

## **Transport for Wales Rail 4<sup>th</sup> Supplemental Agreement**

### **Responses to industry consultation**

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**a. GBRf's response, and TfWRL's reply**

**From:** [Redacted]

**Sent:** 24 August 2021 17:47

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** RE: GB Railfreight response to Transport for Wales Rail 4th Supplemental Agreement (Section 22A)

**Importance:** High

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Chris & Claire,

It was useful to have a joint meeting today on TfW's proposals, as stated in this supplemental, for the Wrexham-Bidston route from December 2021.

GB Railfreight (GBRf) has been involved from the start of the Wales & Borders Event Steering Group (for Dec '22 Timetable), and particularly in respect of the GBRf cement services operating to and from Penyffordd Cement Works along the line of route. There has been much discussion regarding how the currently operating cement services running between Penyffordd Cement Works and the Avonmouth (Hanson) terminal can fit in with the aspirations of TfW Rail. For the record, GB Railfreight has a currently open Section 22A Application for firm access rights for its cement services (GBRf 17<sup>th</sup> Supplemental; proposed rights attached) and is looking to complete this application. The 17<sup>th</sup> Supplemental currently, understandably, has an outstanding objection from TfW Rail with its requirement for additional Wrexham to Bidston services.

After much recent discussion, though, GB Railfreight cannot support TfW Rail's 4<sup>th</sup> Supplemental Agreement, as proposed, as it contains competing access rights clashes with GBRf's existing cement services for which GBRf is currently seeking firm access rights.

GB Railfreight agrees that TfW has indeed proposed an alternative set of pathways for GBRf's 6V41 17:08 [TThO] Penyffordd Cement Works – Avonmouth service and also 6M42 09:20 [MWFO] Avonmouth – Penyffordd Cement Works trains however they are proposed to run via a completely different route with some differing terminal slot times. The new route is via Hereford and Newport (Maindee) instead of the current routing via Wolverhampton and Cheltenham Spa. GBRf would not be able to run these services via the new routing from December 2021 as it does not have sufficient traincrew competent with the new routings. In any case, even if GBRf could re-route these trains, there are terminal slot timing issues that would be created, knocking on to other freight services at Avonmouth.

GBRf would need to train at least 10 of its Bristol traincrew to learn the route Shrewsbury – Hereford – Newport (Maindee) and back. This is 94 miles of new route, in each direction, and GBRf just does not have the opportunity to release these 10 drivers for route-learning and also back-cover their booked turns with other drivers. It just is not possible.

In addition to the issues with these particular cement services on the Wrexham-Bidston route, GBRf's customer (Hanson Cement) has aspirations to *increase* the number of cement services out of Penyffordd Cement Works, its favoured UK cement plant, over and above those currently in the May 2021 Working Timetable. Hanson's recent £24 million investment programme there has secured the long-term future of this cement works, with new and improved equipment increasing the productivity of the plant to 650,000 tonnes of cement per year. As part of this investment, three new rail cement silos have been built alongside the existing railhead permitting new flows of railborne cement traffic to commence. There is also the possibility of inward fuel and by-products by rail.

With the Government's carbon net-zero legal requirements in force, and the real chance of modal shift of freight from road to rail with all the benefits that brings, GBRf is really concerned that there will also be no room for growth of services to/from Penyffordd Cement Works should these rights be granted, especially without any infrastructure enhancements on the route.

GB Railfreight notes that in Section 4.1 of the Form F application, there is no mention of the impact on freight operators, as requested. There is mention elsewhere in this Form F on the effects on some current freight services however not specifically on the Penyffordd freight services.

In addition, in Section 3.2 of the Form F, the application states that TfW Rail has designed its proposed new passenger services with windows for Penyffordd freight services outside the 7am-7pm window. GB Railfreight is clear this is not acceptable, given that such opportunities to run additional Penyffordd cement services do exist right now, albeit in limited numbers. To actually reduce opportunities, and not give adequate room for freight growth from the terminal, in this post-Covid world of travel and where modal shift from road to rail is key, is the wrong thing to do.

As stated before, GBRf, TfW Rail and Network Rail have had some detailed discussions on all the various service interactions, with a call having taken place, again, on this application this morning. Each party, I believe, has at least understood the finer points of the others' issues but I believe there are some intractable issues on each side. Taking this all into account, GB Railfreight's personal view is that a step-change in passenger quantum on the route really does need additional infrastructure around Penyffordd to support all aspirations, not least as it will also give some degree of performance improvements.

