

PLANNING AND LISTED BUILDING STATEMENT

Residential Adventure and Activity Centre

**Ford Castle, Ford
Berwick-upon-Tweed
TD15 2PX**

Prepared for: PGL Travel Ltd

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Appendix 01: Planning History

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EXECUTIVE SUMMARY

- 1.1.1 This Planning and Listed Building Statement has been prepared and is submitted by SLR Consulting Limited ('SLR') on behalf of PGL Travel Ltd ('PGL').
- 1.1.2 PGL are the UK's leading outdoor education provider, who have a leasehold interest in Ford Castle and wish reopen the activity centre following Ford Castle Adventure Limited's closure of the Site in September 2020 following the devastating impact of Covid-19.
- 1.1.3 PGL are therefore thrilled to have the opportunity to deliver their offering at Ford Castle, a unique property which already functions as an established activity centre. This complements their existing portfolio both in terms of accommodation character and geographical location.
- 1.1.4 PGLs vision for the site and proposals are for the refurbishment and upgrade of existing accommodation, classrooms, bathrooms, kitchens and service areas to support 175 guests, 23 teachers and 50 PGL staff, and the siting of new, replacement activity equipment within the field to the north-east of the site, including the creation of a new pond. These Proposals support the Site's extant use as a Residential Institution and Activity Centre which has been operating since circa 2012, and the replacement activity equipment is proposed an area which is already used for this purpose, albeit that the range of activities proposed is altered to meet the aspirations of PGLs established customer base
- 1.1.5 In order that the proposed changes to the Activity Centre can be considered under the most appropriate consenting mechanism and following pre application consultation with the Council, three separate applications are being submitted to Northumberland County Council to deal with the PGLs proposals. PGL are seeking **Full Planning Permission and Listed Building Consent, Listed Building Consent and a Certificate of Lawfulness**, for the refurbishment and upgrade of Ford Castle and the siting of new activity equipment, including a new pond, as summarised below:
- 1. Planning and Listed Building Application** – this application covers the existing activity field and includes the removal of the existing activity equipment, and the siting of a zipline, two aero-balls, two air rifle ranges, a challenge course, linear high ropes, and the creation of a small pond for raft building. This proposal does not involve a change of use;
 - 2. Listed Building Application** – this application includes the removal and replacement of specific bathrooms, replacement of kitchens (including new drainage channel in kitchen and extraction equipment), boxing-in of fireplaces, introduction/alteration of curtain poles and installation of stair handrails.
 - 3. Certificate of Lawfulness Application** – this application includes the upgrade/replacement of modern shower rooms, toilets and bathrooms.
- 1.1.6 The proposals in this application deal with the proposals within the Activity Field. This Planning Statement therefore supports a Planning and Listed Building Application.

1.0 Introduction

1.1 Overview

This Planning and Listed Building Statement has been prepared and is submitted by SLR Consulting Limited ('SLR') on behalf of PGL Travel Ltd ('PGL'). It supports their Planning and Listed Building Application for the siting of new activity equipment including a new activity pond at Ford Castle.

- 1.1.1 The Proposals described in this Statement and the accompanying Design, Access and Heritage Statement set out PGL's overall strategy for the improvement of the Estate to provide a sustainable future as an outdoor educational centre, following the Centre's closure in 2020, which occurred due to the impacts of the Global Pandemic. The Site's current use is therefore longstanding, as a residential activity centre (Use Class C2), which opened in 2012 with previous operators. PGL have since secured the Castle and Activity Field on a leasehold basis and will deliver an improved activity offering, with a fresh new operator and brand.
- 1.1.2 The ethos of PGL is to deliver inspirational learning through adventure with the aim of bringing out the best in young people. The Proposals for enhanced and reorganised facilities for adventure holidays support the Site's existing use as an Outdoor Activity Centre and will enable PGL to develop a range of high-quality services. This Proposal represents an overall improvement to the existing activity structures on offer at Ford Castle, as well as securing a long-term management plan for its heritage assets.
- 1.1.3 Having operated holidays, tours, and courses since 1957, PGL provides outdoor education courses, activity holidays, cultural tours, and ski trips to over 250,000 children each year. In January 2019 PGL was acquired by Midlothian Capital Partners and became part of HB Education Ltd.
- 1.1.4 Within the UK, PGL operate at 14 locations, the majority of which successfully utilise historic buildings and protected landscapes to good effect. Their centres all include purpose-built activities and equipment including climbing towers, giant swings, zip wires, and water sports, with weather resistant indoor and outdoor spaces. The programme of activities offered builds children's confidence and the popularity of such adventure holidays with school groups has grown in recent years. PGL have therefore been expanding their operations by acquiring new sites within the UK to deliver a range of services and high-quality activities across all sites.
- 1.1.5 PGL is recognised by the major activity governing bodies and is licensed by the Adventure Activities Licensing Authority (AALA) for a range of outdoor activities. PGL is a founder member of the British Activity Providers Association (BAPA), the School Travel Forum (STF) and a Learning Outside the Classroom Quality Badge holder.

1.2 Application Description

- 1.2.1 The Site to which this application relates falls within the administrative boundary of Northumberland County Council (NCC), to whom this application is made. SLR has undertaken a detailed pre-application submission in advance of preparing this application to seek to address any technical issues related to the

Site and proposals. This has informed the submission and detailed design (this is explained further in Section 1.4).

- 1.2.2 The full Site Address is **Ford Castle, Ford, Berwick-upon-Tweed TD15 2PX** (the ‘Site’).
- 1.2.3 This Statement details the Proposals and how they will be delivered. The Proposals are fully underpinned by supporting technical documents and drawings which are submitted as part of this **Planning and Listed Building Application**. This application covers the existing activity field and includes the removal of the existing activity equipment, and the siting of a zipline, two aero-balls, two air rifle ranges, a challenge course, linear high ropes and the creation of a small pond for raft building. This proposal does not involve a change of use.
- 1.2.4 The description of development is as follows:
- 1.2.5 *‘The removal of existing activity equipment and the siting of new activity equipment in the form of a zipwire, two aero-balls, two air rifle ranges, a challenge course, high linear ropes and the creation of a small activity pond for raft building’*
- 1.2.6 Further information on the proposals is provided within the Technical Documentation, Plans and Drawings and the Design and Access Statement (DAS) prepared by NBDA Architects.

1.3 The Submission Content

- 1.3.1 In accordance with the Town and Country Planning Act 1990 (as amended), The Town and Country Planning (Development Management Procedure) Order 2015 and Planning (Listed Buildings and Conservation Areas) Act 1990, and Berwick-upon-Tweed Borough Local Plan, the planning submission comprises the following documentation:
- Planning Statement (this document)
 - Completed and signed copies of Ownership Certificates
 - Design and Access Statement
 - Heritage Statement;
 - Preliminary Ecological Assessment;
 - ‘Shadow’ Habitats Regulations Assessment;
 - Transport Assessment;
 - Travel Plan Statement;
 - Construction Method Statement;
 - Refuse Strategy Statement;
 - Landscape and Visual Assessment;
 - Flood Risk Assessment & Drainage Strategy;
 - Arboricultural Impact Assessment.

