Tony Skilton
Secretary
Access Disputes Committee
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cc Shona Elkin
Network Rail

19 September 2014

Freightliner Group Limited
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1 Eversholt Street
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NW1 2FL
[redacted]

Dear Tony,

Re Timetable Planning Rules, Disputes TTP739

With reference to your email of 8 September 2014, this letter constitutes the sole reference document from Freightliner Group Limited ['Freightliner'] (representing Freightliner Limited and Freightliner Heavy Haul Limited).

Yours sincerely

Jason Bird
Track Access Manager
Freightliner Limited

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South Wales Main Line: changes to Sectional Running Times

Background

A proposal to revise Sectional Running Times ("SRTs") on Line of Route GW900 between Margam and Llanwern was received by Freightliner on 23 July 2014. This is attached as Appendix A. Although the proposal was detailed as being under Access Condition D2.2, affecting Section 5.4 of the Timetable Planning Rules ("TPRs"), we believe it was made specifically under Access Condition D2.2.7 and affecting Section 5.1.3 of the Timetable Planning Rules.

Although responses were requested by 6 August 2014, the timing of the request coincided with the response to Version 4.0 of the 2015 TPRs (due 1 August 2014) and the delivery of Freightliner's Priority Date statement for the May 2015 timetable (due 8 August 2015). Freightliner therefore was not in a position to respond until 12 August 2014. However, it is noted that Condition D2.2.7 does not specify a response period; we therefore assume that a reasonable time period should apply, depending on the nature, size and timing of the proposal.

The proposal was submitted, as in Network Rail's opinion "during the 2012/13 business year, heavy axle weight services leaving Margam TC have been losing time between Margam Moors Junction and Bridgend, causing 3,749 delay minutes over the 13 periods. After careful analysis of the current sectional running times using a representative sample of timing runs, it has become apparent that the current timings for various trailing weights travelling in the Up direction between Margam TC and Marshfield require updating.

Concerns

Freightliner's main concern over the proposal was the methodology used to compile the proposal, which differed significantly from previous standard practice. We therefore believe the conclusions to be flawed and inaccurate.

Primarily, the timing locations have been taken to be at slightly different places than has conventionally been the case. In the past, timing points have normally been assumed to match the Sectional Appendix mileages; where the Sectional Appendix does not show a mileage for a particular location, it should be agreed between the affected parties specifically where a location actually is. For example, Cardiff Central is shown as being at C23 signal rather than 170m30ch as per the Sectional Appendix - i.e. approximately ¼ mile out. While at 30mph this only makes ½ a minute difference, consistency of practice is important. Another example is Stormy, where the Sectional Appendix quotes 194m51ch for "Stormy Down and Up Passenger Loops", which may make sense for passing trains, but not necessarily for those trains stopping in the loops, where the mileage of the exit signals may be more appropriate. However, the proposal has taken the location to be PT3040 signal to be the location (the signal governing the entry to the Up Loop). This practice also has implications on TRUST reporting if a change is made to the base assumptions of the actual locations of timing point.

Freightliner is also not in favour of reviewing only certain timing loads on a line of route - this will give inconsistent data if some have been reviewed and others not. We were not, however, aware of discussions between Network Rail and DB Schenker, meaning that this exercise was supposed to form the first part of a wider review: this was not stated in the proposal. While the majority of the SRTs used are currently only used by DB Schenker services, they are in fact general user and may be used by Freightliner (or any other Freight Operating Company) at any time.

Freightliner's response (attached as Appendix B) effectively contained a counter-proposal, based on analysis of the Tratim output used in the past (this output is still valid, as the line speed profile has not changed since it was produced).

Detail

n.b. p/p = pass-to-pass, p/s = pass-to-stop, s/p = start-to-pass, s/s = start to stop

Margam TC to Margam Moors Jn
All SRTs are currently 5 minutes start-to-pass. Noting the comments in the proposal that this is subject to further review, your proposal indicates reducing the 2200t and 2400t SRTs to 4½, but leaving the 2000t one at 5 minutes - this is inconsistent. We would suggest in future that Margam Abbey Works East Jn becomes mandatory for all trains on the OVE line. This should give greater visibility as to where trains are, although "curly bracket" time will be necessary to differentiate between trains that have come from Margam Abbey West and those from the yard.

