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Margret Haswell
Executive, Access and Licensing
Office of Rail and Road
4th Floor, 1 Atlantic Square
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15th August 2025

RE: Freightliner Heavy Haul Proposed 25th Supplemental Agreement **Response to Final Network Rail Representations**

Dear Margret,

Thank you for providing the opportunity to comment on Network Rail's Final Representations to Freightliner Heavy Haul's 25th Supplemental Agreement, covering additional rights for services operating on expectation of Rights, or with amended characteristics to their firm Rights, at the time the 'Complex and Competing Applications' process commenced.

Freightliner is pleased to see that Network Rail are now prepared to accept the majority of Firm Rights included in this application, given the time elapsed since initial application, although it is disappointing to see that all aspirational areas of this application are unsupported by Network Rail.

Freightliner can confirm the position in relation to Rights not supported is agreeable due to changes since the application was submitted.

There are a number of proposed firm rights where Network Rail have raised queries or comments – many of which are in relation to the aspirational aspects of this application, or have come about as a result of multiple timetable changes since the original application was submitted. Please see below Freightliner's comments in relation to these:

The Right sought for 6M50 (SX) Machen Quarry - Lawley Street Aggs Terminal is for a 14.10 – 15.10 departure window but the Working Timetable path departure time is at 14.02. Network Rail would support a 13.32 – 14.32 departure window

Freightliner agree to this amendment, principally created by an amendment to Train Planning Rules between Machen and Newport to correct deficiencies in the Sectional Running Time.

The Right sought for 6V27 (MSX) Lawley Street Aggs Terminal – Stoke Gifford (04.30 - 05.30 departure window) has Stoke Gifford as a destination but the December 2025 Working Timetable has East Usk Yard instead. Network Rail would support the Right as requested, with a destination of Stoke Gifford. As the Working Timetable paths arrives at Bristol Parkway at 08.18, adjacent to Stoke Gifford, Network Rail would support an arrival window of 07.48 - 08.48. As Freightliner Heavy Haul have not requested a Right through to East Usk Yard, it means Network Rail would not be supportive of this extension without undertaking consultation as this would be utilising capacity in the timetable another operator could use. It is also worth highlighting that this train has been offered in the December 2025 Working Timetable with a

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different headcode, 6V47.

Freightliner agree to this amendment including the headcode and destination – this schedule has again been amended since this application was submitted to the ORR.

The Right sought for 6C54 (SX) Tunstead Sidings – Hardendale Quarry is for a 04.45 – 05.45 arrival window but the Working Timetable path arrival time is at 04.30 on FSX. Network Rail would support a 04.00 – 05.00 arrival window on FSX. For clarity, the Right sought matches for the Fridays only schedule. Freightliner agree to the amendment of the arrivals window FSX. To allow this to be shown, the Right as applied for has been amended to FO, with a new Right proposed FSX with the amended arrival time.

The Right sought for 6V08 (SX) Tunstead Sdgs – Brentford Town Days is for a 2200t timing load with a Heavy Axle Weight (HAW) restriction but the December 2025 Working Timetable path does not include the HAW restriction. Network Rail would be supportive of the 2200t timing load without this restriction. Freightliner agree to this amendment.

The Right sought for 6M90 (SX) Brentford Town Days – Tunstead Sdgs is for a SX Right but the December 2025 Working Timetable is MSX. Network Rail would support an MSX Right. Freightliner agree to this amendment.

The Right sought for 6A88 (SX) Tunstead Sidings – Wembley Receptions 1-7 is for SX but the December 2025 Working Timetable path is FSX. Network Rail would support a FSX Right. In addition, the Right sought is for an intermediate stop at Crewe Basford Hall but the December 2025 Working Timetable path has the stop at Crewe station. Network Rail would support the intermediate stop at Crewe station. Freightliner agree to these amendments.

The Right sought for 6V51 (SX) Tunstead Sidings – Park Royal Marcon is for a 07.29 – 08.29 arrival window but on Fridays only the Working Timetable path arrival time is at 07.22. Network Rail would support a 06.52 – 07.52 arrival window on Fridays only. For clarity, the FSX matches the windows sought. In addition, the Right sought has an intermediate stop at Hanwell Bridge Loop but the December 2025 Working Timetable path does not include this stop. Network Rail is not supportive of the intermediate stop at Hanwell Bridge loop. Freightliner agree to these amendments.