1.3.2 The following drawings and plans listed within **Table 1-1** are submitted as part of the planning application

Table 1-1 Drawing List

Drawing Title	Drawing Reference	Size	Scale
Site Location Plan	2035-AF-001	A3	1:1250
Existing Location Plan	2035-AF-001	A3	1:1250
Proposed Location Plan	2035-AF-002	A1	1:1250
Proposed Layout	2035-AF-003	A1	1:500
Proposed Activity Field Overall Sections	2035-AF-005	A0	1:200
Zipline Details	2035-FC-940	A1	1:100
Challenge Course	2035-AF-941	A1	1:100
Linear High Ropes	2035-FC-943	A1	1:100
Air Rifle Range	2035-AF-945	A1	Varies
Aeroball	2035-AF-946	A1	1:50
Activity Shelter Details	2035-AF-947	A1	1:100

1.4 Pre-application Advice

- 1.4.1 A pre-application advice request was submitted to NCC on 3rd September 2021 (Ref: **21/00739/PREAP**) detailing the proposed development and highlighting the potential to improve and enhance facilities at Ford Castle, to support its reopening as an established Residential Activity Centre.
- 1.4.2 The pre-application proposal description is stated as follows: *‘Propose to refurbish and upgrade of existing building facilities. Siting of activity equipment, 2 line zip wire, challenge course, Pond, Linear Course, 2 x Aeroballs, 2 x Archery Ranges, 2 x Air Rifle Ranges.’* It was considered that one full planning and listed building application would be submitted at that stage. However following site meeting discussions and subsequent heritage meetings and given the context of the various improvements three applications are now proposed, as outlined within the Executive Summary.
- 1.4.3 A site meeting was attended by Jon Sharp (Case Officer - Senior Planning Officer) on Monday 11th October 2021. At the meeting, it was confirmed that the proposal will involve no change of use or increase in guest numbers when compared to the existing position. Subsequently a further site meeting was attended by the Conservation Officer and SLRs Heritage team to discuss the wider heritage considerations on 2nd November 2021. This meeting also informed the formal written pre-application advice which was received on 16 November 2021 and has informed the preparation of this application.
- 1.4.4 Formal comments were provided by Highways, Flooding, Archaeology, Environment and Design, Environmental Protection and Ecology which have been considered in the accompanying Technical Reports. The formal pre-application planning advice concluded that *‘the principle of the development **would** be acceptable; the proposals **are** considered to be in accordance with the development plan. In the event that a planning application is submitted, it **would** be likely to be looked upon favourably.’*
- 1.4.5 Where technical comments were raised, these have been addressed within the supporting technical information (as also summarised in Section 6). In regards to specific internal and external heritage

matters raised relating to the Listed Buildings, these have been addressed within the Listed Building and Certificate of Lawfulness Applications, where these are not pertinent to this application.

1.5 The Structure of this Planning Statement

1.5.1 The remainder of this Statement develops and builds on the overview provided above. This Statement is divided into a further 6 Sections and is structured as follows;

- **Section 2.0** Site Description and Surrounding Area
- **Section 3.0** Description of the Development
- **Section 4.0** Site Planning History
- **Section 5.0** Review of Planning Policy
- **Section 6.0** Summary of Technical Assessments
- **Section 7.0** Conclusion

2.0 Site Description and Surrounding Area

2.1 Site Location

- 2.1.1 The full extent of the Ford Castle Estate is approximately 6.2 hectares and lies within, 2km of A697. It is situated in a rural location, approximately 2.4km north-west of Etal and 3.9km south of Milfield. The site benefits from a private road to the north-western corner of the estate which leads to an intersection of B6354 and B6353, neighbouring the River Till.
- 2.1.2 To the north of the site lies a large area of well-established deciduous woodland which acts as a natural screening buffer. To the north-east of the site lies a wood-pasture and parkland identified as BAP priority habitat, and beyond this, are a small number of residential estate houses. To the south-east of the site lies the village of Ford, and to the south of the site lies St Michael's Church (Grade II* Listed), Parsons Tower (Grade II Listed Scheduled Monument), and further wood-pasture and parkland identified as BAP priority habitat. To the east of the site lies wood-pasture and parkland identified as BAP priority habitat, and beyond this the River Till, which is SAC designated (River Tweed SAC).
- 2.1.3 The Ford Castle Estate is made up of various protected structures which are as follows:
- Ford Castle [Grade I Listed]
 - Ford Castle North Forecourt (Wall and Gateway with Laundry and Service Wing attached to rear) [Grade II* Listed]
 - Ford Castle East Gateway (East Forecourt Wall and Handyman's Cottage) [Grade II* Listed]
 - Ford Castle Game Tower (Attached Garden Walls and Carriage Arch) [Grade II Listed]
 - Ford Castle Flagpole Tower [Grade I Listed]
 - Ford Castle Walles Garden [Grade II Listed]
 - Ford Castle Portcullis Gate, Armoury Tower and Forecourt Walls [Grade I Listed]
 - Ford Castle Terrace Walls [Grade II Listed]
- 2.1.4 Ford Castle itself was built in the late 13th century and was subject to fortification in approximately 1338. By the 14th century Ford Castle had undergone quadrangular fortification leading to a rectangular courtyard encased by a stone curtain wall with a tower sitting at each corner. Elements of this enclosed courtyard are listed above.
- 2.1.5 Ford Castle Building has undergone multiple periods of restoration over the years, with significant repairs occurring between 2015 and 2018 to remove the building from Historic England's 'Buildings at Risk register'. In order to do so, extensive repairs were undertaken to ensure the buildings longstanding protection and restoration.
- 2.1.6 The site area to which this application relates is 1.47 hectares. The existing 1.47 hectare playing field contains a football pitch to the north of the site, with low to medium level timber structures adjacent.

To the southern side of the site, running parallel to the Walled Garden are low level timber assault course structures.

- 2.1.7 As part of the proposed works, the existing structures will be removed and cleared from the site.

2.2 Ecological Designations

- 2.2.1 The Site is not designated as a statutory or non-statutory ecological site. Within relatively close proximity (470m west) is the River Tweed (Till Catchment Rivers), a Site of Special Scientific Interest (SSSI) and part of the River Tweed Special Area of Conservation (SAC). No direct impacts would occur in respect of the River Till as it does not form part of the proposals.

2.3 Site Access

- 2.3.1 The Site has two access points, the first being from a private road to the north-western corner of the Estate which leads to an intersection of B6354 and B6353, neighbouring the River Till. The second relating to a road off the B6353 leading directly to Ford Castle Portcullis Gate. Access will not change as a result of the proposals. Main access will continue to be via Portcullis Gate for all guests and employees, and car parking would continue to be at the existing location where 37 spaces are available. It should be noted that the secondary access is not included in the lease arrangements and therefore this route cannot be used by PGL for access. Access arrangements will there be unchanged from the establish arrangements which have been in use with 2012 for the Activity Centre.

2.4 Current Use

- 2.4.1 The Site's current use is as a residential adventure and activity centre (Use Class C2), which opened in 2012. The previous owners ceased operations following the outbreak of the Global Pandemic in 2020.

