

# LISTED BUILDING CONSENT APPLICATION

**Residential Adventure and Activity Centre**

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

Prepared for: PGL Travel Ltd

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## EXECUTIVE SUMMARY

- 1.1.1 This 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 PGL's 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 Activity Centre which has been operating since circa 2012. The replacement activity equipment is proposed in an area which is already used for this purpose, albeit that the range of activities proposed is altered to meet the aspirations of PGL's 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 PGL's 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 Listed Building alterations within the Castle. This Listed Building Statement therefore supports the Listed Building Application submission.

## 1.0 Introduction

### 1.1 Overview

*This Listed Building Application Statement has been prepared and is submitted by SLR Consulting Limited ('SLR') on behalf of PGL Travel Ltd ('PGL'). It supports their Listed Building Consent Application for the refurbishment and upgrade to 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 activity 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 suitability of facilities and accommodation within the Castle building, which will also secure the long-term use and management of the 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.
- 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 the applications relate 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 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 **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.
- 1.2.4 The description of development is as follows:

*'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 within Ford Castle to support 175 guests, 23 teachers and 50 PGL Staff'*

- 1.2.5 Further information on the proposals is detailed within the Technical Documentation, Plans and Drawings and the Design, Access and Heritage Statement (DAHS) prepared by SLR Consulting.

## 1.3 The Submission Content

- 1.3.1 In accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990, and Berwick-upon-Tweed Borough Local Plan, the planning submission comprises the following documentation:
- This Application Statement (this document) which sets out the site context, content of the application and planning policy justification;
  - Completed and signed copies of Ownership Certificates;
  - Design, Access and Heritage Statement;
  - Preliminary Ecological Appraisal;
  - 'Shadow' Habitats Regulations Assessment.
- 1.3.2 The following drawings and plans listed within **Table 1-1** are submitted as part of the listed building consent application.

### Table 1-1 Drawing List

Drawing Title	Drawing Reference	Size	Scale
Site Location Plan	2035-FC-001	A3	1:1250
Courtyard Upper Roof Plan	2035-CY-005	A1	1:100
Courtyard Lower Roof Plan	2035-CY-004	A1	1:100
Courtyard Ground Floor Plan	2035-CY-010	A1	1:100
Courtyard First Floor Plan	2035-CY-011	A1	1:100
Main Castle Proposed Basement Floor Plan	2035-MC-010 Proposed Basement Floor Plan	A1	1:100
Main Castle Proposed Ground Floor Plan	2035-MC-011 Proposed Ground Floor Plan	A1	1:100
Main Castle Proposed First Floor Plan	2035-MC-012 Proposed First Floor Plan	A1	1:100
Main Castle Proposed Second Floor Plan	2035-MC-013 Proposed Second Floor Plan	A1	1:100
Main Castle Proposed Roof Plan	2035-MC-014 Proposed Roof Plan	A1	1:100
Proposed Bathroom Alterations S07 and S23	2035-MC-100 Bathroom Alterations Examples Sheet 1-RevC	A1	1:20
Proposed Bathroom Alterations S15 and S16	2035-MC-101 Bathroom Alterations Examples Sheet 2-RevC	A1	1:20
Proposed Bathroom Alterations F14 and F26	2035-MC-102	A1	1:20
Proposed Bathroom Alterations F41	2035-MC-103	A1	1:20
Proposed Bathroom Alterations F36 ad F37	2035-MC-104	A1	1:20
Proposed Bathroom Alterations F33 and F20	2035-MC-105	A1	1:20
Proposed Bathroom Alterations F04 and F05	2035-MC-106 Bathroom Alterations Examples Sheet 7-RevC	A1	1:20
Proposed Kitchen Alterations	2035-MC-110 Kitchen Alterations-RevD	A1	1:50
Firebox Insert and Boxing examples	2035-MC-210 Fireplace Insert & Boxing Examples	A1	1:20 1:2
Proposed Clock Tower Scope of Work	2035-Doc-01-Clock Tower Scope of Works – Listed Building-RevB	na	na
Proposed Basement Scope of Work	2035-Doc-03-Scope of Works - Basement Only– Listed Building-RevB	na	na
Proposed Ground Floor Scope of Work	2035-Doc-05-Scope of Works – Ground Floor – Listed Building-RevB	na	na
Proposed First Floor Scope of Work	2035-Doc-07-Scope of Works – First Floor – Listed Building-RevB	na	na
Proposed Second Floor Scope of Work	2035-Doc-09-Scope of Works – Second Floor – Listed Building-RevB	na	na
Proposed Bedroom Specification	2035-Doc 11 – Bedroom – Specification - RevA	na	na
Proposed Handrail Details for Staircase 3	2035-MC-214 - Proposed Handrail Details - Stair 3 - West - RevA	A1	1:2 1:50



