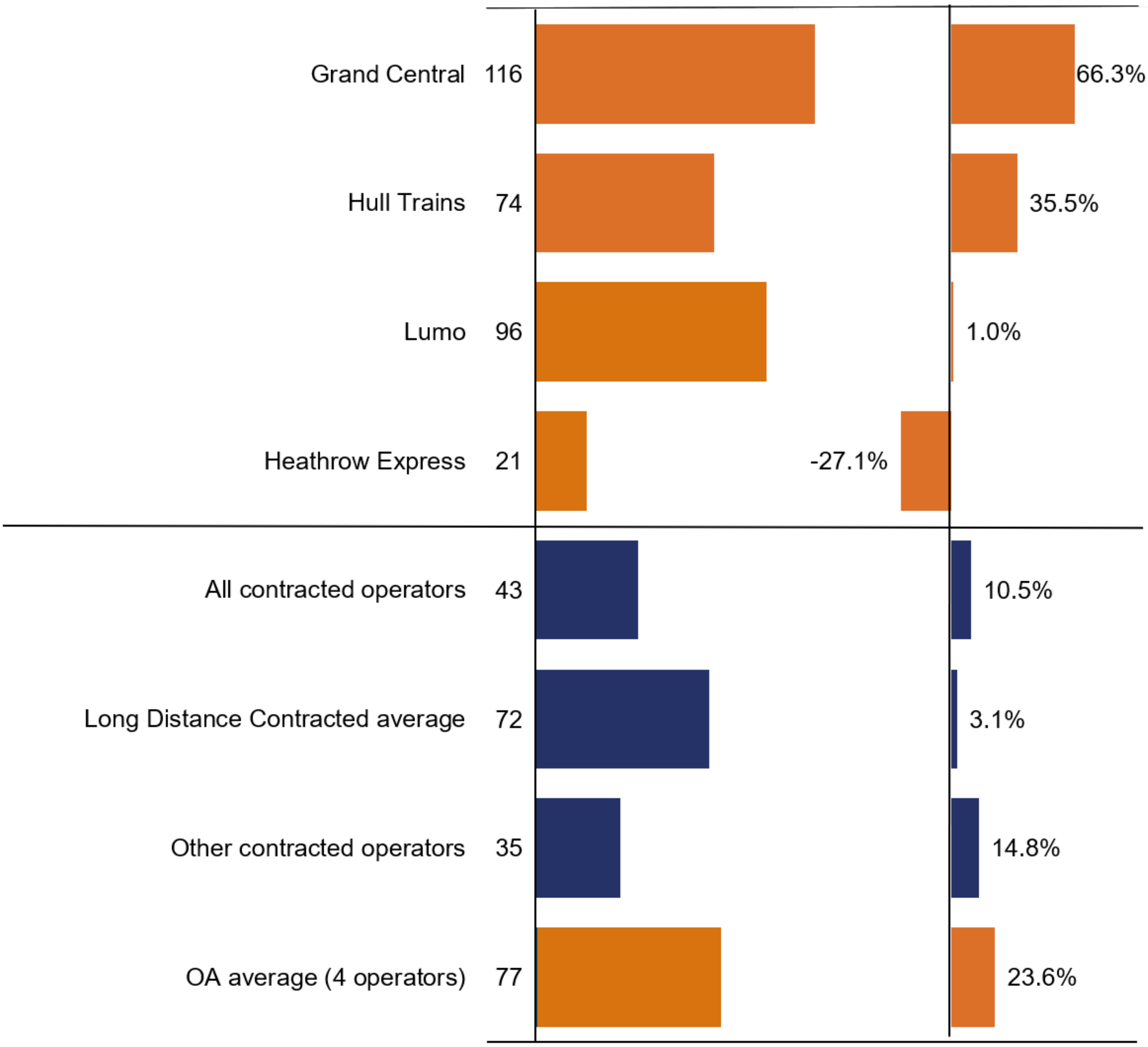
**Figure 2.13 Complaints rate by long-distance operator (number of complaints per 100,000 journeys), Great Britain, annual data April 2025 to March 2026 and percentage change from April 2024 to March 2025**




Source: TOC complaints rate data supplied to ORR. Available on ORR's data portal in [Passenger rail complaints statistics.]