3.0 Site Planning History

3.1 Planning History Overview

- 3.1.1 There are a number of planning applications related to this Site; the oldest available application dates back to 1985, and relates to the provision of a field study centre.
- 3.1.2 There appears to be no (available) change of use applications submitted since 1985 therefore it is understood that the residential institution use commenced at that time and is therefore long-standing.
- 3.1.3 The most relevant applications relate to the Site's expansion as an activity centre, applications [12/00936/FUL](#), [12/01034/FUL](#), and [13/00929/FUL](#) granted consent for:
- Climbing Course
 - Zip Wire
 - Low Ropes
 - Assault Courses
- 3.1.4 From reviewing the applications, particularly the Officer's Reports, it is noted that these proposals were considered to enhance the experience for visitors to the established facility and not to have an adverse impact upon the setting of the Grade I Listed Building; on archaeology, or; ecology. From our pre-application discussions PGLs proposals would be viewed in the same light.
- 3.1.5 As noted above, significant repairs were carried out between 2015 and 2018 which resulted in Ford Castle being removed from Historic England's 'Buildings at Risk register'. These listed building applications [15/02284/LBC](#), [16/01889/LBC](#), [17/04110/LBC](#) and [19/00457/LBC](#) detail the amount of repair work and investment recently undertaken to ensure Ford Castle's restoration and protection. Coupled with this however is need to ensure that Ford Castle has a purpose and viable long-term use. PGL's recent leasehold of the property, and their commitment to invest in reopening the Centre offers an excellent opportunity to protect the heritage asset and ensure it is managed and maintained.
- 3.1.6 Following a review of the Site's planning history and the reasons for approval, it is hoped that NCC will support the refurbishment of Ford Castle and the sitting of new activity structures and an activity pond, which are the subject of this application. Such enhancements will secure the protection of the listed heritage assets and the surrounding grounds, reinstating the Site to its recent leisure use. It is noted that all applications available online have been viewed positively by your Authority, with no refusals and that therefore the Site's enhancements over the years have been supported.
- 3.1.7 To view the full planning history list, please refer to the Planning History Table as stated within **Appendix 1**.

4.0 Description of the Development

4.1 PGLs Overall Vision

- 4.1.1 The proposals seek to improve the facilities at Ford Castle which is an existing residential activity centre. PGLs overarching site wide proposals comprise of the installation of new activity equipment and refurbishment of the existing accommodation, classrooms, bathrooms, kitchens, and service areas, with no increase in bed spaces, or changes to the layout, within Ford Castle (Grade I Listed), Ford Castle North Forecourt (Grade II* Listed) and Ford Castle East Gateway (Grade II* Listed).
- 4.1.2 PGLs proposals include the siting of new replacement activity equipment within the existing Activity Field which is located to the north-east of the Site.
- 4.1.3 To summarise, PGLs proposals under this planning application comprise of the following elements:
- The siting of new activity bases within the existing activity field;
 - The excavation of a new activity pond for low impact raft building;
 - Re-instatement to historic footpath adjacent to the Walled Garden within the Activity Field;
- 4.1.4 These proposals have been designed to have due regard ecology and heritage which comprise key considerations which have been at the forefront of the design process in the siting of equipment.. PGL have therefore taken an ecological and heritage focussed design-led approach throughout the pre-submission process, rather than imposing a ‘standard design’ operating model on the site. This reflects the bespoke approach which they have adopted at their existing site Bawdsey Manor, as referred to below.

4.2 Description Overview

- 4.2.1 The Proposals outlined within this Planning and Listed Building Application involve the siting of new activity bases within the field to the north-east (where the existing activity bases are currently sited, which will be removed). Below is a breakdown of the activity equipment:
- Zip Wire (featuring two zip lines)
 - 2 x Aero Balls
 - 2 x Air Rifle Ranges
 - Challenge Course
 - Linear High Ropes
 - The excavation of a new activity pond for low impact raft building.
- 4.2.2 Access to the activity structures is proposed to be via a re-instated historic footpath, which would lie adjacent and parallel to the Walled Garden within the activity field. This path would be finished in porous loose gravel and reinstatement represents a heritage enhancement. New paths are also proposed from the re-instated path, to manage movement through the activity field and will be finished in the same

gravel detail as the reinstated path. These paths will link each individual activity structure and will be constructed on the basis of a ‘no-dig’ design..

4.3 Activity Equipment

- 4.3.1 As listed above, there are a number of activity equipment structures proposed within the existing activity field area. All equipment has been tried and tested by PGL elsewhere and is hugely popular with guests. The range of equipment proposed has therefore been informed by their operational experience and guest expectations. All equipment is manufactured off site, and transported to site for erection.. In addition, the colours and materials used for the structures are muted and reflective of the surrounding environment, typically natural timber and green paint.
- 4.3.2 The new activity structures will enhance the Site’s existing character, removing the existing structures which are of a poor condition. The proposed activity equipment has been carefully selected to cater for children of all ages, with progressive learning opportunities as they proceed through each of the courses. The objective is to encourage independence, confidence, self-esteem and teamwork, whilst providing enjoyment within a unique historic setting.
- 4.3.3 The popularity of the activity equipment is shown at their operational site, [Bawdsey Manor](#) (*Bawdsey Manor, Bawdsey, Woodbridge IP12 3BH*). East Suffolk granted permission in 2018 for a range of activity structures (including all of the above proposed listed structures). Bawdsey Manor is now one of their most popular sites.
- 4.3.4 Bawdsey Manor is also comparable in many ways with Ford Castle, in that it is sensitive both in terms of its heritage and ecology. Bawdsey Manor is located within an Area of Outstanding Natural Beauty and the whole site is a Registered Park and Garden. The Manor House itself is Grade II* Listed, and there are a number of Grade II Listings within the Estate. The Site is also subject to an adopted Conservation Management Plan. PGL have therefore been hugely committed, since acquiring this site in 2017, to enhancing and preserving the Site’s heritage value and delivering a long-term sustainable future use. PGL have also worked with Historic England throughout the process, and have formed a positive relationship with both Officers and Statutory Consultees. It is hoped that NCC will view PGLs ‘balancing act’ approach to both development and restoration as positive.
- 4.3.5 Below is a description of the proposed Activity Structures:

Zip Wire

- 4.3.6 A Zip Wire is proposed centrally within the Activity Field (north-west to south-east direction). This will have two zip lines.
- 4.3.7 The Zip Wire extends from a starting platform of 6.8 metres in height and finish columns of 3.6m in eight. The Zip Wire start platform and finish columns will be of a steel construction. All steel work will be hot

dip galvanised. The zipwire finish area/landing platform will be rubber matting placed on a slightly raised earthwork grass mound.

- 4.3.8 A staircase leads up to the platform which has safety railing around all four sides with space for exit and entry. Each zipline spans approximately 137 metres in length.
- 4.3.9 Please refer to Drawing 2035-FC-940 for full specification/details.

Aero Balls

- 4.3.10 Two no. 4-Man Aero Balls are proposed at the southern end of the Activity Field. Each Aero Ball is in the form of a trampoline of 5.5 metres by 5.5 metres. The trampolines are enclosed with an outer frame/netting and a spring-loaded fabric housing that protects players from the frame and each other. The height of each Aero Ball is 4.45 metres.
- 4.3.11 Please refer to Drawing 2035-AF-946 for full specification/details.

Air Rifle Ranges

- 4.3.12 Two timber clad, asphalt shelters measuring 2m by 1.5m and 2.5m high are proposed in the area between the Walled Garden and the Aero Balls. Gated entry is proposed to the rear for safety. Targets would be set in the open approximately 10m from the firing line. External walls are proposed to be clad in treated Shiplap. As Drawing 2035-AF-005 refers, the air rifle range will be lower than the walled garden, which stands at 3.6m in height.
- 4.3.13 Please refer to Drawing 2035-AF-945 for full specification/details.

Challenge Course

- 4.3.14 The challenge courses consist of 10no low-level obstacles at varying heights set around a linear track. Each track includes a 2m wide gravel base approximately 50m in length, which weaves in an informal configuration to suit terrain. Low-level stations along the course are formed from timber in association with other items such as ropes, and tyres.
- 4.3.15 The Challenge Course is located to the east of the Activity Field, adjacent to the existing tree line which runs along the site boundary, and is to be retained with two trees relocated.
- 4.3.16 Please refer to Drawing 2025-AF-941 for full specification/details.