Drawing Title	Drawing Reference	Size	Scale
Proposed Handrail Detail for Staircase S20	2035-MC-215- Proposed Handrail Detail Stair S20 - RevA	A1	1:2 1:50
Proposed Handrail Detail for West Staircase	2035-MC-216 Proposed Handrail Detail West Staircase	A1	1:50

## 1.4 Pre-application Advice

### Northumberland County Council

- 1.4.1 A pre-application advice request was submitted to NCC on 3<sup>rd</sup> 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 was 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 11<sup>th</sup> 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 SLR’s Heritage team to discuss the wider heritage considerations on 2<sup>nd</sup> 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 respect of specific external heritage matters raised by the proposed activity alterations, these are considered in our Planning and Listed Building Application which deals with the activity field. Removal and replacement of modern shower rooms and toilets are

addressed within the Listed Certificate of Lawfulness Applications, where these are not pertinent to this application.

### Historic England

- 1.4.6 A pre-application advice request was submitted to Historic England (Ref: **PA01167589**) detailing the proposed development. Formal advice was received on 23<sup>rd</sup> November 2021 from Martin Lowe.
- 1.4.7 In summary, Historic England welcomed the proposals. HE noted that whilst there remain some rooms that retain historic decoration and details, the interior is not 'overly sensitive' in this regard. Rather, the layout and the archaeological potential of its fabric is more significant.
- 1.4.8 HE concludes that as the proposals are using the existing layout, then impact is minimised.
- 1.4.9 HE does acknowledge that the upgrading of fire safety measures and other services could have an impact, but accepted that this detail was still awaited, (this detail has however been included within this submission – and is addressed within the Design, Access & Heritage Statement).

## 1.5 The Structure of this 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 13<sup>th</sup> century and was subject to fortification in approximately 1338. By the 14<sup>th</sup> 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 The main 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'. To achieve this, extensive repairs were undertaken to ensure the buildings future protection and restoration.
- 2.1.6 The Site area to which this application relates is 2,050 m<sup>2</sup>.

### 2.2 Site Access

- 2.2.1 The overall Castle Estate has four access points, however only the established access, off the B6353 leading directly to Ford Castle Portcullis Gate is included within PGL's leasehold interest through a right of access. Access will not alter because of the proposals, therefore no change to the consented and established access is required. 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 under the lease arrangements.

## 2.3 Ecological Designations

- 2.3.1 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.

## 2.4 Heritage Designations

- 2.4.1 Ford Castle originated in the 13th century as a castle defending a crossing of the River Till and was the scene of important events in Border history, most notable the connection to the Battle of Flodden in 1513. It developed into a manor house in the late 17th century, which then underwent stylistic changes and extensions in the 18<sup>th</sup> and 19<sup>th</sup> centuries.
- 2.4.2 Since the mid-20th century it has been used for outdoor education. This longstanding use resulted in much of the internal domestic character being lost, but the Castle's retains its external character whilst the layout and fabric of the interior is of historic and archaeological interest. The Castle's close connection with the village of Ford results in one of the most charming and distinctive settlements in Northumberland. The Castle is covered by various listings, mostly at Grade I.

## 2.5 Current Use

- 2.5.1 The Site's current use is as a residential activity centre (Use Class C2), which opened in 2012. The previous owners have ceased all operations since 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 relevant 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 PGL's 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, which is 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 established 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. PGL's 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 To summarise, PGL's proposals under this listed building application comprise the refurbishment of the main Ford Castle building and associated Courtyard, involving:
- Works to the historic bathrooms (removal/repair of fittings);
  - Installation of extractor ventilation to bathrooms;
  - Conversion of attic bedroom into a bathroom facility;
  - Insertion of protective barriers to openings of fireplaces;
  - Insertion of protective boxes around fireplaces;
  - Installation of handrails;
  - Installation of kitchen facilities;
  - Removal and replacement of floor coverings to bedrooms and communal areas;
  - General renewal/fitting of curtain fixtures to bedrooms;
  - General installation of non-fixed unlit emergency escape signage;
  - General re-decorating in accordance with the specification set out within the lease of the Castle.

