

Jonathan Rodgers
Office of Rail and Road
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Dear Jonathan

GTS response to Network Rail Representations (received 14 September 2026) on GTS 46th Supplemental Agreement (Section 22a) application for the Elizabeth line SCD 2028 Timetable

Thank you for the opportunity to respond to Network Rail's representations. As we noted in our initial Form P submission we are working with Network Rail (NR) on a timetable development study that will be due by the end of October. We acknowledge that Network Rail confirm they do not dispute the strategic rationale of the application and we agree additional work is required to demonstrate there is capacity and tolerable performance levels when considered against wider benefits.

We recommend that GTS provides a further update once the first phase of the timetable development work has concluded to avoid generating additional correspondence and we would recommend that NR wait to respond to our full representations at the end of October.

In the interim, there are some specific points we would like to address that were raised in the NR representations, which we will include in our full response at the end of October for completeness:

1. Network Rail have noted in section 5.6 that the Access Rights application does not fully reflect the phased approach noted in the supplemental. GTS are open to suggestions as to how the Supplement Agreement is structured based on the output of discussions taking place. We suggest that we address those changes as, and when, we have an agreed way forward.
2. In section 9, Network Rail notes that whilst the Elizabeth line performs well, there have been instances where Elizabeth line performance is below target. GTS recognises that there is always room for improving performance and agrees with parts of Network Rail's analysis. However a significant proportion of recent performance impacts have been associated with infrastructure-related incidents, alongside a range of external factors across the railway. GTS remains committed to working collaboratively with Network Rail and industry partners to improve holistic performance for customers.
3. GTS also wishes to reiterate that we have not asserted that the proposed uplift will have no performance impact. The relevant question is whether the overall performance implications are tolerable and capable of appropriate management when weighed against the substantial passenger and network benefits. Network Rail similarly identifies this as the key question.
4. In section 10 Network Rail notes the expected increase in tonnage and associated impact the rights sought would have on the network. The analysis and figures stated in the Form P were provided by NR to GTS/TfL in order to support a high level conversation which remains ongoing. We recognise there is likely more work to do on that analysis with NR, however our



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primary area of concern relates to how the regulatory framework allows for NR to request additional funding and investment to be made as a condition of access being sold, rather than splitting proportionately across all users of the infrastructure. We will continue to work with NR to resolve this point.

5. Also in section 10 NR suggest that engineering time is being eroded and that an increase in service provision late into the evening will impact the ability for engineering trains to access work sites. The timetable proposal does not affect existing engineering access times, nor does it add extra services during two-track railway times. Where NR have concerns about pathing of engineering trains, GTS commits to working with NR to help provide capacity through the normal industry processes which are separate to this application.
6. In section 12, Network Rail notes that the duration of rights should only be granted until PCD December 2029 due to the potential impact of the temporary infrastructure arrangement at Old Oak Common. GTS is aware of the changes in 2029 and it is important for the industry to plan for the long term. To support this the Phase 2 timetable already includes a timing allowance to account for the permanent speed restriction required to support the infrastructure changes from December 2029. In addition, neither GTS nor Network Rail currently expects the Elizabeth line service pattern to change as part of the December 2029 recast. As these additional services are intended to meet continuing customer demand, GTS considers there is a reasonable basis for the rights to continue beyond December 2029. GTS believe this is highly relevant to Section 4 of the Railways Act 1993, including protecting the interests of users of railway services, promoting the use of the railway network and enabling railway operators to plan their businesses with a reasonable degree of assurance. In that context, GTS considers that extending the duration of the rights would support long-term planning and avoid unnecessary administrative burden. GTS therefore requests that, when granted, the duration of the rights is aligned with the end of the contract period.
7. Section 13 notes that the timetable change date SCD 2028 has been moved from May to July in response to the UEFA European Football Championship. GTS are currently in a dispute with Network Rail over this change as it imports significant cost and operational delivery risks to GTS. We continue to work with Network Rail to find a compromise, including considering whether we can collectively achieve a position that would support bidding our proposed service enhancements at an earlier timetable change date. In line with industry best practice, GTS aspires to have access rights in place prior to bidding. Should an earlier implementation date be pursued, this would require the industry to reach a timely agreement on the necessary timetable and access arrangements ahead of the relevant Priority Date. GTS looks forward to continuing to work with ORR, Network Rail and industry partners to support agreement of this supplemental over the coming months.

We will continue to keep the ORR informed at all stages of this process. With the next update following the delivery of the timetable work being undertaken by Network Rail's Advanced Timetable Team.

Yours sincerely



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