Linear High Ropes

- 4.3.17 A high linear ropes course is constructed from two timber poles approximately 14 metres high. Each pole is mounted with climbing staples and separated by approximately 7.6 metres with an extended timber beam at the top. In between these two poles are two Jacob's Ladders which involve a series of timber logs suspended on ropes with varying gaps between them. Extending from the outer side of each timber

pole is a trapeze platform. Suspended above the platform towards the end of a long niko-rail is a trapeze swing bar, requiring a 'leap of faith' to traverse the gap.

- 4.3.18 The Linear High Ropes are located to the west of the Activity Field, nestled against a strong boundary of existing trees, but outside of the root protection zone.
- 4.3.19 Please refer to Drawing 2035-af-943 for full specification/details.

Activity Pond

- 4.3.20 The proposed development requires the excavation of material to lower the ground level, to form a pond basin. The lower parts of the basin would be below the ground water level and would flood to form a pond, in continuity with the ground water level. The proposed pond would have an area of 1,100 m² with a maximum water depth of 1.5 metres.
- 4.3.21 The excavated material will be used for the landscaping bunds which will surround the Pond, helping to provide both screening and ecological diversification benefit. No material would be removed from the site.
- 4.3.22 The proposed Pond is located relatively centrally within the sSte. The Pond design includes two raft building hard standing areas, totalling circa 200m², located to the east and west of the pond. Gently sloping beach areas are proposed in these locations to enable the children and staff to build the rafts and successfully launch them into the Pond from these beach areas. Activity Shelters are also proposed, for children and staff to shelter between sessions, or during spells of bad weather.
- 4.3.23 Raft Building sessions take to 90 minutes, only 15 minutes are spent on the water. The majority of the activity is comprised on instruction and cognitive problem solving. Typically, PGL operate groups of 10-12 children at any one time.
- 4.3.24 Please refer to Drawing 2035-AF-002 and Drawing 2035-AF-005 for full specification/details.

Activity Shelters

- 4.3.25 As discussed above, two activity shelters are proposed either side of the proposed activity pond. The shelters will be timber clad and have a maximum height of 2.3m.
- 4.3.26 Please refer to Drawing 2035-AF-947 for full specification/details.

4.4 Ecology

- 4.4.1 A site walkover and Preliminary Ecological Appraisal has been conducted which identified that the activity field comprises of species-poor grassland with a small number of mature trees at the margins. No invasive plant species were recorded within the Site itself.
- 4.4.2 In regards to site habitats, two mature sycamore trees were identified as having features which bats could use for roosting. These are being retained and the proposals will therefore cause no impacts on roosting bats.
- 4.4.3 The proposals to install the activity equipment, shelters and the creation of the pond would not affect any important habitats and would be positioned to avoid mature trees and the root systems of adjacent

trees in woodland setting. It is also considered that the pond will provide additional foraging habits for bats, and help to diversify the ecological baseline.

4.5 Arboriculture

- 4.5.1 An Arboricultural Impact Assessment was conducted which surveyed all trees within the Activity Field.
- 4.5.2 Every effort has been made to retain trees wherever possible. Only two 'C' category trees are required to be moved to facilitate the proposal. Both trees will be transplanted elsewhere within the Site.
- 4.5.3 Drawing 2035\AF-003 illustrates the trees which are proposed to be moved. These trees are located centrally within the site and require removing to accommodate the proposed activity pong and zip wire.

4.6 Landscape and Visual

- 4.6.1 The proposed activity equipment can be separated into two general categories:
- Low level small-scale equipment such as the challenge course, aeroballs, the small wooden/activity shelters, and the air rifle range, and;
 - Higher level, lightweight structures such as the frames for the zip wire and high ropes linear course, consisting of posts wires and ropes.
- 4.6.2 Please refer to Drawing 2035-AF-005 which demonstrates scale and massing of the activity equipment against the Site's adjacent surrounds.
- 4.6.3 Predominantly the proposed activity equipment sits beneath the tree line which borders the site, with the exceptions of the east and parts of the southern boundary. The tallest of the activity equipment have been positioned closer to the trees to help reduce visual impact.
- 4.6.4 The smallest piece of equipment, the challenge course, has been proposed along the eastern boundary. The challenge course consists of predominantly low-level structures with the tallest being only 4.2 metres from the ground which consists of posts and ropes.

4.7 Employment

- 4.7.1 The overarching, site-wide development proposals and reopening of the Site will deliver fifty local jobs. A significant number of these staff can be accommodated in and around the Castle, thus making it a very sustainable model, with staff walking to work. From PGLs other sites car staff ownership is very low in any event.

4.8 Guest and Staff Accommodation

- 4.8.1 Accommodation will be provided as follows:

Table 2-1 – Accommodation

Accommodation	Staff Numbers	Guest Numbers
The Estate House B&B	15	-

Accommodation	Staff Numbers	Guest Numbers
Chauffeur Cottage	6	-
Further Rented Accommodation	7	175
Flag Tower	2	-
Total	30	175

- 4.8.2 Guest accommodation is already provided within Ford Castle due to its extant use, however internal alterations (as detailed under the separate listed building application) are proposed which will cover the internal re-arrangements required to make the rooms suitable for PGL use and the Centre’s re-opening. These details have been included within a separate Listed Building Application, however for context purposes, this detail has been included within this Planning and Listed Building Application Statement.

4.9 Parking and Access

- 4.9.1 There is an existing car park within the wider Ford Castle grounds, which is not included within the red line boundary. There are no changes proposed to these areas due to the number of guests reducing. PGL therefore consider that there is sufficient parking already in place, as demonstrated.
- 4.9.2 Regarding construction access, and the delivery of the activity equipment, this is expected to take place via a public highway road which directly adjoins the B6353. This was the previous construction access used to deliver the existing installed activity equipment (which will subsequently be removed as a result of this permission).
- 4.9.3 The construction phase will be carefully planned to minimise vehicular traffic generation, this may include distributing deliveries across several days and using a combination of on-site storage and ‘just in time’ delivery practices. The delivery and installation of the new activity equipment is expected to be undertaken across a 12-week period.

5.0 Planning Policy

5.1 Policy Overview

- 5.1.1 This Section of the Statement sets out the legislative policy context as it relates to the proposed development and explains how the proposed development accords with the most recent national and local policy guidance.
- 5.1.2 In line with national policy, planning applications must be determined in accordance with the context of the Development Plan ‘*unless material considerations indicate otherwise*’ (Section 38(6) of the Planning and Compulsory Purchase Act 2004). Policies in the Development Plan will seek to safeguard environmental interests and will aim to resist developments which are likely to give rise to significant adverse environmental and amenity effects.
- 5.1.3 In the context of Section 38(6) of the 2004 Act, the following formally adopted documents have been reviewed:
- National Planning Policy Framework (2021)
 - Berwick-upon-Tweed Local Development Plan (1999)
 - Northumberland Local Plan (2019)
- 5.1.4 Outlined below are the key policies relevant to the consideration of the proposed development, accompanied with an explanation of how PGL’s proposal complies with them.

