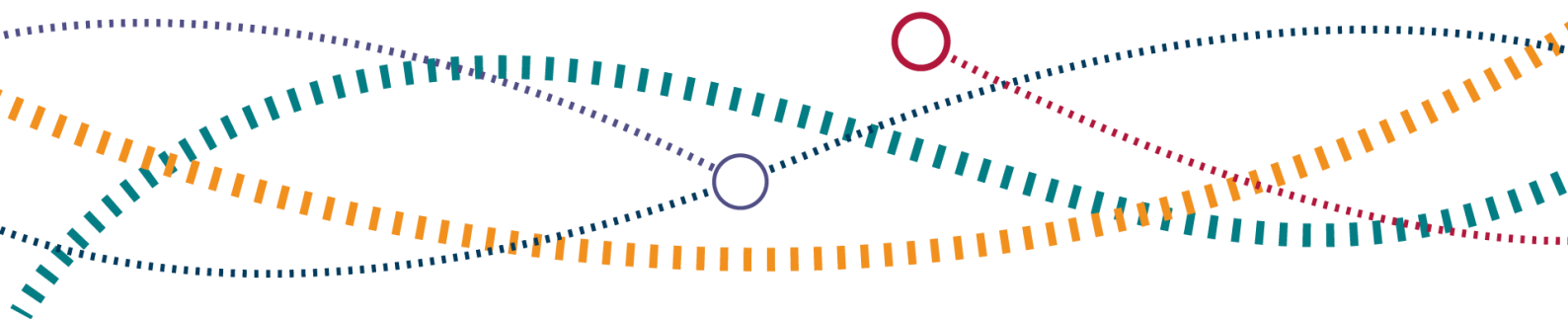




Review of Network Rail Vegetation Workbank Planning and Change Control Management

Targeted Assurance Review

18 June 2026



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Executive Summary

Vegetation management is both a safety-critical and performance-critical activity for the railway. There are direct implications for train operations, asset resilience, environmental compliance and public confidence. There have been concerns about the effectiveness, consistency and sustainability of Network Rail's approach to lineside vegetation management. These concerns have been amplified by extreme weather events, increasing environmental obligations and visible cycles of reactive clearance activity.

This Targeted Assurance Review was undertaken to provide an independent review of Network Rail's vegetation workbank planning and change control management. The review does not assess individual clearance decisions or habitat management outcomes. Instead, it focuses on the system through which vegetation management decisions are made, delivered, reviewed and adapted. It assesses whether the Asset Management System is capable of supporting safe, efficient and sustainable outcomes over the long term.

The review found that Network Rail has been strengthening the technical and operational foundations of vegetation management. As inspection practices have evolved, regulatory engagement has driven improved condition visibility and influenced the accelerated adoption of monitoring technology. Examples of improved or good practice were identified in some routes. There is clarity of commitment across Network Rail, particularly at route and delivery unit level where teams have been making continued efforts to manage vegetation risks. However, these efforts are often ad-hoc and lack a clear and joint-up strategy that links vegetation needs, priorities and required resources.

The evidence indicates that vegetation is not yet being managed through a fully integrated asset management system. Planning, delivery, assurance and change control operate through multiple, locally optimised mechanisms that are not consistently integrated. While significant volumes of vegetation work are delivered, Network Rail regions cannot consistently demonstrate a clear line of sight between expenditure, activity and the outcomes that vegetation management is intended to achieve. This lack of clarity exists both vertically through governance layers and horizontally across different vegetation workstreams.

In a devolved operating environment, this has manifested in several interrelated ways.

- Corporate technical intent is not consistently translated into clearly articulated, assured regional or route-level vegetation management strategies that define the

intended maintenance approach, outcomes expectations and trade-offs between competing priorities.

- Decision frameworks and change control management vary across the network, limiting visibility of risk acceptance, deferrals and cumulative impact at both region and corporate level.
- Maintenance reporting is fragmented across various asset information systems and workstreams, constraining assurance of value for money and limiting understanding of the balance between preventive and reactive interventions.
- National performance measures, while serving important assurance functions, do not provide a coherent view of whether vegetation management is becoming more preventive, more resilient or more effective over time.

The review recognises the importance of recent Network Rail initiatives, including the publication of Lineside Technical Strategy and the introduction of strengthened technical standards for vegetation evaluation. These represent positive steps in clarifying corporate ambition and improving technical consistency. However, in the absence of an overarching governance framework that integrates strategy, decision-making, reporting and performance review, the impact of these initiatives is likely to remain variable across a devolved organisation.

Taken together, the findings suggest that the vegetation management is limited by the absence of a clear vegetation management strategy and supporting governance arrangements that bring existing processes together into a single coherent system. Without this integration, Network Rail will continue to rely heavily on reactive intervention, face difficulty demonstrating long-term value for money, and struggle to provide confidence to funders, operators, environmental regulators and the wider public that vegetation risks are being managed in a sustainable and outcome-led manner.

The review therefore makes 4 targeted and proportionate recommendations aimed at strengthening the governance and conditions under which existing standards, plans, and delivery arrangements operate. ORR intends to monitor Network Rail's progress and actions to address them through the rest of CP7. These recommendations focus on:

- Establishing clear Route-based vegetation management strategies;
- Reviewing and strengthening change control governance and impact assessment;
- Improving the coherence and application of vegetation maintenance reporting; and

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- Ensuring that national performance measures support effective assurance, learning, and continuous improvement.

Collectively, these recommendations support a transition towards a more resilient, transparent, and strategically managed approach to vegetation across the railway network.

1. Introduction

1.1 Purpose

1. The purposes of this Targeted Assurance Review (TAR) are to:
 - acquire a more detailed understanding of Network Rail's planning of vegetation maintenance activities and how it monitors delivery; and
 - obtain assurance from Network Rail that it has a robust system and control governance mechanisms in place for managing workbank changes, associated risk and impacts.

1.2 Background

2. Effective vegetation management is critical in providing a resilient Lineside environment for train operations. Lineside vegetation, if not effectively managed, poses hazards, such as obscuring drivers' view of signals and lineside signs, danger to people on or about the trackside by obstructing position of safety and reducing clearances, preventing proper inspection of assets, impacting other assets such as drainage systems or earthworks stability.
3. The Network Rail Regional Strategy Business Plan PR23 submissions outline a step change increase in funding to deliver more vegetation management works in CP7 compared to CP6.
4. ORR's current monitoring of NR's performance in vegetation management is mainly based on two key indicators - compliance achievement against NR's own standards and through comparison of 'planned' versus 'actual' maintenance costs and volumes.
5. We understand that only part of vegetation maintenance works is being delivered by NR's in-house resources – Maintenance Delivery Units (MDUs). NR implemented an Activity Based Planning (ABP) tool in CP6 for managing planned maintenance activity (volumes) and planned costs and headcount¹.
6. Network Rail also delivers other planned preventive vegetation works through other delivery agents (non-MDUs) including its Works Delivery and the external supply chain. However, reporting and monitoring of these works are not fully transparent to

¹ ORR Target Assurance Review on Network Rail's Approach to Maintenance, 16 August 2022.

ORR and local MDUs. The ORR needs to understand their effectiveness on delivering outcomes.

7. Due to the complexity and variations in delivery models adopted by the regions and routes, Network Rail acknowledged that there are challenges to forecast accurately vegetation maintenance volumes. Therefore, it is essential to understand:
 - How funding is effectively planned, spent and monitored by Network Rail to deliver vegetation maintenance outputs in CP7 and the corresponding relation in delivering outcomes for Lineside resilience; and
 - Network Rail's control mechanisms to manage vegetation workbank changes and associated risks arising.

1.3 Objectives

8. The objectives of this Targeted Assurance Review (TAR) are to:
 - Gain assurance into NR's process and management system used to plan and monitor delivery of vegetation maintenance activities. This includes the balance between preventive and reactive works at region/ route levels;
 - Obtain details of each region's change control governance mechanism in place and assess their robustness to manage vegetation workbank changes, associated risks and impacts on achievement of outputs and outcomes;
 - Obtain assurance that there is a clear "Line of sight" between region asset management team and maintenance delivery units to manage risks arising from workbank changes;
 - Identify areas for improvement and good practices where applicable; and
 - Provide recommendations where applicable.

2. Assurance Approach

2.1 Scope

9. This scope of this TAR is limited to vegetation asset group under the Lineside portfolio.
10. The TAR focuses on NR's processes and systems used to plan the vegetation workbank and manage changes. This is undertaken through evidence collection and assessment of the following areas.
 - Central and regional governance process and management system used to plan and monitor vegetation maintenance work delivery;
 - Change control governance – Decision-making processes, authority and accountability that defines, measures and controls delivery of outputs and outcomes (i.e. how regions justify the needs of workbank changes such as cancellation, prioritisation, deferrals);
 - Impact assessment: tools or methods used to assess and manage the corresponding impacts on performance outputs (cost, volumes, efficiency) and outcomes (such as safety, train performance) against baselines; and
 - Management of risks arising from workbank changes: how risks are recorded and communicated with affected parties such as delivery units and operation teams etc.

“De-vegetation” works for earthwork examinations are excluded from the scope.

2.2 Methodology

11. The TAR is consolidation into three main parts:
 - (ii) Phase 1 – Request for Information (RFI) to both TA and regions
 - (iii) Phase 2 – Undertake follow-up interviews with region/ route asset management teams in each region
 - (iv) Phase 3 – Undertake follow-up interviews with Infrastructure Maintenance Delivery Manager (IMDM) and/or Infrastructure Maintenance Engineers (IMEs) and Off-Track Maintenance Engineers (OTMEs) in selected Maintenance Delivery Units (MDUs) in each region

Table 2.1 Selected MDUs in each region for Phase 3 interview

Region	Route	Selected MDU
Eastern	North East	Sheffield DU
Eastern	East Coast	Peterborough DU*
NW&C	North West	Liverpool DU
NW&C	West Coast South	Euston DU
Scotland	--	Motherwell DU
Southern	Wessex	Eastleigh DU
W&W	Wales	Cardiff DU
W&W	Western	Western DU

* Unable to arrange with pending confirmation of the route Infrastructure Director

- (v) Phase 4 - ORR's assessment of the information above – this will identify any good practices and lessons learned. Recommendations will be made for improvements, where necessary.

3. Findings

12. The findings presented in this section have been compiled from our engagement with the five regions via the RFI process and subsequent interviews with regional and route asset management teams, as well as selected Maintenance Delivery Units. The list of questions included in Phase 1's RFI to both the Technical Authority and regional teams can be found in Annex A & Annex B respectively.
13. The roles and responsibilities for managing vegetation works across Network Rail regions are varied and complex. This necessitates the implementation of structured processes and a robust asset management system (AMS) to ensure clear vertical and horizontal lines of sight. Throughout this report, the term "maintenance resilience" is used as we considered below:

"Maintenance resilience is the ability of vegetation management practices to anticipate hazards, absorb environment stresses, and recover service efficiently. Unlike reactive responses, a resilient maintenance regime systematically reviews outcomes and adapt future interventions, ensuring continuous improvement under changing climate and funding pressures."

14. In this review, we identified opportunities for improvement and corresponding enablers essential for Network Rail to enhance its asset management system, supporting a holistic approach to manage vegetation as assets.

3.1 Network Rail Vegetation Maintenance Workstreams & Governance

3.1.1 Key Maintenance Workstreams

15. Network Rail generally delivers vegetation management works under two key workstreams over a 5-year Control Period in all regions.
 - Region Asset Manager or Route Engineer-led (described as "AM-led" in this report) vegetation work programme; and
 - Maintenance Delivery Unit (MDU) Activity Based Plan (ABP) focusing on inspections, cyclical tasks, local preventive but non-repetitive schemes and reactive tasks.

Region/ Route Asset Management-led vegetation work programme

16. The AM-led vegetation work programme primarily aims to create a compliant vegetation profile - a dynamic envelope to be kept free of any vegetation encroachment, whose width is dependent on track geometry, the sighting of signals, signs, level crossings, and the presence of refuges, pathways or OLE as defined in Network Rail standard NR/L2/OTK/5201² (Figure 3.1).
17. The NR standard had been updated in March 2025 to address recommendations made in Independent Report Review³ and RAIB investigation into the Salisbury Tunnel accident⁴. The AM-led programme also includes works scoped to manage vegetation issues outside the “dynamic profile” such as hazardous trees and leaf fall sites.

Figure 3.1 Compliant vegetation profile defined in NR Standard NR/L2/OTK/5201/02 Issue 4, March 2025

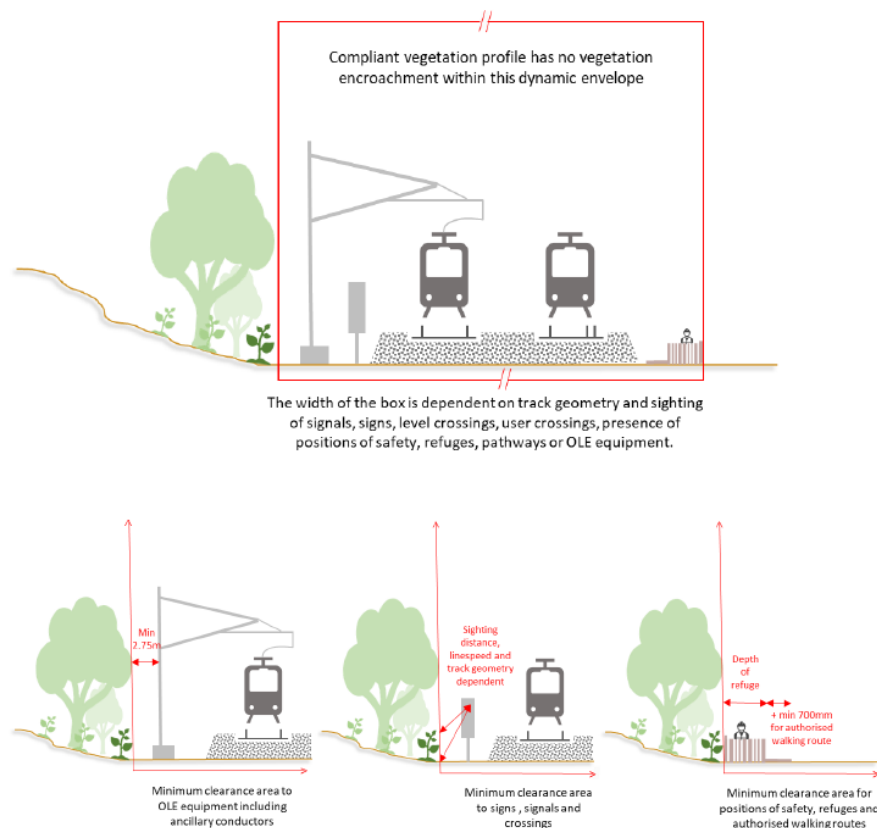


Figure 1 – Compliant vegetation profile

² NR/L2/OTK/5201/02 Issue 4 'Vegetation Maintenance'

³ Recommendation 5 - [Review of vegetation management - Report by ARUP dated 30 September 2022 | Office of Rail and Road](#)

⁴ Recommendation 1 (12/2023/01) - [Report 12/2023: Collision between passenger trains at Salisbury Tunnel Junction - GOV.UK](#)

18. Two types of approaches may be implemented to commission vegetation works delivered under the AM-led programme. The selection between these options is primarily determined by region or route asset management teams. Where Type 1 is selected, cleared sites will be handed over to internal Maintenance Delivery Units with the expectation that these sites will be managed by MDUs.
 - Type 1 – Vegetation clearance (cut)-only works; or
 - Type 2 – “Cut & Maintain” bundled package with vegetation clearance works followed by regular maintenance works by external supplier over a set period to prevent re-growth
19. At the time of receiving RFI responses, Scotland does not have a large amount of Type 2 “Cut & Maintain” bundled vegetation programme works planned. It was acknowledged that the region has started planning the bundled package works during Year 2 to avoid reliance on the existing MDU capability to prevent regrowth to sustain compliant vegetation profile.
20. Furthermore, the type of works commissioned under AM-led programme can vary by control period. For example, W&W focused on Type 2 “Cut & Maintain” bundled packages in CP6, while the region mainly planned Type 1 clearance-only works for CP7. Section 3.2.2 will discuss the significance of system planning and integrating long-term site maintainability in programme decision making.

