This constitutes Network Rail’s response to Freightliner Group Limited’s (FL) letter of the 5th June 2014 and also the Hearing Chair’s letter of the 16th June 2014.

This response is split into the following sections:

* Item 8 (Stratford):
  + Network Rail’s commentary on the degree to which FL has met the Direction specified in the Hearing Chair’s letter of the 1st May 2014
  + Network Rail’s response to FL’s contention that there was no consultation in relation to the TPR items remaining in dispute (as specified in the Hearing Chair’s letter of the 16th June 2014)
  + Network Rail’s current position with regards to the Sectional Running Times (SRTs) through Stratford
  + Capacity issues
  + Summary
* Items 19 and 20 (Scotland)
  + Network Rail’s assessment on the counter-proposals submitted by FL.

FL’s response to the Direction

FL were asked by the Hearing Chair in his letter of the 1st May 2014, to serve Network Rail and the Committee with its counter proposals and that these proposals should explain in sufficient detail, what amendments Freightliner propose should be made to the Timetable Planning Rules (TPR) at Stratford. These proposals should be detailed enough to enable a Timetable Panel to reach a decision at a hearing.

The primary industry accountability to deliver timetables that are robust and resilient sits with Network Rail. Network Rail is under obligation to ensure that its TPRs reflect the ‘as is’ capability of the network.

In August 2013, Network Rail set up an industry TPR forum so that all proposed or new TPR changes could be consulted with all Timetable Participants in an open and fully auditable manner.

Over the past 9 months Network Rail has also been leading an industry working group remitted to deliver a consistent set of streamlined processes for the calculation of TPR values. It is acknowledged that for *future* TPR changes the following would be expected as a minimum and indeed Network Rail expected to see the amendments proposed by FL set out in a *similar* way given FL’s involvement in that working group:

* A well evidenced data set from a number of sources
* Agreement that the new values proposed are consistently achievable, robust and resilient:
  + For the infrastructure concerned
  + For the type of rolling stock concerned
* Consultation with other industry parties through attendance and discussion at a forum (or similar).

In their letter of the 5th June 201, FL have set out their methodology for the calculation of a number of TPR values. With particular regards to the SRT values, the Tratim model has been used (page 3 of 25). FL also note that this model was in use till about 2007. Network Rail does not support the use of this model in isolation. Tratim was based on a 1980’s version of the British Rail infrastructure and considered (by some anecdotally) to be out of date with regards to 20 years’ worth of infrastructure changes and modern rolling stock

FL’s calculations are therefore theoretical; based on a model now no longer widely used by the industry. Network Rail cannot support any value calculated by FL for Stratford without the appropriate range of evidence, agreement and evidence that the values proposed are robust and evidence of consultation with other operators.

FL have provided *some* evidence of actual running and analysis for a 10 day period sourced using CCF. CCF does not however show how a train performs ‘on the ground’ as CCF shows movement between track berth circuits only. FL have therefore made approximations as to the transit times of the trains detailed in their letter.

FL finally state (page 6 of 25) that where trains take 5 minutes or more, that ‘this is generally very easily explained’ by the following:

* Train was scheduled to take 5 minutes
* Train’s schedule contained pathing time
* Train was delayed by other services

Network Rail cannot support the logic above and wishes to state the following:

* The amount of time it takes a train to traverse between points A and B will differ depending on a number of factors outside of both Network Rail and FL’s control. TPR values should reflect ‘what is’ rather than make any assumptions as to the optimisation of factors outside of the control of timetable planners.
* The inclusion of pathing time in a train’s schedule does not of itself make a train take that amount of time. The amount of time a train takes is ‘real’, irrespective of the pathing time.
* Trains that may or may not have been delayed do not constitute admissible evidence of the SRT being inaccurate or indeed prove the existence of a TPR error.

In conclusion Network Rail believes that the evidence provided by FL is *unsatisfactory* and would not constitute a robust proposal for onward consultation with other industry parties.

Consultation

Network Rail stated its letter of the 22nd April 2014 that it did impose the SRT changes without consultation and this was consistent with the contents of its sole reference document submitted during May 2013.