### 4.2 Description Overview

- 4.2.1 These Proposals involve the sensitive refurbishment of existing accommodation, classrooms, bathrooms, kitchens and service areas to support 175 guests, 23 teachers and 50 PGL staff. It is important to note that there is no change to the layout proposed, and therefore, any internal alterations are minor cosmetic revisions, which are required to bring the building facilities up to required standards and back into viable use, as well as working for PGL operationally. In addition, Ford Castle previously operated to a 180-guest capacity, therefore, there will be a slight reduction in guest numbers. This is due to PGL's new operating model which utilises 3ft wide beds (rather than 2.6ft wide), resulting in a reduced number of beds and thus maximum number of children being accommodated.
- 4.2.2 The proposals include 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, installation of stair handrails, relating to the following buildings within the Ford Castle Estate:

- Ford Castle (Grade I Listed) [NHLE reference 1371004];
- Ford Castle North Forecourt (Grade II\* Listed) [NHLE reference 1042186] and;
- Ford Castle East Gateway (Grade II\* Listed) [NHLE reference 1154087].

4.2.3 These Proposals preserve the structural integrity and key characteristics that render the buildings Grade I and Grade II\* listed. As the proposed floor plans illustrate, each room within each floor has been colour coded to define its new purpose and detail the proposed internal arrangements.

### 4.3 Building Alterations and Historic Context

4.3.1 Below is a summary of the proposed refurbished uses within Ford Castle, Ford Castle North Forecourt and Ford Castle East Gateway. To summarise, the lower floors will continue to provide the back of house, catering, office, and teaching areas. The ground floor will provide lounge breakout space for guests and staff, with the museum being retained. One guest bedroom will also be provided at this level and the existing ancillary kitchen will be retained and refurbished.

4.3.2 The first and second floors will provide bedrooms (for children and teachers) and bathroom facilities. There is an element of teacher accommodation provided at each level to aid the overseeing of younger guests. The guest bedrooms will accommodate multiple children on a dorm style basis. Overall, 12 guest bedrooms (dorms) are provided, along with 13 adult bedrooms (teachers).

4.3.3 The existing and proposed floor plans detailed in the tables below, illustrate the uses of the various rooms. The room uses remain generally consistent with the buildings most recent use and therefore the main changes are cosmetic and relate to the upgrading of facilities, such as the kitchen and ablutions facilities. As detailed above, the existing activities are proposed to be replaced and the various new activities and new pond illustrated on the Proposed Site Plan and associated drawings are the subject of a separate Planning and Listed Building Application.

4.3.4 Please note, to clarify:

- ‘Ford Castle’ as referred to on the drawings includes both Ford Castle (Grade I Listed) and Ford Castle North Forecourt (Grade II\* Listed).
- ‘Courtyard’ as referred to on the drawings is Ford Castle East Gateway (Grade II\* Listed).

4.3.5 Please see below three Tables which provide a breakdown of works proposed within the buildings.

4.3.6 **Table 4-1** provides a summary of the accommodation delivered, per building, per floor.

4.3.7 **Table 4-1** provides a summary of the works proposed per building, per floor.

**Table 4-1 – Proposed Plans and Elevations**

Proposed	Reference number	Scale	Accommodation delivered
Main Castle Basement	2035-MC-010	1:100 @ A1	<ul style="list-style-type: none"> <li>• Kitchen and stores</li> <li>• Laundry</li> </ul>

Proposed	Reference number	Scale	Accommodation delivered
			<ul style="list-style-type: none"> <li>• 3 No. Dining Rooms</li> <li>• 5 No. Offices</li> <li>• 1 No. Classroom</li> <li>• 4 No. Toilets</li> </ul>
Main Castle Ground Floor	2035-MC-011	1:100 @ A1	<ul style="list-style-type: none"> <li>• Main Entrance Lobby</li> <li>• King James Museum</li> <li>• Games Area</li> <li>• Breakout Space</li> <li>• 2 No. Lounge Areas</li> <li>• Library</li> <li>• 1 No. Guest bedroom</li> <li>• 1 No. Adult Bedroom</li> <li>• 2 No. Stores</li> <li>• 3 No. Toilets</li> <li>• 1 No. Shower and Toilet</li> <li>• 2 No. Shower</li> </ul>
Main Castle First Floor	2035-MC-012	1:100 @ A1	<ul style="list-style-type: none"> <li>• 8 No. Guest Bedrooms</li> <li>• 4 No. Adult Bedrooms</li> <li>• 13 No. Shower and Toilet</li> <li>• 2 No. Shower</li> <li>• 1 No. Toilet</li> <li>• Cleaning Store</li> </ul>
Main Castle Second Floor	2035-MC-013	1:100 @ A1	<ul style="list-style-type: none"> <li>• 3 No. Guest Bedrooms</li> <li>• 7 No. Adult Bedrooms</li> <li>• 2 No. Toilets</li> <li>• 4 No. Shower and Toilets</li> </ul>
Courtyard Ground Floor	2035-CY-010	1:100 @ A1	<ul style="list-style-type: none"> <li>• Plant room</li> <li>• 4 No. Staff Bedrooms</li> <li>• 1 No. Guest Bedroom</li> </ul>
Courtyard First Floor	2035-CY-011	1:100 @ A1	<ul style="list-style-type: none"> <li>• Plant Room</li> <li>• 3 No. Storeroom</li> <li>• Housekeeping</li> <li>• Activity Equipment Storage</li> <li>• 3 No. Guest Bedroom (including 1 No. wheelchair accessible bedroom)</li> <li>• 4 No. Adult Bedroom</li> <li>• 2 No. Kitchenette</li> <li>• 2 No. Adult Lounge</li> <li>• 11 No. Shower and Toilet</li> </ul>

