

Capacity Planning
Network Rail
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Dear TPR Specialists

2027 Timetable Planning Rules: Version 4

Thank you for your correspondence of 25th and 26th June 2026 confirming the publication of Version 4 of the 2027 Timetable Planning Rules (TPR). First Rail London (FRL) has reviewed these documents and provided responses and comments below.

Anglia Route

5.2.1 Headway Values

EA1310 Camden Road West Junction to Richmond

The additional wording shown below is not clear and could be misinterpreted in application. FRL requests that this wording is reviewed and clarified in the next Anglia TPR Forum.

Notes
* A stopping train cannot arrive at Acton Central until 1½ minutes after a preceding passenger train or 2 minutes after a preceding freight train has passed/departed South Acton
^ A 2-minute headway can be applied on departure from Richmond provided {½} is applied to the second train approaching Kew Gardens, due to restrictive aspects at intermediate signal(s). The ½ adjustment-applies only where both trains stop at Kew.
% A 2-minute headway can be applied to a second movement on departure from Gunnersbury, where the first movement is LO and the second movement is LUL only. This reduced headway in these specific circumstances only may apply for the whole section.

5.2.2 General Capacity Constraints

Whilst FRL notes the minor cosmetic change in Version 4 to the table in this section through the removal of a ‘superfluous’ column, Network Rail has not satisfactorily addressed FRL’s concerns raised at Version 3 (repeated in italics below). FRL is placing this item in dispute, and will issue an appeal against Network Rail’s decision at Version 4, pursuant to Condition D2.2.21 of the ‘Network Code’.

FRL response to 2027 TPR Version 3:

FRL does 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 factors which could affect a level crossing's "risk category".**
- **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 TPR. There is no "value" comprising a "Rule" which timetable planning colleagues can apply in order 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 '[g]eneral 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 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.

5.3 Junction Margins and Station Planning Rules

EA1310 Kensal Green Junction

FRL is grateful for the work undertaken on assessing impact of the TPR change proposed at Version 3 (below). However, there are still some unresolved matters from FRL's response to Version 3 (repeated in italics below). Therefore, FRL is placing this item in dispute, and will issue an appeal against Network Rail's decision at Version 4, pursuant to Condition D2.2.21 of the 'Network Code'.

		6 641m and above
Depart Kensal Green Junction	Depart/pass Harlesden Junction towards Kensal Green Junction	1 (applies only where first movement is 392m or above)
Pass from Willesden Junction High Level	Depart Kensal Green Junction	1½

FRL response to 2027 TPR Version 3:

FRL requests that Network Rail undertakes an impact assessment of the proposed change, to advise on any impact on the current timetable structure and train slots therein.

Kent & HS1 Routes

FRL has no further comments for Version 4 of the 2027 Kent & HS1 TPR document.

National

1.15 General Capacity Constraints

With the exception of an email setting out Network Rail's general approach in respect of Section 1.15, FRL has received no further consultation from Network Rail regarding our response to the proposals issued in Version 3. Furthermore, FRL has been inadequately consulted on further changes to this section issued by Network Rail at Version 4, none of which satisfy the principal points made previously by FRL on this matter. Therefore, FRL restates the unresolved concerns and objections issued in response to Version 3 (repeated in italics below). FRL is placing this item in dispute, and will issue an appeal against Network Rail's decision at Version 4, pursuant to Condition D2.2.21 of the 'Network Code'.

FRL response to 2027 TPR Version 3:

FRL does not agree with the majority of this section. There has been insufficient consultation on this matter. At present there is no clarity on what the criteria are for triggering capacity constraints to be formalised in the TPR or, once a rationale has been established, how these should be assessed alongside infrastructure capability.

FRL requests that Network Rail consults further on this matter, via the relevant TPR meetings, before any further attempt is made to formalise this within the National TPR. The proposals published in this Version 3 are not acceptable to FRL and should be withdrawn ahead of Version 4 publication.