The other TPR values, junction margins and approach control allowances were consulted and included in the relevant draft Rules published at D-54 for the December 2012 timetable on the 25th November 2011 and again at D-44 on the 3rd February 2012 in the final Rules. These Rules and FL’s response to these changes are included in both FL’s and Network Rail’s sole reference documents.

Network Rail believes that it is relevant to detail the following specifically with regards to SRTs, as the process is more fluid than consulting on a junction margin change:

* Circa.40,000 SRT changes were made nationally during the December 2012 timetable development period. It has never been common practice to include SRTs within the TPR documents due to the volume of values concerned. SRT values are held within a system called B-Plan and this gets published to operators as planning geography at D-26.
* In addition, once a week Network Rail sends an updated geography CIF (output file) to the Rail Ops portal via ATOS who notify the operators automatically by email that the update is available. Operators then upload this revised CIF.
* An extract from the existing Anglia TPR document with regards to SRT values is below:
  + 5.1.3 New and Revised Sectional Running Times
    - New and revised SRTs are agreed between Train Operators and Network Rail on an individual basis and are supplied by the method agreed in each instance.
* It is understood that the method that existed specifically between the Anglia Timetable Planning Team and the operators on the Anglia Route during the December 2012 timetable development period, was for the planners on both sides to work together on any schedules requiring revision, flexing or alteration. This was done on email or by phone. All ‘flexes’, changes to a schedule ‘bid for’ by an operator made by Network Rail to accommodate that train schedule alongside other train schedules using the appropriate TPR values, are then recorded on a ‘flexing spreadsheet’ sent to the operators at D-26. This is fully auditable.
* Emails can be provided which show that the Network Rail planners were proactively working with all of the freight operators on the revised timings during the December 2012 timetable development period. There is also included as a sample an email between a Network Rail planner and Robin Nelson, Head of Train Planning for FL specifically with regards to the SRTs (attached as Appendix 1).
* The offer made at D-26 on the 8th June 2012 was not disputed by FL either within the offer response period (20 working days) or even following any subsequent timetable development period, of which there have been five at the time of writing.
* NR acknowledges that due to the volume of SRT changes made, it would not be possible for every operator to necessarily be aware of every specific SRT change, particularly where a timetabling office team might be small.

In conclusion, Network Rail believes that FL did have an *awareness* that the SRT values had changed and of the reasons for the changes.

Nevertheless Network Rail also acknowledges that this would fall short of open, transparent and holistic consultation. This is the main reason for the establishment of the Anglia TPR forum so that all operators can have total and transparent visibility of all changes being proposed.

