



Beacon Fell View, Holiday Park, 11 Higher Road, Longridge, PR3 2TF

Statement of Case

Appeal under section 78 of the Town and Country Planning Act 1990
against a refusal to grant planning permission.



Contents

1.0	Introduction	2
2.0	Site and Surroundings.....	2
3.0	Reasons for Refusal.....	3
4.0	Discussion	4
5.0	Conclusion & Balance.....	6

Report Appendices

1. Letter from Simply Ecology – 20th October 2025
2. Topographical Site Survey

1.0 Introduction

- 1.1 This Statement of Case has been prepared by Jake Salisbury MA (Hons) MRTPI, Planning Partner at Graham Anthony Associates, in support of an appeal against the refusal of Ribble Valley Borough Council to grant planning permission¹. The application sought permission for the *‘proposed conversion of existing workshop to holiday cottage associated with Beacon Fell View Caravan Park. Proposed works to include creation of new first floor and balcony, alterations to roof and insertion of new windows’* and was refused by notice dated 24th September 2025.
- 1.2 This appeal is submitted because the applicant considers the Council’s refusal to be inconsistent with national and local planning policy and based on misinterpretation of technical information relating to ecology and biodiversity. The proposal accords with the Core Strategy and the NPPF’s presumption in favour of sustainable development, and the evidence presented within this Statement demonstrates that the reasons for refusal cannot be reasonably sustained.
- 1.3 This appeal statement is also accompanied by a letter from *Jason Reynolds MSc MCIEEM Lead Ecologist at Simply Ecology*, confirming that no bats will be affected by the proposal and that the development is de minimis with respect to BNG.

2.0 Site and Surroundings

- 2.1 The appeal site is accessed via Higher Road and is situated within the existing Beacon Fell View Caravan Park, which accommodates over 300 static caravans alongside a range of amenity buildings, including a swimming pool, bar, and associated leisure facilities. Geographically, the site lies approximately 0.6 miles northeast of Longridge. The park is a long-established rural holiday destination that makes a positive contribution to the local economy through visitor expenditure and employment opportunities. It comprises a mix of static caravans and supporting amenity structures set within an extensive, landscaped, and sloping site.

¹ Ref: 3/2025/0462

- 2.2 The appeal building is a former workshop located at an elevation of approximately 155 metres AOD. For context, a substantial number of caravans positioned to the north of the site are situated around 175 metres AOD, demonstrating that the workshop occupies a relatively low-lying position within the park. The combination of existing mature vegetation and intervening built form provides effective screening, ensuring the building is not visually prominent in either local or wider views.

The Proposed Holiday cottage

- 2.3 This appeal relates to the creation of a single holiday cottage through the conversion of an existing building on-site, limited to a modest ground floor footprint of 79.4 square metres. For viability reasons, the existing mono-pitched roof would be raised by 1.5 metres at its highest point to enable the creation of a two-bedroom layout. However, the single-pitched design would help to minimise the visual impact and maintain a low-profile form. Externally, the existing timber boarding would be replaced with high-quality burnt oak Marlinment cladding, and new glazing would be introduced to provide improved natural light and visual interest. A section of the building would also be reduced in height by 0.5 metres to accommodate a balcony feature, adding character and amenity value to the proposal. The roof would be finished in a modern corrugated material, complementing the building's rural context. Overall, the proposed design would deliver an aesthetically pleasing and sympathetically designed conversion that enhances both the appearance of the site and the surrounding parkland setting.

3.0 Reasons for Refusal

- 3.1 The reasons for this appeal as listed on the Council's decision notice include:

Visual Impact: "The proposal due to its size, scale and design would result in a visually prominent structure that would be harmful to the character and appearance of the Open Countryside, contrary to Policies DMG1 and DMG2 of the Ribble Valley Core Strategy and Policy LNDP3 of the Ribble Valley Core Strategy."

