

Oliver Stewart
RAIB Recommendation Handling Manager



24 July 2026

Mr Andy Lewis
Deputy Chief Inspector of Rail Accidents

Dear Andy,

RAIB Report: Fatal accident at Grimston Lane footpath crossing, Suffolk on 23 February 2016

I write to provide an update¹ on the action taken in respect of recommendation 2 addressed to ORR in the above report, published on 21 November 2016.

The annex to this letter provides details of actions taken in response to the recommendation and the status decided by ORR. The status of recommendation 2 is **'Closed'**.

We do not propose to take any further action in respect of the recommendation, unless we become aware that any of the information provided has become inaccurate, in which case I will write to you again.

We will publish this response on the ORR website.

Yours sincerely,

Oliver Stewart

¹ In accordance with Regulation 12(2)(b) of the Railways (Accident Investigation and Reporting) Regulations 2005

Recommendation 2

Recognising Network Rail's commitment in its 'Transforming Level Crossings' document, to equip all existing passive crossings with automatic warnings by 2039, the intent of this recommendation is that the risk to vulnerable users at passive level crossings is reduced in an expedient manner during the interim.

Network Rail should:

- i. review its criteria for determining when it is appropriate to include an allowance for vulnerable users when calculating the required warning time at level crossings that are used by pedestrians; this review should take into account forecast demographic changes, in particular the ageing population;
- ii. review the allowances made for vulnerable users to take into account good practice and research; and
- iii. use the above to review levels of risk at existing passive level crossings to inform decisions to prioritise the crossings that are to be upgraded with the addition of automatic warning systems, or otherwise improved.

ORR decision

Following review of the closure statement and supporting evidence, we are satisfied that Network Rail has adequately addressed the requirements of Grimston Lane Recommendation 2 and that the recommendation can be considered for closure.

In relation to recommendation point (i), Network Rail has undertaken a review of the criteria used to determine when a vulnerable user allowance should be applied and has embedded revised requirements within a new Network Rail standard, 'Calculating level crossing user traverse times'. The new standard moves away from reliance on proportions of vulnerable users and instead requires Level Crossing Managers to consider the needs of individual vulnerable users, including the ageing population, using local knowledge, census data, and structured professional judgement.

In relation to recommendation point (ii), Network Rail commissioned research into pedestrian traverse speeds and benchmarked its approach against other sectors and railway administrations. The conclusion of that work was that the existing vulnerable-user traverse speeds remain appropriate. Whilst the traverse speeds themselves have not changed, the review was evidence-based and has resulted in strengthened application criteria and governance arrangements.

In relation to recommendation point (iii), Network Rail has demonstrated that consideration of vulnerable users is embedded within its risk assessment process through ALCRM, Narrative Risk Assessments and structured expert judgement. The new standard requires documentation of decisions relating to vulnerable users and traverse times, which provides greater consistency and traceability when prioritising interventions and improvements at passive crossings.

The strongest evidence supporting closure is the publication of a mandatory company standard which formalises the identification of vulnerable users, requires

consideration of demographic information and local conditions, mandates application of extended traverse times where concerns exist, and records the rationale for decisions within risk assessments.

The only limitation is that the closure statement provides limited evidence of specific reviews already undertaken at existing passive crossings as a direct consequence of the recommendation. However, given that the recommendation sought changes to the methodology and decision-making framework rather than upgrades at named crossings, the revised standard establishes an enduring process through which those reviews and prioritisation decisions will be undertaken going forward.

Overall, we consider that Network Rail has met both the intent and substantive requirements of the recommendation, and we would recommend closure.

1. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Network Rail has:

- taken the recommendation into consideration; and
- has taken action to close it.

Status: Closed.

Previously reported to RAIB

2. On 22 November 2017 ORR reported the following:

We are content with the approach Network Rail is taking to address the recommendation and the timescales proposed.

Update

3. Following timescale extensions, Network Rail provided the following closure statement and supporting document on 19 May 2026:



[N252-11] Grimston
Lane Rec 2.docx



[N252-11]
NR_L3_XNG_003_02

Previously reported to RAIB

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- ii. review the allowances made for vulnerable users to take into account good practice and research; and
- iii. use the above to review levels of risk at existing passive level crossings to inform decisions to prioritise the crossings that are to be upgraded with the addition of automatic warning systems, or otherwise improved.

ORR decision

1. We are content with the approach Network Rail is taking to address the recommendation and the timescales proposed.
2. After reviewing the information provided, ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Network Rail has:
 - taken the recommendation into consideration; and
 - is taking action to implement it by 28 February 2018

Status: Implementation ongoing. ORR will advise RAIB when actions to address this recommendation have been completed.

Information in support of ORR decision

3. On 2 October 2017 Network Rail provided the following initial response:

A two-phased approach is necessary to deliver this recommendation; review and implementation the latter phase/bullet point 3 above, subject to the review findings and agreed business strategy.

Network Rail will further evaluate the current approach to its application of vulnerable user criteria when calculating the required warning time at footpath, bridleway and private user worked crossings used by pedestrians. In doing so the central level crossing team will review existing research and internally held intelligence. The review will centre on the current application of enhanced traverse time for persons with physical, mental or impaired mobility. It will also

look to good practice measures which may reduce risk and improve safety. The review will also take account of imported risks which could be incurred through process changes. This includes risk transfer on the network and performance and train running sustainability.

Evaluation will be led centrally with the support of the vulnerable user peer review group. The group, represented by members of the central level crossing team, Route Level Crossing Managers, Level Crossing Managers and legal services, met earlier this year to channel further improvements to guidance material. Progress has already been achieved in defining user vulnerabilities to assist identification of vulnerable users and direct risk management activity accordingly. Additional expertise in data analysis will be sought to aid the group. A paper which will outline the findings of this review, propose options and detail any adverse impact from changes in protocol will be prepared and presented to the industry's Level Crossing Strategy Group (LCSG). The group will help to direct the formal approach and any subsequent business change. RAIB and ORR are both represented at LCSG meetings.

Implementation/bullet point 3 of the recommendation will require additional time determined by the output of the work.