Network Rail’s current position

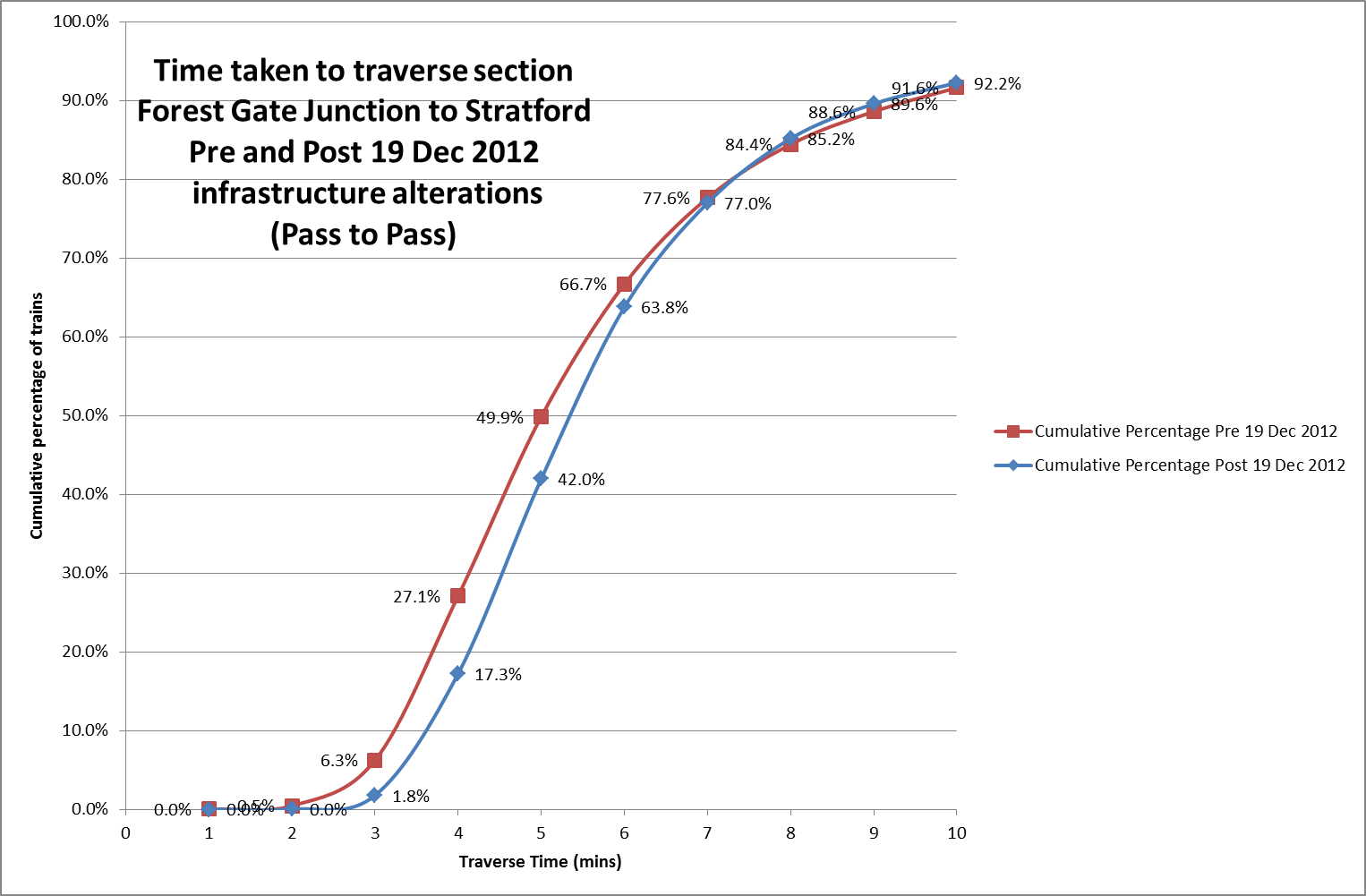
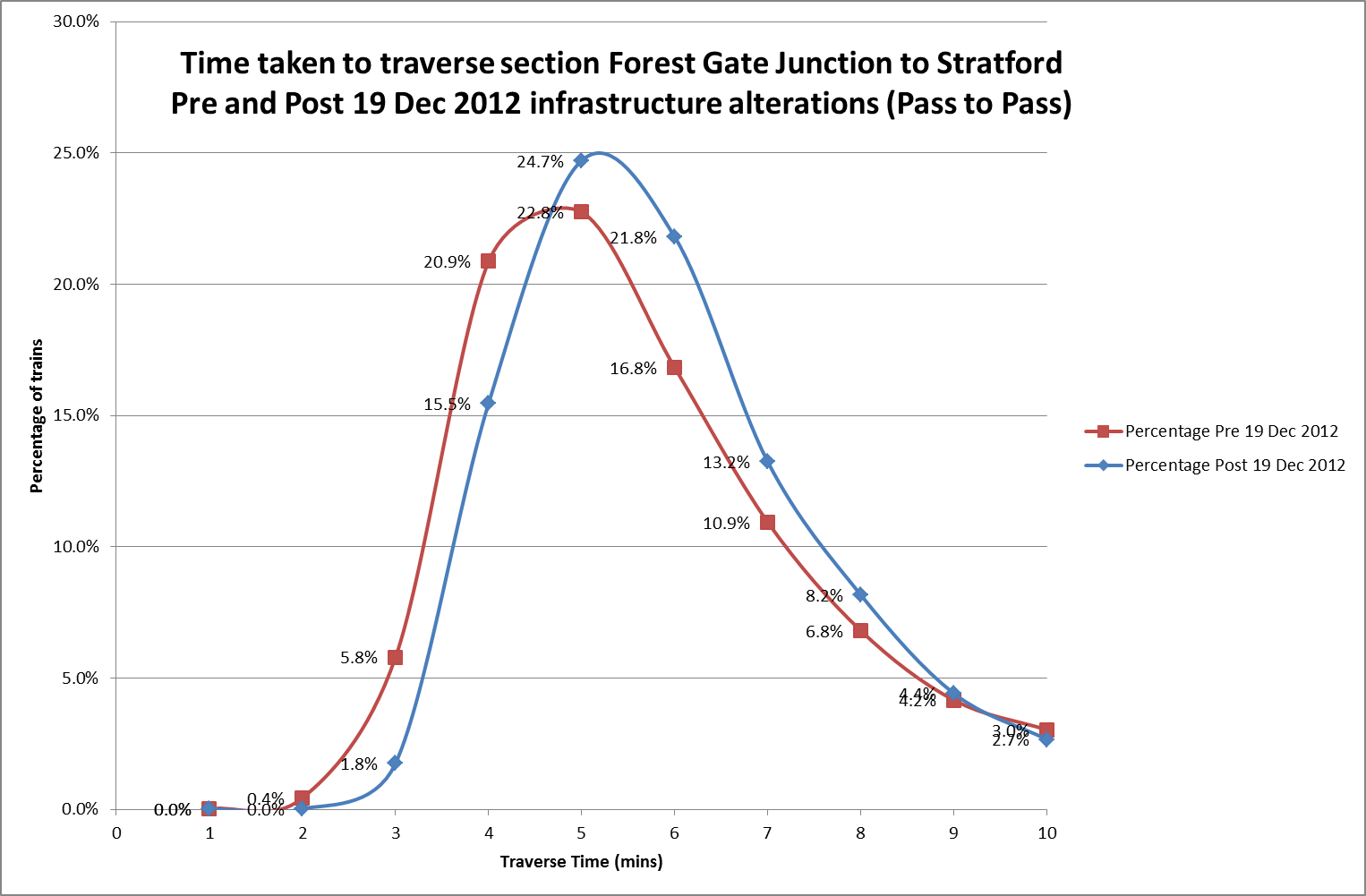
Network Rail has consistently stated that it believes the current TPR values at Stratford to be robust and resilient. This was evidenced in Network Rail’s sole reference document submitted during 2013 and also it its letter of the 22nd April 2014; this letter contained further PPM analysis with regards to Greater Anglia showing a 0.6% PPM improvement as a result of the specification/operational plan following the December 2012 Rules change.