Maintenance Delivery Unit (MDU) Activity Based Plan (ABP)

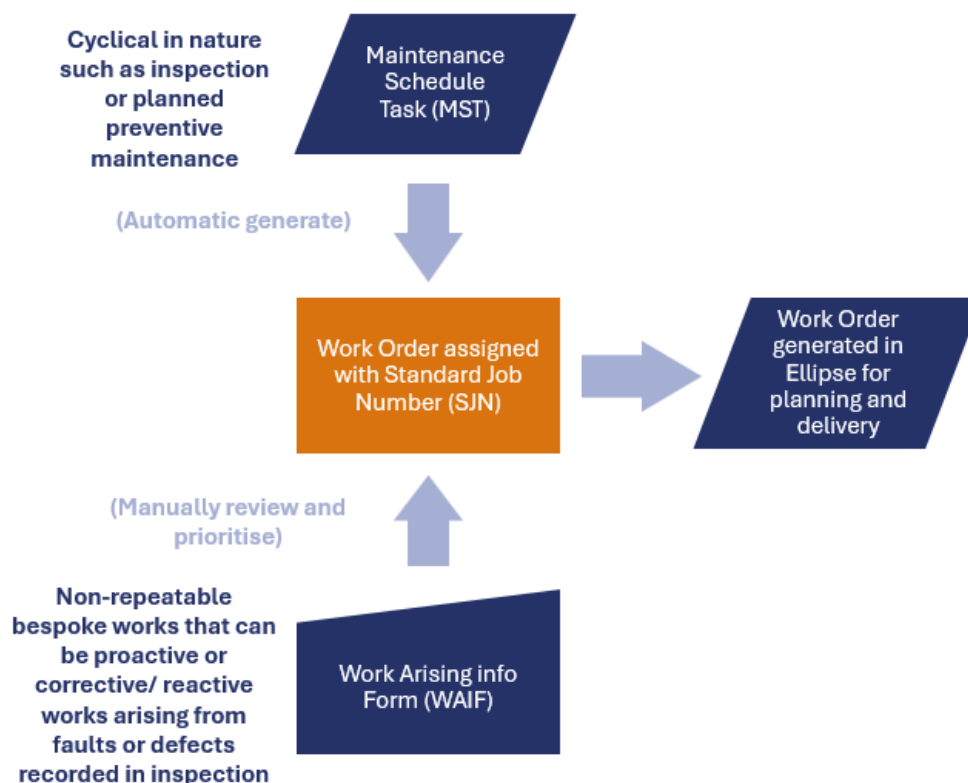
21. The Activity Based Planning (ABP) tool was implemented by Network Rail towards the end of Control Period (CP5). This tool introduced a bottom-up maintenance resource planning process and cost estimating tool for assets maintained by MDUs. Vegetation management works are covered by this tool.
22. The delivery of MDU ABP workbank is from within its organisation using internal resources and external contractors. Scheduling and management of these works occur in Ellipse, the integrated corporate asset management and work management system supporting infrastructure maintenance planning. Additional background of the ABP tool can be found in the ORR Target Assurance Review, “Network Rail’s approach to Maintenance”⁵.
23. Currently, vegetation management activities within the ABP workbank is primarily delivered via Maintenance Delivery Units (MDUs). While, in principle, other

⁵ [Network Rail's Approach to Maintenance - Targeted Assurance Review](#)

vegetation management works delivered regionally through Works Delivery such as AM-led vegetation programme works should also be planned and managed using Ellipse. However inconsistencies have been identified in implementation as discussed in section 3.2.2.

24. Vegetation management activities executed by MDUs are scheduled and delivered in form of Work Orders generated through two primary mechanisms (Figure 3.2).
- **Maintenance Standard Tasks (MSTs):** These cover activities at prescribed frequency, such as vegetation inspections, tree inspections, cyclical maintenance works to manage weed growth and hedges.
 - **“Works Arising” (WAIF) process:** This covers non-repetitive bespoke tasks. These may include both proactive and corrective or reactive interventions. Corrective or reactive works could be arising from faults identified during planned inspections (e.g. encroachment to signal sighting, level crossing, overhead line assets) as well as post-incident inspections. Proactive works may involve local vegetation schemes commissioned by MDUs to external supply chain to mitigate potential vegetation defects.

Figure 3.2 A simplified diagram showing the process of how vegetation maintenance Work Orders are generated within NR’s Ellipse system



25. Work orders generated are assigned with standard job numbers and stored in Ellipse. Descriptions of standard job numbers can be specified as vegetation maintenance method (e.g. chemical spraying, flailing, pruning, mechanised felling of trees) or indicated as specific purpose such as vegetation works for signal or level crossing sighting.

3.1.2 Current Governance, Roles and Responsibilities

26. Governance is responsible for ensuring compliance, managing budget and funding, planning and delivering activities, and implementing changes to the workbank. Regions' responses to our RFI outlined that Infrastructure Directors (IDs) in England and Wales (E&W) regions and Route Director in Scotland have the overall accountability for the planning and delivery of vegetation maintenance, compliance with standards and delivering outcomes.
27. We summarised those roles and responsibilities at region level in Figure 3.3, Figure 3.4, Figure 3.5 and Figure 3.6. During the review, W&W region's operating structure had reorganised in early 2025, which we have considered in the corresponding figure.

Figure 3.3 A simplified organisation diagram showing departments involved with planning vegetation works and assurance in Eastern and W&W

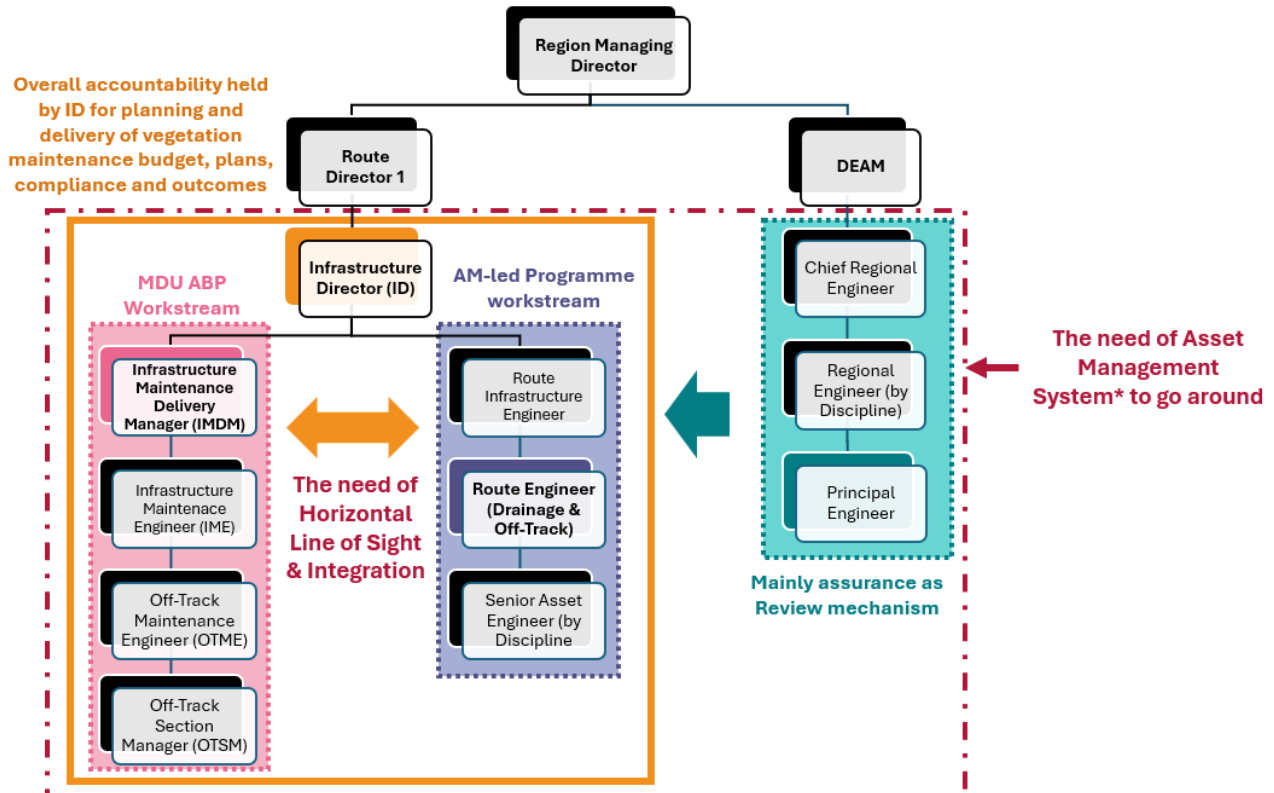


Figure 3.4 A simplified organisation diagram showing departments involved with planning vegetation works and assurance in NW&C

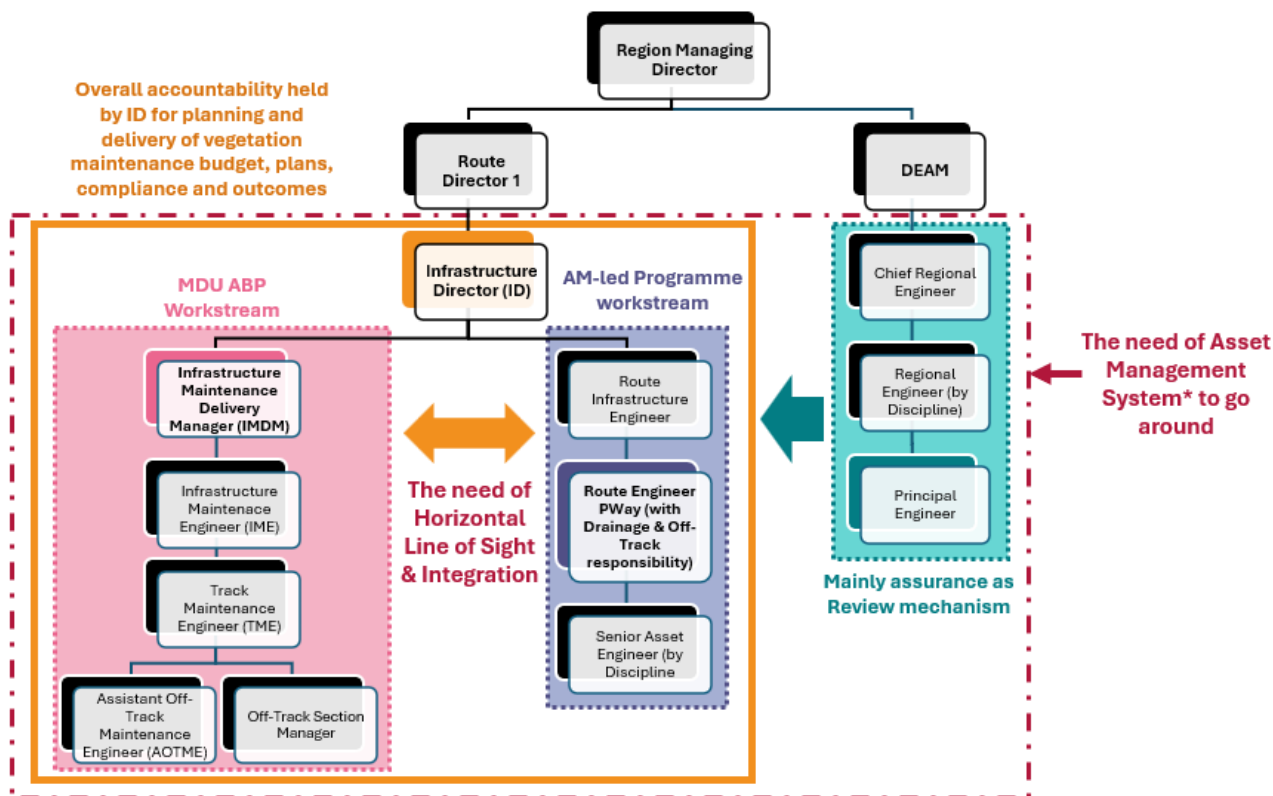


Figure 3.5 A simplified organisation diagram showing departments involved with planning vegetation work management in Scotland

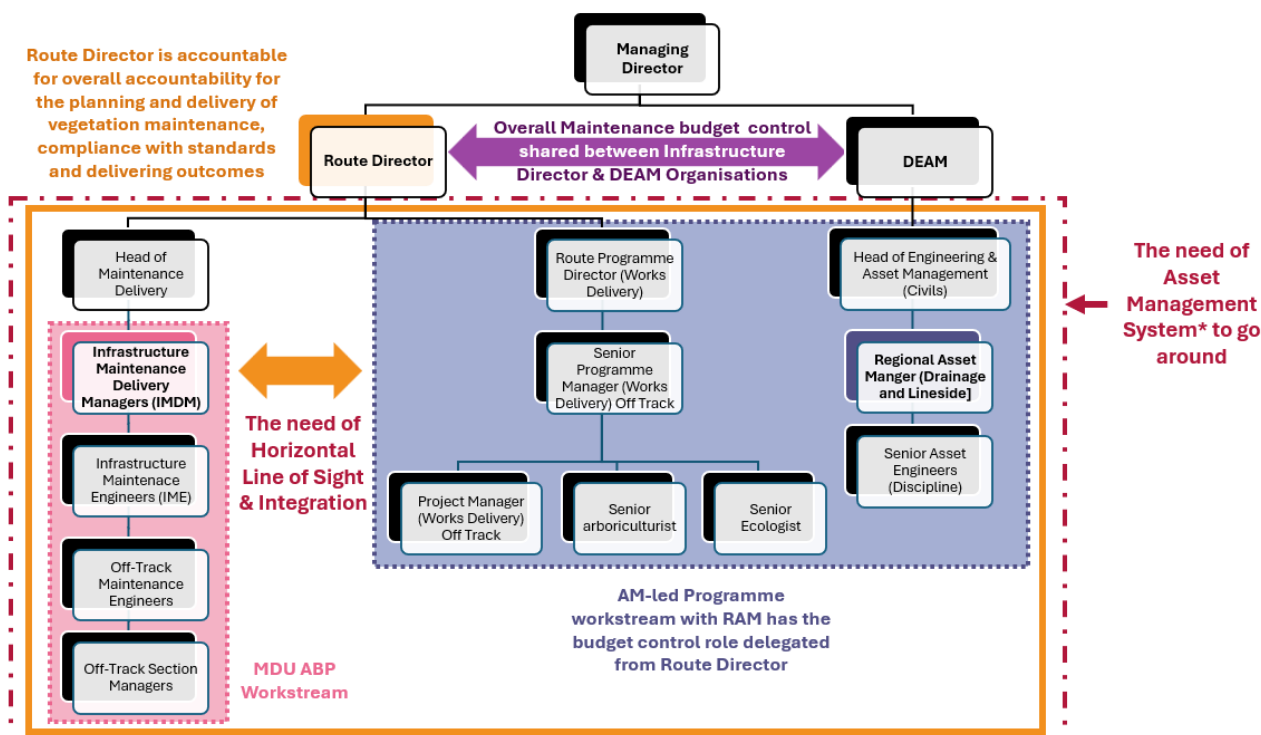
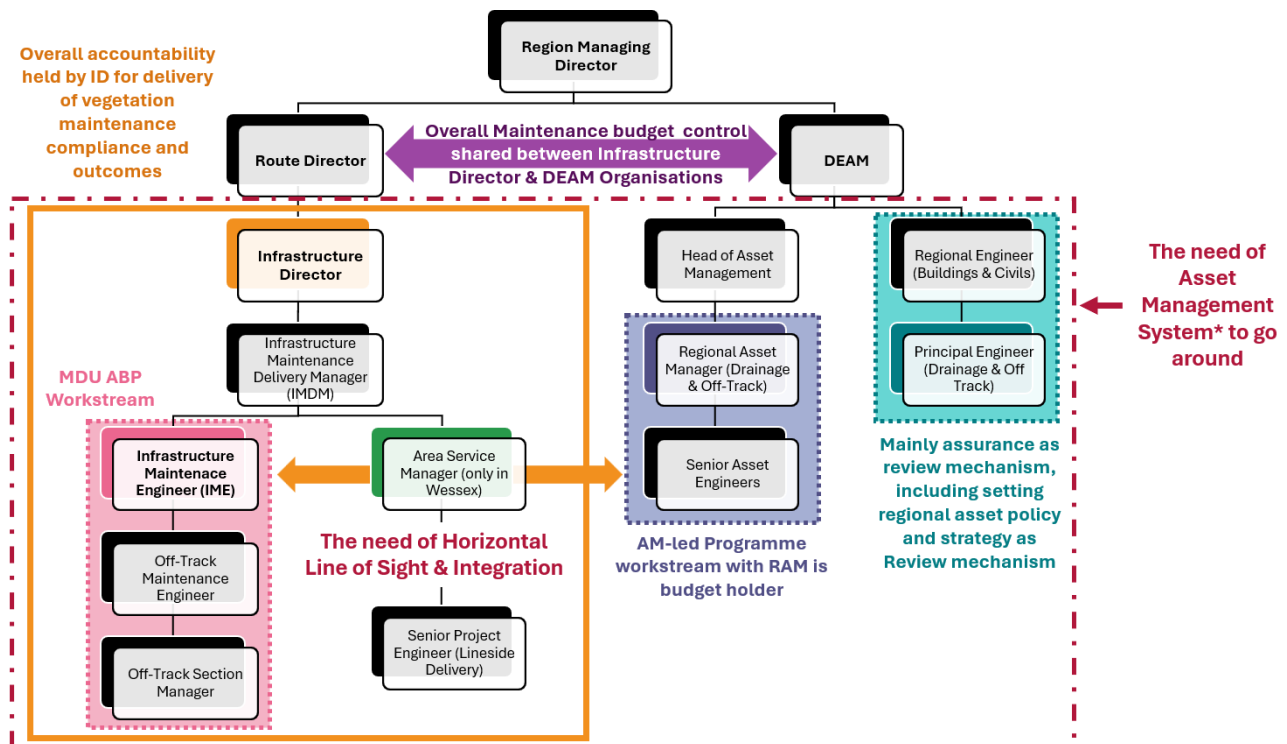


Figure 3.6 A simplified organisation diagram showing departments involved with planning vegetation work management and assurance in Southern



28. Depending on the devolved organisational structure, the discharged duty and delegated roles and responsibilities for planning, delivery monitoring and budget control of vegetation workstreams could fall within MDUs and Route Engineer (RE) teams under Infrastructure Director (ID) organisation; or Region Asset Manager (RAM) in the Director of Engineering and Asset Management (DEAM) organisation or spanning between two organisations (Figure 3.7).

