

**Subject:** Re: Consultation on consolidation and revision of freight general approvals

Alice

Thank you for consulting South West Trains on the above.

We are concerned that the new permission granted in Annex D, paragraph 7(b) of the general approval could have the effect of granting what are effectively new Level 1 rights to freight operators without the need for ORR's specific approval. The ability to amend any of the characteristics of an existing Level 1 right potentially gives the scope for material changes to be made, which are currently subject to an industry consultation and ORR approval.

We believe that only non-material changes to Level 1 rights should be permitted by this general approval without the need for specific ORR approval, and to ensure that this is the case suggest that either this permission should be more tightly defined or require Network Rail to carry out an industry consultation.

Regards

Sam Gibbins  
Track Access Manager  
South West Trains