**Table 4-2 - Proposed Works Per Building, Floor and Room**

Proposed Works	Building/Floor	Rooms
		<ul style="list-style-type: none"> <li>• <b>Room G12 (Basin Repair)</b></li> </ul>



Proposed Works	Building/Floor	Rooms
<p>Refurbishment works affecting historic bathrooms (removal/repair/replacement of fittings)</p>	Main Castle Ground Floor	<ul style="list-style-type: none"> <li>• <b>Room G18</b> (<i>Toilet Removal &amp; Replacement</i>)</li> </ul>
	Main Castle First Floor	<ul style="list-style-type: none"> <li>• <b>Room F05</b> (<i>Removal of heated rail</i>)</li> <li>• <b>Room F14</b> (<i>Removal of heated rail</i>)</li> <li>• <b>Room F20</b> (<i>Covering of wall tiles for protective purposes</i>)</li> <li>• <b>Room F37</b> (<i>Removal of whole ablutions suite, heated rail, tiles and flooring. Replacement suite to include shower facilities</i>)</li> <li>• <b>Room F41</b> (<i>Covering of wall tiles for protective purposes, removal of whole suite, flooring and heated rail. Replacement suite to include shower facilities</i>)</li> </ul>
	Main Castle Second Floor	<ul style="list-style-type: none"> <li>• <b>Room S07</b> (<i>Removal of whole ablutions suite, heated rail, flooring and wall tiles. Replacement suite to include shower facilities</i>)</li> <li>• <b>Room S23</b> (<i>Covering of wall tiles for protective purposes, removal of whole suite, flooring and heated rail. Replacement suite to include shower facilities</i>)</li> </ul>
<p>Installation of extractor ventilation to bathrooms</p>	Main Castle First Floor	<ul style="list-style-type: none"> <li>• <b>Room F33</b></li> <li>• <b>Room F37</b></li> <li>• <b>Room F41</b></li> </ul> <p><i>(Removal of baths from extant bathrooms referenced above and the conversion into shower room will necessitate the insertion of an extractor fan to remove excess moisture from the building)</i></p>
	Main Castle Second Floor	<ul style="list-style-type: none"> <li>• <b>Room S07</b></li> <li>• <b>Room S15</b></li> <li>• <b>Room S23</b></li> </ul> <p><i>(Removal of baths from extant bathrooms referenced above and the conversion into shower room will necessitate the insertion</i></p>

Proposed Works	Building/Floor	Rooms
		<i>of an extractor fan to remove excess moisture from the building)</i>
Repositioning of Attic Room Doorway	Main Castle Second Floor	<ul style="list-style-type: none"> <li>• <b>Room S16</b></li> </ul> <p><i>(Door to be relocated to improve circulation space of room S16. To be relocated a minimal distance as part of the proposals. The skirting and boarding removed would be reinstated or replicated to either side of the relocated door).</i></p>
Conversion of an Attic Bedroom to Bathroom Facility	Main Castle Second Floor	<ul style="list-style-type: none"> <li>• <b>Room S15</b></li> </ul> <p><i>(Ablutions facilities to be installed)</i></p>
The insertion of protective barriers to the openings of fireplaces of sixteenth/seventeenth century date	Main Castle First Floor	<ul style="list-style-type: none"> <li>• <b>Room F09</b></li> <li>• <b>Room F21</b></li> <li>• <b>Room F40</b></li> </ul> <p><i>(Protective barriers to each of the fireplaces would seek to preserve the ability to appreciate the contribution that they make towards an understanding of the Castle, retaining visibility of highly important features whilst at the same time fulfilling a health and safety obligation in rooms where children will be unsupervised).</i></p>
	Main Castle Second Floor	<ul style="list-style-type: none"> <li>• <b>Room S06</b></li> </ul> <p><i>(Protective barriers to each of the fireplaces would seek to preserve the ability to appreciate the contribution that they make towards an understanding of the Castle, retaining visibility of highly important features whilst at the same time fulfilling a health and safety obligation in rooms where children will be unsupervised).</i></p>
The insertion of protective boxes around nineteenth century fireplaces	Main Castle Ground Floor	<ul style="list-style-type: none"> <li>• <b>Room G16</b></li> </ul> <p><i>(The proposals for each of the fireplaces would seek to preserve each fireplace including lintels, surrounds and any grates, hobs and register plates behind boxing. This is in the interest of fulfilling any health and safety obligations that should be</i></p>