FL stated in the letter of the 5th June 2014 that they had issues with the large volume of actual train running data submitted by Network Rail in their sole reference document; this data did not take into account whether trains were delayed and the reasons for the delay. This data contained the actual train running information from circa. 1700 schedules from a 3 month period from January to March 2013 and in Network Rail’s view should be a large enough data sample from which to draw conclusions as to actual running time, not least because with such a large dataset the median and modal actual values should be so apparent as to render any need to explain outlying values surplus to requirements. Network Rail has noted FL’s concerns that ‘whilst this is an interesting piece of statistical analysis, it cannot bring to any conclusion as to what the SRT should actually be’ and does not accept this assertion for the reasons stated above.

Nonetheless, Network Rail has undertaken a further piece of work in collaboration with the Anglia performance team, the Network Rail national performance team and Abellio Greater Anglia as follows (attached as Appendix 2). The methodology is set out below:

* The report assessed the actual amount of time taken for freight trains (Class 0,4,6,7,8) to traverse the route section Forest Gate Junction (FRSTGTJ) to Stratford (SRA) since the commencement of CP4.
* Times shown are for pass to pass.
* Data has been collected using the Network Rail Business Objects System (Timings and Delays universes).
* The times at the two locations have been recorded in whole minutes as per normal TRUST conventions.
* Data has been taken from 1st April 2009 to 23rd June 2014.
* Trains that ran before 19th December 2012 (date value of 41262) are considered pre-infrastructure change.
* Trains that ran on or after 19th December 2012 (date value of 41262) are considered post-infrastructure change.
* 33564 train schedules are included.
* 6 out of the 33564 were found to have negative traverse times; Railhead Treatment trains or other test trains and these have been eliminated.
* The report is based on the WTT lateness at two locations. WTT lateness at location = actual time at location = planned time at location.
* The report then assesses the difference between the time at Stratford and Forest Gate East Junction. Traverse time = SRA lateness – FRSTGTJWTT lateness.
* The number of times the trains achieve each reported traverse time has been summed and put in terms of percentages and cumulative percentages.
* The percentages and cumulative percentages have been graphed up until 10 minutes of traverse time. This is to show more clearly what happens to the trains that did not receive a significant delay and to remove significantly delayed outliers, as are of no value in the assessment of any SRT.
* The summary report is included; the file containing the base data is available on request on a memory stick due to the size. The summary is the same in both.
* Conclusions:
  + Pre 19th December 2012 27.1% of the trains managed to traverse the section in 4 minutes or less. Post 19th December 2012 this had dropped to 17.1%. Thus as of June 2014 82.9% of trains would fail to conform to a 4 minute SRT.
  + Pre 19th December 2012, 49.9% of the trains managed to traverse the section in 5 minutes or less. Post 19th December 2012 this had dropped to 42%. Thus as of June 2014 58% of trains would fail to conform to a 5 minute SRT.
  + The two statements combined with the graphs following would suggest that an SRT of 4 minutes would be wholly insufficient.
    - Even before the infrastructure changes associated with the NLL re-signalling were brought in, a majority of trains would fail to make the SRT in 4 minutes.
    - A 5 minute SRT value is better supported by the data and indeed if the test was to set the SRT at the 50% mark in terms of traverse time, then an SRT of 5 ½ minutes would need to be considered. Please note that NR is not proposing a 5 ½ minute value.

Graphs included in appended file (Appendix 2):



In conclusion, Network Rail believes that the current 5 minute SRT is *robust and resilient*.

Capacity issues

SRT changes are in Network Rail’s view about increasing resilience and accuracy in the base timetable. The impact on capacity is therefore not relevant in the first instance. On this point it has been challenging to persuade Freightliner to the contrary for a period of years.

Network resilience and timetabling accuracy are served by having TPR values that reflect the ‘as is capability’ of the network.

FL persist in relying on documents produced jointly by FL and National Express East Anglia (“NXEA”) during the run up to the December 2010 timetable change (page 8 of 25). These documents purport to show a standard off-peak hourly pattern. Network Rail stated in its letter of the 22nd April that these documents were fundamentally flawed in their logic, did not work even in the Down direction or where no TPR changes had been made and that the documents are valid as developmental timetabling work/optioneering only. This position was articulated in a capacity analysis (high level) report completed during July 2013 sent on to FL for comment. No comments in respect of this assertion have been received by NR. This analysis was summarised in Network Rail’s letter of the 22nd April 2014.

FL state on pages 8 and 9 that there has been an implied reduction in capacity using the 2010 development timetable/optioneering as a base. Network Rail responds as follows:

* The 2010 work was flawed in both directions (Network Rail Capacity Analysis report detailed and appended to its April 22nd 2014 letter), therefore any capacity assessments or implications on the basis of this study should not be deemed reliable as the related 4-minute SRT does not stand up to empirical analysis.
* FL has continued to develop the 2010 work without consultation or collaboration with Network Rail or indeed the principal passenger operator (now Abellio Greater Anglia).
* FL allege (page 9 of 25) that ‘it is possible’ to increase the number of freight paths; this statement does not reflect reality and is factually incorrect (see first bullet point above for more information).
* All advanced timetabling development work should now be ‘Cliented’ by the Network Rail Capacity Planning function. This has been agreed with the ORR so that the interests and aspirations of all operators and industry parties can be considered in an impartial & structured manner; the future-proofing of unclear or unstated customer requirements (3rd main paragraph page 9) would be of the expense of increased risk to all other operators.

FL has stated (page 11 of 25) that Network Rail has failed to take account of the Decision Criteria as detailed in their letter of the 5th June 2014 and indeed FL has also stated that Network Rail has failed in its duty under the Railways Infrastructure (Access and Management) Regulations 2005 section 21, paragraph 4; “The infrastructure manager must, including in the case of congested infrastructure, undertake an evaluation of the need to reserve capacity to be kept available in the final working timetable to enable him to respond rapidly to foreseeable and ad hoc requests for infrastructure capacity”. Freightliner has also stated that Network Rail has failed to take cognisance of the requirement for Strategic Capacity on the Anglia Route. This is a very serious allegation and one Network Rail believes to be incorrect and poorly evidenced as follows:

* Network Rail freight commercial run a regular Strategic Freight Capacity Development Group (SFC-DG) meeting to which Peter Graham from FL regularly attends. Lindsay Durham of FL is also invited to attend. This meeting is remitted to take a longer term future view for freight and to discuss freight operator lists for strategic capacity requirements. At no stage has this group expressed a specific concern with regards to capacity issues at Stratford for onward discussion with Capacity Planning.
* Network Rail produces its Strategic Capacity Statement twice a year for consultation and Network Rail has also produced a code of practice setting out the principles upon which strategic slots are to be included in the Statement. No specific concerns from the freight operating community have been fed back to Network Rail with regards to the Anglia Route.

In addition to the above, Network Rail has undertaken a retrospective review of the following Rail or Route Utilisation Studies (RUS):

* Cross London RUS 2006
* Greater Anglia RUS 2007
* Freight RUS 2007
* London and South East RUS 2011

All of the documents are consistent in that they recommend that cross-country routes should be developed to assist delivery of freight growth for Felixstowe port traffic. New traffic out of Thameshaven is stated as needing to run via the Gospel Oak – Barking line (once improved) rather than via Stratford. Indeed the majority of the paths have been timetabled this way from May 2014. The Gospel Oak-Barking improvements are due to complete during 2016 and this combined with the commissioning of the new Ipswich Chord and the Ipswich Yard re-modelling mean that Network Rail will have delivered the freight operators’ stated aspirations in the respective RUS documents to run longer trains.

In conclusion Network Rail does not agree with any suggestion that the TPR changes have decimated capacity in any actual or real sense, or that any TPR change that reflects actual undelayed train behaviour can do so, and that FL’s allegation (page 11 of 25) that Network Rail has failed to take into account D.4.6.2 (g) seeking consistency with any relevant RUS is incorrect.

Where FL cite (page 11 of 25) D.4.6.2 (d) that journey times are as short as reasonably possible and that Network Rail has failed to take this into account, this is incorrect as the key word in this sentence is “reasonable” and not “desired”, particularly where actual train behaviour supports the view that the desired value is not consistently achievable. In addition, the majority of schedules altered during any timetable development period still have to arrive at booked destination, port or terminal, within an allowance dictated by the driver’s diagram. At a meeting held on the 26th June 2014 at FL’s offices, both Robin Nelson and Jason Bird agreed with some statements read out by Network Rail regarding the importance of on time performance to FL’s customers. Appendix 1 (email sent by Robin Nelson) is also important to show how Network Rail works with freight operators during a timetable development period to get trains to their terminals at specific set times, if necessary by removing pathing time elsewhere in that train’s schedule. This means that Network Rail has not failed (as FL allege page 11 of 25) to take into account D.4.6.2 (j) enabling operators of trains to utilise their assets efficiently, in fact Network Rail has absolutely taken this into account.

Summary – Item 8

This dispute has been on-going for 4 years. Network Rail’s stated position in its sole reference document of 2013 and in its letter of the 22nd April therefore stands. FL have failed to provide any new evidence that the TPR values that they are seeking to re-impose would be agreeable to other operators on the Anglia Route or indeed would provide for a robust and resilient timetable in any way.

Network Rail does not support the summary made by FL (page 11 of 25) that it has failed in its industry obligations. Network Rail has maintained and delivered against its industry obligations.

Comments on the determination that FL is seeking (page 12 of 25):