2.32 Open access had a greater rise in the volume of complaints per 100,000 journeys and saw more complaints overall than long-distance contracted services during the latest year. Avanti West Coast showed the strongest improvement compared to the previous year.

**Figure 2.14 Complaints rate, all operators (number of complaints per 100,000 journeys), Great Britain, annual data April 2025 to March 2026 and percentage change from April 2024 to March 2025**




Source: TOC complaints rate data supplied to ORR. Available on ORR's data portal in [Passenger rail complaints statistics.]

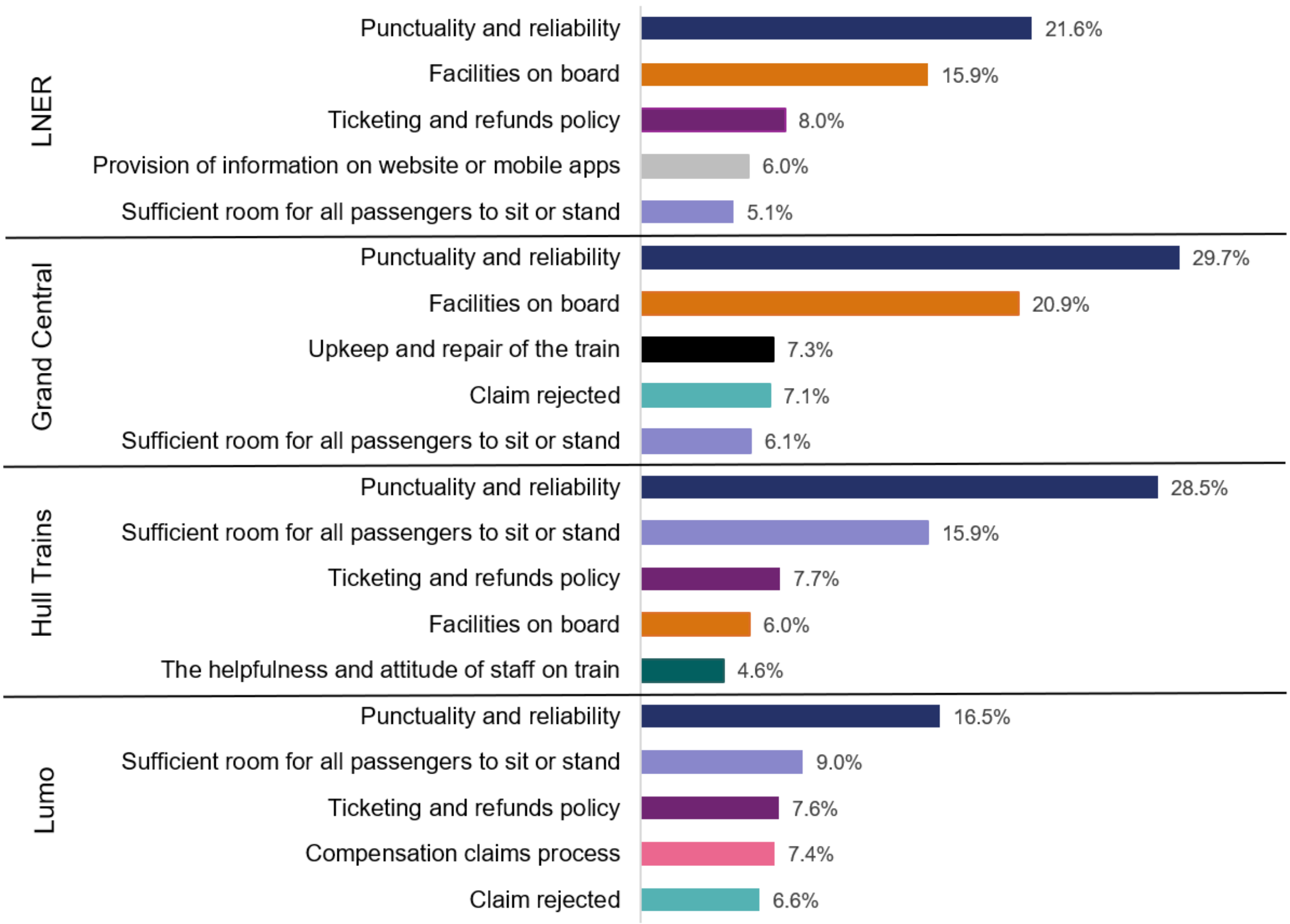
2.33 Figure 2.14 compares complaints rates of open access operators against the averages for all contracted operators, long-distance contracted operators, and other contracted operators. The long-distance average is derived from four operators (Avanti West Coast, CrossCountry, East Midlands Railway, and LNER), whereas the average for other contracted operators is derived from the remaining 16 operators.