5.2 National Planning Policy Framework (NPPF) 2021

- 5.2.1 The key purpose of the NPPF is to enable the planning system to perform an economic, social and environmental role; build a strong, responsive economy; sustain vibrant communities; and protect and enhance the natural, built and historic environment, as defined under Chapter 2.
- 5.2.2 The most pertinent part of the National Planning Policy Framework (NPPF) 2021 is Chapter 16 ‘*Conserving and Enhancing the Historic Environment*’. **NPPF Paragraph 81** highlights the need for Council’s to support economic growth and productivity whilst considering local business needs as well as wider opportunities for development. **NPPF Paragraph 84** states that decisions should enable sustainable growth and business expansion in rural areas through the conversion of existing buildings. **NPPF Paragraph 189** highlights heritage assets as an irreplaceable resource which should be conserved in an appropriate manner to ensure they can be enjoyed by existing and future generations. In terms of their historical and architectural significance it is considered that the principle of the installation of activity structures has already been established as this area of the Castle grounds is already in this use as part of the wider residential activity centre which only ceased operations in 2020 owing to the Global Pandemic.
- 5.2.3 **NPPF Paragraph 197** outlines the need for Councils to take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses. Finally, **NPPF Paragraph 202** states the potential harm to the heritage asset should be weighed against the community benefits of such proposal, when it is considered to lead to less than substantial harm. There is a clearly a strong emphasis on viability, sustaining and enhancing the significance of a heritage asset in the heritage advice contained in the NPPF, and a recognition that any harm to an asset must be balanced against the other benefits afforded by a development. In terms of their historical and architectural significance it is

considered that the proposal does not alter the structural nor architectural integrity of the Listings, nor the Listings setting.

5.3 Local Planning Policy

- 5.3.1 It is understood that Northumberland Draft Local Plan was submitted to the Secretary of State for Ministry of Housing, Communities and Local Government on 29 May 2019, and is currently going through the Examination process. It was then published for consultation on 9 June 2021. The Northumberland Local Plan is currently a material consideration, with the amount of weight that can be given to specific policies (and parts thereof) dependent upon whether Main Modifications are proposed, and the extent and significance of unresolved objections.
- 5.3.2 The Northumberland Local Plan - Publication Draft Plan (Regulation 19) (Jan 2019) as amended by proposed Main Modifications (June 2021) has therefore been reviewed. It is understood that once formally adopted, this will replace the Borough Local Plans.

Berwick-upon-Tweed Borough Local Plan (1999)

- 5.3.3 From a local policy perspective, the Berwick-upon-Tweed Borough Local Plan (April 1999) contains **Policy F1** (Environmental Wealth) which outlines that enhancing and sustaining the Boroughs environmental wealth will be of primary importance, specifically highlighting landscape and its native biodiversity and human heritage. **Policy F3** (Tweed Valley, Kyloe Hills and Glendale) is of relevance as it highlights the boundaries of “Areas of High Landscape Value” and seeks to ensure that any development within the areas of high landscape value is compatible with the principal objective of conserving or enhancing the natural beauty of these areas.
- 5.3.4 The site falls within Ford’s settlement boundary and is washed over by an Area of High Landscape Value. Therefore, in line with **Policy F3**, the activity structures have been located with scale, density, height, massing and means of enclosure in mind. They have purposely been located within the existing activity equipment area, where there is already an established use. Such existing structures were granted through previous applications which considered them as an enhancement to the experience for participants at the existing facility and considered not to have an adverse impact upon the setting of the Grade I Listed Building, or; on Archaeology, or; ecology
- 5.3.5 **Policy F10** (Protected species) aims to prohibit developments that cannot demonstrate that the reasons for development outweigh any adverse effects to protected species or their habitats. **Policy F31** (Social and Economic Welfare) supports developments that are projected to enhance the quality of life for the communities in which they reside. The proposed refurbishment and continued use of Ford Castle as a Residential Activity Centre would therefore be acceptable in this policy context by supporting a well-established facility within a rural local community, which would in turn bring economic prosperity to the area.

Northumberland Local Plan 2019

- 5.3.6 The Northumberland Local Plan (Draft Plan 2019), **Policy STP1** (Spatial Strategy) supports sustainable development which enhances the vitality of communities across Northumberland. This policy is relevant

as the proposal seeks to provide a sustainable future for the heritage assets, reopening the established Residential Activity Centre.

- 5.3.7 Listed below are the other relevant emerging policies which we consider relevant to this proposal:
- 5.3.8 **Policy STP2** (Presumption in favour of sustainable development) highlights the positive approach of the Council who will work pro-actively to ensure proposals improve the economic, social and environmental conditions of the area.
- 5.3.9 **Policy STP3** (Principles of sustainable development) aims to ensure development proposals adhere to the list of principles that will deliver a range of economic, social and environmental factors.
- 5.3.10 **Policy STP4** (Climate change mitigation and adaptation) states that proposals should mitigate climate change and contribute towards the greenhouse gas emissions targets. Moreover, **Policy STP4** highlights the list of considerations developments must consider supporting climate change adaptation.
- 5.3.11 **Policy STP5** (Health and wellbeing) aims to support developments which promote and support the health and wellbeing of communities, residents, workers and visitors.
- 5.3.12 **Policy QOP 1** (Design Principles) lists the principles which a proposals design will be assessed against. Proposals will be supported where design makes a positive contribution to local character and distinctiveness and contributes to a positive relationship between built and natural features, including landform and topography; creates or contributes to a strong sense of place and integrates the built form of the development with the site overall, and the wider local area; incorporates high quality aesthetics, materials and detailing, and respects and enhances the natural and built environment, including heritage, environmental and ecological assets, and any significant views or landscape setting. The activity equipment has been carefully sited within an already established tree lined field, which will act as a natural screening buffer. The equipment proposed is also sensitive in its design, reflective of the surrounding natural and historic environment.
- 5.3.13 **Policy QOP 2** (Good Design and Amenity) states that developments must provide high standards of amenity for existing and future users ensuring the amenity of those living in, working in or visiting the local area will be preserved. This policy will not support developments which would result in unacceptable adverse impacts on the amenity of neighbouring uses, including both individual and cumulative impacts. It is considered that PGLs proposals are consistent with its surroundings in terms of amenity to neighbouring residents, scale, design and material and as such the development is acceptable in these terms, as also reflected in the Landscape and Visual Assessment which supports this application.
- 5.3.14 **Policy QOP 5** (Sustainable design and construction) lists the potential mitigations to climate change a development can propose to comply with Northumberland Design Guide. As the activity structures are to be used by children and other people they must comply with safety standards meaning they have to be made new thus limiting the opportunity to source recycled activity structures. With regards to the Pond, the banks will be formed from the excavated materials, meaning that no materials need to be imported or removed.
- 5.3.15 **Policy TRA 1** (Promoting Sustainable Connections) supports developments that promote a range of sustainable transport options and those options must be incorporated throughout the design process.

Staff will be living on site or within Ford village thereby limiting the need for staff members to travel by car. There are also bus stops along the B6353, within a 5-minute walk of the main access.