Margam Moors Jn to Stormy
Current SRTs:
60H66S20 = 8 p/p, 11 p/s
60H66S22 = 9 p/p, 10 p/s
60H66S24 = 10 p/p, 11 p/s

Proposed SRTs:
60H66S20 = 11½ p/p, 12½ p/s
60H66S22 = 12½ p/p, 13½ p/s
60H66S24 = 12½ p/p, 13½ p/s
Plus the removal of the 2-minute "curly bracket" allowance for Up trains leaving Margam TC. However, this is based on PT3040 as the Stormy timing point, rather than the Sectional Appendix (194m39ch) - nearly ½ mile out.

The proposal is incorrect, as Margam Moors Jn is a mandatory timing point. Therefore, all SRTs should be based on the fastest transit between the two locations – i.e. a clear run along the Up Main from Port Talbot. The correct values are therefore:
60H66S20 = 8½ p/p, 9½ p/s
60H66S22 = 9 p/p, 10 p/s
60H66S24 = 9½ p/p, 11 p/s

There are however two major influences at play in this section. Firstly, what appears to be incorrect, and hence the source of delay, is that the {2} allowance is inadequate and needs to be increased. However, TRUST is also recording passing times at Stormy incorrectly - it records as trains pass PT3034 signal rather than at Stormy, some ¾ of a mile out. As 2000t trains are doing barely over 20mph at this location, this will account for an apparent loss in running time of 2 minutes. Note this is at odds with the use of PT3040 as the timing point in the proposal.

Stormy to Bridgend
Current SRTs:
60H66S20 = 8 s/p, 5 p/p
60H66S22 = 7 s/p, 4 p/p
60H66S24 = 8 s/p, 5 p/p

Proposed SRTs:
60H66S20 = 9 s/p, 8 p/p
60H66S22 = 8 s/p, 7 p/p
60H66S24 = 8 s/p, 7 p/p
Again this is based on PT3040 as the Stormy timing point, rather than the Sectional Appendix mileage (194m39ch). Similarly the Bridgend timing point used is some distance out. The inconsistencies in the SRTs for the different timing loads is continued - why does a 2000t train take longer than a 2400t train? NR has responded that "heavier loads [run] faster downhill especially when coasting which is used on this stretch of line." Given that acceleration due to gravity is not dependent on weight, and that a lighter timing load is likely to enter the section at a faster speed than a heavier one, we believe this to be impossible.

We therefore believe the correct values should be:
60H66S20 = 7½ s/p, 5 p/p
60H66S22 = 7½ s/p, 5 p/p
60H66S24 = 7½ s/p, 5 p/p

Bridgend to Pontyclun
Current SRTs:
60H66S20 = 13 p/p
60H66S22 = 9 p/p
60H66S24 = 13 p/p
Clearly, the 2200t value is incorrect here

Proposed SRTs:
60H66S20 = 10½ p/p
60H66S22 = 11 p/p
60H66S24 = 11 p/p
Bridgend timing point incorrect, as noted above; Pontyclun timing point - signal C3 used (182m05ch) instead of 181m40ch as per the Sectional Appendix.

We think the proposals are understated here, and the correct values should be:
60H66S20 = 11 p/p
60H66S22 = 11½ p/p
60H66S24 = 12 p/p

Pontyclun to Cardiff Central
Current SRTs:
60H66S20 = 12 p/p, 12 p/s
60H66S22 = 12 p/p, 12 p/s
60H66S24 = 12 p/p, 12 p/s

Proposed SRTs:
60H66S20 = 12 p/p
60H66S22 = 13 p/p
60H66S24 = 13 p/p
No change proposed to p/s values, we presume - nothing is mentioned? If the p/s values are left unchanged, they will in fact be slower than p/p for two of the timing loads.
Pontyclun timing point incorrect, as noted above; Cardiff Central timing point - signal C23 used instead of 170m30ch as per the Sectional Appendix.