Ecology: “There is insufficient information submitted within the application to determine the presence of bats within the site. In the absence of this information, the proposal fails to fully assess the impact on protected wildlife species, contrary to Policy DME3 of the Ribble Valley Core Strategy and The Conservation of Habitats and Species Regulations 2017.”

Biodiversity Net Gain: “There is insufficient information submitted within the application to confirm that the development is 'de minimis' and exempt from Biodiversity Net Gain under Section 4 of The Biodiversity Gain Requirements (Exemptions) Regulations and the application therefore lacks sufficient information to determine the biodiversity pre-development value of the onsite habitat.”

3.2 We fundamentally disagree with Ribble Valley’s reasons for refusal as set out in the discussion section below.

4.0 Discussion

4.1 The Local Planning Authority acknowledges that the appeal proposal is acceptable in principle when assessed against Policies DMG2 and DMB3 of the Ribble Valley Core Strategy. In summary, the development represents a small-scale tourism proposal that supports the continuation and enhancement of an existing business through the conversion of an existing structure located within the heart of an established holiday park.

Visual Amenity/External Appearance

4.2 The building subject of this appeal is located within the heart of a vast existing holiday site, directly adjacent to the main amenity complex and other static holiday accommodation. The appeal includes no extensions to the footprint of the building and will simply raise the roof by 1.5 meters at the heights point, set against the backdrop of a sloping topography. The officers report points to the proximity of a public footpath and the potential impacts, however this footpath is within the holiday park it isn’t a tranquil rural setting as suggested. The design will visually enhance an existing building, and the transient nature of a footpath means that this location couldn’t be considered prominent.

Ecological Matters

- 4.5 The appeal is supported by a letter from Jason Reynolds MSc MCIEEM Lead Ecologist at Simply Ecology, confirming that no bats will be affected by the proposal and that the development is de minimis with respect to BNG. No contradictory evidence has been provided to challenge the result of the professional assessment provided.

5.0 Conclusion & Balance

- 5.1 The Council's refusal on visual impact grounds is unfounded. The appeal building is located within a low-lying part of an established commercial holiday park, well screened by mature vegetation and masked by existing site infrastructure. As such, the proposed alterations would have no adverse effect on the wider landscape character or visual amenity of the area.
- 5.2 The ecological reason for refusal arose solely from a typographical error in the initial report, which has since been formally corrected by Simply Ecology. A verification letter from qualified ecologist Jason Reynolds confirms unequivocally that the proposal would not affect any protected species and that it fully complies with Policy DME3 and the Conservation of Habitats and Species Regulations 2017.
- 5.3 Furthermore, the appellant has demonstrated that the development correctly qualifies as de minimis under the Biodiversity Gain Requirements (Exemptions) Regulations 2024, and is therefore exempt from mandatory Biodiversity Net Gain assessment. Supporting evidence from Simply Ecology substantiates this position, addressing and resolving any outstanding concerns previously raised by the Council.
- 5.4 Accordingly, the appellant respectfully invites the Inspector to allow the appeal and grant planning permission for the proposed development, subject to any reasonable conditions deemed appropriate.

GRAHAM ANTHONY ASSOCIATES

Simply Ecology Limited,
7-2-6 Cameron House,
White Cross,
South Road,
Lancaster,
LA1 4XF

Email: info@simplyecology.co.uk
[REDACTED]

20th October 2025

Appeal of Ribble Valley Borough Council Planning Application Refusal ref 3/2025/0462

Beacon Fell View Caravan Park, Higher Road, Longridge, PR3 2TF.

Dear Jake,

I write to confirm that Simply Ecology Limited was commissioned in October 2023 by Graham Anthony Associates to submit information as part of an appeal against refusal of planning application 3/2025/0462 for the above site in Longridge. I understand that ecology matters were two of the three grounds presented by the Local Planning Authority as reasons for the refusal of workshop conversion into the holiday cottage.