* Network Rail should not make changes to TPR values, including SRTs without consultation – Network Rail supports this but would draw to the Hearing Chair’s attention the issue of the volume of changes and the manner in which geography updates are sent between Network Rail and the operators. Unless or until operators employ sufficient staff to permit full consultation on several thousand SRT changes each timetable development period then it is likely that there will be a continued mutual reliance on informal contact and documentary review, of the kind that NR believes can be demonstrated with FL since 2010. This does not distract from Network Rail working proactively through each Route TPR forum to agree how these issues and changes should be communicated.
* Any such changes should be proposed, consulted and managed in the timescales dictated by Part D of the Network Code, although Network Rail accepts the challenges regarding SRT changes as stated above. Network Rail’s primary duty is to produce robust and resilient timetables and wishes FL to note that Network Rail can make changes to the Rules between D-44 and D-26 in accordance with D.2.2.7.
* That all affected Timetable Participants should agree TPR changes – Network Rail does not support this and stated this clearly in the letter of the 22nd April 2014. Network Rail is obliged to consult only and to make decisions in accordance with Part D.
* In the event of no agreement the previous December 2012 Rules should apply – Network Rail does not support this and stated its reasons in the letter of the 22nd April. Network Rail also believes that FL is seeking a contradictory determination here; ‘all parties must agree changes’, which Part D does not support, however if no agreement can be reached then the status quo should apply.
* Changes to TPR values should not solely concentrate on performance – Network Rail does not support this. Network Rail has been remitted by the National Task Force and the National Task Force Operating Group to deliver timetables throughout CP5 that perform. The determination here being sought is therefore part of a much wider industry debate.

Network Rail is therefore seeking the view from the Hearing Chair that this dispute item should now be closed.

Scotland Items

**Item 19**

**Scotland Section 5.2 Headway Values -** SC023 Motherwell to Newton via Hamilton

Details of this change were sent to Freightliner prior to inclusion in v1.0 2013 Scotland TPRs. Appendix C contains a document which refers to comments received from Freightliner in July 2011 which confirms that consultation had taken place. This document also confirms that Network Rail made concessions to revise and reduce the proposed values following said consultation. In response to why Network Rail felt it was necessary to include numerical values vice ‘TCB’, Freightliner have stated that this is not a description of headway and the changes made were intended to address thisPlease find comments below from Network Rail in response to the points raised by Freightliner in relation to the headway values on the Down line.

If the second train is stopping at Airbles, a headway value of 3 minutes would be accurate. As First Scotrail operate 99.3% of all services on this line of route, and all of their passenger services call at Airbles a published headway value of 3 minutes is the best fit for the service type on this section of line. Listing differentiated headway values for such a small proportion of services is unnecessary and if this principle was applied across the whole network there would be huge volume of additional rules.

As previously noted, the service types on this section of line are almost exclusively First Scotrail stopping passenger trains which allows a headway value of 4½ minutes to be applied. This would ensure that a stopping train departing from Airbles would sight M417 at green. This is based on 75EMUAC SRTs as follows; Airbles – Haughhead Jn S/P 2½ + Haughhead Jn – Hamilton Central P/S 2 = 4½

For trains which have stopped at Chatelherault a headway value of 3 can be applied. This would ensure that a stopping train departing from Chatelherault would sight MH703R at green. This is based on 75EMUAC SRTs as follows; Chatelherault – Haughhead Jn S/P 1 + Haughhead Jn – Hamilton Central P/S 2 = 3.

For trains which have not stopped at Chatelherault a headway vaule of 5 can be applied. This would ensure that a non-stop train would sight MH707 at green. This is based on 75EMUAC SRTs as follows; 1st train Haughhead Jn – Hamilton Central P/S 2 + 2nd train Allanton Loop – Chatelherault P/P 2 + Chatelherault – Haughhead Jn P/P 1 = 5.

The only mandatory timing points are Hamilton Central and Newton in this section. Further separation of the locations where headway values are represented is not possible as intermediate timing points are not mandatory. It is not the wish of Network Rail to introduce further mandatory timing points on this section of line. A headway value of 6 minutes would apply for non-stop trains as the section with the greatest constraint is M203 to M179 and the distance from M203R (required to be sighted at green) to M203 is 1225yds which justifies the value of 6 minutes vice 5½. For stopping trains, headway of 4 minutes can be applied between Hamilton Central – Blantyre.

Please find comments below from Network Rail in response to the points raised by Freightliner in relation to the headway values on the Up line.

Comment will be added to state that trains can pass/depart Newton at 3½ minute headway with 4½ minute headways applying for remainder of Blantyre – Hamilton Central section. Network Rail doesn’t support reducing headway below 4½ minute as this will have no material effect on the timetable and introduce undue complexity to the TPRs.

As previously noted, the service types on this section of line are almost exclusively First Scotrail stopping passenger trains which allows a headway value of 4½ minutes to be applied. This would ensure that a stopping train departing from Hamilton Central would sight M228 at green. This is based on 75EMUAC SRTs as follows; Hamilton Central – Haughhead Jn S/P 2½ + Haughhead Jn – Airbles P/S 2 = 4½.

