

### 5.2.2. General Capacity Constraints

GBRf do not agree to the addition of this list of level crossings within this section of the TPR, 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 TPR 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"; and
- Changes to TPR 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 TPRs. There is no "value" comprising a "Rule" which timetable planning colleagues can apply in order to assess the validity of a requested train slot. 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 should be removed and reissued under a separate cover as guidance. Not only is such guidance not appropriate for inclusion in the TPR, as it does not constitute a "Rule"; it is also unacceptable to impose conditions in the TPR, however these may be worded, which are based on information which is neither verified nor properly consulted and are therefore essentially subjective in nature. (2027 v3.0)

### 5.3 Junction Margins

EA1010 Stratford/Forest Gate Jn – changes proposed are not agreed in full, as detailed in our email of 14/07/2017. (2018 v4.0)

Following the lack of any proposals from NR in respect of the December 2018 timetable (as this was the envisaged time to make changes as per NR's statements at the dispute hearing for TTP1069), GBRf is submitting its counter-proposal for SRTs and junction margins as part of this response. This is substantially the same as the previous counter-proposal supplied as part of the dispute paperwork (and previous counter-proposals). (2019 v1.0)

Response noted with thanks. However the entries currently shown in Version 2.0 reflect what was originally proposed at the TPR forum, which did not turn into a revised proposal following the review that was agreed should happen. In most cases they are unduly optimistic or pessimistic due to the assumptions used, and the same applies to Railsys modelling. For example Up passenger pass from Orient Way/Up freight pass platform 10 = 1½ (including 34%) uplift is technically impossible as the second train cannot pass or depart from Maryland until the overlap of L270 is clear (to otherwise avoid a timeout if the overlap was pointed towards Bow Jn). 1½ including a 34% uplift implies a technical value of 67s. A 12-car passenger train takes 32s to clear the junction and allowing for 8s to reset the route, leaves only 27s for the second train to get from Maryland to Stratford - implying an average of 60mph, which cannot happen under approach-control conditions. We believe the suggested values below are the simplest way of describing all the various permutations and are achievable, noting that most of the values proposed are higher than those currently shown TPRs. Similarly, the adjustment