We address these ecology matters in this letter, which is to be made available to relevant third parties as part of your Appeal.

1.1 Context

- 1.1.1 Simply Ecology surveyed the site and wrote the report 'Beacon Fell View Holiday Park, Longridge, PR3 2TF- Bats: building Inspection and Activity Surveys Ref SE/GANQ003/02 (June 2025)'.
- 1.1.2 The relevant extract from the Planning Officer report and the Decision Notice identified two grounds for refusal, which were worded as follows:

Landscape/Ecology.

1) *There is insufficient information submitted within the application to determine the presence of bats within the site. In the absence of this information, the proposal fails to fully assess the impact on protected wildlife species, contrary to Policy DME₃ of the Ribble Valley Core Strategy and The Conservation of Habitats and Species Regulations.*

- 1.1.3 This was supported in the Planning Officer report by the following:

"With regards to bats, whilst the report states that the works can go ahead without an EPS licence as only low levels of activity were recorded on the follow up surveys in May 2025, the report states that "it is concluded that the proposed works will impact on local bat populations". This is ambiguous and suggests that the proposed development would have an

impact on the protected species and in the absence of a conclusive report, there is insufficient information for the Local Planning Authority to fully assess the impact on bats.”

2) *There is insufficient information submitted within the application to confirm that the development is 'de minimis' and exempt from Biodiversity Net Gain under Section 4 of The Biodiversity Gain Requirements (Exemptions) Regulations and the application therefore lacks sufficient information to determine the biodiversity pre-development value of the onsite habitat.*

1.1.4 This was supported in the Planning Officer report by the following:

“With regards to Biodiversity Net-Gain, the application form states that the site is over 25sqm but there is no on-site habitat. When the Planning Officer visited the site, it was noted that there was small part of the site which contained grass and shrubbery. The area of the site adjacent to the south-western elevation as indicated in brown on the existing site plan constituted plants and vegetation. Whilst it is acknowledged that the proposed scheme includes additional soft landscaping, insufficient information has been submitted within the application to demonstrate that the development would impact on less than 25sqm of on-site habitat, given that the Planning Officer’s site visit noted habitat present adjacent to the building which was not noted within the submitted application form. As such, there is insufficient information submitted within the application to assess the pre-biodiversity value of the site.”

2.0 ECOLOGY RESPONSE

2.1 Bats.

- 2.1.1 The Simply Ecology bat survey report provides a comprehensive write up of all methods and surveys carried out at the site. The Building Inspection Results section summarises as follows:

"In summary, the target building was a workshop that was in use. The building was assessed for signs of bat activity and potential roost features. The exterior of the building has stone walls with many small gaps and cracks in the mortar. Internally and the roof were constructed of materials that had negligible suitability for bats. There was no evidence of bat activity from the interior of the workshop.

Due to the large number of crevices in the stone walls, but the overall rather poor setting the building was considered to have **"Low Potential Suitability"** for roosting bats (in accordance with BCT Good Practice Guidelines, 2023)."

- 2.1.2 In light of this Low Potential, a single night-time emergence survey of the building was undertaken. The Activity Survey Results were summarized as follows:

"In summary, very low levels of activity were observed and no bats were seen to emerge from the target building."

- 2.1.3 The Conclusions and Recommendations section of the report reads as follows:

"The building had some areas with very little or no potential for bats – these were the corrugated roof and the interior as these offered no real suitability for roosting. However, the exterior walls were constructed of stone and had loose rubble in-fill. There were many PRFs identified in the stonework and easy potential access to the internal space. Evidence of nesting birds was found, and bats could access even smaller spaces for roosting. The proposed re-development could have the potential to affect any roost of protected bat species.

In accordance with BCT Guidelines, a follow-up night-time activity survey was conducted in May 2025. Despite completing the night-time survey during optimal timing and conditions, bat activity at the site was very low and infrequent. Only very low levels of activity were recorded, but no bats emerged from the target building and it was concluded that no roosting was taking place.