Proposed Works	Building/Floor	Rooms
		<i>considered in rooms where children will be left unattended).</i>
	Main Castle First Floor	<ul style="list-style-type: none"> <li>• <b>Room F17</b></li> <li>• <b>Room F28</b></li> <li>• <b>Room F35</b></li> </ul> <p><i>(The proposals for each of the fireplaces would seek to preserve each fireplace including lintels, surrounds and any grates, hobs and register plates behind boxing. This is in the interest of fulfilling any health and safety obligations that should be considered in rooms where children will be left unattended).</i></p>
	Main Castle Second Floor	<ul style="list-style-type: none"> <li>• <b>Room S21</b></li> <li>• <b>Room S22</b></li> </ul> <p><i>(The proposals for each of the fireplaces would seek to preserve each fireplace including lintels, surrounds and any grates, hobs and register plates behind boxing. This is in the interest of fulfilling any health and safety obligations that should be considered in rooms where children will be left unattended).</i></p>
The installation of handrails to specific staircases	Main Castle Ground Floor	<ul style="list-style-type: none"> <li>• <b>Stair 3</b></li> </ul> <p><i>(Three stairwells currently devoid of a handrail or requiring an additional rail will, under the proposals, be used by children whilst moving about the Castle. The insertion of necessary rail fittings is therefore integral to the safety of the children)</i></p>
	Main Castle First Floor	<ul style="list-style-type: none"> <li>• <b>West Stair</b></li> </ul> <p><i>(Three stairwells currently devoid of a handrail or requiring an additional rail will, under the proposals, be used by children whilst moving about the Castle. The insertion of necessary rail fittings is therefore integral to the safety of the children)</i></p>
	Main Castle Second Floor	<ul style="list-style-type: none"> <li>• <b>Room S20</b></li> </ul> <p><i>(Three stairwells currently devoid of a handrail or requiring an additional rail will,</i></p>

Proposed Works	Building/Floor	Rooms
		<p><i>under the proposals, be used by children whilst moving about the Castle. The insertion of necessary rail fittings is therefore integral to the safety of the children)</i></p>
<p>Installation of Kitchen Facilities</p>	<p>Main Castle Basement</p>	<ul style="list-style-type: none"> <li>• <b>Room B26:</b></li> <li>• <i>Excavation of below ground drainage gully required between the cooker and external drain in service yard to east. To include the renewal of a grease trap in the service yard and the interior integration of the kitchen sink drainage currently breaching the external wall (extant sink drainage through wall to be removed with wall repaired) and the re-surfacing of the service yard with flag stones to provide enhancement)</i></li> <li>• <i>Covering of historic wall tiles</i></li> <li>• <i>Removal of extant fixtures and fittings and installation of new free-standing kitchen</i></li> <li>• <i>Installation of extractor fan through existing skylight</i></li> <li>• <i>Installation of electric cabling</i></li>   <li>• <b>Room B27-B31, B33 &amp; B36-B37</b> <i>(Removal of cupboards/shelving and floor covering and installation of new covering)</i></li> <li>• <b>Rooms B29</b> <i>(Installation of extractor fan through existing skylight and installation of concrete ramp)</i></li> <li>• <b>Room B34</b> <i>(Installation of electrical cabling)</i></li> <li>• <b>Room B37</b> <i>(condenser pipework required to facilities the planned use of the room as a cold room)</i></li> </ul>

4.3.8 In addition to the specific alterations listed above, there are some more general alterations which are required across most of the rooms within all three buildings. These include:

- Removal and replacement of modern vinyl and carpet floor coverings to bedrooms and communal areas;
- The renewal/fitting of curtain fixtures to bedrooms;
- Re-plastering (minimal) and re-decorating in accordance with a specification set out within the lease of the Castle;

- Replacement of existing power sockets with USB and power socket ports;
- Replacement and upgrading of extant non-historic light fittings;
- Installation of emergency lighting;
- Installation of fire signs;
- Installation of bedroom signage;
- Installation/renewal of power within the below rooms (Basement of Ford Castle):
  - B39
  - B24
  - B14
  - B07
  - B08
  - B11

4.3.9 For transparency, other proposals not addressed by the Listed Building Application are the refurbishment of a number of other bathroom/toilet facilities of clearly modern date for which a Certificate of Lawfulness will applied for under separate cover.

4.3.10 For clarity, the application for a Certificate of Lawfulness will cover all the floors and sanitaryware fittings within the following bathrooms except where features are explicitly referenced. Features in brackets will be either be retained or will be subject to the Listed Building Consent application.

- B16, B17, B18, B19 (not toilet), G12 (not basins), DG85, G17, G18 (not toilet), F04, F05 (not heated rail), DF107, F13, F14 (not heated rail), F18, F20 (not wall tiles), DF129, F24, F33, F26 (not heated rail) F36, F39, S03, S16 (not heated rail), S18.
- B35.
- G03A, G10, G08A, G014A, G15, G16, G18A, F07.

4.3.11 Please refer to the Design, Access and Heritage Statement (DAHS) which details the full scope of works proposed. The DAHS also assesses the potential impact to the Listing, provides a justification for the works, and where necessary or applicable, presents potential mitigation measures.

4.3.12 As a general summary, the above works are required to ensure the current and future fit for purpose viability of the Castle accommodation, and consequently, to secure the long-term conservation of the Castle. Where facilities are being removed, or re-configured, this will be done carefully and removed items will stored on the Estate. Works are not anticipated to breach the historic fabric, and where works are considered more 'obtrusive' i.e. the drainage excavation within the service yard, an archaeological watching brief is offered to be undertaken. Any substantial historic fragments not able to be reinstated will be considered for storage on the Castle Estate.

## 4.4 Employment

4.4.1 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 PGL's other sites staff car ownership is very low in any event.

4.4.2 Staff and guest rooms/accommodation are already provided within Ford Castle due to its extant use, however internal alterations proposed in this listed building application consider 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.

## 4.5 Parking and Access

- 4.5.1 There is an existing car park within Ford Castle, 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 in the TS.

## 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 installation of activity structures has already taken place as the grounds were already in use as a residential adventure and activity centre which ceased operations in 2020 owing to the Global Pandemic.
- 5.2.3 **NPPF Paragraph 197** contends 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, but

simply repurpose the building and ultimately bringing it back into full use, since they ceased in 2020. Rather than proposing their demolition and replacement, the refurbishment of the internal areas of the Main Ford Building and associated Courtyard would enable PGL to preserve the historic assets and allow the viable use of the buildings to continue, safeguarding the future of the site's listed buildings. PGL would therefore be protecting and conserving the buildings' internal fabric, bring a purpose back to the building's fabric.

## 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) is 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 **Policy F17** (Listed Building Development) states that works to a listed building will be permitted provided the historical elements of such are not weakened or altered. In addition, in line with **Policy F17**, the essential architectural or historic elements of the building will not be altered or weakened as a result of these proposals, instead this proposal seeks to restore and enhance the historical elements within Ford Castle, without altering the internal structural integrity. These proposals have been designed to enhance the aesthetics and overall appearance of such areas, which we believe is of benefit to the proposal.
- 5.3.4 **Policy F19** (Buildings of Special Architectural or Historic Interest) highlights the importance of retaining the surrounding setting of listed buildings, specifically mentioning the compatibility of surrounding structures and the visibility of the listed building.

### Northumberland Local Plan 2019

- 5.3.5 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.