2.34 This figure shows that open access had a greater rise in the volume of complaints and had a higher complaints rate than the grouped averages of contracted operators.

2.35 Complaints can result from a range of factors, including some events which are outside of the control of TOCs. Journey length may also be a factor; long-distance operators have historically tended to receive proportionately more correspondence about their services, meaning that we cannot draw strong conclusions from this data in isolation.

2.36 We report on the top five complaint categories for each ECML operator in Figure 2.15 below.

**Figure 2.15 Top five complaints categories for long-distance operators on the East Coast Main Line, annual data from April 2025 to March 2026**




Source: TOC complaints rate data supplied to ORR. Available on ORR's data portal in Passenger rail complaints statistics.

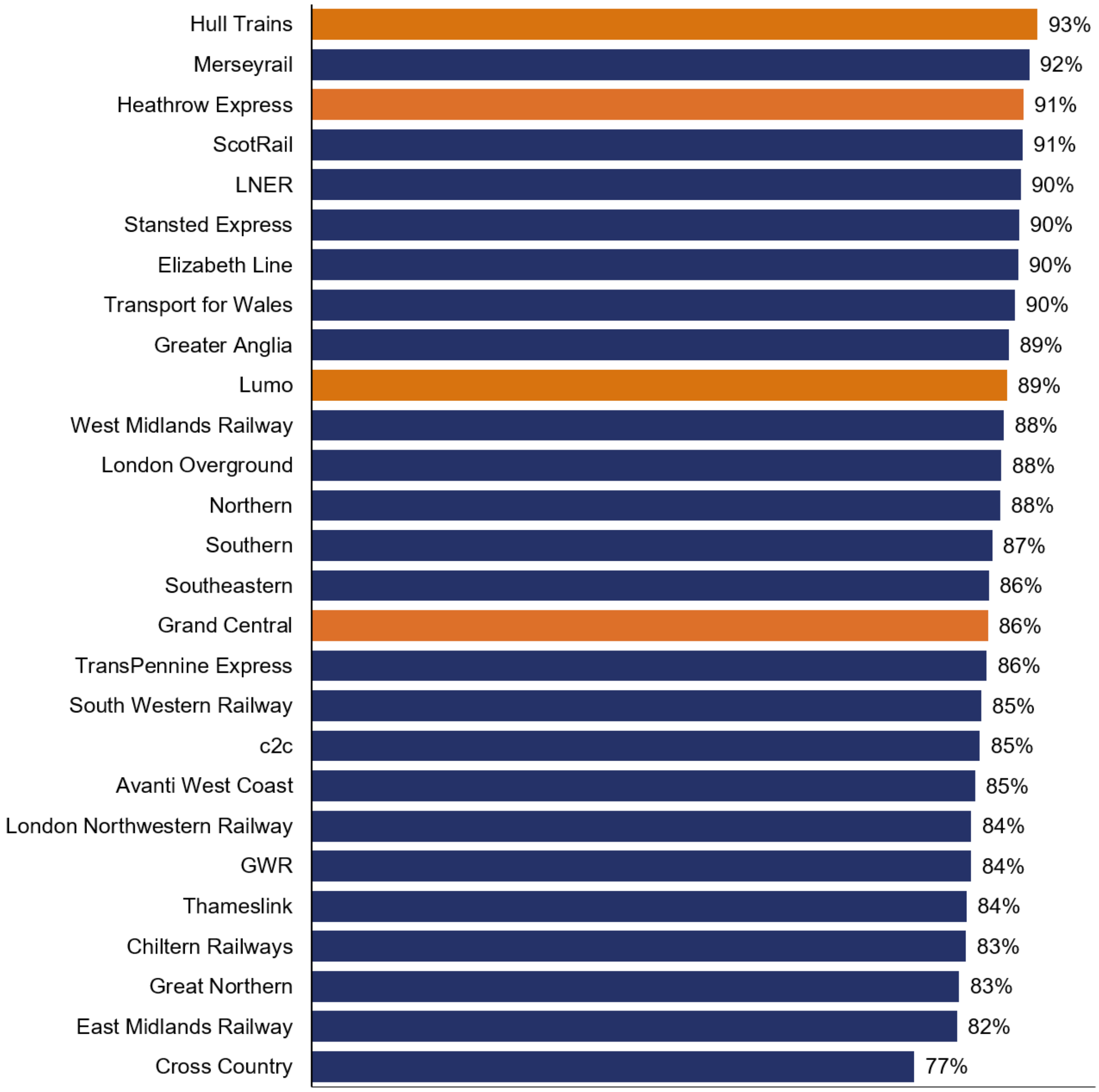
2.37 This data shows both the wide range of factors which impact on passenger satisfaction, and the consistent importance to passengers of punctuality and reliability. As with our 2025 report, train performance (punctuality and reliability) is a key complaints category. During the previous year, this was the top complaints category for Lumo and the second highest complaints category for LNER, Hull Trains and Grand Central. During the latest year, it is the top category for all of the open access operators as well as LNER.