- *It is advised that* all works can go ahead and that no Ecological Clerk of Works or Natural England Licence is necessary at this site. This is based upon site-specific surveys and is backed up by the lack of evidence of previous or current bat roosting. It is concluded that the proposed works will impact on local bat populations. **Reason:** This advice is in accordance with the Bat Conservation Trust guidelines and will deliver legal compliance. All UK bat species are protected by The Wildlife and Countryside Act (1981) (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended)."

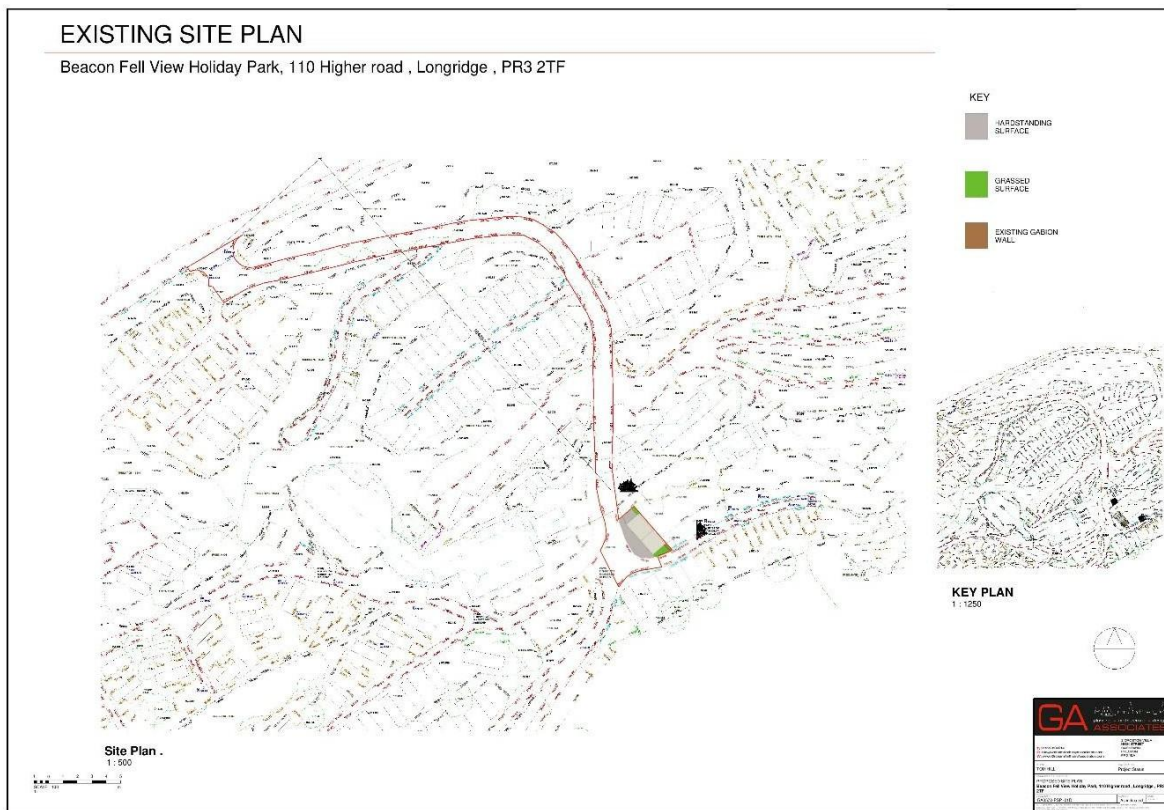
- 2.1.4 The ground for refusal was that there is insufficient information provided to determine the presence of bats at the site. Given the surveys were conducted in accordance with relevant best practice guidelines, we feel that this is an inaccuracy. We consider that the survey, and write up is comprehensive and clear throughout the entire bat survey report, with the one sentence which is at odds with the rest of the report, which introduces a little ambiguity. A more purposeful approach from the Planning Officer in seeking clarification of this single issue, would have been helpful, especially given the consistent narrative presented throughout the report, which we consider is clear and unambiguous.
- 2.1.5 Our response to the issue of bats in relation to the grounds for refusal is to simply insert the omitted word 'not' into our Conclusions and Recommendations section. With the amendment, our Recommendation should therefore read:

It is advised that all works can go ahead and that no Ecological Clerk of Works or Natural England Licence is necessary at this site. This is based upon site-specific surveys and is backed up by the lack of evidence of previous or current bat roosting. It is concluded that the proposed works will **NOT** impact on local bat populations. **Reason:** This advice is in accordance with the Bat Conservation Trust guidelines and will deliver legal compliance. All UK bat species are protected by The Wildlife and Countryside Act (1981) (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended).

- 2.1.6 We recommend that no other report amendments or further survey are necessary, and no further information needs to be submitted. This concludes our submission in relation to bats.

2.2 Biodiversity Net Gain.

- 2.2.1 No information on Biodiversity Net Gain (BNG) formed part of the original planning application. This section of the planning appeal submission addresses BNG.
- 2.2.2 The entire red line has an area of ~1938m² (See Plan 1). Of this, the vast majority is the access route, which is an area of hard standing through the caravan park that has been in existence for many years. In BNG terms, the surface of the access is classed as 'Urban Developed Land; Sealed Surface. No upgrades or changes to the access route are proposed and in the Statutory Biodiversity Metric this habitat type is afforded a biodiversity value of zero (See Plate 1).
- 2.2.3 At the current workshop, the majority of land around it remains hard standing, but there are two small parcels of vegetation (See Plan 2). As can be seen in Plate 2 and Plate 3, these are areas of short, regularly mown amenity grassland. Covering only 3.6m² and 13m², the area of both covers 16.6m². Grassland is present to the rear of the workshop, but this is not inside the site boundary, and will not be impacted by the proposed conversion (See Plan 3).
- 2.2.4 In terms of BNG, it is clear that the impacts upon any habitat with value greater than zero are restricted to the two small parcels of vegetated garden habitat which cover less than 25m². No other habitats with BNG value are present within the site red line boundary.



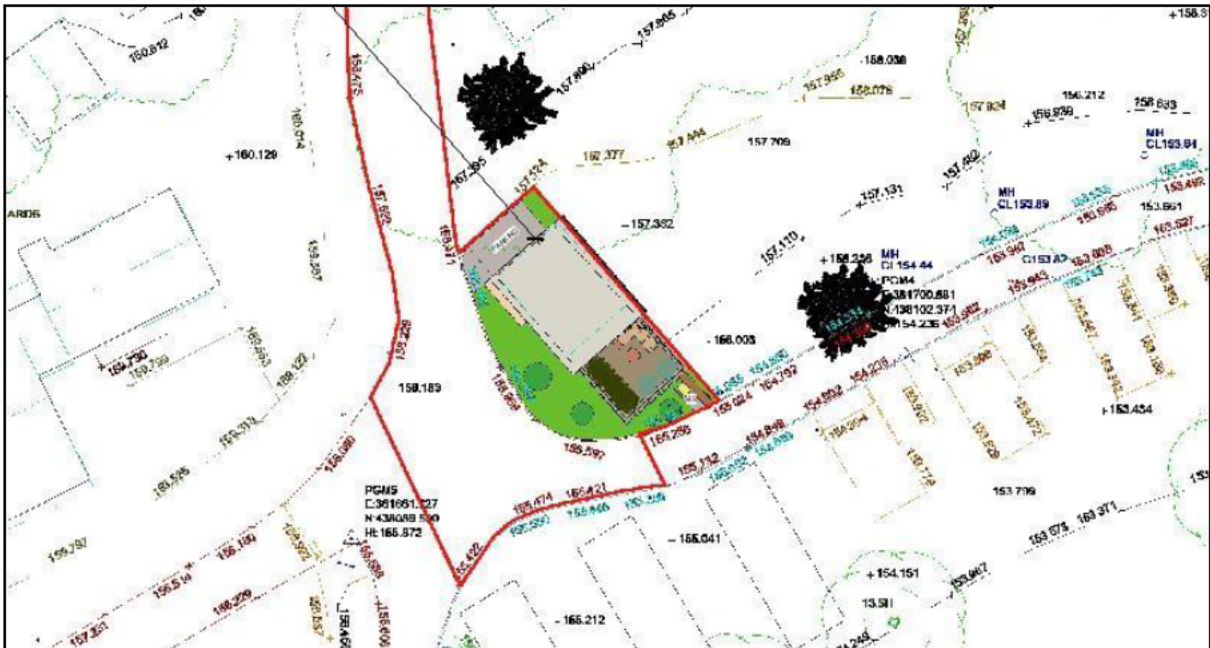
Plan 1: The site red line boundary.