- 5.3.16 **Policy TRA 2** (Effects of Development on the Transport Network) provides a list of requirements which a development must adhere to in order to limit their effect on the transport network. The proposals do not seek to make any alterations which would either necessitate or give rise to any uplift in vehicular trip generation. The proposals will result in a small reduction in the maximum number of guests accommodated, which will reduce to 175. The proposals will therefore result in a minor reduction in the potential traffic generation of the residential activity centre. Moreover, given PGLs operating model only three groups will be accommodated at any one time, equating to only 3 coach arrivals and departures.
- 5.3.17 **Policy TRA 4** (Parking Provision in New Development) highlights that appropriate amounts of off-street parking which comply with parking standards must be made available prior to development being brought into use. As this proposal does not include a change of use, and represents a reduction in the maximum number of guests accommodated, the parking on Site currently is sufficient for the continued activity centre to function.
- 5.3.18 **Policy ENV 1** (Approaches to assessing the impact of development on the natural, historic and built environment) aims to protect the character and value of natural, historic and built environments through applying appropriate weight to designations, national importance and the use of character-based approach to landscape designation. Therefore, as previously mentioned for **Policy F3** (Berwick-upon-Tweed Local Plan) the location and design of the activity structures has been developed with **Policy ENV 1** in mind.
- 5.3.19 **Policy ENV 2** (Biodiversity and geodiversity) aims to support developments that avoid significant harm through location and/ or design as well as developments securing net biodiversity gains and wider ecological enhancements. The PEA outlines that the activity field comprises of species-poor grassland, and therefore the activity pond will provide additional foraging habits for bats, and help to diversify the ecological baseline. The siting of structures has been designed to avoid root protection zones.
- 5.3.20 **Policy ENV 4** (Tranquillity, dark skies and a sense of rurality) aims to limit the effects of urbanisation on the open countryside landscapes by conserving tranquillity. No external lighting is proposed.
- 5.3.21 **Policy ENV 7** (Historic Environment and Heritage Assets) seeks to conserve and enhance the significance, quality and integrity of Northumberland's heritage assets and their settings. This policy is therefore similar to **Policy F19**; the proposed activity structures have been located within the existing activity equipment area, where there is already an established use. **Policy ENV 7** states an optimum use, that is considered viable for both the heritage asset as well as public benefit, will be determined for proposals demonstrating less than substantial harm. As the main Ford Castle Building and aspects of its associated Courtyard are Grade I and a mixture of Grade I and Grade II respectively, any proposed development could be seen to have an impact on the building and surrounding grounds. However, given that the material alterations are minor, it is considered that the replacement activity structures would not lead to substantial (or less than substantial) harm to, or loss of significance of any designated heritage asset,

nor would it have a materially adverse impact on the character, features or immediate setting of the estates grounds (Policy ENV 7).

- 5.3.22 **Policy WAT 3** (Flooding) this site is within Flood Zone 1 and the development proposals are assessed as having no impact on flood risk, as demonstrated within the Flood Risk Assessment and Surface Water Drainage Strategy which supports this application.
- 5.3.23 **Policy WAT 4** (Sustainable Drainage Systems) highlights that SUDs will be incorporated into developments wherever necessary to control the flows of surface water across the site. A drainage strategy is included with this application which outlines PGLs approach to this matter. The method of attenuation comprises of swales sited around the contributing catchment area, adjacent to the structures generating runoff. The swales will infiltrate runoff up to the 1% AEP + 40% CC event. Infiltration testing will commence in late 2021 to confirm that this method is suitable for the geology, as discussed further in the supporting Flood Risk and Drainage Strategy Document.

5.4 Policy Summary

- 5.4.1 As is evident from the subsections and policy review above, the proposal was brought together and designed to be sensitive to its setting whilst also delivering a viable and effective use for the heritage asset, which is a recurring theme throughout the relevant policies. PGL are committed to Ford Castle's longstanding protection and restoration. Investing in and replacing the existing structures to ensure the longstanding use is viable in this post Pandemic setting is pivotal to this objective. Furthermore, technical reports attached to this planning and listed building application (which are summarised within Section 6 below), support the case that the proposal comply with relevant policies at all levels.

6.0 Summary of Technical Assessments

6.1 Assessment Summary

- 6.1.1 Supporting this application are a number of Technical Reports which have informed the development and design of the proposals. The range of supporting reports have been informed through the pre-application discussions with the Council to ensure that all relevant technical issues are considered and addressed in a comprehensive and integrated manner.
- 6.1.2 This application is supported by the following Technical Assessments that are summarised below:
- Heritage Statement;
 - Preliminary Ecological Assessment;
 - Shadow Habitats Regulation Assessment;
 - Transport Assessment;
 - Travel Plan Statement;
 - Construction Method Statement;
 - Refuse Strategy Statement;
 - Landscape and Visual Assessment;
 - Flood Risk Assessment & Drainage Strategy;
 - Arboricultural Impact Assessment.
- 6.1.3 Please see below a summary of each Technical Assessment which supports this application.

6.2 Heritage Statement

- 6.2.1 A Heritage Statement has been produced to assess the significance of any known or potential heritage assets of archaeological nature within the boundary of the Site, in accordance with the guidelines of the Chartered Institute for Archaeologists and Historic England.
- 6.2.2 In respect to archaeology, it has been established through baseline evidence that although activity from the prehistoric period is attested to in the wider area through the retrieval of finds, that it is not until the Iron Age/Roman period that established settlement is evident and that this likely favoured more topographically favourable areas in relation to the watercourses with the area, the Site likely peripheral to activity including the later medieval activity which focussed away from the Site around the church and castle. Archaeological potential is not therefore considered to warrant further investigation at this stage, with the general lack of evidence for activity and the anticipated levels of disturbance associated with the proposals perhaps warranting a watching brief only as a best practice measure to record remains in the unlikely event that they are present.
- 6.2.3 In respect to archaeology, it has been established through baseline evidence that although activity from the prehistoric period is confirmed in the wider area through the retrieval of finds, it is not until the Iron Age/Roman period that established settlement is evident. It is likely favoured more topographically favourable areas in relation to the watercourses with the area, the Site likely peripheral to activity

including the later medieval activity which focussed away from the Site around the church and castle. Archaeological potential is not therefore considered to warrant further investigation at this stage.

- 6.2.4 In respect to heritage, it has been established that one Listed Building will experience minimal less than substantial harm as a consequence of changes within its setting. It is anticipated that the limited level of harm identified will allow a favourable determination in respect to Section 66 of the Listed Buildings and Conservation Areas Act, with consideration permitted through the process of applying the balancing effect of public benefits allowed by the NPPF and with due regard to the otherwise positive effects that the proposals would have on the asset - this being the continued viable use of the Grade I Listed Ford Castle and the effects that this would have on viability of associated assets.

6.3 Preliminary Ecological Assessment

- 6.3.1 A Preliminary Ecological Assessment (PEA) was produced following a site walkover which occurred in September 2021.
- 6.3.2 The PEA concluded that further assessment in respect of the adjacent River Till SSSI/SAC is likely to be required for Northumberland County Council to discharge its relevant duties. Therefore, a Stage 1 'screening' report which considers the potential for the proposed activities and operation to result in a likely significant effect on the SAC has been produced and supports this application (as summarised below).
- 6.3.3 Regarding further survey work, the PEA concluded that no further ecological surveys are necessary and therefore an Ecological Impact Assessment is not required.

6.4 Shadow Habitats Regulations Assessment

- 6.4.1 A 'Shadow' Habitats Regulations Assessment (HRA) has been produced to inform the Screening Stage (1) of a Habitats Regulation Assessment (HRA) in respect of these proposals.
- 6.4.2 This report provides supporting information to assist the Competent Authority (Northumberland County Council) to undertake the first (screening) stage of a HRA which principally aims to establish the potential for Likely Significant Effects on National Network Sites (formerly European designated sites e.g. Special Conservation Areas and Special Areas of Protection) to arise in respect of the development activities which are proposed (alone or in-combination) and to "sign post" any follow-on stages of assessment, as required.
- 6.4.3 This report does not constitute a 'screening assessment' and it is incumbent upon the Competent Authority to carry out the test for Likely Significant Effects as required under Article 6(3) of the Habitats Directive. The Competent Authority must undertake their own assessment and provide a decision to the project proponent.
- 6.4.4 This report provides site-specific details in respect of the proposed development and potential effects on the relevant National Network Sites that are present within a 2km radius of the Site. This distance is

considered appropriate due to the localised nature of the proposed development and as it does not involve any emissions / discharges to air or new discharges to water.

- 6.4.5 No Ramsar sites are present within a 10km radius.
- 6.4.6 This Report concludes, that based on available scientific information and project details provided, the proposed development would not result in an adverse effect on the relevant National Network Site (River Tweed) alone or in combination with other projects.
- 6.4.7 As such, it is not considered that an Appropriate Assessment is required.