Figure 3.7 Current roles and responsibilities in managing different vegetation maintenance activities by region

		AM Team		Maintenance Delivery Unit (MDU)						
		RAM/RE	WD	ID / RD	IMDM	IME	OTME	SM	General DU*	
Inspection, corrective & reactive maintenance	Budget holder			A						
	Planning									
	Monitoring of Delivery									
	Approval of workbank changes									
Planned Preventive maintenance manage regrowth & sustain compliance	Budget holder									
	Planning									
	Monitoring of Delivery									
	Approval of workbank changes									
		AM Team		Maintenance Delivery Unit (MDU)						
		RAM/RE	WD	ID / RD	IMDM	IME	OTME	SM	General DU*	
Type 1 & 2 AM led programme wide work	Budget holder/control									
	Planning									
	Monitoring of Delivery									
	Approval of workbank changes									

Eastern
North West & Central
Southern
Anglia Route in Eastern
Scotland
Wales & Western

Type 1 – Vegetation clearance (cut)-only works

Type 2 – “Cut & Maintain” bundled package with vegetation clearance works followed by regular maintenance works by external supplier over a set period to prevent re-growth

29. Regions were able to describe these delegated roles and responsibilities of vegetation workbank management when responding to our RFI. Scotland further responded that RAM is responsible for the overarching strategy. A good practice was identified in Wessex route of Southern, which provided a document called “Vegetation maintenance Wessex Route Disposition statement and RACI” to explain the roles and responsibilities in managing vegetation activities in detail.

30. Across the network, the overall accountability remains consistent at the leadership level with Infrastructure Directors in E&W and Route Director in Scotland. However, there is limited evidence of adequate oversight of total efforts delivered by vegetation workstreams at region or route level, limiting opportunities to fully leverage potential synergies. The corresponding impacts on vegetation planning and change management will be discussed in section 3.2.2 and section 3.5.

Enabler 1 – Integrated governance across vegetation workstreams

A unified governance structure that enables integrated planning, oversight, and assurance across all vegetation management activities.

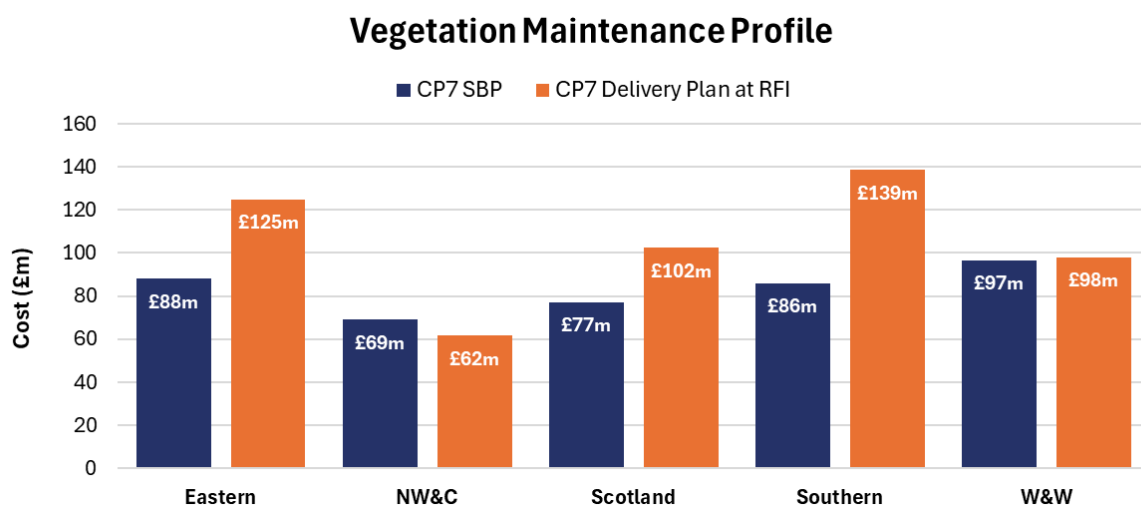
3.2 Vegetation Planning: Current Practices and Challenges

31. Considering the varying scopes, objectives, governance structures and management approaches of NR's key workstreams, we conducted an analysis of how different teams interact in planning and coordinating their vegetation maintenance activities and funding profiles to support achieving long term "maintenance resilience".

3.2.1 Maintenance Profile and Funding Allocations

32. When compared to CP6, Network Rail regions have a stepped increase in investment for vegetation management works in CP7. During the Phase 1 RFI, we requested all regions to confirm any changes in their maintenance profile outlined in their CP7 Strategic Business Plan and provide breakdown of maintenance budget allocated to different vegetation maintenance types.

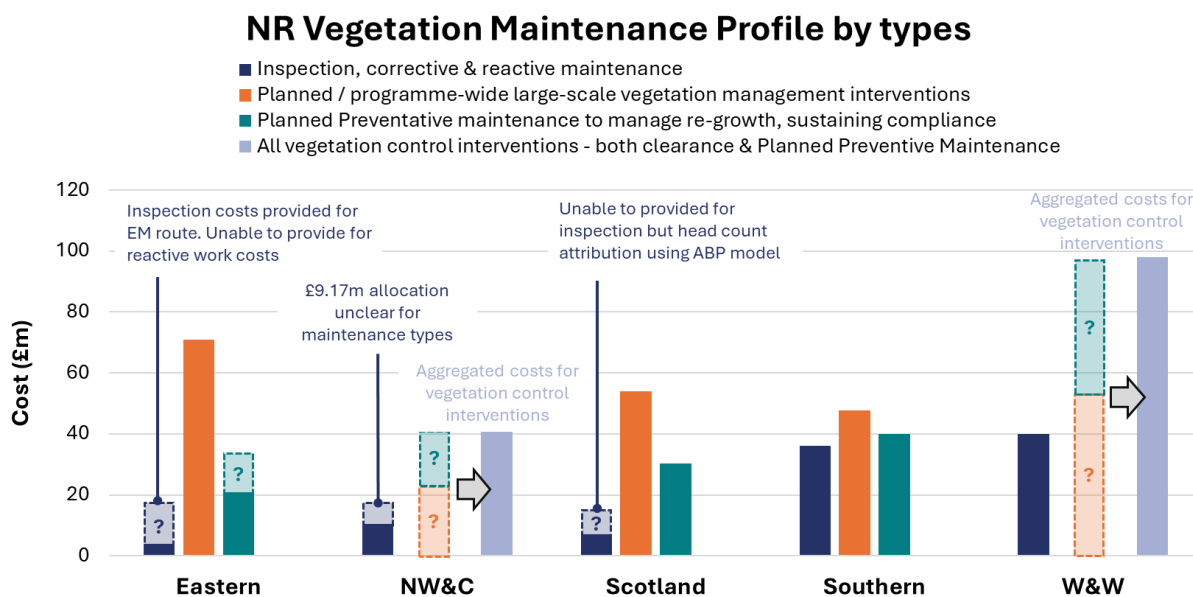
Figure 3.8 Network Rail Region Vegetation Maintenance Profile – CP7 SBP Vs CP7 Delivery Plan provided at RFI stage, Jul-Sept 2024



33. Figure 3.8 indicates, when comparing to CP7 Strategic Business Plan (SBP), most of regions' maintenance profiles generally are in line or have further increased their investment on the delivery plans shared during RFI stage. NW&C is the only region which has reduced its budget spent since entering CP7.
34. As part of the ORR PR23 determination, we established and agreed upon actions with Network Rail to enhance its reporting of volumes and costs associated with all types of vegetation maintenance activities planned and executed by all delivery organisations. Such reporting forms one of the key supporting measures to enhance the transparency of NR's vegetation maintenance planning and delivery. It also supports ORR in monitoring effectiveness of vegetation maintenance in achieving and sustaining vegetation profile compliance with its standards following clearance works, as well as minimising vegetation management failure-related incidents and delays.
35. Our focus in this review was to evaluate how Network Rail regions or routes plan and integrate their workstreams. This is especially important for planned preventive maintenance activities (PPM) to manage re-growth at sites previously cleared. This was identified as one of the key improvement areas in the John Varley's independent report⁶ in 2018.

⁶ [Network Rail vegetation management review: valuing nature, a railway for people and wildlife - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/811111/network-rail-vegetation-management-review-valuing-nature-a-railway-for-people-and-wildlife.pdf)

Figure 3.9 Region's breakdown of maintenance budget allocated to different vegetation maintenance types (Regional RFI responses, July 2024)



36. Figure 3.9 shows the breakdown of funding allocated to different vegetation maintenance types in responses to our RFI. Some regions or routes were not able to provide separate delivery targets (such as volumes) and/or funding allocation for PPM activities to manage regrowth and sustain compliance for sites cleared in previous Control Periods or to be cleared in CP7. We found the breakdown of funding allocation does not consistently align with the total funding as shown in Figure 3.8 due to inability to provide complete details or clarity for maintenance types.

Eastern

37. Most routes in Eastern provided separate funding allocations for large-scale vegetation control interventions. This included clearing to achieve vegetation compliant profiles, and PPM activities to manage regrowth. According to the RFI responses, East Coast and North East routes stated that CP7 Year 1 PPM works will maintain a portion of sites cleared in CP6, while Year 2 PPM works will cover AM-led vegetation workstream sites completed in CP7.
38. However, Anglia route was unable to provide the planned volumes and funding allocation for planned preventive maintenance, though the RFI indicated the associated targets for DU's cyclical maintenance tasks (i.e. MSTs) can be provided. While East Midland route can provide budget targets allocated for PPM activities planned preventive maintenance, only one aggregated volume target for both the

PPM activities and planned large-scale vegetation control interventions were provided.

Scotland & Southern

39. Scotland and Southern regions provided breakdown of funding for AM-led large-scale vegetation control works and PPM works to manage regrowth in their RFI responses.
40. As for vegetation inspections, Scotland explained that it does not have dedicated vegetation inspectors due to multi-skilled staff arrangement. Hence, hours against inspections are shown in Activity Based Planning (ABP) model. Motherwell MDU selected for Phase 3 interview provided its Maintenance Schedule Task list which includes two main MST descriptions. Each task was shown to be linking to specific asset number and location with ELR reference.
 - Line 1 outlines maintenance activities like chemical spraying, flailing, and tree pruning; and
 - Line 2 explains purposes such as spray to maintain access, flailing to maintain vegetation clearance site or achieve a define distance of compliance etc.

Figure 3.10 Excerpt from Motherwell MDU's MST list, filtered to show disaggregated MST data

Engineer	Work Group Set	Work Group	MST Description Line 1	MST Description Line 2	MST Frequency
Motherwell Off Track Engineer	Irvine SM(OFFTRACK)	FCAIRVA - OFF-TRACK IRVINE	VEG MAINTENANCE - CHEMICAL	SPRAY CLEARED SECTION	364
Motherwell Off Track Engineer	Irvine SM(OFFTRACK)	FCAIRVA - OFF-TRACK IRVINE	VEG MAINTENANCE - CHEMICAL	SPRAY CLEARED SECTION	364
Motherwell Off Track Engineer	Motherwell VSM(OFFTRACK)	FCADUMA - OFF-TRACK DUMFRIES	VEG MAINTENANCE - FLAIL	3 meter compliance required	364
Motherwell Off Track Engineer	Motherwell VSM(OFFTRACK)	FCADUMA - OFF-TRACK DUMFRIES	VEG MAINTENANCE - FLAIL	6 meter compliance required	364
Motherwell Off Track Engineer	Irvine SM(OFFTRACK)	FCAIRVA - OFF-TRACK IRVINE	VEG MAINTENANCE - FLAIL	ANNUAL MTCE PROGRAMME	364
Motherwell Off Track Engineer	Motherwell VSM(OFFTRACK)	FCAMOTA - OFF-TRACK MOTHERWELL	VEG TREES - HI PRUNER/PRUNE	Signal Clearance of SIG:TH6	364

41. For Southern, Wessex's Area Service team, which manages planned preventive maintenance (PPM) of cleared sites for MDU, presented its tracking system mapping the previously cleared site with PPM works scheduled in Ellipse and the AM-led large-scale vegetation control work sites delivered by external supply chain, Southern Integrated Delivery (SID).
42. The effectiveness of NR's review mechanism and monitoring of delivery performance of different maintenance types will be discussed in detail in the later section 3.4.

NW&C and W&W

43. Both NW&C and W&W regions provided aggregated budget allocations for both PPM activities to manage re-growth and large-scale vegetation control interventions in their RFI responses.

- NW&C region responded that the “*database of mileage for maintenance of cleared sites is not disaggregated to individual sites (annual planning) and the volume and cost for this is not reported as a separate activity yet.*”.
- W&W region indicated that “*we haven’t this split out for planned preventative and managed regrowth works - as the delivery models deal with this – with a strategy to transfer more to the route OPEX within the control period.*”.

44. Subsequently, in the Phase 3 joint interview with W&W Route Engineer (RE) teams and MDU teams in Cardiff and Exeter, both routes have presented steps taken to advance the new ways of working between RE and MDU teams following re-organisation of regional operating structures (i.e. devolution to routes) in early 2025. We have seen evidence that the new way of working supports better coordination and integration between two workstreams. This had resulted in budget resources allocated from RE teams to MDUs to establish cyclical tasks (i.e. MSTs) for planned preventive maintenance activities to manage re-growth of cleared sites (section 3.2.2). However, concerns about coherent monitoring and reporting remains as seen in other regions.

3.2.2 The need of integrated planning

45. During this review, we found that regions consistently have challenges in demonstrating their efforts to fully integrate planning of two key vegetation workstreams. While we were aware of several positive changes or ongoing improvement initiatives in the final interviews held with region’s/route’s asset management teams and selected MDU teams, certain obstacles remain in systemic management of vegetation as an asset.
46. This section will examine these specific challenges and suggest associated enablers that we recommend Network Rail consider to achieve a more fully integrated asset management system (AMS) (Figure 3.3, Figure 3.4, Figure 3.5 and Figure 3.6), thereby enhancing system planning effectiveness.

Challenge 1: Cross-team or workstream data integration and reporting

47. Based on the RFI responses and interviews, we found the visibility into pipelines or planned works under two workstreams has been impeded by the separate or inconsistent asset information management systems used by AM teams and MDU teams, limiting planning integration.