Again, despite our combined efforts, I'm afraid that GBRf cannot support this application given its clashes with our own 17<sup>th</sup> Supplemental.

Regards,

Ian Kapur.  
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GB Railfreight Ltd.,

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**From:** Chris Dellard

**Sent:** 23 November 2021 17:08

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** RE: GB Railfreight response to Transport for Wales Rail 4th Supplemental Agreement (Section 22A)

Hi Ian,

Thank you for setting out GBRf's position which reflects the useful discussions that we had at our joint meeting with Network Rail on 24 August.

At September SOAR Panel, TfW Rail's request for Wrexham-Bidston access rights was Authorised by the Panel subject to several caveats and we are continuing to work with Network Rail to resolve these. Since then, we have confirmed with Network Rail that we are now seeking to introduce a 2tph service from May 22 rather than Dec 21, following agreement with TfW Authority.

While this gives more time for certain prerequisites to fall into place (particularly Network Rail's level crossing intervention work) we are not expecting that it will fundamentally alter the position regarding the specific conflicts between GBRf's existing cement services for which GBRf is currently seeking firm access rights, and TfW Rail's proposals. Our Timetable bid for May 22 on this route is essentially identical to our (now withdrawn) bid for Dec 21.

Therefore we will now proceed to apply to ORR under section 22A for the full quantum of rights that we have consulted on, effective from May 22. This is because we have a commitment to deliver a 2tph service and so our requirement is still definite and immediate. Meanwhile we will continue to work with Network Rail to help to close out the SOAR Panel's caveats in accordance with its Decision.

Regards,

Chris

**b. Transport Focus' response**

**From:** [Redacted]

**Sent:** 27 July 2021 15:15

**To:** [Redacted]

**Subject:** Re: Transport for Wales Rail Ltd consultation - Section 22A Application – additional Wrexham-Bidston Track Access rights, 2022 Principal Change Date

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Chris,

Thank you for sending Transport Focus details of TfW Rail's track access application. They note that:

it applies for firm rights to operate, from the PCD in December, 2021, until the end of the track access contract in August, 2025, two trains an hour, Mondays to Saturdays, between Wrexham Central and Bidston;

that frequency is a commitment made to the Welsh Ministers in the Grant Agreement of 2018;

the timetable proposed for December 2021 has been under development by the Wales Event Steering Group since September 2019;

GBRf has a particular concern regarding its train 6V41, which is currently 17.43 off Penyffordd Cement Sidings – clearly in the p.m. peak;

there are other freight workings on the route, and their associated light engine moves;

the additional services would not call at all stations, saving 11 minutes on the current journey time, providing more buffer for delays;

the paths are timed using Class 150 SRTs, not the shorter times possible if operated by Class 230 trains;

any delay to the introduction of Class 230s would therefore not impact on the timetable's reliability.

Transport Focus also notes that:

Network Rail has identified that work is necessary at nine level crossings;

a funding decision by the DfT is due this month, July, 2021;

if delayed, the necessary work would also delay the 2/hour frequency;

if not complete before April, 2022, the higher frequency could not operate in the December timetable period.

The Sectional Appendix shows two user worked crossings only on the line, either side of Penyffordd. Where are the other seven located?

In their reply to GBRf's 17th. SA (o/r 0610e21, on 8/10/21) Transport Focus opined:

“Finding hourly capacity on a double-track railway for two passenger trains and one freight train seems to be an entirely reasonable request. Transport Focus believes the application should be approved.”

That opinion still holds; passengers are looking forward to the improved service that has been promised. Transport Focus supports the application.

Regards,

John Sears.

Tel. [Redacted]

**c. GWR's response**

**From:** [Redacted]

**Sent:** 23 August 2021 15:25

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** Re: Transport for Wales Rail Ltd consultation - Section 22A Application – additional Wrexham-Bidston Track Access rights, 2022 Principal Change Date

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Good afternoon Chris,

thank you for this.

This application appears to have no effect on GWR therefore we have no objection.

(150 timings are sought. 150 vehicles appear to be available. Turnrounds are eased. As a result the service is more robust.

The ESG concept is designed to prove accommodation bearing in mind justifiable aspiration and available (or designed) infrastructure, and where proven then to show how this can be done.)

Many thanks.

Rob

**Robert Holder | Network Access Manager | Great Western Railway**

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