2.38 Facilities on board is another key complaint category for Grand Central and LNER. Hull Trains' and Lumo's second most complained about category is now sufficient room to sit and stand.

## Overall Passenger Satisfaction

2.39 Drawing on data from Transport Focus's RCXS, Figure 2.16 below shows Passenger Satisfaction by Train Operating Company (TOC) for the most recent financial year. In this instance, passenger satisfaction is defined as the percentage of respondents who replied with 'Fairly Satisfied' or 'Very Satisfied' when asked about their overall satisfaction with the service in the surveys.

**Figure 2.16 Overall passenger satisfaction by operator, Great Britain, annual data, July 2025 to June 2026.**




Source: Rail Data Marketplace - RCXS Respondent Level Data. Contains public sector information licensed under the Open Government Licence v3.0.

2.40 Figure 2.16 shows that open access operators generally achieved higher levels of overall passenger satisfaction than contracted operators.

# 3. What international market participants are saying

3.1 International passenger rail services through the Channel Tunnel represent a significant market. Eurostar generated approximately £1.5 billion of annual revenue (Rail industry finance statistics) and accounted for 11 million passenger journeys in 2024-25 (Getlink quarterly financial information). While smaller than the wider contracted GB mainline rail sector, which generated approximately £12.2 billion of revenue, accounting for 1.73 billion passenger journeys in 2024-25, this is substantially larger than the long-distance domestic open access sector, which generated approximately £163m of annual revenue (2024-2025 figures where available, 2023-2024 in the case of Hull Trains) and accounted for 4.7 million passenger journeys (2024-2025).

3.2 During July 2026, we held a series of structured interviews with a range of participants involved in the cross-Channel passenger rail market. This included the infrastructure manager London St Pancras High Speed (which operates the high-speed link to the Channel Tunnel (HS1) as well as London St Pancras Station), together with five existing and prospective train operators, namely: Eurostar, Evolyn, Gemini, Trenitalia, and Virgin.

3.3 We used a common discussion guide across interviews to help ensure that we obtained broadly comparable evidence on key issues affecting the development of competition in the market. Our publication of these stakeholder views does not constitute ORR endorsement of the points raised.

## Industry views

### Rolling stock

3.4 Rolling stock is a significant requirement for the launch of new services, given the substantial capital investment associated with procuring a fleet capable of operating cross-Channel services, representing the largest category of upfront expenditure for a new entrant or established player, which for example in the case of VTE entailed a total capital requirement of c £700m. Interviewees highlighted the long lead times associated with designing, manufacturing, testing, and commissioning new trains, together with the limited availability of suitable second-hand rolling stock capable of being adapted for international operation.

