



**Freightliner Group Ltd**  
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B4 6EQ

Margret Haswell  
Executive, Access and Licensing  
4<sup>th</sup> Floor, 1 Atlantic Square  
York Street  
Glasgow  
G2 8HS

## **RE: Freightliner Limited 21<sup>st</sup> Supplemental Agreement**

### Response to Network Rail Representations

Dear Margret,

Thank you for providing Freightliner Limited ('Freightliner') the opportunity to comment on Network Rail's representations to the proposed 21<sup>st</sup> Supplemental Agreement.

Freightliner note that, at the time of writing, owing to the unprecedented number of applications received, Network Rail have been unable to provide full details on the impact of this application. This should not be the case as they have been included in all ECML ESG work, given the timing loads being applied for in this Supplemental Agreement reflect those already running in the working timetable as TOVRs.

In line with previous ORR directions stating that TOVRs should be converted to Firm Access Rights within 12 months of commencement of operation, Freightliner would reiterate that Network Rail already understand that these train slots can be accommodated, and as such expect this application to be expedited swiftly, and that continued non-support appears to be an overly bureaucratic application of the 'East Coast Access Rights Policy' put in place by Network Rail.

Given the cross industry support garnered in 2020/2021 to implement train slots with 1800T trailing weight timing loads through the Southampton Freight Train Lengthening ESG, and the successful implementation of these changes in order to take advantage of substantial DfT investment on the route between Southampton and the Midlands, Network Rail's position not to support the contractualisation of these Rights where the impact of the change is understood to be very minor (between 30 and 60 seconds increase in running time across a 6 mile section of the Doncaster to Leeds route) appears to show a fragmented approach from different Network Rail Routes in relation to Access Rights, and a lack of oversight. Freightliner would promote a higher level of oversight being taken by Network Rail at a National level to ensure a coordinated approach in terms of assessing benefits, thus avoiding situations where one Route's multi-million pound investment cannot be taken advantage of due to concerns over 30 seconds of increased sectional running time elsewhere.

Freightliner will await further information from Network Rail regarding any capacity or operational concerns and respond to these in due course.

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Yours Sincerely



Chris Matthews  
Timetable Strategy and Rail Industry Manager  
Freightliner Group

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