- 5.3.6 Listed below are the other relevant emerging policies which we consider relevant to this proposal:
- 5.3.7 **Policy STP2** (Presumption in favour of sustainable development) highlighting the positive approach of the Council who will work pro-actively to ensure proposals improve the economic, social and environmental conditions of the area.
- 5.3.8 **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.
- 5.3.9 **Policy STP4** (Climate change mitigation and adaptation) contends 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 to support climate change adaptation.
- 5.3.10 **Policy STP5** (Health and wellbeing) aims to support developments which promote and support the health and wellbeing of communities, residents, workers and visitors.
- 5.3.11 **Policy QOP 1** (Design Principles) lists the principles in which the proposals design will be assessed against. This Policy ensures that buildings and spaces are functional and adaptable for future uses, facilitates an inclusive, comfortable, user-friendly and legible environment and supports health and wellbeing and enhances quality of life.
- 5.3.12 **Policy QOP 2** (Good Design and Amenity) contends 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.
- 5.3.13 **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. The proposals within this application allow the heritage assets to be continue to have purpose and therefore enable them to be valued, conserved protected and enhanced.
- 5.3.14 **Policy ENV 7** (Historic Environment and Heritage Assets) contends to conserve and enhance the significance, quality and integrity of Northumberland's heritage assets and their settings. 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 proposed refurbishment 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).

## 5.4 Policy Summary

- 5.4.1 Given that the proposal relates to the sensitive refurbishment of a Grade I listed building, the scheme aligns positively with adopted policy relating to the conservation and enhancement of the historic environment. Additionally, it is important to note that Ford Castle has previously undergone significant

repairs between 2015 and 2018 to ensure the building was removed from Historic England's 'Buildings at Risk register'.

- 5.4.2 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 the building to bring the facilities up to modern standards is pivotal to bringing the building back into its consented use as an outdoor activity centre. Furthermore, technical reports attached to this 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 two Technical Reports which have informed the development and design of the proposals. These Reports have also informed the future management regimes for the Castle to enable it to reopen as an outdoor activity centre. The 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:

- Design, Access Statement and Heritage Statement;
- Preliminary Ecological Assessment.

### 6.2 Design, Access Statement and Heritage Statement

6.2.1 This report has provided an assessment of the special interest of the Listed Buildings at Ford Castle where PGL Travel Ltd wish to install a new kitchen, carry out bathroom refurbishments and undertake otherwise minor works to facilitate the successful use of the Castle for the residential accommodation of groups of children and adults for outdoor activities.

6.2.2 Whilst some negligible or limited harm has been identified in respect to various isolated elements which hold historic fabric, the overall effect on the historic fabric of the individual Listed Buildings would (in accordance with the terminology of the NPPF) be at the extreme lower end of less than substantial. The proposed works are demonstrably able to be accommodated without appreciably affecting the overall understanding of the significance of the Listed Buildings and should be considered against the overarching principal of ensuring the long-term viable use of the Castle which will ensure its long-term conservation.

6.2.3 As a best practice measure, a watching brief by a buildings archaeologist could be undertaken during specific works applied for under this Listed Building Consent application. This would be during the removal of some of the floor coverings but also in the very unlikely event that historic fabric to certain walls is disturbed to an extent that would display a visible horizon during works in bathrooms. Locations are as follows:

- Ford Castle (1371004)
  - B14 floor covering
  - B24 floor covering
  - F37 bathroom refurb and ventilation – wall to rear of toilet
  - F41 bathroom refurb and ventilation – external walls
  - S07 bathroom refurb and ventilation – external walls
  - S23 bathroom refurb and ventilation – external wall
  - F33 ventilation insertion – external wall
  - S15 – bathroom installation and ventilation - external wall
- Ford Castle north forecourt walls and laundry and service wing (1042186)
  - B26 floor covering and drainage excavation
  - B27 floor covering
  - B28 floor covering
  - B29 floor covering

- B30 floor covering
- B31 floor covering
- B33 floor covering
- B37 floor covering
- B37 floor covering
- Ford Castle east gateway, east forecourt wall and handyman’s cottage (1154087)
  - G05 floor covering
  - G06 floor covering
  - G07 floor covering
  - G08 floor covering
  - G09 floor covering
  - G12 floor covering
  - G13 floor covering
  - G14 floor covering
  - G17 floor covering
  - G19 floor covering

6.2.4 Please refer to the Harm, Justification and Mitigation Measures Table within Section 6 which summarises the above described works and their potential impact to the specified Listed Buildings. A justification for the works where this is necessary or applicable and potential mitigation measures.

### 6.3 Preliminary Ecological Appraisal

6.3.1 A Preliminary Ecological Assessment (PEA) was produced following a site walkover which occurred in September and October 2021. The Phase 1 walkover survey found that the main castle site lacks any significant biodiversity interest. A bat roost of low conservation significance (soprano pipistrelle – day roost) has been retained when repairs were undertaken.

