

**From:** Burton, Louise <[REDACTED]@naturalengland.org.uk>

**Sent:** 03 November 2021 17:39

**To:** East Anglia One <[EastAngliaOne@planninginspectorate.gov.uk](mailto:EastAngliaOne@planninginspectorate.gov.uk)>; East Anglia Two <[EastAngliaTwo@planninginspectorate.gov.uk](mailto:EastAngliaTwo@planninginspectorate.gov.uk)>

**Cc:** Williams, Emre <[REDACTED]>

**Subject:** Further Advice to inform the Secretary of State's HRA for East Anglia 1N and East Anglia 2

Dear Sirs,

Re: Additional analysis to inform SNCB recommendations regarding collision risk modelling - BTO Research Report No.739 (2021)

As you will be aware from our letter dated 26<sup>th</sup> August 2021, Natural England recently commissioned BTO to undertake an analysis that combines the avoidance rates from various sites as presented in Cook et al. (2014), with those derived from the ORJIP study (Bowgen & Cook 2018) and any additional sites where the appropriate data are available, in order to provide avoidance rates based on data across a range of sites where possible. This report was published online at:

[REDACTED]  
[REDACTED]

The data used to inform the report and the R code were made available by the BTO alongside the report, to allow interested parties to review the report and the evidence base for its recommendations. We have been contacted by a consultant who has reviewed that material and raised concerns with the inclusion of one of the post-construction studies within the report.

Natural England has reviewed these concerns and discussed them with the author of the report and the other SNCBs. Having carefully considered the issues raised we have concluded that they present reasonable grounds for the exclusion of that study from the findings of the report. Accordingly, Natural England has concluded that it is not appropriate to use the recommended rates in the BTO report.

Therefore our advice is that CRM modelling should use the avoidance rates previously advised by SNCBs i.e. those presented in the 2014 SNCB advice note based on Cook et al (2014). These are available at:

[REDACTED]  
[REDACTED]  
[REDACTED]

Natural England sincerely apologise for any inconvenience or additional work caused by our previous advice to developers and regulators to start using the recommended avoidance rates. We are working hard to identify a course of action to ensure that any future SNCB recommendations regarding avoidance rates are robust and can be adopted with confidence by stakeholders.

We will continue to keep you updated on this matter. If you have any questions or would like to discuss the implications for your proposal, please do not hesitate to contact me.

Best Wishes

Lou

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