

Response to Version 3.0 of the 2027 Timetable Planning Rules

5.2.2 General Capacity Constraints

Page 77 (High Risk Level Crossings) – We do not agree to the addition of this list of level crossings within this section of the TPRs, for the following reasons:

- The statement that this is a list of level crossings 'which have been deemed high risk' adequately demonstrates the lack of an objective standard underpinning its compilation. A list which is derived from one or more subjective considerations is subject to constant change, making it unsuitable to form the basis of a TPR.
- In addition, this list of level crossings has been included in the TPRs without any consultation of the supporting data or relevant standards and criteria. The only information provided in this regard is a single number relating to usage for each crossing by road vehicles, pedestrians and cyclists; however, there is no clarity on timeframes over which these numbers apply, or how these have been considered alongside the wide variety of other affecting factors which could affect a level crossing's "risk category".
- Changes to TPRs should be based on data, supported by evidence, with sources of information/evidence agreed by parties (typically via the TPR Forum): none of which can be said to be true of this proposal sent at Version 3.

In addition to the technical inadequacies within this 5.2.2 proposal, outlined above, it should be noted that the proposal does not constitute a "Planning Rule"; as such, it does not belong in the TPR. There is no "value" comprising a "Rule" which timetable planning colleagues can apply to assess the validity of a requested train slot. In this regard, it is not conversant with the proposed changes in Version 3 of the National TPR (themselves subject to disagreement elsewhere in our response) under Section 1.15.2 which states that 'general capacity constraints detail limitations on the quantum of traffic in a single direction'; but there is no quantified constraint or limitation on quantum identified in any of these proposals. Instead, there is simply reference made to a need for an Access Proposal to be 'risk assessed', itself a duplication of work which sits within the established industry "TCRAG" framework.

The changes proposed to Section 5.2.2 of the 2027 Anglia TPR in Version 3 should be removed and reissued under separate cover as guidance. Not only is such guidance not appropriate for inclusion in the TPRs as it does not constitute a "Rule"; it is also unacceptable to impose conditions in the TPRs, however these may be worded, which are based on information which is neither verified nor properly consulted, and are therefore essentially subjective in nature.