Plate 1: The existing hard standing access road to the site. Photo taken from the workshop looking SW. This will not be impacted, but also has zero biodiversity value in any event.



Plate 3: The 3.6m area of amenity grass will be retained (highlighted).



Plan 3: Crop of the proposed layout.

2.2.5 The Biodiversity Net Gain plan conditions do not apply in this case. The new proposed conversion will not impact any priority habitats and the area of impact is less than 25m². This development is therefore classed a 'de minimis' under 4. (2) and (3) (a) of the and is exempt from the requirements of BNG.

De minimis exemption

4.—(1) The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the first and second conditions.

(2) The first condition is that the development does not impact an onsite priority habitat.

(3) The second condition is that the development impacts—

(a) less than 25 square metres of onsite habitat that has biodiversity value(3) greater than zero; and

(b) less than 5 metres in length of onsite linear habitat.

(4) For the purposes of this regulation—

(a) “priority habitat” means a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006(4);

(b) a habitat is impacted where the habitat is lost or degraded such that there is a decrease in the biodiversity value of that habitat;

(c) “linear habitat” means the types of hedgerow habitat or watercourse habitat identified for the purposes of the biodiversity metric(5) (which are measured by length (expressed in kilometres) rather than area).

Box 1: The de minimis criterion applies at Beacon Fell.

2.2.6 Our response to the issue of BNG in relation to the grounds for refusal is as follows: Following a thorough assessment of the proposals against legislative and Local Planning Policy requirements, it was the professional ecologist’s opinion that the proposed development does not reach the threshold which requires Biodiversity Net Gain calculation or a Biodiversity Gain Plan and is exempt under the *de minimis* regulation of The Biodiversity Gain Requirements (Exemptions) Regulations 2024 4. (2) and (3) (a) and the biodiversity gain planning condition does not apply.

2.2.7 Notwithstanding, although the site is dominated by habitats of limited value to wildlife, development proposals should seek to enhance its long-term ecological interest and provide new opportunities for protected and notable species in accordance with Section 15 (paras 187 & 193) of the National Planning Policy Framework (December 2024) and the Local Plan.

2.2.8 The proposed development incorporates areas of garden and soft landscaping which will provide new habitat on the site.

- *It is advised that the provision of a new garden area, will provide new habitats that will enhance the site compared to the existing baseline. Reason: This will deliver compliance with the Local Authority’s statutory duty to conserve and enhance biodiversity under Section 41 of the Natural Environment and Rural Communities Act (2006), the Environment Act (2021) and Section 15 (paragraphs 187 & 193) of the National Planning Policy Framework (December 2024), as reflected in the Local Plan.*

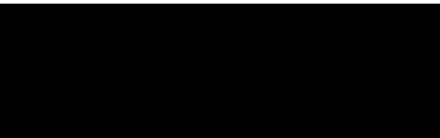
2.2.9 We recommend that no report amendments or further survey are necessary, and no further information needs to be submitted. This concludes our submission in relation to BNG.