6.5 Transport Statement

- 6.5.1 A Transport Statement (TS) has been produced to assess the development's traffic impacts on the local highway network.
- 6.5.2 The TS has determined that the proposed development will not result in a perceptible detrimental impact on the local highway network, both in terms of highway operation and highway safety. It is therefore concluded that the continued use of the Site as a residential activity centre would be acceptable and would not pose any concerns in terms of highway safety or highway operation.

6.6 Travel Plan Statement

- 6.6.1 A Travel Plan Statement (TPS) has been produced to summarise the measures and initiatives designed to help reduce reliance on the private car through promoting the use of sustainable forms of transport.
- 6.6.2 As part of the plan, a Travel Plan Co-ordinator will be appointed to promote the Plan to staff and guests, implement the Plan's measures, provide the necessary reporting, liaison with local authorities, and develop the Travel Plan in response to changes in local transport conditions, travel habits and trends.
- 6.6.3 Regular monitoring and review will provide a measure of the success of the TPS and identify where improvements can be made.

6.7 Construction Method Statement

- 6.7.1 A Construction Method Statement (CMS) has been produced to provide clarification of the construction method pertinent to highways and transportation and how it will be undertaken as to not impact the operation or safety of the site or surrounding highway.
- 6.7.2 The CMS confirms that deliveries would include:
- timber poles;
 - steelwork;
 - machined timbers;
 - plant; and
 - concrete.

- 6.7.3 These deliveries would be made via flatbed trucks or concrete mixers, as appropriate.
- 6.7.4 The activity equipment and associated materials would be delivered via the unnamed road which junctions off the B6353 approximately 330 metres to the east of the primary site access. The unnamed road provides access to various properties including Jubilee Cottage.
- 6.7.5 Please refer to Section 4.0 of the CMS which describes how the CMS will be implemented with regards to communicating the construction requirements, commencement date etc, to stakeholders, and details to be provided to staff/HGV drivers/contractors regarding site restrictions and implemented measures.

6.8 Refuse Strategy Statement

- 6.8.1 A Refuse Strategy Statement has been produced to confirm the waste collection arrangements and how they will be undertaken as to not impact the operation of the site, or safety either on-site or on the surrounding highway. It should however be noted that the Refuse Strategy was established under the previous operator and is therefore already consented given that there is no material change to the operation or use of the site.
- 6.8.2 To summarise, a Swept-Path Analysis has been undertaken which demonstrates that RCVs can access, manoeuvre and egress in a forward gear without any issues.
- 6.8.3 PGL will agree a formal contract with a commercial waste management company which includes a list of measures to ensure refuse collection is undertaken safely and efficiently.

6.9 Landscape and Visual Assessment

- 6.9.1 A Landscape and Visual Assessment (LVA) has been produced to identify the landscape character of the site and its context, as well as the nature of views towards and from the site, to inform the appraisal, and to assess the potential landscape and visual effects which would be likely to occur if the proposed enhancement were to take place.
- 6.9.2 In respect of landscape impacts, the LVA considers that the likely landscape effect experienced upon the application site is minor/negligible as although the change in activity equipment would be evident, it would not alter the landscape context of the application site. The likely effects upon the immediate character of Ford Castle and Ford village are assessed as minor/moderate negative due to the perceived intensification of the use which would be experienced from isolated areas of the village. The effect upon the Duddo and Lowick character area would be minor/negligible negative due to the isolated nature of the proposed development.
- 6.9.3 The assessment has identified that the potential effects upon landscape receptors would be both within the site itself and within the immediate landscape context of Ford village with a minor/moderate negative effect upon the village itself, and a minor/negligible effect upon the Duddo and Lowick character area.
- 6.9.4 Effects upon individual landscape elements and features within the site range from negligible to minor negative, primarily due to the loss of grassland within the application site area. There would also be negligible and minor/negligible negative effects upon aesthetic and perceptual aspects. In summary, the

negative landscape effects experienced would be focused upon individual site features within the site itself and within the immediate landscape context.

- 6.9.5 In respect of visual impacts, the proposed development would be visible from a number of receptors to the north, east and south of the site; with clear views to the site only afforded from the east from residential properties on the edge of Ford village which would experience moderate/major and moderate effects. All other receptors assessed would experience effects less than moderate which is due to the enclosed, partially screened nature of the application site.
- 6.9.6 All other visual effects upon walkers, road users and recreational users/visitors would be less than moderate.
- 6.9.7 To summarise, the LVA concludes that proposed development would enhance the existing outdoor activity facilities associated with Ford Castle Activity Centre through the provision of new, additional equipment, within the field currently used for outdoor activities.
- 6.9.8 The appraisal identifies that the landscape effects of the proposed development would be localised and predominantly contained within the application site itself. Landscape effects further from the site are identified as being minor/negligible.
- 6.9.9 The site is visually contained by mature tree cover to the north and west, and Ford Castle walled gardens to the south with several mature trees also to the south. The visual envelope extends to the east to approximately 0.25km from the site boundary and includes two properties which are assessed as experiencing moderate-major and moderate effects. All other visual effects are assessed as less than moderate.

6.10 Flood Risk Assessment & Drainage Strategy

- 6.10.1 A Flood Risk Assessment and Surface Water Drainage Strategy has been produced in accordance with guidance presented within the National Planning Policy Framework (NPPF) and its associated Planning Practice Guidance (PPG), taking due account of current best practice documents relating to assessment of flood risk published by the British Standards Institution BS8533.
- 6.10.2 In respect of flood risk, the Environment Agency Mapping indicates that the Site is wholly located in Flood Zone 1 and is at very low risk of fluvial and surface water flooding. The flood screening assessment also concludes that the Site is not at risk from any other source of flooding.
- 6.10.3 Turning to drainage, a preliminary drainage strategy has been developed to demonstrate that the requirements of national, regional, and local planning policy can be achieved at the Site given the nature and the quantum of development proposed. Currently there is no formal drainage system on the Site as there are no buildings or structures. The introduction of activity shelters and air rifle sheds (amongst

other equipment) prompts the requirement for consideration of a drainage system to compensate for the introduction of impermeable areas.

- 6.10.4 It is proposed that the new drainage strategy will infiltrate or runoff the ground. The method of attenuation comprises of swales sited around the contributing catchment area, adjacent to the structures generating runoff. The swales will infiltrate runoff up to the 1% AEP + 40% CC event.
- 6.10.5 Infiltration testing will commence in late 2021 to confirm that this method is suitable for the geology. Because of the low area of impermeable surfaces and subsequent low volume of runoff, it is projected that this method is the most feasible and achievable for the Site.
- 6.10.6 In common with most drainage strategies put forward in support of planning applications, the strategy presented here will need to be subject to detailed design and relevant approvals before it is brought into use.

6.11 Arboricultural Impact Assessment

- 6.11.1 An Arboricultural Impact Assessment has been produced to assess the impact on trees.
- 6.11.2 The report concludes that two trees (T5 and T11) need to be moved to facilitate the proposal. These trees are considered suitable for transplanting due to their age and size, and will therefore be moved to more suitable areas of the site. T8 (Category U) has also been recommended for removal and replacement due to poor live growth. These proposals therefore offer the opportunity for Arboricultural enhancements within the Site.
- 6.11.3 All other trees and groups will be retained, protected and integrated into the proposal. Sufficient space and adequate protection measures have been set out to ensure that retained trees are not damaged during the pre-construction and construction phases and to enable their successful retention post-construction. Tree protection measures are discussed within the AIA and are also illustrated on the Tree Protection Plan.
- 6.11.4 Trees T1, G3 and G12 are subject to construction within their root protection areas. Special measures are therefore recommended to ensure that these trees and tree groups are not damaged. These measures are also discussed within the AIA and are also illustrated on the Tree Protection Plan.

