

From: planningcomments@highpeak.gov.uk
To: [Planning Comments \(HPBC\)](#)
Subject: Comment Received from Public Access
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Application Reference No. : HPK/2023/0192
Site Address: Land at Hogshaw Fairfield Buxton Derbyshire
Comments by: Paula Wakelin

From:
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Submission: Neither

Comments: Whilst in principle I do not object to the planning application, as I appreciate that new homes need to be built, I would like to make some comments on the supporting information provided. A Preliminary Ecological Appraisal Report (PEAR) has been submitted in support of the application. Firstly, Guidelines for Preliminary Ecological Appraisal produced by the Chartered Institute of Ecology and Environmental Management (CIEEM) state that "Under normal circumstances it is not appropriate to submit a PEAR in support of a planning application because the scope of a PEAR is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species". A PEAR does not include the impact assessment required to do this. Secondly, the PEAR is out of date (by its own admission) in April of this year. It should be updated and turned into an Ecological Impact Assessment (EcIA) to support the application. Ideally, the secondary protected species surveys would also be completed and the results and required licensing and mitigation reported therein. Finally, the Bird Survey Guidelines suggest that breeding bird surveys should always be scoped in unless robust justification can be provided. I did not see that to be evident in the PEAR provided.

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