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Executive, Access and Licensing
Office of Rail and Road
4th Floor, 1 Atlantic Square
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19th August 2025

RE: Freightliner Limited Proposed 24th 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 Limited's 24th 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 also have concerns over the non-support of certain Rights due to conflicts cited by Network Rail where trains currently exist in WTT slots, and over some of the capacity restrictions highlighted 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 4M79 (SX) Southampton MCT- Lawley Street FLT is for a 03:30 - 04:30 arrival window but on Fridays only the Working Timetable path arrival time is at 02.39. Network Rail would support a 02.09 – 03.09 arrival window on Fridays only. For clarity, Network Rail is happy to support the FSX element of the Rights as it has been requested. Therefore, this right would need to be split into a FSX right and a separate FO right.

Freightliner agree to this amendment.

The amendment to the existing Right sought for 4S59 (SX) Southampton MCT – Coatbridge FLT is for a Class 66 1400t timing load as far as Carlisle then a 2 x Class 86 1200t timing load from Carlisle but the Working Timetable path timing load is for a Class 66 1600t timing load to Crewe Basford Hall for a Class 90 1600t timing load forward. Network Rail would support a 1400t timing load to Carlisle and a 1235t timing load from Carlisle. Network Rail is not supportive of the higher tonnages as they have not been part

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of our plan to assess and furthermore have not been included in the statutory consultation processes. Freightliner note these comments, and that there is no change to the Right requested.

The Right sought for 4L52 (SO) Crewe Basford Hall – London Gateway includes a crew change stop at Rugby. The December 2025 Working Timetable path does not include this stop. Network Rail supports the other amendments to this Right but not the Rugby stop. The inclusion of this stop could have an impact on the operation and performance of the Timetable on the West Coast Mainline. Please refer to the WCML section below. It is also worth highlighting that this train has been offered in the December 2025 Working Timetable with a different headcode, 4L49.

Freightliner agree to the removal of the stop at Rugby, and have amended the headcode.

The Right sought for 4O38 (SX) Lawley Street FLT – Southampton MCT includes a crew change stop at Birmingham International. The December 2025 Working Timetable path does not include this stop. Network Rail supports the other amendments to this Right but not the Birmingham International stop. Inclusion of this stop could have an impact on the operation and performance of the Timetable.

Freightliner agree to this amendment

The Right sought for 4E62 (SX) London Gateway – Doncaster Railport is for a 16.25 – 17.25 arrival window but the Working Timetable path arrival time is at 16.20. Network Rail would support a 15.50 – 16.50 arrival window.

Freightliner agree to this amendment. This has been amended since the application was made.

The Right sought for 4M98 (SX) Southampton MCT – Garston FLT is for a 1800t timing load but the Working Timetable path timing load is 1600t. Network Rail would support a 1600t timing load.

Freightliner agree to this amendment.

The Right sought for 4M61 (SX) Southampton MCT – Trafford Park FLT is for a 1800t timing load but the Working Timetable path timing load is 1600t. Network Rail would support a 1600t timing load.

Freightliner agree to this amendment.

The Right sought for 4L67 (SX) Trafford Park FLT – Felixstowe North FLT has a Class 66 timing load from Trafford Park FLT – Crewe Basford Hall where it switches to electric traction then back to a Class 66 timing load from Ipswich Yard. The December 2025 Working Timetable shows the electric traction from Trafford Park with no traction change at Crewe Basford Hall. As such, Network Rail would support the 75C90S12 timing load from origin rather than from Crewe Basford Hall.

Freightliner agree to this amendment. The stop at Crewe Basford Hall has been amended to Train Crew only.

The Right sought for 4M69 (MO) Ipswich SS – Trafford Park has an 02.30 - 03.30 departure window but the Working Timetable path departure time is 04.53. Network Rail would support a 04.23 - 05.23 departure window. In addition, the destination in the Right sought is for Trafford Park FLT but the December 2025 Working Timetable path has Crewe Basford Hall as a destination. Network Rail would support Crewe Basford Hall as the destination with a 10.31 - 11.31 arrival window.

Freightliner agree to this amendment.

The Right sought for 4L44 (SO) Trafford Park – London Gateway has a destination of London Gateway but the December 2025 Working Timetable path has Tilbury IRFT as the destination. Network Rail would

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support Tilbury IRFT as the destination with a 13.46 - 14.46 arrival window.
Freightliner agree to this amendment.

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

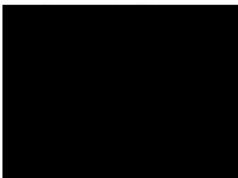
Freightliner are unclear on the situation in relation to Network Rail's lack of support for rights which conflict with rights included in the GB Railfreight 34th Supplemental Agreement. This application seeks to establish Rights for trains that are already operating in the WTT, while, noting our comments above, make small scale changes to those paths to allow optimisation. Freightliner are unclear as to the status of the Rights in GB Railfreight's application, and whether these are aspirational or existing – if aspirational, Freightliner would hope priority would be given to existing services in the WTT running today (ie. This application), as is the case with those included in this application.

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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