3.5 Despite these challenges, most interviewees did not regard rolling stock availability itself as a principal barrier to entry or expansion. Participants told us that trains could be procured from established manufacturers, subject to securing suitable financing and allowing sufficient time for delivery. Our November 2025 Temple Mills decision letter briefly summarises the plans of would-be market players to involve major global Original Equipment Manufacturers Alstom, Hitachi, and Siemens.

## Depot access

3.6 We asked industry to provide us with their broader views regarding the extent to which access to depot facilities may affect competition and the development of international passenger rail services. During stakeholder meetings we did not discuss any aspect of companies' applications to gain access to the Temple Mills International depot, details of which are available on our website.

3.7 Interviewees generally regarded access to depot facilities as one of the most significant barriers to entry and expansion in the cross-Channel passenger rail market. Several participants emphasised the importance of depot access as it impacts on other stages of the process, such as rolling stock procurement, financing, and wider investment decisions. Some prospective operators also highlighted the lengthy timescales and uncertainty associated with developing alternative depot facilities, particularly where significant investment may be required.

3.8 While industry broadly agreed on the importance of access to depot facilities, views differed regarding the extent to which access to a particular depot was essential. Some participants highlighted the benefits of depot facilities located close to key terminals and operational centres. This is consistent with current industry arrangements, where existing and prospective operators have generally proposed maintenance facilities located close to the principal stations served by their services. However, views differed regarding the extent to which access to any particular depot was essential, with some stakeholders suggesting that alternative arrangements could be developed, albeit at additional cost or complexity.

## Track and tunnel access

3.9 Track and tunnel access is a clear pre-requisite for cross-Channel services. Interviewees highlighted the importance of infrastructure charges, with some interviewees noting that access charges for use of London St Pancras Highspeed infrastructure and the Channel Tunnel account for a significant proportion of operating costs, and some interviewees noting that this potentially impacts the commercial viability of new services and future expansion.

3.10 Several participants considered the process for obtaining access rights to be relatively transparent and did not regard the availability of train paths, in and of itself, as a principal barrier to entry. However, market participants identified a range of practical challenges associated with securing and coordinating access across multiple infrastructure managers and jurisdictions. Interviewees noted that prospective operators must engage with different processes covering HS1, the Channel Tunnel and the French network, increasing complexity and uncertainty for investors.

3.11 Several stakeholders discussed framework track access agreements and future framework capacity allocation. While interviewees generally regarded access to track capacity as achievable, some highlighted challenges arising from differing processes and requirements across infrastructure managers, as well as the interaction between framework agreements, rolling stock procurement and depot access.

## Stations

3.12 As would be expected, market participants regarded access to station facilities as an important factor affecting the development of competition in the cross-Channel passenger rail market. Several interviewees identified capacity constraints at international stations as a significant challenge, although participants emphasised that the principal issue was often the capacity of passenger processing facilities, including security and border-control arrangements, rather than the physical size of stations or the number of platforms available. Participants also noted that international stations and their associated processes had largely evolved in a single-operator environment, and require adaptation to accommodate multiple operators and address potential conflicts of interest. The conflicts mentioned referred to the principal operator also controlling access to terminal facilities such as border control, requiring negotiations with the incumbent operator.

## Other barriers

3.13 Interviewees identified a range of other factors that may affect entry and expansion in the cross-Channel passenger rail market. Several participants highlighted the economics of international high-speed rail services, noting the scale of upfront investment required, and the uncertainty associated with future passenger demand. Some market participants pointed to infrastructure-related costs, including the Channel Tunnel's business rates and other infrastructure charges, although views differed regarding the significance of these issues and the extent to which they could be mitigated through commercial arrangements or operational efficiencies.

3.14 Industry also highlighted the complexity of operating international rail services compared with domestic rail markets. Interviewees referred to information asymmetries between incumbent and prospective operators, the availability of information required to support investment decisions, and the challenges associated with navigating cross-border regulatory, operational, and border-control arrangements. Some participants additionally highlighted concerns regarding investment certainty, noting that the long-term nature of rolling stock and maintenance commitments can sit uneasily alongside shorter-term access and regulatory arrangements.

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