6.3.2 Regarding further survey work, the PEA concluded that no further ecological surveys are necessary and therefore an Ecological Impact Assessment is not required. This is because the entire Castle has been subject to recent extensive repairs involving the repointing of masonry, re-roofing and re-leading. This has led to the removal of gaps/holes/lifted tiles etc which in other situations bats make use of to access voids or roost underneath/between. Consequently, the lack of access will prevent bats from entering loft spaces other than where special provision has been made for them (e.g. via bat access slates or deliberately missing mortar under ridge tiles). As the Castle was in a failing condition prior to the works it would have presumably been necessary to undertake bat surveys in advance which then informed the need for licensing and mitigation.

6.3.3 It was also noted on both the September and October 2021 visits undertaken by SLR that bat mitigation features had been incorporated into the roof above the servants area/kitchen comprising of “Morris” lead slates in the upper roof pitch and deliberate gaps in the mortar under the ridge tiles. It is considered that this corresponds to the Natural England Licence for soprano pipistrelle (day roost) which relates to the Castle location.

6.3.4 The PEA also 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).

## 6.4 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.

## 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 Castle as a single entity through a sustainable and beneficial use. The proposals contained within this pre-application submission will therefore not only secure the assets 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 DAHS, a PEA, 'Shadow' HRA and Drawings covering the range of Listed Building considerations pertinent to the Proposals. Based on our assessments submitted with these applications, 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 heritage terms.
- 7.1.4 To summarise, this proposal will secure the proper upkeep and future of the historic Ford Castle and aspects of its associated Courtyard, bringing it back into full use as a residential activity centre. On behalf of our Client, we look forward to working with Northumberland County Council and relevant statutory consultees to achieve a robust and high-quality listed building solution. This will enable PGL to operate at an appropriate site capacity and deliver their overarching business objective of reopening to school groups.

## APPENDIX 1: PLANNING HISTORY

App Ref	App type	Description	Date Validated	Date Determined	Decision	Case Officer
<a href="#">19/02056/LBC</a>	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
<a href="#">19/00457/LBC</a>	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
<a href="#">17/04110/LBC</a>	LBC	Listed Building Consent for works to protect building fabric including lifting parapet stones, adding a lead DPC, scarcement 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.				
<a href="#">16/01889/LBC</a>	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
<a href="#">15/02284/LBC</a>	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
<a href="#">15/01139/DISCON</a>	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
<a href="#">14/04024/LBC</a>	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
<a href="#">14/03186/LBC</a>	LBC	Listed Building Consent: Re roof existing slate tile roof to	29 Sep 2014	25 Nov 2014	Permitted	Miss Ros Duncan



App Ref	App type	Description	Date Validated	Date Determined	Decision	Case Officer
		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.				
<a href="#">14/01115/DISCON</a>	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
<a href="#">13/03928/LBC</a>	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
<a href="#">13/00929/FUL</a>	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
<a href="#">12/01077/DISCON</a>	DOC	Discharge of condition number 3 of application C/09/00065/LBC - materials	02 Apr 2012	25 May 2012	Permitted	Mrs Sarah Seabury
<a href="#">12/01034/FUL</a>	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
<a href="#">12/00936/FUL</a>	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
<a href="#">11/01108/COU</a>	COU	Change of use to Tea Room/Café [The Estate House]	27 Jun 2011	01 Aug 2011	Permitted	Mr Tony Lowe
<a href="#">C/09/00065/LBC</a>	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
<a href="#">N/09/B/0150</a>	LBC	Alterations to improve disabled facilities	24 Mar 2009	17 Jul 2009	Permitted	Unknown

App Ref	App type	Description	Date Validated	Date Determined	Decision	Case Officer
<a href="#">C/01/00263/LBC</a>	LBC	Listed Building Consent for installation of suspended ceiling	05 Dec 2001	21 Mar 2002	Permitted	Unknown
<a href="#">C/91/B/039 LBC</a>	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
<a href="#">C/87/B/044 LBC</a>	LBC	Listed Building Consent for installation of LPG tank in Ground Keepers yard	07 Dec 1987	29 Feb 1988	Permitted	Unknown
<a href="#">C/87/B/299</a>	FUL	Installation of LPG tank in Ground Keepers yard	07 Dec 1987	13 Jan 1988	Permitted	Unknown
<a href="#">C/84/B/313 LB41</a>	LBC	Alterations and change of use to staff accommodation at The Flag Tower	18 Dec 1984	18 Dec 1984	Permitted	Unknown
<a href="#">C/84/B/314 LB42</a>	LBC	Alterations to garage block to provide field study centre	18 Dec 1984	14 Feb 1985	Permitted	Unknown

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