48. According to the requirement specified in Network Rail standards such as NR/L2/OTK/5201/02⁷, vegetation maintenance activities should be managed within Ellipse. As discussed in Section 3.1.1, this encompasses all Work Orders (WOs) generated via Maintenance Schedule Task (MST) mechanism for cyclical tasks and “works arising (WAIF)” process for non-repeatable bespoke works that can be proactive or corrective/ reactive works arising from faults identified during inspections.
49. To distinguish work outputs delivered to “create” vegetation compliant profiles from those delivered for reactive and preventive maintenance, Network Rail employs in Ellipse two key maintenance codes, MNT 170 & MNT171 respectively. Suffixes “-XXX” and “-YYY” would be applied to maintenance code to classify works planned and implemented by MDU and AM-led vegetation management programme (non-MDU) respectively.
- “MNT 170 – Off Track maintenance Vegetation Management Create”
 - “MNT 171 – Off Track Maintenance Vegetation Management Maintain”.
50. While all regions acknowledged the above arrangement, we found that inconsistent adoption of the specific codes in Ellipse persists across regions and routes, with varied approach taken to record planned and delivered AM-led vegetation programme outputs due to different reasons. Consequently, most regions have adopted their local systems to manage delivery of AM-led vegetation programme works. Section 3.5 discusses the limitations of these systems in managing changes and assessing impacts.
- Several regions stated that Ellipse’s hierarchy does not fully address planning and reporting needs for AM-led programme works. Ongoing challenges with Ellipse adoption exist in Works Delivery (WD) teams responsible for management of programme-wide works.
 - A few RAM or Route Engineer teams noted WD teams could be proficient at reporting delivered outputs but less so at documenting planned works. Inputting planned works and delivery of AM-led vegetation management programme works into Ellipse could be irregular, sometimes occurring towards the end of financial year. Some routes responded that “create” and “maintain” work types are all reported under MNT 171 code.

⁷ NR/L2/OTK/5201/02 Isse 3 ‘Vegetation Maintenance’

- NW&C and W&W regions suggested that the inconsistency issues can also stem from insufficient Ellipse planners within WD teams or misalignment between Ellipse’s hierarchy and AM-led programme reporting needs.
- Southern indicated its programme works are managed under “SMART” – a business planning system for all capital expenditure (Capex) works in instead of Ellipse. This approach is taken because its AM-led vegetation programme works, delivered by Southern Integrated Delivery (SID) supply chain, are funded as “Land Management” schemes under Capex, instead of operating expenditure (Opex).

51. The Technical Authority’s RFI responses described that a tool called “Workbank Management Tool” has been developed to support tracking the delivery of the Vegetation Management Plans (VMPs) and improve transparency in drivers and desire outputs or benefits. Nevertheless, none of the regions specifically referenced to this tool during this review.
52. Within the scope of this review, the suitability of Ellipse and its alignment with regions’ the business-as-usual activities for vegetation management are not covered. However, we found the inconsistent use of systems for planning, recording and monitoring vegetation maintenance works has hindered Network Rail’s ability at region and national level to comprehensively assess total efforts delivered by all vegetation workstreams and evaluate output effectiveness on improved outcomes. This could undermine quality of corporate assurance over maintenance performance.
53. We did not see evidence of specific assurance about vegetation maintenance reporting quality undertaken at NR Technical Authority or Central Function or regions. This led to an emerging issue we raised for complete vegetation maintenance reporting with Network Rail regulatory function team during this review. We expect Network Rail to undertake its assurance review over this inconsistency use of information system and provide adequate corporate’s supports to regions to transparently report all vegetation maintenance activities within Network Rail and to ORR (paragraph 34).

Enabler 2 – Transparent and comprehensive performance and reporting framework

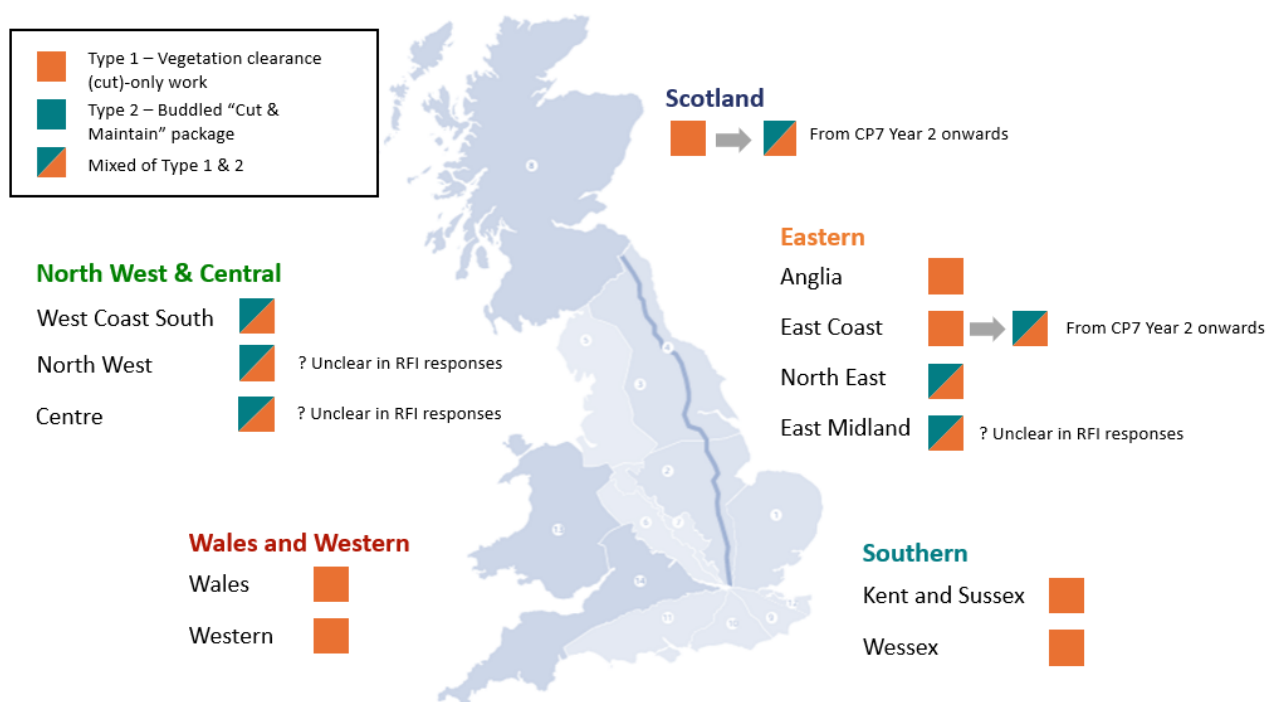
A clear monitoring and reporting framework to support funding decisions, planning, and delivery across different vegetation maintenance types

Challenge 2: Common governance gap hindering cross-team planning

54. All regions and routes are cognisant of the quarterly rolling forecast (RF) planning and review process throughout each financial year. The RF process includes reviewing AM-led vegetation management programme activities and the MDU ABP workbank. Some MDUs also reported collaborating with the AM or Route Engineer teams to review their workbanks.
55. During interviews, some asset management teams in various regions or routes indicated that they have strengthened coordination with MDUs through regular meetings focused on vegetation workbank alignment. However, while these forums support information exchange, the absence of an integrated and consistently applied governance framework for decision-making and asset management continues to limit the extent to which collaboration translates into coherent and system-level vegetation planning across workstreams.
56. As discussed in Section 3.1.2, delegation of decision-making authority and budget control often varies depending on the nature of the workstream. We found that limited strategic oversight of vegetation workstreams, particularly when changes are made to scope, assumptions or funding, creates challenges in managing shifts in maintenance approach over time. Consequently, it has become increasingly difficult to strategically maintain compliant vegetation profiles following their creation.

Management of evolving and changing maintenance approach

57. The AM-led programme works can be scoped as either Type 1 – “Vegetation clearance (cut)-only” or Type 2 - “Cut & Maintain bundled packages” delivered by external supply chain (paragraph 18). Additionally, the AM team noted that the final scope of works could evolve due to interactions with environmental regulators for necessary licence and permits – for example, by clearing vegetation to a shorter distance from tracks. This consequently increases cyclical maintenance activities to sustain compliance post-clearance or, in the worst case, creates MDU’s reactive maintenance to address operational failures caused by vegetation overgrowth. Section 3.5 will examine NR’s current change control process to manage risks arising from changes.
58. Figure 3.11 show the types of AM-led vegetation programme works that have been or are being planned for CP7. According to the interviews, several routes or regions such as Scotland, East Coast route in Eastern have begun planning Type 2 bundled “Cut & Maintain” package at selected sites from Year 2 onwards with additional funding allocated. One of the aims is to reduce reliance on limited MDU resources for sustaining compliant vegetation profile.

Figure 3.11 Types of vegetation works planned and commissioned under AM-led programme workstream

59. The type of AM-led vegetation programme may vary depending on locations and or control period (paragraph 19 & 20). Within the current governance structure (Figure 3.7), RAM or Route Engineer teams generally act as budget control and are responsible for managing AM-led programme works, including planning, monitoring and approval changes to the programme workbank. Only in a limited number of routes or regions do MDUs have a decision-making role in AM-led programme workbank.
60. Typically, MDUs are shared with the AM-led programme workbank, but their level of involvement differs across the network. Engagement between MDU and AM teams ranges from informal consultations and regular maintenance review meetings to establishing dedicated vegetation management task forces. Some MDUs mentioned during interview that they have insight into the broader “aspiration” programme-wide activities, which may require realignment during the control period or subject to change.
61. Details of AM-led programme workbank shared with MDUs often only include location, mileage, delivery years and occasionally high-level driver descriptions. We found from interviews that assumptions made about MDUs' capacity to undertake preventive maintenance after clearance, which is necessary to manage regrowth to

sustain compliant vegetation profile, still need mutual agreement between teams in certain regions or routes.

62. Most RAM / Route Engineer teams reported insufficient visibility into how post-clearance preventive works are incorporated within MDU's ABP workbank to sustain compliant vegetation profile created. Some routes responded that their expectations over such preventive works will be planned by MDUs based on their experience. This lack of transparency and monitoring is reflected in the difficulties encountered when responding to our RFI requests regarding maintenance profiles and funding allocations (section 3.2.1)
63. Given the impact of governance on decision making, we found that there was no apparent strategy established at either the regional or route level across network for a mutual agreement of intended maintenance approach and clear horizontal line of sight to coordinate and integrate maintenance activities across teams. Developing such a strategy is also crucial to support effective change management over time discussed in section 3.5.

Uncertainty in preventive planning to sustain long-term compliance

64. Our review has shown that the absence of a coordinated vegetation management strategy at both regional and route levels, combined with governance gaps to manage vegetation workstreams, has prevented the reliable implementation of the 'Cut and Maintain' approach. This has resulted in difficulties in sustaining compliant vegetation profiles in line with NR standards and hindered efforts to establish long-term "maintenance resilience" across the network. This section illustrates how these challenges have manifested in practice, drawing on examples and ongoing improvement initiatives from some routes or regions.
65. Some regions noted regrowth at some previously cleared sites may be influenced by accelerated climatic conditions. While environmental factors may increase frequency and intensity of regrowth, the absence of clear agreement in preventive maintenance responsibility post-clearance, defined funding allocation and robust monitoring of output delivery further contributes to a recurring "Cut & Regrow" cycle. In this context, a coordinated and strategically aligned approach to vegetation management becomes increasingly important to manage encroachment risks and avoid escalating whole-life costs, as highlighted in the John Varley's independent review (2018).
66. Without establishing a clear baseline preventive maintenance schedule or program, evaluating effectiveness and suitability of maintenance methods and frequency becomes difficult. Consistent feedback from regions and routes' MDUs highlights the challenge in understanding and monitoring the trend of the distribution between

reactive maintenance and preventive works being forecasted to meet NR's standard requirement post-clearance. This has impaired ability to review strategic maintenance approach and make informed decisions on optimising maintenance plans as climatic and financial conditions change.

67. Additionally, certain routes or regions have expressed their intentions to develop in-house MDU capabilities for undertaking preventive maintenance at cleared sites in the future. Without comprehensive planning and monitoring mechanisms for preventive works currently delivered by external supply chains, valuable insights and lessons would not be captured. This can complicate maintenance requirement analysis to determine future planning of labour, equipment, materials, and costs to inform a more robust vegetation management plan.
68. Both challenges and examples of improved practice (indicated by a green bar) relating to integration of preventive maintenance planning at cleared sites were identified in some regions.

Eastern

69. Good practice was identified in the North East (NE) route AM team and Sheffield Delivery Unit (DU), which have established a mutual agreement to implement Type 2 - "Cut & Maintain" bundled approach within CP7 AM-led programme works. This encompasses a five-year preventive maintenance period following clearance delivered by external supply chains. The NE Route Engineer (RE) also provided documentation on the "Strategic Vegetation Management Work Prioritisation Process", as well as the route 10-year workbank which incorporates schemes delivered under both the AM-led programme and MDU workbanks.
70. Although the strategy process establishes a framework with a range of vegetation-related scoring categories and the specified requirement - *"score each category and rank each site according to cumulative risk and consequence score. Combine data with engineering judgement to generate workbank"*, it remains unclear how the scoring system operates and how the framework supports or informs decision making regarding prioritisation and trade-offs among schemes within the 10-year workbank. Furthermore, the NE RE indicated that monitoring and reporting volume outputs of programme work activities remain challenging due to limitations in the corporate asset information system, Ellipse discussed earlier (paragraph 50).
71. The Eastern DEAM team responded in the interview that it has initiated the development of a regional strategy to support standardisation of route-based strategies. The Infrastructure Maintenance Delivery Manager (IMDM) and NE Route Engineer further confirmed their ongoing work on strategic business planning for the

next funding period, with the intent to address previous planning gaps where output volumes were determined by available funding rather than asset requirements. The route aims to assess these disparities and anticipates an increase in vegetation preventive works that would be reflected in future DU workloads.

72. We consider these progressive steps could support better integration in planning. We expect the region and routes to take actions to establish clear line of sight between the maintenance approach and vegetation specifications being applied for preventive maintenance activities at cleared sites (paragraph 62) as part of the development of strategy and business planning.

NW&C

73. NW&C's RFI responses indicates that informal consultation of AM-led program work with MDUs has led to instances where both AM/RE team and MDU team planned work at the same sites, resulting in inefficiencies.
74. From the interview with Liverpool DU, we found that a Principal Route Engineer designated for Off-Track was just recently appointed. Currently there are two sites under trial to implement preventive work to avoid signal sighting issue caused by vegetation. Compliant vegetation profile is maintained through cyclical maintenance activities via MSTs and reactive works outside the dynamic profile. We however did not see any evidence of how cleared sites are strategically managed.
75. The NW&C West Coast South (WCS) Route Engineer team described that the route is transiting to a "Cut & Maintain" approach, with some sites implementing "Cut & Maintain" bundle package. However, responsibility for delivering 3-year preventive maintenance at other sites after clearance remains undecided and depends on funding at the time of interview.
76. The interview also revealed that maintenance in the Euston DU ABP workbank, apart from inspections, is mostly reactive based on works arising from inspections. We considered this reactive approach would not be sufficient to manage vegetation risks given current rapid growth rates. Impact on safety and train performance could occur before vegetation defects are identified in the 3-year inspection cycle. We expect the route and NW&C region to undertake an assurance review of potential vulnerabilities with risk controls and impacts on performance under the current approach.

Scotland

77. Good practice was identified in Scotland which established its vegetation specification and shared with MDUs. Motherwell MDU interviewed provided examples of MST set up in Ellipse, detailing how cleared sites are treated (Section

4.3.1) and explained that a weekly MST backlog report is reviewed to inform prioritisation with the oversight from the Head of Maintenance.

78. The DU explained the baseline frequency outlined in NR's standards is followed to schedule preventive maintenance works, which may suggest potential misalignment between RAM expectations set in its specification and DU planning. The RAM team updated about the ongoing development of a dashboard designed to track preventive maintenance at cleared sites and improve visibility into implementation of vegetation specifications.
79. During the interviews, both the MDU and RAM teams recognised the importance of strategic planning and resource allocation as critical opportunities to reduce reactive workload pressures resulting from legacy non-compliance and the effects of extended growing seasons.

Southern

80. Wessex is the only route that provided a formal documentation (paragraph 28) outlining the allocation of vegetation maintenance related tasks. The document was produced approximately six months after the publication of the RAIB investigation into the train collision at Salisbury Tunnel Junction (October 2023).
81. The route has implemented this governance through the establishment of "Area Services" team - a dedicated role to develop and monitor Wessex vegetation management plan for vegetation clearance works and preventive maintenance of previously cleared site on behalf of the DU.
82. During the interview, the Southern region team and Eastleigh DU illustrated how Wessex route, alongside Area Services (AS), utilises mapping tools to track locations of both Asset Management (AM)-led program works and preventive activities conducted following clearance over time. The Senior Asset Engineer (SAE) in the RAM team under DEAM organisation demonstrated that it has retained an oversight over how the planning and delivery of Wessex's AM-led vegetation program workbanks and preventive maintenance delivered by AS team are coordinated. This aligns with the region's responses to our RFI relating to roles and responsibility (Figure 3.7), suggesting the RAM team maintains certain level of visibility and roles in monitoring delivery.
83. We however understand the above governance approach is only limited to Wessex route. The region described that Kent and Sussex routes are required to take steps to improve clarity of recording and capability to maintain cleared sites.