3.0 CONCLUSIONS

- 3.1.1 In October 2025 Simply Ecology Ltd was commissioned by Graham Anthony to submit information as part of an appeal against refusal of planning application 3/2025/0462 for the above site in Longridge. I understand that ecology matters were two of the three grounds presented by the Local Planning Authority as reasons for the refusal of workshop conversion into the holiday cottage.
- 3.1.2 The first issue was in relation to the Planning officer's interpretation of the bat survey report and the second issue was whether there would be Biodiversity Net Gain requirements.
- 3.1.3 The information detailed in this document comprehensively addresses the two issues used to justify the refusal of planning permission.
- *It is advised that the development would not cause any impacts upon bats and that it is exempt from Biodiversity Net Gain.*

Should you have any questions, please do not hesitate to get in touch.

Yours sincerely

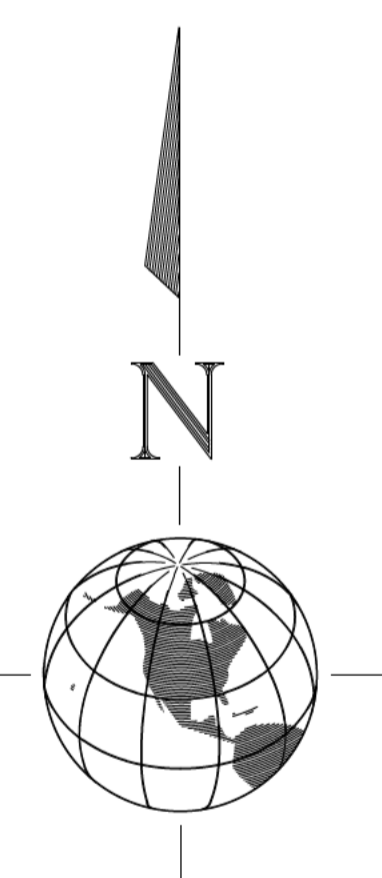
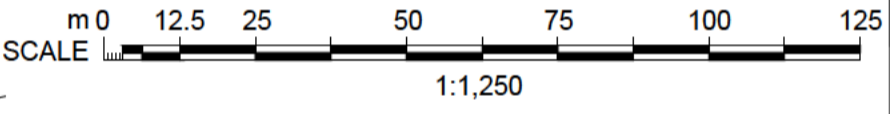
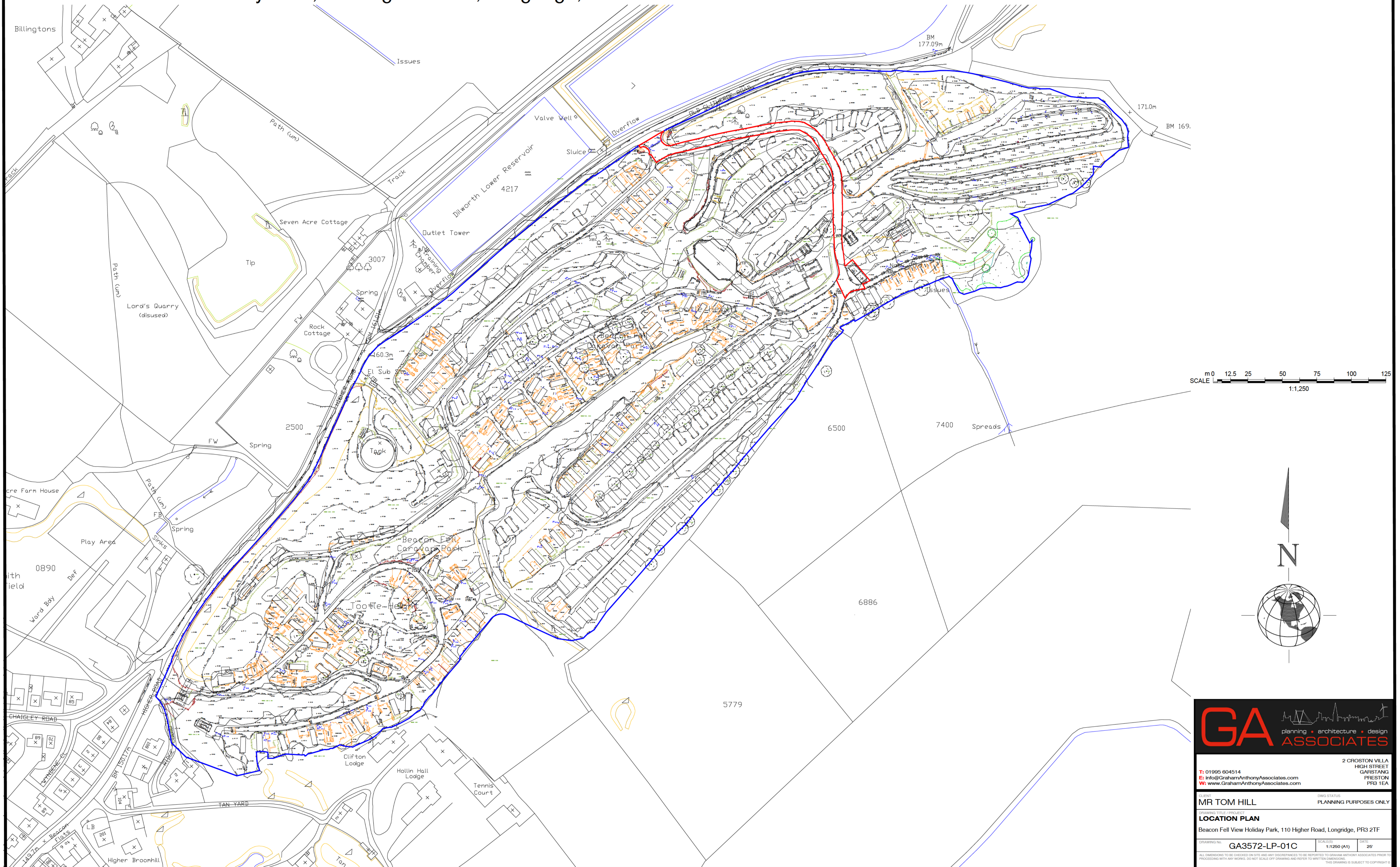


Jason Reynolds MSc MCIEEM

Lead Ecologist

LOCATION PLAN

Beacon Fell View Holiday Park, 110 Higher Road, Longridge, PR3 2TF



GA ASSOCIATES
planning • architecture • design

T: 01995 604514
E: info@GrahamAnthonyAssociates.com
W: www.GrahamAnthonyAssociates.com

2 CROSTON VILLA
HIGH STREET
GARSTANG
PRESTON
PR3 1EA

CLIENT: MR TOM HILL
DWG STATUS: PLANNING PURPOSES ONLY

DRAWING TITLE / PROJECT: **LOCATION PLAN**
Beacon Fell View Holiday Park, 110 Higher Road, Longridge, PR3 2TF

DRAWING No: GA3572-LP-01C
SCALE: 1:1250 (A1)
DATE: 25

ALL DIMENSIONS TO BE CHECKED ON SITE AND ANY DISCREPANCIES TO BE REPORTED TO GRAHAM ANTHONY ASSOCIATES PRIOR TO PROCEEDING WITH ANY WORKS. DO NOT SCALE OFF DRAWING AND REFER TO WRITTEN DIMENSIONS.
THIS DRAWING IS SUBJECT TO COPYRIGHT ©