We think the original p/p SRTs are correct, but the p/s SRTs are slightly understated - the correct values should be:
60H66S20 = 12 p/p, 12½ p/s
60H66S22 = 12 p/p, 12½ p/s
60H66S24 = 12 p/p, 12½ p/s

Cardiff Central to Marshfield (RL)
Current SRTs:
60H66S20 = 12 s/p, 11 p/p
60H66S22 = 12 s/p, 6½ p/p
60H66S24 = 12 s/p, 11 p/p
Clearly, the 2200t p/p SRT is incorrect.

Proposed SRTs:
60H66S20 = 11 p/p
60H66S22 = 11 p/p
60H66S24 = 11 p/p
No change proposed to s/p values, we presume - nothing was mentioned in the proposal.
Cardiff Central timing point incorrect, as noted above; Marshfield - signal DM163A (163m25ch) used instead of 163m60ch as per the Sectional Appendix.

We believe the correct values should be:
60H66S20 = 11 s/p, 10½ p/p
60H66S22 = 11½ s/p, 11 p/p
60H66S24 = 11½ s/p, 11 p/p

Methodology

Freightliner believes that using small, unrepresentative samples of actual running data to be a poor method of calculating SRTs – the first port of call should always be a trusted computer model. This should be backed up afterwards by observing actual running times. However, in compiling a suitable sample to verify the model, extreme care must be taken to discount extraneous factors that are not relevant to the SRT, such as temporary speed restrictions, infrastructure or traction faults.

While Network Rail usually insists on at least ten examples of actually running to be necessary to demonstrate the need for a Freight Operating Company proposal, it has not seen fit to apply those strictures to its own proposal – for the 2000t SRTs, only four examples were provided, at 2200t thirteen and at 2400t none at all (demonstrating the need for modelling, as there were no trains at the suitable tonnage to observe). However, even ten examples would represent a small sample. Of the thirteen 2200t examples, widely-fluctuating values were observed and most were still taken into consideration, apparently without investigation why such differences were occurring. Performance should not, in fact, be so widely variable. If observed data is to be used, it really is necessary for the records to be personally observed so that all factors can be taken into account to make an appropriate judgment as to whether any one individual run (or part of it) is suitable for assessment. To that extent, it is quite insufficient to take a sample of running times and average them out.

Furthermore, given the inaccuracy of TRUST reporting at Stormy, care should have been taken to ensure that TRIST reporting points were in fact recording accurately, before drawing any conclusions as to the accuracy of SRTs.

Freightliner also noted in its response that Network Rail had commenced loading the revised values into Bplan, despite no decision notice in respect of the TPR change having been issued at that time.

Decision

Network Rail responded to Freightliner on 20 August 2014 (attached as Appendix C), and a decision notice later the same day (attached as Appendix D). However the SRTs noted on the decision notice differed from the original proposal. This was subsequently corrected on 5 September 2014 (attached as Appendix E). Freightliner disputed the decision on 28 August 2014, in accordance with Condition D2.2.8(a).

Remedy sought be Freightliner

1. That Network Rail's proposal should be withdrawn;
2. That Freightliner's counter-proposal should be adopted as a future proposal (noting that further work specifically on the subject of acceleration allowances is needed);
3. That the principle of the use of unrepresentative data samples to form Timetable Planning Rules proposals be deemed inappropriate; and
4. That Network Rail should ensure the accuracy of TRUST recording points before questioning SRTs.

Appendix A

Copy of proposal from Network Rail.

Appendix B

Copy of Freightliner's response

Appendix C

Copy of Network Rail's reply.

Appendix D

Copy of Network Rail's decision notice.

Appendix E

Copy of Network Rail's revised decision notice.

Appendix F

Tratim tables used to inform Freightliner's counter-proposal.