84. While an annual baseline preventive maintenance has been scheduled in Wessex route according to NR's standards requirements, the RAM team highlighted the challenge keeping up with the forecast preventive maintenance works due to capacity constraints. The team suggested a thought process is needed to evaluate and refine preventive maintenance specifications based on vegetation condition and locations, mostly importantly determining appropriate methods for making informed decision. The teams responded that they lacked tools for predicting the impact of preventive measures works on vegetation asset conditions. This was primarily due to insufficient accurate historical trend data. While the recent accelerated adoption of Digitalise Lineside Inspection (DLI) tool (refer to Section 3.4.2) would facilitate the development of such trend analysis capabilities, it will require time to establish fully.

W&W

85. The W&W Wales route presented its initial strategic document during a joint interview with the Route Engineer (RE) and Cardiff DU teams. The RE explained that, following the devolution to route within the W&W region, the route team has taken steps to address historic gaps in maintenance planning between teams and foster a more integrated approach by reaching consensus on addressing emerging resource needs.
86. The Wales RE and Off-Track Maintenance Engineer (OTME) of Cardiff DU outlined their decision-making framework described in the initial strategic intent document to guide necessary adjustments in vegetation maintenance plans (paragraph 100). Consequently, funding was transferred to the DU ABP workbank in early 2025 (FY25 RF9), facilitating additional preventive "cut and spray" activities and mechanised maintenance. The RE clarified that this allocation aims to strategically manage regrowth at cleared sites, which is an enhancement of its delivery plans submitted in Periodic Review 2023 (PR23).
87. The Western RE and DU teams made an enhancement of the Western ABP workbank with the introduction of a "4-year annual spraying programme" aimed at managing regrowth. The Western DU team stated that spray activities will be closely monitored throughout delivery to evaluate its effectiveness, guiding any necessary adjustments to maintenance methods during the programme.
88. The Western DU team noted that the introduction of spraying programme presents a progression in approach from previous ABPs which primarily driven by inspection-based reactive works. Nonetheless, the team acknowledged that the spraying programme covers only 30–40% of the DU's mileage, with resource constraints limiting expansion. Consequently, the revised ABP is still a combination of preventive maintenance and reactive maintenance, and additional resources are needed for

further optimisation. Western route has not yet developed strategic intent or document.

89. The Western DU team has noted improved visibility of the AM-led programme work pipeline since devolution to route. However, there remain concerns about the current DU's capacity to accommodate increased maintenance requirements for regrowth management at sites which experience scope reduction under the AM-led programme. This situation may lead to resources being allocated reactively to reprioritise, especially sites that are descoped entirely. This challenge primarily stems from the lack of a formalised deferral process, such as those used in renewal projects, being applied to large-scale vegetation maintenance works to manage risk arising from changes. This will be discussed further in section 3.5.

Enabler 3 – A defined baselined preventive maintenance regime

A justified preventive maintenance baseline to manage regrowth, improve planning certainty, and support long-term cost efficiency and maintenance resilience.

3.3 Strategy and Outcomes

90. The current structure of individual workstreams allows teams to operate autonomously. However, this has led to insufficient strategic alignment in managing change in maintenance and consistent implementation of an approach necessary to sustain a compliant vegetation profile in the long run.
91. Certain regions or routes have made progress in improving coordination between asset management teams and maintenance delivery units. However, the review did not identify consistent evidence demonstrating how locally defined outcomes systemically translated into delivery outputs. In the absence of transparent decision-making on prioritisation of workstreams and associated trade-offs, regions may face challenges in aligning strategic objectives with operational execution. This limits the ability to assess intervention effectiveness and to demonstrate how delivery plans support intended vegetation management outcomes.

3.3.1 Alignment between Outcome-based Direction and Output Delivery

92. All regions responded to our RFI relating to their status of compliant vegetation profile at CP6 exit and provided their compliance position targets for CP7. However,

at the time of responses, regions perceived the definition of compliant vegetation profile differently. Some regions may define their scope of vegetation clearance more strictly than the requirements set in the NR's standards. As mentioned in paragraph 17, Technical Authority had updated the NR standards during this TAR to address recommendations made in previous independent review and RAIB investigation.

93. In addition, vegetation inspections have been carried out on foot. Several regions indicated in RFI responses that they were not yet assured the quality of vegetation encroachment conditions until full adoption of the corporate Digitalised Lineside Inspection (DLI) tool, a process expected to take 18 to 24 months. During this review, we found that several MDUs have been taken steps to accelerate adoption of DLI. This will be discussed in section 3.4.
94. Apart from vegetation encroachment condition targets, regions also set their own local outcome targets. These targets differ by route and region, and may serve as either leading or lagging indicators, as well as being qualitative or quantitative in nature.
- Reduction in reactive works and/or vegetation service affecting failures (SAF) that could be unofficially defined as "effective incident count" and "track WSF" as lagging indicators in some regions
 - Reduction in hazardous tree stocks or trees affected by Ash-Die Back
 - Improved management process and ongoing assurance relating to hazardous trees and elf fall risks
 - Reduction in autumn-related train delay
 - Compliance to autumn risk assessment
95. Interviews with the asset management teams revealed instances where local targets lacked clearly defined baselines, explicit risk tolerance, or forward-looking outcome ambition. As a result, it was not always clear how improvement was being measured and monitored over time.
96. In contrast, across all RFI responses, regions consistently referenced their aims to achieve CP7 clearance or maintenance volume outputs that contribute to the Network Rail's corporate target, Train Accident Risk Reduction (TARR). The target is defined as delivery performance of vegetation maintenance volumes through prescribed vegetation standard jobs in Ellipse (refer to paragraph 118 in Section 3.4.1).

97. However, we did not see sufficient evidence demonstrating how locally defined outcome targets are systematically translated into or correlated with output delivery. Although regions recognised AM-led vegetation programme work as crucial initiatives for establishing compliant vegetation profiles and managing sites affected by leaf fall or hazardous trees, most responses lacked clarity on the performance indicators or metrics used to evaluate outcomes or the anticipated contribution of individual scheme to vegetation encroachment condition or wider performance outcome targets.
98. In the subsequent joint interviews with route teams and MDUs, most MDUs indicated that they have limited visibility of certain local targets set at route or region level described in RFI responses. In several cases, MDUs responded that aspects such as train performance or autumn performance are managed by Asset Management team or Route Engineer team through AM-led programme planning. Meanwhile, MDUs primarily focus on delivering cyclical works through MSTs and fulfilling Work Orders within the timescale defined in NR standards, particularly those related to level crossings and signal sighting considered to be safety critical, frequently mentioned in all the interviews.
99. Moreover, documentation outlining the reasoning or decision-making process behind trade-offs between priorities for AM-led programme work site selections was found to be limited. For example, the basis for choosing one site over others was frequently unclear. Some regions cited broad strategic considerations such as route criticality and route strategy values, but vegetation-specific parameters, risks or performance outcome targets under the AM-led programme workbank were notably lacking.
100. We observed improvement practices in only three routes or regions applying their bespoke frameworks to facilitate more informed decisions on priorities and trade-offs within vegetation programme workbank. However, the varied frameworks adopted underscore the need for continued efforts to strengthen coherence in the governance framework (section 3.3.2) and to improve transparency in decision-making process across network.
- Scotland was developing a “vegetation criticality scoring matrix” covering 14 metrics that are considered when building vegetation workbank and scored on a 0-3 rating. Six of these metrics are considered as primary drivers with applied weighting factors. The RAM responded that the overall score is used to inform prioritisation of schemes in its AM-led programme workbank, as well as supporting risk evaluation when changes occur.

- The Eastern NE route has developed its framework through the “Strategic Vegetation Management Work Prioritisation Process” for decision-making and prioritisation within its AM-led programme (refer to paragraph 69).

However, further improvements are needed to enhance transparency, documentation of rationale, and the integration of measurable outcomes and review mechanisms to ensure ongoing progress.

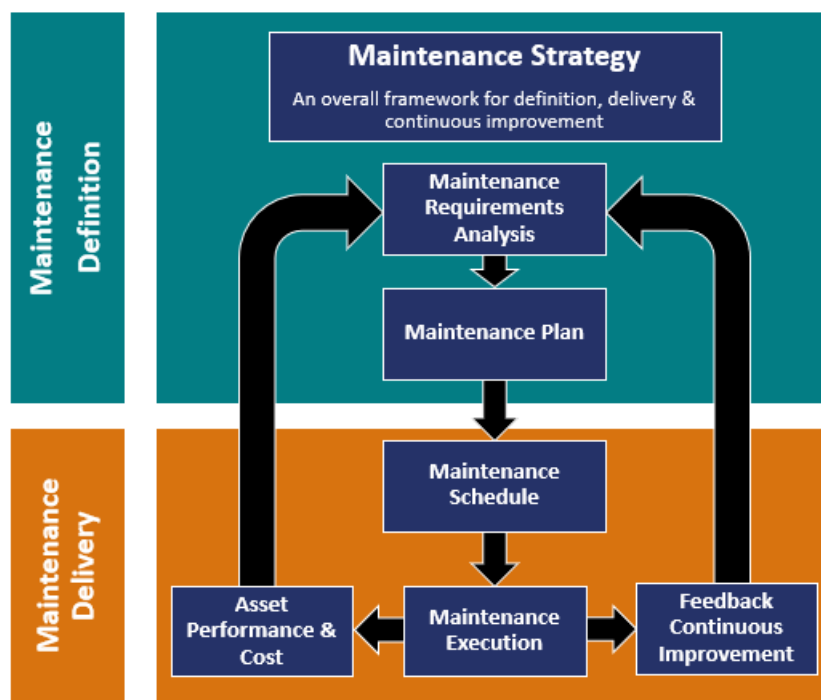
- W&W Wales route has provided its initial strategic intent document, prepared by the Off-Track Maintenance Engineer in Cardiff MDU team in collaboration with the Route Engineer. The document outlines a “3-tier approach” framework used to classify line of route, assigning corresponding targeted vegetation interventions and maintenance approaches. It details key factors such as the current vegetation profile compliance position, past works completed and tier scores. These elements, along with the AM-led programme “create (clearance)” programme, inform six proposed management plan types for any given ELR over a 10-year horizon through to 2034.

101. A notable improvement was identified in the Wales route of W&W region which has fostered a more effective horizontal coordination in planning between the RE team and MDU team through its initial strategy, increasing transparency in decision-making processes. As referenced in paragraph 86, these efforts had resulted necessary adjustments to vegetation management plans, ensuring alignment with the route’s proposed strategic maintenance approach.
102. During the interview, we discussed with the Wales route team that the initial strategic intent document should be formalised and the need of review mechanisms to enable continuous validation and verification of the intended strategy described.
103. A few routes referred to the Vegetation Management Plans (VMP) being developed as part of NR standard NR/L2/OTK/5201/03⁸ requirements and the recommendations arising from the independent reporter’s review in 2022. While these routes expressed that VMPs would address identified gaps, we have not seen sufficient evidence at the time of reporting demonstrating how these plans would provide the strategic alignment, governance clarity and outcome-based direction identified as necessary in this review.

⁸ ‘Vegetation Management Plans, issue 2’

104. We recognise Vegetation Management Plan required under NR standard is an essential management tool, focusing on delivery mechanisms and compliance. However, good maintenance practice comprising two interlinked processes (refer to Figure 3.12), maintenance definition and maintenance delivery, necessitate a vegetation management strategy to define overarching objectives, strategic intents and approach to manage vegetation assets, risk appetite, and outcome-based targets.

Figure 3.12 A good maintenance practice comprising interlinked processes - maintenance definition and maintenance delivery



105. Such management strategy provides a structured framework for translating these objectives into measurable outputs and actionable plans, ensuring consistency and reliability in delivery. Crucially, a VMS establishes adaptive governance and feedback mechanisms, enabling region and routes to adjust their strategies, processes and priorities in responses to changing conditions, new information and lessons learned over control periods (i.e. maintenance resilience).
106. The findings of this review reveal substantial challenges resulting from the absence or early-stage development of a collaborative and mutually agreed integrated VMS. Operational workstreams, particularly between asset management teams and MDUs often function in isolation, resulting in strategic disconnects and limited coordination in planning (paragraphs 60 - 65 and 98). There is insufficient evidence of a unifying

strategy at region or route level that defines shared outcomes objectives, aligns workstreams and supports joined-up planning, delivery and review.

107. The limited evidence of strategic oversight of vegetation workstreams (paragraph 56 and section 3.2.2), combined with evolving maintenance approach during and between control periods (paragraph 59) further compounds these issues. Decision rationales are often implicit or locally held, which limits transparency and comparability and effective change control (60 - 62 and 162). This isolation introduces inefficiencies and reactive pressures (paragraph 73, 76 and 154). It also restricts NR's ability to demonstrate consistent, risk-informed decision making and effective management of trade-offs.
108. In response to these governance gaps, Network Rail's Technical Authority has published the "Lineside Technical Strategy", which articulates corporate ambitions and technical intent for lineside management. While this represents an important step in clarifying organisational direction, its broad scope would not replace the need for regionally- or route-specific vegetation management strategies that integrate asset management and maintenance delivery. The current devolved operational structure demands that these corporate ambitions be interpreted and implemented locally through a defined management strategies. This ensures that strategic intent is reflected in prioritised outcomes and coordinated workstreams. However, review and assurance mechanisms for monitoring local interpretation and implementation remain immature (section 3.4.1), which limits central visibility into challenges, successes, and alignment across the network.
109. In the absence of a VMS, local teams are more likely to adopt ad-hoc or reactive approaches, particularly when faced with operational disruptions or changing priorities. This increases the likelihood of short-term, sub-optimal actions focusing solely on achieving "immediate compliance" such as meeting intervention deadlines for corrective measures or clearing sites without strategic planning for ongoing maintenance. Such practices may support achieving a compliant vegetation profile in the short run but could undermine sustainable outcomes and compromise long-term "maintenance resilience" and value.
110. This situation also impedes NR's ability to monitor compliance effectively and establish robust feedback mechanisms, creating challenges in substantiating funding allocations for preventive maintenance and lineside resilience. The Phase 3 joint interviews suggest that certain routes or regions exhibit a stronger understanding of strategic objectives. Some routes and region have already proactively initiated development efforts for management strategies (paragraph 71 and 86), pursuing opportunities to exploit synergies.

Enabler 4 – Regional or Route vegetation management strategies

Region- or Route-level strategies that define intended maintenance approach, outcome targets, priorities, and trade-off principles, and provide a clear link between outcomes and delivery.

3.3.2 Governance Framework to Support Strategy

111. Review of current practice indicates that most routes and regions lack a common governance framework. Such a framework would enable trade-off decisions, prioritisation or translation of vegetation-related overarching outcome targets into measurable outputs and actionable plans. A few routes and regions have developed their bespoke frameworks (paragraph 100). These account for local criteria, thresholds, or scoring approaches to perform and interpret their risk assessments and guide strategic intervention decisions. While these approaches could support local decision-making but vary in structure, criteria and documentation.
112. What is not consistently evidenced is a single, overarching governance framework that defines how vegetation managed decisions are expected to be formed, justified, recorded, and reviewed across regions or routes.
113. We noted that Network Rail Technical Authority introduced and published a new standard NR/L2/OTK/5201/05⁹ for vegetation evaluation during this review. The purpose of the standard is to help mitigate risk of failure by describing the process for risk assessment, intervention selection and prioritisation of tree and vegetation works. This new standard is a positive step in improving the technical basis and promoting a more structured approach to evaluation.
114. Through our regular liaison, we understand that the TA is in the process of developing a “Comprehensive Vegetation Risk Model” to facilitate a quantitative assessment of vegetation-related risks, both individually and collectively. The TA has also emphasised that regions are responsible for taking proactive measures such as intelligent and safety-validated adoption of technologies to enhance the quality of vegetation asset data (section 3.4.2), thereby ensuring the provision of high-quality inputs for the risk model.
115. Nevertheless, the new standard has yet to provide an explicit, organisation-wide risk rating and decision framework. Consequently, decision governance is inconsistently

⁹ NR/L2/OTK/5201/05 Issue 1, ‘Vegetation Evaluation’

evidenced in relation to how intended outcomes are defined and translated to practical measurable output delivery. This includes how trade-offs between competing objectives are considered, or how consistency of decision quality is assured across devolved regions or routes (paragraph 97 & 99). Decision rationale could be implicit or locally held, rather than explicitly structured in a way that support transparency, comparability and organisational feedback loop.