The Right sought for 6M51 (SX) Park Royal Marcon – Tunstead Sidings is for SX but the associated path is MSX. Network Rail would support a MSX path. In addition, the Right sought is for 19 minute crew stop at Crewe Basford Hall but the December 2025 Working Timetable path is for a 15 minute crew stop. The Timetable Planning Rules state a 2 minute dwell for crew changes so Network Rail would support a 2 minute crew stop at Crewe Basford Hall. Freightliner agree to these amendments.

The Right sought for 6O51 (SX) Tunstead Sidings – Stewarts Lane Tarmac is for SX but the associated path is MTWO. Network Rail would support a MTWO path. Freightliner agree to these amendments

The Right sought for 6L36 (SX) Tunstead Sidings – Bow East FLHH (Olympics) is for SX but the associated path is FSX. Network Rail would support a FSX path. In addition, there are two 'Y' paths associated with this Right sought in the December 2025 Working Timetable. One matches the 08.12 -

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0912 arrival window but has a 2000t timing load, as opposed to the 2400t Right sought in this application. The second path has an arrival time of 06.35 so does not match the 08.12 - 09.12 but does match the 2400t Right sought. Network Rail would support a 06.05 - 07.05 arrival window with a 2400t timing load. Network Rail would like to clarify this support only relates to one of the 6L36 (SX) 'Y' paths and the other path with the 08.12 - 09.12 window would need a separate Right with a 'Y' characteristic and this will need to be progressed through a separate application.

Freightliner agree to these amendments and have amended the days run and arrival window to align with the 2400T path. Any Y paths will be agreed separately.

The Right sought for 6M55 (SX) Peterborough West Yard – Tunstead Sidings is for a 15.32 – 16.42 departure window and a 20.08 – 21:08 arrival window but the Working Timetable path departure time is 16.56 and arrival time is 21.41. Network Rail would support a 16.26 - 17.26 departure window and a 21.11 - 22.11 arrival window.

This train has been significantly retimed since this application was submitted to the ORR as a result of the ECML December 2025 timetable recast.

The Right sought for 6L81 (SX) Tunstead Sdgs – Trowse Yard Redland Sidings is for a 2200t timing load but the December 2025 Working Timetable path is for a 2000t timing load. Network Rail would support a 2000t timing load.

Freightliner agree to these amendments

The Right sought for 6D17 (SX) Tunstead Sdgs – Elstow Redland Sidings includes an intermediate stop at Bedford for 14 minutes but the December 2025 Working Timetable path has a 2 minute stop at Bedford which is line with the Planning Rules allowance for a crewe change. Network Rail would support a 2 minute intermediate stop at Bedford.

Freightliner agree to these amendments

The Right sought for 6H93 (SX) Elstow Redland Roadstone - Tunstead Sidings is for a 21.25 – 22.25 departure window but the Working Timetable path departure time is at 00.20. Network Rail would support a 23.50 – 00.50 departure window. In addition, the Right sought is for SX but the associated path is MSX. Network Rail would support a MSX path. Finally, the Right sought includes a crew change at Barrow Hill 2/3 but in the December 2025 Working Timetable the train is not routed this way. For this reason, Network Rail is not supportive of the Barrow Hill 2/3 intermediate stop.

Freightliner agree to these amendments, noting the departure window needs to remain after 00:01 for this right to remain MSX, an earlier departure would create an FSX path.

The Right sought for 6B71 (SX) Tunstead Sidings – Northampton Castle Yard is for a 06.46 – 07.46 departure window but on Mondays only the Working Timetable path departure time is at 07.55. For clarity, the MSX matches the windows sought. Network Rail would support a 07.05 – 08.05 departure window that would cover both the MO and MSX variations.

Freightliner agree to these amendments

The Right sought for 6H41 (SX) Tunstead Sdgs – Bredbury Tilcon includes an intermediate stop at New Mills Central but the December 2025 Working Timetable does not include this stop. For this reason, Network Rail is not supportive of this intermediate stop being included in the Right sought.,

Freightliner agree to removal of this stop which was included in error.