Appendix J

FRL welcomed the invitation from Network Rail to partake in working group discussions on this matter, with which we have been fully engaged. Whilst FRL recognises some changes have been made in Version 4, our substantive concerns raised in response to Version 3 (repeated in italics

below) remain unresolved. Therefore, FRL is placing this item in dispute, and will issue an appeal against Network Rail's decision at Version 4, pursuant to Condition D2.2.21 of the 'Network Code'.

FRL response to 2027 TPR Version 3:

FRL objects to the inclusion of this section. As noted on multiple occasions during the recent meetings on the subject, much of the content of this is unnecessary due to:

- *Replicating detail already contained within the National TPRs;*
- *Contradicting detail already contained within the National TPRs;*
- *Forming concepts that are not strictly rules, so should not be contained in the TPRs;*
- *Some being concepts and not being rules and therefore cannot be enforced.*

FRL therefore requests that Appendix J is removed ahead of Version 4 of the National TPRs and work is undertaken instead through the National TPR forum to update parts of the National TPR document where Network Rail feels that change or reinforcement is necessary.

*Additionally, specific concern must be raised about item TP17. Aside from there being no definition of what a "genuine operational gap" might be other than a TPR-compliant one, the granting of Access Rights is **only** a matter for ORR and no-one else. Performance considerations are part of the reasons why Network Rail may or may not support an application for Access Rights, but the National TPRs must not be used to try to determine on ORR's behalf whether or not an application should be accepted. Reference to SOAR guidance is also inappropriate as whatever this document contains, or any change procedure to it, is not governed by Part D.*

North West & Central Region

5.2.2 General Capacity Constraints

Network Rail has not satisfactorily addressed FRL's concerns raised at Version 3 (repeated in italics below). FRL is placing this item in dispute, and will issue an appeal against Network Rail's decision at Version 4, pursuant to Condition D2.2.21 of the 'Network Code'.

FRL response to 2027 TPR Version 3:

FRL is not in agreement with the proposed imposition of quantum capacity constraints on the West Coast Main Line Fast Lines from Camden Junction on Route MD101. Whilst FRL recognises that Network Rail has sought to quantify a constraint on quantum, there has been insufficient reasoning provided on the rationale and technical justification for this proposal, including how this reflects existing agreed TPRs for the route.

5.3 Junction Margin and Station Planning Rules

MD101 Harlesden Junction

FRL is grateful for the work undertaken on assessing impact of the TPR change proposed at Version 3 (below). However, there are still some unresolved matters from FRL's response to Version 3

(repeated in italics below). Therefore, FRL is placing this item in dispute, and will issue an appeal against Network Rail's decision at Version 4, pursuant to Condition D2.2.21 of the 'Network Code'.

Planning Note

A train over 306m departing/passing Harlesden Jn towards Kensal Green Jn via the Up City Line will foul Harlesden Jn in rear if a train is dwelling at or has not yet passed Kensal Green Jn ahead of it. Please refer to Anglia TPR rules for appropriate margins.

FRL response to 2027 TPR Version 3:

In accordance with the corresponding response to Kensal Green Jn (above), FRL requests that Network Rail undertakes an impact assessment of the proposed change, to advise on any impact on the current timetable structure and train slots therein.

Sussex Route

FRL has no further comments for Version 4 of the 2027 Sussex TPR document.

Wessex Route

FRL has no further comments for Version 4 of the 2027 Wessex TPR document.

Summary of dispute items

FRL will be issuing an appeal against the following Network Rail decisions within Version 4 of the 2027 TPR:

- Anglia – Section 5.2.2 General Capacity Constraints
- Anglia – Section 5.3 Junction Margins and Station Planning Rules: EA1310 Kensal Green Junction
- National – Section 1.15 General Capacity Constraints
- National – Appendix J
- NW&C – Section 5.2.2 General Capacity Constraints: MD101
- NW&C – Section 5.3 Junction Margins and Station Planning Rules: MD101 Harlesden Junction Planning Note

FRL looks forward to continuing to work with the TPR fora across all routes towards the publication of 2028 Version 1 and beyond.

Yours sincerely

M. Walker

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