116. Given decision-making roles and responsibilities are divided between key workstreams, the absence of a coherent decision governance layer or tool limits the ability to demonstrate how vegetation management decisions collectively support strategic intent. This also constrains the effectiveness of review activities (section 3.4.1) and change control management at regional and national levels (section 3.5).

Enabler 5 – Coherent decision-making framework and vegetation risk model

A structured decision-making framework, supported by a comprehensive vegetation risk model, to enable strategic prioritisation and consistent system-level governance

3.4 Review Mechanism and Asset Data Quality

3.4.1 Effectiveness of performance indicators and quality of evaluations

117. The Technical Authority's (TA's) RFI responses outlined key national metrics and reports used to assess and monitor vegetation performance and compliance. These includes:

- Train Accident Risk Reduction (TARR) metrics; and
- The Chief Engineer's periodic Assurance Pack that covers two measures which are: vegetation inspections scored as Condition 3 when vegetation encroaches into the dynamic envelope defined in NR's standard NR/L2/OTK/5201/02 (Figure 3.1, page 11), and tree incursions with derailment risk.

118. Based on the TA's RFI responses, the TARR metric in the NR scorecard is calculated based on the comparison of planned versus actual volumes of vegetation maintenance activities as recorded under specific standard jobs in Ellipse. These

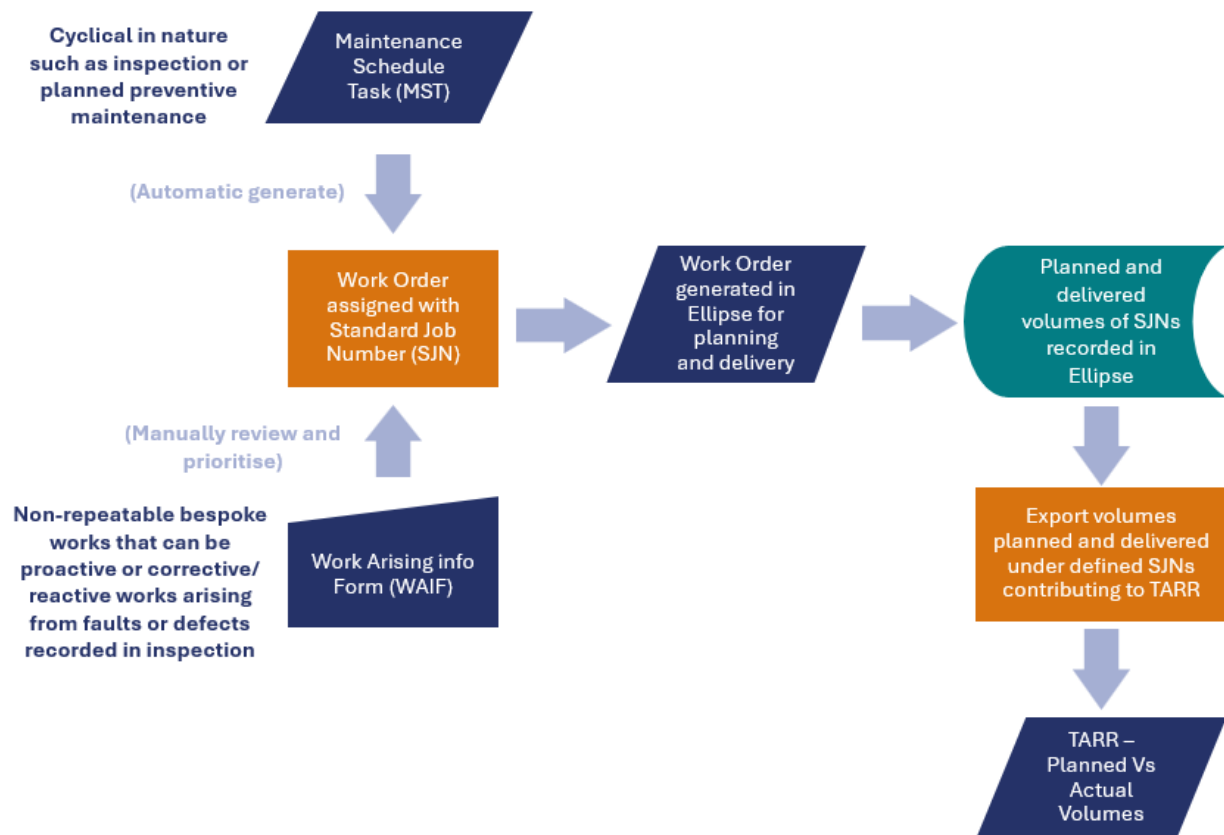
standard jobs, illustrated in Figure 3.1, are considered by Network Rail to be instrumental in reducing the risk of encroachment, obstruction, contact or objects on the line.

Table 3.1 Volumes of standards jobs contributing to the corporate TARR metric used to assess and monitor vegetation compliance in NR scorecard

MNT Code	Standard Job Number & Description
MNT 171	009656 - VEG TREES - CHAINSAW FELL
MNT 171	009657 - VEG TREES - MECHANISED FELL
MNT 171	009662 - VEG MAINTENANCE - FLAIL
MNT 171	009663 - VEG MAINTENANCE - STRIM/BRUSHCUT
MNT 171	009664 - VEG TREES - HI PRUNER/PRUNE
MNT 171	009665 - VEG MAINTENANCE - MULCH/MOW
MNT 171	009667 - VEG SIGNAL SIGHTING
MNT 171	009668 - VEG LEVEL CROSSING SIGHTING
MNT 171	009686 - VEG TREES - AERIAL TREE WORK

119. Standard job numbers (SJN) are assigned to Work Orders generated through the Maintenance Scheduled Task (MST) mechanism for cyclical works or “WAIF” process for non-repeatable works that can be proactive or reactive (Figure 3.13). As a result, the volumes captured in the TARR metric encompass both planned preventive maintenance and reactive works.

Figure 3.13 A diagram showing the process of vegetation works generated and recorded in Ellipse contributing to the national TARR metric for vegetation performance evaluation



120. We interviewed both the regions and Technical Authority to seek their own reflections on the effectiveness of national TARR metric in evaluating vegetation performance. All respondents consistently indicated that the TARR metric is not sufficiently effective due to its measurement methods or definitions. For example,

- Some regions responded that TARR quantifies volumes for specific standard job numbers under MNT 171 (Table 3.1) but does not account for AM-led workstream works delivered to “create” compliant vegetation profile under MNT170 – works that should also contribute to risk reduction. We however identified inconsistencies in the use of relevant maintenance codes when recording planned and delivered activities in Ellipse (paragraph 50).
- Some regions further noted that since introduction of TARR metrics, there has been a shift towards focusing on output-based volume delivery rather than outcome-oriented measures assessing whether necessary tasks are being delivered in appropriate locations or planned locations.

121. Our review indicates that the current national TARR metric largely captures activity volumes but cannot distinguish between preventive or reactive interventions, nor do they provide a clear line of sight into safety and resilience outcomes. The absence of adequately documented strategies (paragraph 63 and 105) further restricts the metric's effectiveness in describing how vegetation management delivery aligns with intended maintenance approach or in assessing whether it achieves targeted performance outcomes.
122. Several route MDUs were aware of the TARR metric but expressed uncertainty regarding how it helps clarify maintenance needs and strategies. The TARR metric is therefore not widely utilised by MDUs. Compliance at the MDU is often tracked by the timely completion of corrective actions for identified defects within intervention timescales specified in NR standards. While some MDUs acknowledge planned preventive works outside the dynamic compliant vegetation profile as part of the compliance, these works could be deferred or reprioritised in response to reactive maintenance needs.
123. Local metrics within MDUs emphasise managing delivery risks, resolving defects and controlling cyclical maintenance activities associated with higher operational risks, such as signal and level crossing sighting. Nonetheless, there is noticeable variation across the network in how local metrics and monitoring approach are implemented among MDUs.
124. Few MDUs have undertaken local reviews to examine frequency of encroachment incidents or defect-related Work Orders in order to determine whether their maintenance plans should schedule cyclical activities through the MST mechanism. This would lead to a more resilient maintenance approach, rather than relying solely on raising reactive works to address repetitive defects. These reviews however seldom assessed the effectiveness of these cyclical activities in improving safety outcomes at MDU, route or region level. For example, although many MDUs highlighted efforts to implement and execute MSTs for signal sighting during interviews, there is scant evidence that incidents such as signalling wrong side failures (WSFs) or signal passed at red (SPAD) related to vegetation are systematically evaluated against expected outcomes from those works.
125. Our review suggests that assurance activities or performance indicators at national or region and route MDU level are primarily based on work volumes or activity measures. The overall NR review mechanism has not functioned yet as a complete feedback loop (refer to Figure 3.12). Local or frontline monitoring of conditions and performance are not consistently fed back to inform national performance insight and alter strategy where necessary, and the national metric TARR does not effectively

translate back into actionable learning or prioritisation required at planning and delivery level.

126. This absence of conducting evaluation limits the ability to provide reliable evidence regarding effectiveness. Such evaluation could be whether the vegetation management regime is achieving its intended outcome objectives or whether outputs delivered through modified maintenance approach are improving safety and resilience. Without a clearer line of sight between review of maintenance activity delivery against plans and a shared outcome-focused approach to performance evaluation, decisions are still made at local teams or without adequate collective evidence to inform current and future strategic planning and corporate oversight. This puts value for money at unnecessary risk and impedes justification for or against further investment.
127. The TA responded in its RFI that it was planning to improve national metric by using vegetation encroachment conditions as a Passenger Safety Metric (PSM). At the time of this review, the new metric was under development, building on the TA's assurance works implemented to respond to ORR's concerns about vegetation condition data quality raised during this review (paragraph 129).
128. To enable effective and high-quality evaluation of vegetation management performance, we expect a comprehensive set of measures and key performance indicators that facilitate informed management decision making at a collective level. These measures should cover asset management capability, asset stewardship and outcomes aspects, supporting identification of improvement opportunities in asset management through regular assurance activities conducted at route, region and Technical Authority levels.

Enabler 6 – Effective review mechanisms and feedback loops

Robust review processes supported by a systematic comprehensive suite of performance measures to assess effectiveness, inform learning, and drive continuous improvement

3.4.2 Asset data quality, data-driven decision making and technology adoption

Asset data quality and data-driven decision making

129. Our regular liaisons with Network Rail together with the evidence collected during RFI stage of this TAR have raised concerns about regional quality of vegetation condition

data collected from inspections. We identified that the measurement of lineside mileages described by regions does not align with the data extracted from the asset information system, Ellipse by Technical Authority.

130. It was concluded that all five regions have gaps in their vegetation encroachment condition data in Ellipse. Approximately 24% of lineside mileages are not recorded with condition scores in Ellipse as required by NR standards. The issue was found to be stemming from reasons such as setting up of asset hierarchy in Ellipse, paper inspection forms not migrated into Ellipse or missing inspection records.
131. Consequently, we escalated our concerns during this review in early 2025, prompting Network Rail's responses with regional improvement plans and bespoke national monitoring report of regional progress¹⁰. Concurrently with this TAR, we have established close monitoring of all regions' progress in implementing their improvement plans. This is to ensure that regions take appropriate actions to address the underlying issues associated with identified data gaps, and to drive continuous improvements in the quality of vegetation condition data through intelligent adoption of available safety-validated technologies, while also improving operational efficiencies.
132. This has also led to NR's corporate actions to restructure its Vegetation Management Enterprise Risk Register (ERR) – a company requirement on reporting and recording the risks, consequences and bowtie to mitigate risk, including improvement actions. The Vegetation Management ERR has been reformed to address the misalignment to risk management principles identified by NR Technical Authority.
133. In addition to the implementation of a national monitoring report, Technical Authority has committed to deliver Engineering Verifications in each region, enhancing monitoring of compliant vegetation profile against the updated standard requirements. Technical Authority highlighted that asset data quality in NR's information management system remains one of the key risks that would impact assurance quality, vegetation risk model being developed and Asset Risk Evaluation Tool (ARET) results.
134. There have been NR regional comments regarding the challenges and inconsistencies in the use of information management systems (paragraph 50). Alongside, Technical Authority highlighted concern about constrained funding limiting further development of the Lineside Strategic Engineering and Asset Management (StrEAM) system, which serves as an integrated resource for Opex and Capex

¹⁰ [Annual assessment of Network Rail 2024 to 2025 - Asset management | Office of Rail and Road](#)

decision makers. However, there is not yet a clearly defined action within Network Rail to undertake assurance activities (paragraph 52). Such activities are necessary to rectify any underlying issues and inform coordinated actions at route, regions and Technical Authority to ensure that asset information relating to data processing, integration and reporting remains fit for purpose in supporting decision making for managing vegetation assets.

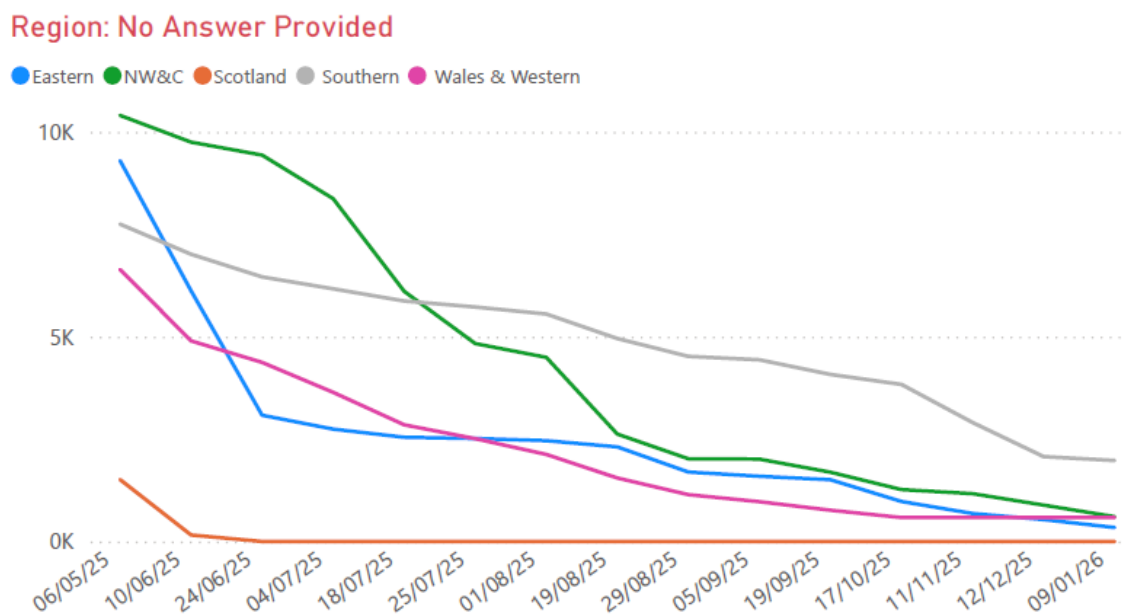
Enabler 7 – Fit-for-purpose asset data and information

Reliable and accessible asset data to support risk-informed decision-making and assurance

Technology adoption and efficiency

135. Since we escalated our concerns on vegetation encroachment condition data quality, we have started seeing improving trends (Figure 3.14), with more of the network scored for conditions in Ellipse. This was partly attributed to regional accelerated adoption of Digitalised Lineside Inspection (DLI) – a tool developed by NR Technical Authority, Research & Development (R&D) and Infrastructure Intelligent (II) teams. This tool allows users to visualise synchronised and automated forward-facing videos and LiDAR aerial images to identify vegetation encroachments. Alongside, the NR central function team was actively supporting MDUs through a series of training supports and briefing of the tools, enabling progressive adoption of the tool. We are expecting all regions to complete their action plans to close the condition gap identified by the end of CP7 Year 2 (March 2026).