In the scenario where the second train stops at Hamilton Central and is routed to Sc024, a headway value of 3½ would apply. This is based on 75EMUAC SRTs as follows; Hamilton Central – Haughhead Jn S/P 2½ + time for first train to Airbles to clear MH234 plus overlap 1 = 3½.

Based on the comments made in reviewing the counter proposal supplied by Freightliner, see the revised values proposed by Network Rail below:

| **SC023 MOTHERWELL TO NEWTON JN (VIA HAMILTON)** | | | |
| --- | --- | --- | --- |
| **Timing Point** | **Down** | **Up** | **Notes** |
|  |  |  |  |
| Motherwell – Airbles | 3 | 4½ |  |
| Airbles – Haughhead Jn | 4½ | 4½ |  |
| Haughhead Jn – Hamilton Central  (Single Line) | 4½  3 \*  5 \*\* | 4½  3½ \*\*\* | To/from Airbles  \* Second train stops at Chatelherault  \*\* Second train non-stop at Chatelherault  \*\*\* Second train to Sc024 |
| Hamilton Central - Newton | 6  4 \* | 4½  3½ \*\* | \* Successive stopping trains Hamilton Central – Blantyre  \*\* Depart/pass Newton |

In summary, Network Rail does not wholly support the counter proposal made by Freightliner but has agreed to some modifications that will require further consultation within the industry before these changes can be included in the final rules.

**Item 20**

**Scotland Section 5.2 Headway Values** - SC099 Whifflet to Rutherglen East Jn

Details of this change were sent to Freightliner prior to inclusion in v1.0 2013 Scotland TPRs. Appendix C contains a document which refers to comments received from Freightliner in July 2011 which confirms that consultation had taken place. This document also confirms that Network Rail made concessions to revise and reduce the proposed values between Carmyle – Rutherglen East Jn in the Up direction following said consultation. Signalling scheme plans were supplied to Freightliner during May 2014 contrary to the comments made by Freightliner.

Please find comments below from Network Rail in response to the points raised by Freightliner in relation to the headway values on the Down line.

Headway values can be separated to include Whifflet North Jn – Langloan Jn as a section and agree that 4½ minutes for all train types is appropriate. Further separation of the locations where headway values are represented is not possible as intermediate timing points are not mandatory. It is not the wish of Network Rail to introduce further mandatory timing points on this section of line. Network Rail supports the suggestion to introduce differentiated headway values.

Please find comments below from Network Rail in response to the points raised by Freightliner in relation to the headway values on the Down line.

Further separation of the locations where headway values are represented is not possible as intermediate timing points are not mandatory. It is not the wish of Network Rail to introduce further mandatory timing points on this section of line. Network Rail supports the suggestion to introduce differentiated headway values.

Based on the comments made in reviewing the counter proposal supplied by Freightliner, see the revised values proposed by Network Rail below:

| **SC099 WHIFFLET NORTH JN TO RUTHERGLEN EAST JN** | | | |
| --- | --- | --- | --- |
| **Timing Point** | **Down** | **Up** | **Notes** |
|  |  |  |  |
| Whifflet North Jn – Langloan Jn | 4½ | 3 |  |
| Langloan Jn – Carmyle | 6  5 | 7  5½ | Following stopping passenger  Following non stop passenger or freight |
| Carmyle – Rutherglen East Jn | 5  4 | 4½  4 | Following stopping passenger  Following non stop passenger or freight |

**Future changes**

Network Rail will model and provide a revised proposal once the signalling scheme plans are confirmed by the project.

In summary, Network Rail does not wholly support the counter proposal made by Freightliner but has agreed to some modifications that will require further consultation within the industry before these changes can be included in the final rules.

Network Rail does not wholly support the amendments suggested by Freightliner but has agreed to some modifications that will require onward consultation within the industry before these changes can be included in the final Rules. These are included as Appendix 4.

In conclusion Network Rail does not think that these are appropriate items to hold in dispute. Consultation has taken place and FL are entitled to propose revisions and amendments at the appropriate stage and Network Rail believes that it has acted reasonably.

Ends.

Shona Elkin