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The Right sought for 6H42 (SX) Bredbury Tilcon - Tunstead Sidings is for a 23.44 – 00.44 arrival window but the Working Timetable path arrival time is at 23.14. Network Rail would support a 22.44 – 23.44 arrival window.

Freightliner agree to this amendment.

The Right sought for 6L10 (SX) Tunstead Sidings - West Thurrock (FHH) is for a 03.57 – 04.57 arrival window but the Working Timetable path arrival time is at 03.54. Network Rail would support a 03.24 – 04.24 arrival window. In addition, the Right sought has an intermediate call at Willesden Up & Down Goods but in the December 2025 Working Timetable the train is not routed this way. Therefore, Network Rail is not supportive of the Willesden Up & Down Goods intermediate stop

Freightliner agree to these amendments

The Right sought for 6J52 (FSX) Tunstead Sdgs – Brindle Heath Up Sidings is for a 2200t timing load with a Heavy Axle Weight (HAW) restriction but the December 2025 Working Timetable path does not include the HAW restriction. Network Rail would be supportive of the 2200t timing load without this restriction.

Freightliner agree to these amendments

The Right sought for 6E03 (SX) Tunstead Sidings – Hunslet Yard is for SX but the associated path is TThO. Network Rail would support a TThO right.

Freightliner agree to these amendments

The Right sought for 6M02 (SX) Hunslet Yard (FLHH) - Tunstead SDGS is for a 21.11 – 22.11 arrival window but the Working Timetable path arrival time is at 20.40. Network Rail would support a 20.10 – 21.10 arrival window. In addition, the Right sought is for SX but the associated path is TThO. Network Rail would support a TThO right.

Freightliner agree to these amendments

The Right sought for 6M55 (SX) Brandon Goods Loop - Tunstead Sdgs is for a 21.25 – 22.25 arrival window but the Working Timetable path arrival time is at 19.52. Network Rail would support a 19.22 – 20.22 arrival window. In addition, the Right sought is for SX but the December 2025 Working Timetable path is for MSX. Network Rail would be supportive of a MSX Right

Freightliner agree to these amendments

The Right sought for 6H24 (SX) Guide Bridge Yard – Tunstead Sidings is for MO but the associated path is FSX. Network Rail would support a MO right.

Freightliner agree to these amendments

The Right sought for 6H79 (SX) Guide Bridge Yard – Tunstead Sidings is for a SX Right but the December 2025 Working Timetable is MSX. Network Rail would support an MSX Right.

Freightliner agree to these amendments

Network Rail comment that this application conflicts with a number of other applications. While this may be the case, While Freightliner agree to the above changes to secure Rights for these services, it is unclear what assessment has been undertaken to understand where additional capacity can be found for aspirational changes, and what trade offs have been considered in reaching the conclusions on what can be supported. As such, although Freightliner are prepared to agree the above amendments, we would still

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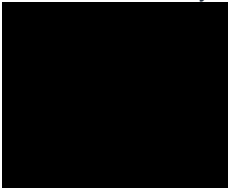
request the ORR accommodate additional days where they have been applied for in order to enhance service offering.

As commented on in other applications, Freightliner have concerns over the issues with Oxford area level crossings being highlighted by Network Rail. Network Rail do not publish any 'General Capacity Constraints' for this area in the relevant documentation, nor have they provided any evidence to the industry to confirm the risk profile at these level crossings. It is particularly concerning to Freightliner that the assessment of these crossings appears to be undertaken on a quantum basis across the day based on the evidence provided in these representations, which cannot be an accurate reflection of the risk profile which, by definition, must change across the course of the day dictated by quantum of train movements, and level crossing usage.

Freightliner would request the ORR investigates this issue further and seeks definitive proof of the issue before allowing it to influence Access Rights, or timetabling, decisions.

Freightliner hope that with the above amendments, given Network Rail's support, the ORR are able to determine that these rights should be included in Freightliner Heavy Haul's rights table.

Yours Sincerely



Chris Matthews
Head of Planning (Long Term)
Freightliner Group

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