Figure 3.14 Network Rail’s vegetation encroachment condition data monitoring to address lineside mileages without condition scores, denoted as “No Answer Provided”, in Ellipse



136. Routes, regions and Technical Authority have generally observed that the recent adoption of the DLI tool presents an opportunity to capture more accurate and comprehensive condition data. This supports the objectives set out in most regions’ Strategic Business Plan during PR23. In our visits to the selected delivery units, we noted the embedding of DLI tools into MDUs’ business-critical activities, enabling MDU teams to undertake vegetation inspections more efficiently and streamlining both the process of initiating works following inspections and planning subsequent activities.
137. Several MDUs reported improvement in operational efficiency through reduction in time spent on raising work orders. However, at the beginning of adoption, it was also acknowledged that some of these gains may be partially offset by the need of manual review to avoid duplication of new work orders raised with the pre-existing ones. Thereby, few MDU representatives highlighted the importance of closer engagement with the local change panel programme teams before technology is rolled out.
138. It was described by regions and routes that vegetation maintenance plans are historically developed based on experience (paragraph 62), available capacity within MDU teams and risk-based prioritisation focused on strategic lines of route with higher safety and operational risks. Such method, however, did not integrate predictive or condition-based elements. This has consequently limited opportunities to adopt a strategy that balances preventive baselines, risk-based prioritisation and

predictive methods (paragraph 66), particularly in areas where the likelihood of vegetation failure is low, but the potential consequences are significant.

139. The strategic implementation of adoption of technology such as the DLI tool would present regions with enhanced support for progressing toward a more proactive, data-driven planning process for vegetation management (paragraph 84). Some regional plans addressing vegetation encroachment conditions include commitments to increase the frequency of vegetation inspection from every three years to annually as the DLI is fully adopted.
140. While it is acknowledged that releasing the full benefit of these technological developments will require time, Network Rail's ongoing adoption and embedment of inspection tools into business-as-usual activities represents a positive step forward. This progression should support improved asset data quality in long-run. We expect Network Rail to continue to make ongoing improvements to asset data quality, thereby enabling more accurate monitoring of vegetation growth and providing clearer insights into variable vegetation risks, particularly amid increasing climate volatility.

Enabler 8 – Intelligent use of technology and monitoring tools

Targeted adoption of inspection and monitoring technologies to improve data quality and support predictive, risk-based vegetation management

3.5 Change Management and Evaluation

141. All regions responded explaining their processes for managing vegetation workbank changes. This review specifically examined how risks arising from changes in AM-led vegetation programme workbank are managed. This is important given that such changes can substantially influence the attainment of compliant vegetation profiles and may have consequential impacts on safety and performance.
142. As discussed in section 3.1.2, regional asset manager or route engineers in asset management team together with Works Delivery team are key decision makers for AM-led programme workstream with exceptions in some routes or region like Anglia, Scotland and Southern (Figure 3.7).
143. This review found inconsistencies in change control processes and impact assessment frameworks used across routes and regions. Table 3.2 summarises the processes and frameworks adopted by each region based on the RFI responses.

Where there is no change control panel, decision-making was found to predominately rest with the asset management team or Works Delivery or project teams.

Table 3.2 Summary of regional change control process and impact assessment used to manage AM-led vegetation workbank based on RFI responses

Region	Documented process	Change Management system/ tool	Change Control Panel	MDU involvement in panel	Impact Assessment Framework
Eastern	No	Change Control App	Yes	IME's approval	Implicit, except East Midland uses NR deferred renewal process [^]
NW&C	No	Asset Workbank System (AWS)	No	Unplanned	Implicit
Scotland	No	Change Control Log	Yes	Head of Maintenance & ID's approval	Implicit
Southern	No	SMART system	Yes	Approval from OTME in Kent & Sussex; and Area Service Manager in Wessex	NR deferred renewal process [^] & CRAM [*]
W&W	No	Project Wise & Power BI reporting	No	Implicit	Implicit

[^] A process outlined in NR standard NR/L2/HAM/02201 to manage the risk arising from deferred renewals

^{*} Corporate Risk Assessment Matrix (CRAM)

144. Each region applies its own local digital system or tool to manage its AM-led vegetation programme workbanks. Additionally, only the East Midland route in Eastern and Southern region responded that they are using the Corporate Risk Assessment Matrix (CRAM) framework, which is a matrix referred in Network Rail Standard NR/L2/HAM/02201¹¹ to assess five impact areas namely safety,

¹¹ NR/L2/HAM/02201 issue 6, 'Management of the risk arising from deferred renewals'

environment, performance, finance and reputation, for the changes to their programme workbank. However, limitations were identified in the change control processes or impact assessments.

Eastern

145. Although the regional RFI responses describe that change submissions are logged in the Change Control App and periodically presented to a panel for approval and sign-off by the Infrastructure Maintenance Engineer, the interview revealed that only the East Midland route currently utilises the “Change Control App”. Other routes limit formal change control processes to Capex works, excluding the Opex funded AM-led vegetation programme. The inconsistencies suggest that the change control process is not coherent within the region and may not be sufficiently robust, creating uncertainty regarding consistent involvement of MDU teams in the assessment and management of risks. This could potentially undermine transparency in implementing required risk mitigation measures.
146. The region noted that its finance team is developing a change control procedure. However, the process will focus only on the MDU ABP budget and workbank, rather than encompassing the broader AM-led vegetation programme overseen by Route Engineers. This approach would hinder addressing systemic governance gaps across the region for vegetation management.
147. With respect to evaluation, the regional referenced factors such as train delay minutes, costs, vegetation-related incidents, and autumn performance. However, these considerations predominantly emphasise performance metrics. In addition, there is insufficient evidence of a structured impact assessment framework adopted, except for the East Midland route applying CRAM. As a result, transparency surrounding informed and balanced decision-making for changes remains limited.

NW&C

148. NW&C utilises the change control system within the Asset Workbank System (AWS) to manage its AM-led vegetation programme workbank. However, the region has yet to adopt a defined change control process or framework to systematically assess the impact of workbank modifications. This results in change assessments that are largely ad hoc, with limited evidence that considerations beyond financial and delivery implications such as safety, performance, asset condition, or environmental sustainability are being robustly evaluated or recorded.
149. Local consultations for AM-led programme workbank changes between MDUs and route engineers are described to be informal and inconsistently implemented across different routes. As discussed previously, such informal consultation had led to

instances where both AM or RE team and MDU team planned works at the same sites, resulting in inefficiencies (paragraph 73). Interviews with selected MDUs in NW&C further revealed that changes could be conveyed to MDU teams without prior consultation. This lack of prior consultation means that MDU teams are not sufficiently engaged in impact assessments or in agreeing mitigation measures, potentially leading to gaps in risk management and a lack of transparency in decision-making.

Scotland

150. Scotland responded that the Regional Asset Manager (RAM), Head of Maintenance, and Infrastructure Director (ID) are involved in approving changes within the AM-led large-scale vegetation control intervention workbank. Approvals are communicated via email correspondence and discussed at four-weekly governance meetings attended by representatives from RAM, Works Delivery, and MDUs.
151. There is no specific tool or framework outlined for assessing impacts of changes to the Asset Management-led vegetation programme workbank, which creates uncertainty around how decisions on mitigation measures are collectively agreed and then implemented. During interviews, the Scotland RAM team stated that the recent adoption of the Digitalised Lineside Inspection (DLI) tool would support safety impact assessments. Additionally, the region was developing a deferred maintenance and change control process specifically for vegetation, designed to formalise decision-making and risk management related to deferral.

Southern

152. Southern is delivering its Asset Management-led vegetation works as “Land Management” under Capex (refer to paragraph 50), which subjects to change control and deferred renewals governance processes as outlined in NR Standard NR/L2/HAM/02201 and the CRAM assessment framework.
153. Although the region included an assessment template within the RFI, it did not provide further supporting examples of practical assessments across different impact areas as specified by CRAM. During interviews, the regional asset management team acknowledged that, aside from leaf-fall performance, which can be measured through improvements in SPADs during autumn or reductions in station overruns. There remain challenges in correlating workbank volume outputs with targeted performance outcomes such as delay minutes. Additionally, the regional assessments tend to focus predominantly on performance and reputational impacts, which leads to uncertainty about a balanced evaluation of other impact areas under the CRAM framework.

154. The Eastleigh Delivery Unit (DU) in Wessex provided a detailed response and examples demonstrating how reprioritisation of works in its ABP workbank is managed with reference to NR Standard NR/L3/MTC/MG0176/11¹². The examples illustrated instances where DU reprioritised certain vegetation Work Orders five or six times due to awaiting completion of AM-led vegetation programmes by external supply chain for compliant vegetation profiles. DU reported that risks of vegetation striking trains are evaluated using Automated Intelligent Video Review (AIVR) imagery prior to approval for reprioritisation. Should the footage indicate a high risk of contact between vegetation and trains, reprioritisation is denied and work is escalated as a high-priority task.
155. Nonetheless, it remains unclear regarding whether and to what extent recurring knock-on impacts on MDU workbank prioritisation, stemming from delays in the AM-led vegetation workbank, are thoroughly considered in impact assessments and appropriately escalated through the region's change control process.

W&W

156. The region outlined its Project Wise system used for workbank development and management in the RFI responses. The system however primarily supports project delivery, scope and programme changes with region's supplier chains, focusing on procurement and financial considerations.
157. The routes' AM teams referenced a "Vegetation Management Strategy Board", where delays to the AM-led vegetation programme workbank are discussed. Other assurance meetings include the OTME compliance meetings, Head of Engineering and Asset Management Periodic Business Review and Route Reliability Governance meeting which is attended by maintenance representatives under routes' Infrastructure Director teams.
158. Currently there is no specific tool or framework employed by both routes to assess the impact of changes to the Asset Management-led vegetation programme workbank. The AM teams engage in working-level liaison meetings between MDU team and Works Delivery to discuss workbank changes. However, the process for change control, including escalation of risks identified from impact assessment to the governance forums described, remains undefined. Both routes have acknowledged the need to formalise the change control process in order to strengthen feedback loop and enhance monitoring.

¹² NR/L3/MTC/MG0176/11 Issue 1, 'Prioritisations, reprioritisations and cancellations'

159. Overall, while NR has established frameworks for assessing impacts of deferred or altered interventions in the context of asset renewals, evidence indicates that equivalent approaches are not applied consistently to vegetation management works, which is typically treated as maintenance activity. As a result, the assessment of impacts arising from changes to AM-led vegetation programme works varies across regions and routes.
160. In few cases, changes or deferrals are supported by impact assessments, while in others the basis for risk acceptance, escalation, or review is less clearly articulated. This variability reflects the absence of a consistently applied change control approach for vegetation management.
161. The absence of a clearly defined relationship between initial vegetation requirement decisions (section 3.3.2) and subsequent change control processes limits the ability to assess cumulative risk, monitor the effects of repeated deferrals, or evaluate whether altered interventions continue to support delivery of intended outcomes.
162. Effective change management relies on clear linkage to the original decision rationale and intended outcomes. Where this linkage is not explicit, opportunities for learning, assurance, and improvement are reduced, and transparency for leadership and stakeholders is constrained.

Enabler 9 – Consistent change control and impact assessment

A consistent approach to managing changes to vegetation programmes, including structured impact assessment and visibility of cumulative risk.

4. Conclusions

163. This review found that Network Rail has taken steps to strengthen aspects of vegetation management, including developments in planning and delivery arrangements, inspection practices, and technical standards. Increased attention to vegetation condition quality and the gradual adoption of new inspection technologies have improved visibility of known issues and supported more informed interventions. These developments indicate growing capability and intent. However, they have not yet resulted in a coherent, system-wide approach to managing vegetation as an asset, and understanding of vegetation risk, performance, and long-term outcomes remains uneven across the organisation.
164. Vegetation management is not yet being managed as a fully integrated system. Decision-making, planning, delivery, assurance, and change control operate through multiple, locally optimised mechanisms that are not consistently connected through a common strategic and governance framework. As a result, while effort is applied at a local level to manage vegetation risks, Network Rail cannot consistently demonstrate a clear line of sight between vegetation management effort (i.e. outputs) and the outcomes it is intended to deliver, either vertically through governance layers or horizontally across workstreams.
165. In the devolved operating environment, this gap manifests in several interconnected ways. Vegetation management decisions are informed by a range of local frameworks, individual teams' judgement, and emerging technical standards, but there is limited evidence of a shared decision governance structure that assures consistency and transparency of intent, prioritisation, and trade-off across regions and routes. Some good or improved practices were identified locally in North East route in Eastern, Scotland, Wessex route in Southern and Wales route in W&W.
166. Performance review has relied on a mixture of national and local measures that fulfil different assurance roles. However, these do not collectively provide a coherent view of whether the vegetation management regime is becoming more preventive, more resilient, or more effective over time. This is attributed in part to the use of a national performance metric that emphasises output-based volume delivery rather than outcome-oriented measure. Changes to vegetation programme wide works, including deferrals, reprioritisation, and scope adjustments, are not consistently governed through structured impact assessment. Vegetation has been treated as maintenance activity rather than being managed through a coherent system-level asset management framework.

167. The Network Rail “Lineside Technical Strategy” published during this review represents an important step in clarifying corporate ambition and technical direction for lineside management. Similarly, new standards such as NR/L2/OTK/5201/05 has strengthened the technical basis for vegetation evaluation and risk-informed decision-making. However, these initiatives operate primarily at a corporate or technical level and do not, in themselves, address how strategic intent is translated into consistent local targeted outcomes, nor how interpretation and implementation are governed, reviewed and learned from across a devolved organisation. In the absence of a defined governance layer, implementation of standards and strategies is likely to remain variable, particularly while supporting vegetation risk models and decision tools continue to mature.
168. The review recognises that Vegetation Management Plans required under Network Rail standards are essential planning and delivery tools. However, findings indicate that without a governance-supported strategy, the consistency, comparability, and assurance of these plans cannot be reliably demonstrated across the network. This limits confidence for funders, regulators, and railway users that vegetation management is being prioritised, adapted, and improved in a coherent and outcome-led manner.
169. Taken together, the evidence suggests that vegetation management is constrained by the absence of a clear vegetation management strategy and supporting governance arrangements that bring existing processes together into a single coherent system. Without this integration, it remains difficult to demonstrate value for money, manage cumulative risk, or adapt the vegetation regime in response to regulatory requirements and changing environmental and operational pressures.
170. The findings of this review point to a set of systemic enablers of change that are required to strengthen integration, assurance, and long-term performance. Addressing these enablers requires a shift in focus toward the system that connects strategy, delivery and assurance, and enables a closed feedback loop.
171. A clear governance framework, aligned to strategy and supported by transparent performance review and robust change control, is necessary to ensure that vegetation management decisions are consistent, evidence-based, and continuously improved across the network. The recommendations are therefore intended to strengthen the conditions under which existing standards, plans, and delivery arrangements can operate more effectively and with greater assurance to funders, regulators and stakeholders.

5. Recommendations

This review has made four recommendations. Each recommendation below is structured to address one or more systemic enablers of change identified through this review. We will monitor Network Rail's progress and actions to address these recommendations.

Recommendation 1: Route-based Vegetation Management Strategies

The intent of this recommendation is for Network Rail to assure that vegetation management is guided by a clear, outcome-led strategic direction at route level that reflects local risks, operational context, financial impacts of vegetation-related issues and environmental considerations, while remaining aligned with corporate ambitions. It will improve clarity to NR corporate, regulators and funders how decisions are made and justified by routes.

Related enabler of changes: Enabler 1, 3, 4 & 6

Network Rail should assure that sustained Route-level vegetation management strategies are developed and implemented to translate corporate technical intent into locally defined approaches, priorities and funding requirements within the devolved operating model, supporting Funding Period 1 plan development and assurance.

These strategies should provide a clear framework that defines intended vegetation maintenance approaches, outcomes expectations, and governance for prioritisation and management of trade-offs between competing objectives (risk, cost, performance and environment considerations) across vegetation workstreams.

They should set out how strategic outcomes are translated into delivery activity, how strategic decisions are governed and reviewed, and how changes to management approaches and agreed plans are assessed and managed. Some good practice was identified in Wales route of W&W in this review.

In doing so, the strategies would support a clearer and auditable line of sight between strategic intent, delivery and review, and be capable of informing assurance and funding decisions, including alignment with the funding periodic review process and time horizon in long run. The strategy should be sufficiently clear and transparent to enable external stakeholders, including funders and regulators, to understand how vegetation management priorities, risks, and outcomes are being managed over time.

Owner: Region Asset Manager and Route Infrastructure Engineer or equivalent

Recommendation 2: Risk Assessment and Change Impact Assurance for Vegetation Workbank

The intent of this recommendation is to assure that vegetation management decisions and risks arising from subsequent changes to approved plans or programmes are governed and assured in a consistent and transparent manner across the network.

Related enabler of changes: Enabler 1, 5, 6 & 9

Technical Authority should review and strengthen the governance arrangements for managing changes to Asset Management-led (non-DU) vegetation workbank and assessing corresponding risks arising from changes. This responds to the findings relating to variability in how vegetation-related drivers of workbank and changes are governed, documented and assured across regions and routes, limiting organisational visibility and system-level assurance.

