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Dear Tracy

Train Protection System Exemption For Crossrail Services Between Paddington and Heathrow Airport Junction

Thank you for the opportunity to comment on this proposal.

GWR is disappointed at the likely failure of Network Rail to deliver ETCS level 2 fitment for the lines between Paddington and Heathrow Airport Junction to the planned timescale. ETCS level 2 fitment would provide comprehensive Automatic Train Protection over the route and fitment of this route section is part of the future wider fitment of ETCS level 2 to the NR Western Route. We are concerned that delays in this area mean that delays in the wider fitment are more likely something that would pose more significant problems for GWR. It is important that NR remain focussed on delivering the wider ETCS level 2 fitment regardless of delays between Paddington and Heathrow Airport Junction and despite any comments made by GWR in response to this proposal.

You have referred to the letter from Mike Hogg dated 19th December 2014 and have indicated that this was a letter of support for the proposals. We would like to make it clear that this letter was supportive of development of an alternative proposal, but was not supportive of any particular outcome of that development work. You will note that this letter also indicated our concerns with any further slippage to the wider Western Route ETCS programme.

We recognise that once it is clear that ETCS level 2 fitment will not be achieved in time for the commencement of Crossrail services the industry faces a difficult situation. Use of enhanced TPWS would mean that Crossrail services fitted with TPWS would be replacing Heathrow Connect services fitted with ATP. This is clearly not ideal and we would like to register our concern at this. However, on the whole GWR recognise that the consultation document does provide a realistic proposal to deal with the issue.

We are not clear whether the data from the Safety Risk Model referred to in section 5.1 was national data or whether data specific to the Western route had been used in the analysis. The latter would clearly be more directly relevant to this proposal.

We feel that the early elimination of ETCS level 1 as an alternative proposal was disappointing. A fuller evaluation of this option may have provided better train protection benefits than that provided by enhanced TPWS. It may also provide a solution that would improve the interface with the ETCS level 2 system in the Heathrow tunnel and would avoid the need for an RSR99 exemption. While the report suggests that there are similar technical difficulties in applying ETCS level 1 and level 2 we feel that this issue could have received a more thorough analysis before being rejected. As we understand it NR currently propose to fit ETCS level 2 all the way to the buffer stops at Paddington, something that is not typical of ETCS level 2 fitments in Europe. Because of this the use of ETCS level 1 may yet have an important role in the Paddington-Heathrow Airport Junction area. We do not feel it should have been rejected as an option for this problem so early in the process.

The report is largely silent on the issue of braking capability and crash worthiness. It is worth noting that the introduction of the Hitachi IEP & AT300 fleets are currently expected to result in the elimination of the 9%g braked HST fleet by December 2018.

Our concerns noted above are real however we recognise the need for an alternative solution should ETCS not be available in the original timescales and we agree that the proposal would be suitable for such a purpose until ETCS is introduced. As such GWR supports the interim proposal should it be required.

Yours sincerely



Ben Rule
Operations Director, Great Western Railway