7.0 Conclusion

- 7.1.1 PGL are thrilled to have the opportunity to deliver their offering at this unique property which complements their existing portfolio both in terms of accommodation character and geographical location. The property will be secured on a leasehold basis with the grounds continuing to be managed by the landlord alongside the wider Estate.
- 7.1.2 PGL's use of the site will ensure the long-term future of the Estate as a single entity through a sustainable and beneficial use. The proposals contained within this submission will therefore not only secure the Site's future, but it will also improve the Site's offering, with a fresh new operator and brand.
- 7.1.3 This application is supported by a full suite of documents and drawings covering the range of planning and technical considerations pertinent to the Proposals. Based on our assessments submitted with this application, and the above summary, we consider that these Proposals not only satisfy the Council's validation requirements, but also demonstrate their acceptability in all material planning terms.

To summarise, this proposal will deliver the full use of the building and future protection of the historic Ford Castle Estate. On behalf of our Client, we therefore look forward to working with Northumberland County Council and relevant statutory consultees to achieve formal planning and listed building permission.

APPENDIX 1: PLANNING HISTORY

App Ref	App type	Description	Date Validated	Date Determined	Decision	Case Officer
19/02056/LBC	LBC	Replace existing felt to flat roof and parapet walkway to Flag Tower with new ventilated lead flat roof and lead covered walkway	26 Jun 2019	05 Sep 2019	Permitted	Miss Stephanie Forster
19/00457/LBC	LBC	Listed Building Consent: Addition of fall arrest man-safe system to north roof pitch, P22; alterations to locations of roof access hatches previously consented; amendment to roofing finishes to the east wing roof pitches; external alterations to extract vent grille through leaded light window, north elevation; replacement of asphalt roof to potting shed building adjacent to walled garden; and internal alterations to Chauffeur's Cottage bathroom and store to form 2 shower rooms and a WC cubicle, with 3 extractor vent terminals up through the existing felt flat roof of the adjacent plant room	25 Feb 2019	17 Apr 2019	Permitted	Miss Stephanie Forster
17/04110/LBC	LBC	Listed Building Consent for works to protect building fabric including lifting parapet stones, adding a lead DPC, scarpement protection, parapet gutters, sacrificial flashings, lead catchpits and sumps where necessary. Replacement of bituminous felt with lead to roofs F3 & F5. Creation of safe roof access to all high level roofs via new lead access hatches and new ladders. Improve drainage to the balcony on the north elevation with the addition of a groove in the stonework to the base of the	01 Dec 2017	24 Jan 2018	Permitted	Unknown

App Ref	App type	Description	Date Validated	Date Determined	Decision	Case Officer
		balcony and new pipe, hopper & downpipe.				
16/01889/LBC	LBC	Listed Building Consent: Addition of lead flashing detail to scarcements (James Tower) for protection of exposed stonework and joints in stonework to prevent water ingress. Replacement of cementitious modern ridge and hip tile (several failing) in lead to roof P7. Creation of safe roof access for future maintenance to all high level roofs via new lead access hatches to both flat lead roofs and pitched slated roofs	02 Jun 2016	19 Jul 2016	Permitted	Mr Ragu Sittambalam
15/02284/LBC	LBC	Listed building consent for re-roofing, gutter detailing, repointing and overhauling of metal window frames. Erection of scaffolding to allow full roof inspection, stripping and reinstatement of stone roof slates (replacing as appropriate), reconfigure, overhaul and replacement of rainwater guttering, hoppers and downpipes and repointing of open joints.	10 Jul 2015	02 Sep 2015	Permitted	Mr Daniel Puttick
15/01139/DISCON	DOC	Discharge of all conditions of planning permission 14/04024/LBC - Internal alterations to form 1 new accessible shower room and alterations to existing toilets to form a shower room	17 Apr 2015	13 Jul 2015	Permitted	Miss Ros Duncan
14/04024/LBC	LBC	Internal alterations to form 1 new accessible shower room and alterations to existing toilets to form a shower room	02 Dec 2014	10 Feb 2015	Permitted	Miss Ros Duncan

App Ref	App type	Description	Date Validated	Date Determined	Decision	Case Officer
14/03186/LBC	LBC	Listed Building Consent: Re roof existing slate tile roof to geography block. Slates will be replaced like for like with welsh slate to part and west moorland to other; where possible existing tiles will be reused. Cast iron rain water goods are to be overhauled with like for like.	29 Sep 2014	25 Nov 2014	Permitted	Miss Ros Duncan
14/01115/DISCON	DOC	Discharge of conditions 3, 4, 5, 6, 7, 8, 9 and 10 of listed building consent 13/03928/LBC - internal alterations to create 3 new bathrooms and alter or extend 8 bathrooms	09 Apr 2014	08 May 2014	Permitted	Miss Ros Duncan
13/03928/LBC	LBC	Listed building consent for internal alterations to create 3 new bathrooms and alter or extend 8 bathrooms	23 Dec 2013	07 Mar 2014	Permitted	Miss Ros Duncan
13/00929/FUL	FUL	Erection of low ropes and assault courses in sports field to the north east of the castle	18 Apr 2013	11 Jun 2013	Permitted	Miss Ros Duncan
12/01077/DISCON	DOC	Discharge of condition number 3 of application C/09/00065/LBC - materials	02 Apr 2012	25 May 2012	Permitted	Mrs Sarah Seabury
12/01034/FUL	FUL	Construction of landing platform and anchor pole for lower end of zip wire, on far side of dene area behind castle	08 May 2012	03 Jul 2012	Permitted	Miss Ros Duncan
12/00936/FUL	FUL	Erection of a linear pole climbing course on unused field to south-east of castle grounds	16 Apr 2012	07 Jun 2012	Permitted	Miss Ros Duncan
11/01108/COU	COU	Change of use to Tea Room/Café [The Estate House]	27 Jun 2011	01 Aug 2011	Permitted	Mr Tony Lowe
C/09/00065/LBC	LBC	Listed Building Consent for installation of boilers including new flues and flue housing and connection to existing heating system	22 Apr 2009	03 Aug 2009	Permitted	Mrs Sarah Seabury

App Ref	App type	Description	Date Validated	Date Determined	Decision	Case Officer
N/09/B/0150	LBC	Alterations to improve disabled facilities	24 Mar 2009	17 Jul 2009	Permitted	Unknown
C/01/00263/LBC	LBC	Listed Building Consent for installation of suspended ceiling	05 Dec 2001	21 Mar 2002	Permitted	Unknown
C/91/B/039 LBC	LBC	Listed Building Consent for the provision of a communications room, generator room and oil tank compound and the erection of a radio aerial	24 Jan 1991	28 Mar 1991	Permitted	Unknown
C/87/B/044 LBC	LBC	Listed Building Consent for installation of LPG tank in Ground Keepers yard	07 Dec 1987	29 Feb 1988	Permitted	Unknown
C/87/B/299	FUL	Installation of LPG tank in Ground Keepers yard	07 Dec 1987	13 Jan 1988	Permitted	Unknown
C/84/B/313 LB41	LBC	Alterations and change of use to staff accommodation at The Flag Tower	18 Dec 1984	18 Dec 1984	Permitted	Unknown
C/84/B/314 LB42	LBC	Alterations to garage block to provide field study centre	18 Dec 1984	14 Feb 1985	Permitted	Unknown

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