The review should consider whether existing standards, guidance, supporting documents and vegetation tools remain sufficient in a devolved operating environment, and whether regions and routes are applying them consistently. The review should result, where appropriate, in creation or revision of governance process, tools and vegetation risk model or equivalent suitable to support:

- consistent interpretation and application of vegetation risk assessment outputs;
- coherent management of changes to AM-led vegetation workbank; and
- assessment of risks arising from deferrals, re-prioritisation and scope changes across regions and routes.

In doing so, any revised or new governance arrangements would improve visibility of decision rationale, risk acceptance, mitigation measures and change impacts, enabling effective system-level oversight, assurance and learning across the network.

Owner: Technical Authority

Recommendation 3: Vegetation Maintenance Reporting, Framework and Its Application

The intent of this recommendation is to assure that vegetation maintenance reporting arrangements provide coherent, meaningful and reliable information to support effective oversight, planning, and assurance of vegetation management activity across the network.

Enabler of changes: Enabler 1, 2, 6, 7 & 8

Recommendation 3A - Regions/ Routes should report all vegetation maintenance outputs (volumes and costs) delivered across vegetation workstream in a coherent, consistent manner and compliance with Network Rail standards (e.g. NR/L3/MTC/MG0176). Such reporting is required to meet the “outcome metric” reporting requirement agreed through the PR23 Final Determination.

Owner: Region Asset Manager and Route Infrastructure Engineer or equivalent

Recommendation 3B - Technical Authority should review the effectiveness and application of its maintenance reporting framework for vegetation management works. This is to address the findings that inconsistent application of asset information systems has resulted in fragmented maintenance reporting misaligned with funding allocation. These issues currently limit integrated oversight, planning and assurance across the organisation.

The review should consider:

- how reporting requirements are applied consistently across different vegetation workstreams;
- whether reported maintenance activity can be consistently classified and compared across vegetation workstreams to enable understanding of the balance between different types of maintenance intervention; and
- whether reporting provides sufficient transparency to enable effective oversight by leadership, funders and other external stakeholders.

Owner: Technical Authority, Network Technical Head of Lineside and Head of Maintenance

In doing so, any improvements to vegetation maintenance reporting would provide a coherent and complete evidence base that enables future analysis of maintenance effectiveness, supports assurance of value of money, and provides a foundation for more outcome-focused performance review.

Recommendation 4: National Vegetation Metrics and Performance Measures

The intent of this recommendation is to assure that national vegetation performance measures provide a coherent, balanced and outcome-focused view of vegetation management, covering both delivery outputs and the effectiveness of the maintenance approach.

Enabler of changes: Enabler 2, 3, 5, 6 & 8

Network Rail should review its national suite of vegetation performance metrics to assess whether they are fit for purpose, consistently applied across regions and routes, and capable of supporting effective assurance of vegetation maintenance approach, risk management and long-term performance across the network.

The review should consider how national measures interact with local and route-level metrics and whether, collectively, they enable a complete and effective feedback loop to support learning, continuous improvement and strategic oversight. This should include consideration of whether existing measures enable enhanced understanding of:

- the balance between different types of vegetation maintenance interventions (e.g. proactive maintenance clearance, preventive maintenance to sustain resilient lineside vegetation profile and reactive works to address defects or faults);
- the adherence with maintenance plan(s) and schedules derived from regional or route's maintenance strategy;
- the effectiveness of maintenance executed in delivering targeted outcomes in performance and stewardship; and
- the extent to which the maintenance regime is becoming more preventive and resilience over time.

In doing so, any improvement in national metrics would strengthen assurance, improve transparency and provide clarity on how local activity and delivery outputs contribute to strategic vegetation management outcomes, with clear links to maintenance reporting, funding decision and preventive maintenance assurance.

Owner: Technical Authority, Network Technical Head of Lineside

Glossary & Definitions

Terms or Acronyms	Definition
ABP	Activity Base Planning
AIVR	Automated Intelligent Video Review
AM	Asset Management
AMS	Asset Management System is composed of integrated elements within an organisation designed to establish, maintain and improve asset management policies, objectives and processes. The aim is to systematically direct, coordinate and control asset management in order to achieve organisational objectives and to ensure continuous improvement.
AS	Area Services
AWS	Asset Workbank System
Capex	Capital Expenditure
CCT	The Common Consequence Tool banding is a score based on the impact of a derailment as a result of the proximity to infrastructure (such as tunnels) and line usage (e.g., Speed and Tonnage)
CP	A control period (CP) is the period to which an access charges review (e.g. a periodic review) applies. Control periods are typically five years in length, but maybe shorter or longer depending on what the regulator decides as part of the review.
CP6	Control Period 6 (CP6) is from April 2019 to March 2024.
CP7	Control Period 7 (CP7) is from April 2024 to March 2029.

Terms or Acronyms	Definition
CRAM	Corporate Risk Assessment Matrix (CRAM) is a matrix which is referred in Network Rail Standard NR/L2/HAM/02001 to carry out risk assessment on four impact areas namely Safety / Health / Environment, Performance, Finance, Satisfaction & Reputation.
DEAM	Director of Engineering and Asset Management.
DLI	Digitalised Lineside Inspection
Ellipse	An integrated asset management and work management system which facilitates planning work performed on the railway infrastructure. It includes a register of maintenance tasks and asset attributes.
ELR	Engineering Line Reference
ERR	Enterprise Risk Register
FP1	Funding Period 1 – the next five-year funding period from April 2029 to March 2034 (i.e. replacing Control Period 8)
FPR29	The new funding and outputs process for FP1, replacing the current periodic review process
ID	Infrastructure Director
IME	Infrastructure Maintenance Engineer
IMDM	Infrastructure Maintenance Delivery Manager
II	Infrastructure Intelligence
MDU/ DUs	Maintenance Delivery units (MDUs) are Network Rail’s maintenance teams based in geographic locations across its network.

Terms or Acronyms	Definition
MNT	Maintenance code
MST	Maintenance Scheduled Task - a cyclic inspection or maintenance schedule task which has a frequency prescribed in Network Rail standards which is scheduled using Ellipse
NR	Network Rail
OLE	Overhead Lineside Equipment
OPEX	Operational Expenditure
ORR	Office of Rail and Road
OTME	Off-Track Maintenance Engineer
PPM	Planned Preventive Maintenance
PSM	Passenger Safety Metric
PR23	The 2023 periodic review of Network Rail (relating to CP7).
RAIB	Rail Accident Investigation Branch
RAM	Region/ Route Asset Manager
RE	Route Engineer
Region	Network Rail's five operating regions – Eastern, North West & Central, Scotland, Southern and Wales and Western.
RF	Rolling Forecast

Terms or Acronyms	Definition
RFI	Request for Information
RPP	Railway Planning and Performance
R&D	Research & Development
SAE	Senior Asset Engineer
SBP	Strategic Business Plan
SID	Southern Integrated Delivery
SJN	Standard Job Number – Standard Job Is a template to create a Work Order for a set task that can be performed on the railway infrastructure. This will include the specific description of the activity and has a Norm Time, crew size, minimum protection requirements and unit of work assigned to it.
SM	Section Manager
SPAD	Signal passed at danger
StrEAM	(Lineside) Strategic Engineering & Asset Management
TA	Technical Authority (TA) is a central business unit within Network Rail that, among other things, sets technical policies and standards for the routes, the System Operator and the wider rail industry.
TAR	Targeted Assurance Review
TARR	Train Accident Risk Reduction – a metric used by Network Rail to measure performance
TME	Track Maintenance Engineer

Terms or Acronyms	Definition
TOCs	Train operating companies (TOCs) run the (passenger and freight) trains and services on the network. The representative body for the passenger operating companies is the Association of Train Operating Companies (ATOC).
TV	Temporary Variation (TV) is a Network Rail's internal process outlined in its Standard NR/L2/CSG/STP001/04 Issue 8 (04 June 2022). The part of Network Rail which does not comply with specified requirement in its standard for a predetermined period of time shall develop and implement an action plan to achieve full compliance with the requirement, include any interim measures to identify and control risks that might arise pending compliance; and monitor progress against the plan.
VMP	Vegetation Management Plan
VMS	Vegetation Management Strategy
WD	Works Delivery
WO	Work Order
WSF	Wrong-Side Failure
WAIF	A WAIF (Work Arising Identification Form) is created manually or electronically for recording defects that need rectification. It is the responsibility of Section Manager / Works Delivery Manager to ensure that the WAIF has been completed correctly and prioritised. The WAIF will be used to Schedule work through the Work Order (WO).

Annexes

Annex A - RFI Questions to Technical Authority

RFI Questions

1. Outline and describe NR asset policy, technical strategy, strategic goals and objectives set for Lineside Vegetation asset group for CP7 and beyond.
2.
 - a) What are the national metrics used to assess and monitor region's vegetation compliance against Network Rail's standards for providing assurance and maintaining corporate oversight? What is the rationale behind the derivation(s), including Network Rail's definition of "compliant" vegetation profile?
 - b) What is Technical Authority's view on the effectiveness of these metrics to monitor vegetation compliance over time? Is there any enhancement being considered by Technical Authority?
3.
 - a) What are the national key performance indicators (KPIs) such as Train Accident Risk Reduction (TARR) used to measure region's performance in delivering vegetation management related works? Please provide the corresponding definitions.
 - b) What is Technical Authority's view on the challenges and opportunities of using these KPIs to differentiate regions' delivery performance in each vegetation management work type below?
 - Inspection (cyclic), corrective and reactive maintenance including works arising from inspections and mitigation measures due to changes in workbank;
 - Planned large-scale vegetation management interventions such as clearance and/ or control works to meet compliance with NR standards and other relevant legal requirements;
 - Planned preventive maintenance to manage overgrowth / regrowth to sustain compliant vegetation profile, including any unwanted growth that could harm to other wildlife;
 - Combined large-scale vegetation control interventions and preventive maintenance (sometimes referred as "Cut & Maintain" programme approach in Network Rail).

- c) What is Technical Authority's view on the effectiveness of these KPIs in Q3a in weighting up impacts of delivery performance in different vegetation work types on safety and compliance outcomes?

4. What is the existing central system available to plan and record actual delivery of different vegetation management work types (see Q3b for the definitions of work types)?

Please provide guidance document of system, details and examples of how different types of vegetation management works can be distinguished within the system.

5. What is national guidance and/or tool available to evaluate and quantify the impact of vegetation workbank changes on outcomes?

Please provide the following details in the responses.

- How the guidance sets out the process to support regions to inform their decision making on mitigation of risks arising from vegetation management workbank changes.
- List of impact/outcomes areas evaluated and how such as assessment templates, scoring guidance etc.
- Any improvement that Technical Authority recommends regions should make on evaluation of impact of vegetation workbank changes in CP7 and beyond, if any.

Annex B - RFI Questions to regions

- 1a)** Provide vegetation compliance profile status against NR standards at the exit of CP6, corresponding CP7 targets and the total mileages for each route in your region.

Where region/ route is in process of adopting the Digitalised Lineside Inspection (DLI) to obtain a more accurate position of compliance status, this compliance % can be estimation based on the best available information at the time of response.

However, route/ region shall provide a time-bound plan in its responses when a more accurate position will be available.

Routes	Total mileage of Lineside covered	Vegetation Compliance Profile Status at CP6 exit (%)*	CP7 Vegetation Compliance Profile Targets (%)*

- 1b)** What other outcome target(s) has the region and/or route(s) set to achieve by the end of CP7?
- 2a)** Who at the region's senior leadership level has the overall accountability for the planning and delivery of vegetation maintenance, compliance with standards and delivering outcomes? Please support your answers with an organisation chart.
- 2b)** For each type of vegetation maintenance works, provide the latest organisation chart highlighting key roles that are responsible for the areas outlined in the table below, including communication links between these roles.

Vegetation Maintenance Work Types	Roles that are responsible for following areas of vegetation workbank management				
Vegetation Maintenance Work Types	Budget Holder / Control	Planning	Delivery Agent *	Monitoring of delivery performance against plan	Approval of workbank changes
Inspection, corrective & reactive maintenance					

Planned large-scale vegetation control interventions					
Planned preventive maintenance to manage overgrowth/ regrowth and sustain compliance					
Combined large-scale vegetation control interventions and preventive maintenance programme works					

*NR Delivery Units or Works Delivery / External supply chains.

3. With reference to CP7 Strategic Business Plan (SBP) submitted, your region outlines the following costs to be spent on vegetation management in CP7.

	Eastern	NW&C	Southern	W&W	Scotland
Vegetation Management Works	£30m	£49m	£53m Capex	£31.5m Capex	£54m
Vegetation Inspections and Reactive Works			£33m	£40m (post-efficient)	
Ash Dieback Management Cost	£58m	£20m	Covered in Capex above	£25m (post-efficient)	£23m

- a) Please confirm the above is your current budget baseline allocated to vegetation for CP7. If not, please provide the latest budget plan; and explain the context of differences and associated impacts on delivering outcomes in safety and train performance in CP7.
- b) Provide the breakdown of costs in SBP or the revised budget plan with the associated details of each vegetation maintenance work type expected to be delivered **by the end of CP7** in the table below.

Vegetation Maintenance Work Types	Total Mileages covered	Total Volumes (m ²)	Cost (£m)
Inspection, corrective & reactive maintenance			
Planned large-scale vegetation control interventions			
Planned preventive maintenance to manage overgrowth/ regrowth and sustain compliance			
Combined large-scale vegetation control interventions and preventive maintenance programme works			

4. Explain the management system / tools and processes being used to plan and monitor delivery of **each type** of vegetation management works. Please support your answers with screenshots of system, KPIs used for performance management.
- 5a) What governance process and approach does the region follow to initiate, plan, develop and approve the vegetation maintenance workbank delivered by non-MDU organisations? Please cover below points as minimum in your responses.
- Level of consistency in applying process and approach between routes across your regions.
 - Coordination between the non-MDU vegetation maintenance workbank and the in-house MDU workbank in the region's CP7 delivery plan. This should include, but not limited to, timing, scoping works, intervention types, locations, resources, prioritisation, record of planned works etc.
- 5b) Provide a full list of planned large-scale vegetation control and preventive maintenance workbank and "Cut & Maintain" programme works to be delivered by **non-MDU organisations in CP7** under the budget described in Question 3. The list should include the following details as minimum.
- Duration and timescales (Year of delivery)
 - Work site locations and/or route locations
 - Mileages covered
 - Drivers of works
 - Type of anticipated interventions required (e.g. one-off large vegetation clearance; planned preventive maintenance to manage regrow and maintain compliance; "Cut & Maintain" programme work)
 - Baseline volumes and costs
 - Budget approval status
 - Metrics used to measure outcome achievement (e.g. train performance, safety performance, compliance etc.)
- 6a) What processes **and** tools does the region use to evaluate and quantify the impact of non-MDU vegetation maintenance workbank changes or under-performance in delivering outputs (cost, volumes etc.). Please include the following in your answer as minimum.
- List of outputs and outcome areas evaluated and how.

- How and where are the results of evaluation recorded?
- Who undertakes evaluations?

6b) What control process and information does the region use to justify and inform the needs of non-MDU vegetation maintenance workbank changes? Provide the following as minimum to explain.

- Who are the key stakeholders (internal and external) involved / engaged for the proposed workbank changes?
- Who need to review the proposed workbank changes?
- Who has the accountability or authority to approve changes?
- How is the agreed change documented?
- What other system or documents have to be updated upon request of changes and following approval of changes and implementation of changes?

6c) Explain how in-house MDU vegetation maintenance workbank is considered in the review and control process when non-MDU vegetation maintenance workbank is changed?

Annex C - Mapping Table of Recommendations and Enablers of Changes

Enabler of change	Descriptions (summary) of enabler	Rec 1	Rec 2	Rec 3	Rec 4
1	Integrated governance across vegetation workstreams	Applicable	Applicable	Applicable	
2	Transparent and comprehensive performance and reporting framework			Applicable	Applicable
3	A defined baselined preventive maintenance regime	Applicable			Applicable
4	Regional / route vegetation management strategies	Applicable			
5	Coherent decision-making framework and vegetation risk model		Applicable		Applicable
6	Effective review mechanisms and feedback loops	Applicable	Applicable	Applicable	Applicable
7	Fit-for-purpose asset data and information			Applicable	

Enabler of change	Descriptions (summary) of enabler	Rec 1	Rec 2	Rec 3	Rec 4
8	Intelligent use of technology and monitoring tools			Applicable	Applicable
9	Consistent change control and impact assessment		Applicable		



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