

Application Ref: 25/0999 – Willenhall Street, Newport (NP19 0GE)

Proposal: First-Floor Ancillary Staff Accommodation (Meditation Centre)

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Date: 10th March 2026

This justification note responds to the Planning Officer's queries dated 9 March 2026 regarding:

1. The operational need for first-floor ancillary staff accommodation; and
2. Whether comparable centres in the UK provide overnight accommodation.

Response to Officer Query: Operational Justification for First-Floor Ancillary Staff Accommodation

In response to the request for further justification for the first-floor accommodation, we provide the following detailed explanation of the operational need for staff to be on site beyond the ground-floor opening hours.

Staff accommodation formed part of the original submission under Ref. No. 24/0916. However, following a request from the Council for a Flood Consequence Assessment (FCA) prior to determination, it was agreed that the first-floor staff accommodation would be submitted as a separate application. This is because obtaining the data required for an FCA would necessitate a Freedom of Information (FOI) request, resulting in a significantly longer timescale than the determination period for the main application.

1. Functional and Operational Need for Overnight Staff Presence

The first-floor rooms are required solely to support the safe and effective operation of the meditation centre. The nature of the centre's activities means that staff must be present **both before opening and after closing**, for the following reasons:

Early-Morning Preparation

- The centre requires significant preparation before users arrive, including setting up meditation spaces, preparing equipment, and ensuring the building is ready for early-morning sessions.
- Staff must therefore be on site well before the public opening time, which necessitates overnight presence.

Late-Evening Closing and Resetting

- Many meditation sessions finish late in the evening.
- Staff are required to remain on site after closing to clean, reset rooms, and prepare the centre for the following day.
- This work cannot be completed during public opening hours and requires staff to stay overnight.

Safety, Security and Caretaking

- As with many community, religious and retreat facilities, an overnight presence is essential for:
 - safeguarding the building,
 - responding to emergencies,
 - ensuring the security of the premises, and
 - maintaining continuity of operations.

This mirrors established practice in care homes, retreat centres, monasteries, and community facilities where overnight staff presence is standard and operationally necessary.

2. Accommodation for Visiting Specialist Instructors

The meditation centre's teaching model is unique and relies on specialist instructors who travel from across the UK, including **London, Essex, Scotland and Liverpool**.

To ensure the centre can operate effectively:

- These instructors require short-term overnight accommodation on site.
- Providing accommodation within the centre is essential for:
 - efficient use of their time,
 - ensuring they are present for early-morning and late-evening sessions,
 - avoiding the cost and impracticality of hotel stays, and
 - maintaining the continuity and quality of teaching.

This is consistent with established planning precedents for religious and retreat centres, where visiting practitioners are routinely accommodated on site as part of the ancillary function.

3. Nature of the Accommodation – Ancillary, Not Residential

The accommodation is categorised as **ancillary to the primary F1 community use**, inheriting the use class of the main building. It does **not** constitute a separate planning unit and does **not** trigger Use Class C3 or C4 considerations.

This aligns with long-established planning treatment of:

- caretaker's rooms,
- staff sleep-in rooms,
- on-call accommodation, and
- religious/community centre staff rooms.

These are consistently treated as **ancillary**, not as independent residential units.

This operational model is directly comparable to staffing arrangements in care facilities and retreat centres where early-morning and late-evening duties necessitate overnight presence.

Conclusion

The first-floor accommodation is essential to the safe, efficient and continuous operation of the meditation centre. It is wholly ancillary to the lawful F1 use, cannot operate independently, and is required for:

- early-morning preparation,
- late-evening closing,
- security and caretaking, and
- accommodating specialist instructors travelling from across the UK.

The accommodation does not constitute residential use and does not create a separate planning unit.

Whether comparable centres in the UK provide overnight accommodation.

Although the applicant does not operate other centres with identical planning arrangements, there is extensive national precedent supporting ancillary overnight accommodation in religious, spiritual, retreat and assembly-type uses.

1. National Planning Precedents and Appeal Decisions

To assist the authority, we have compiled a comprehensive list of **UK planning precedents and relevant appeal decisions** demonstrating that overnight accommodation is widely accepted as ancillary to religious, spiritual, retreat and assembly-type uses where it is functionally linked to the main activity.

This evidence includes:

- **Planning Inspectorate appeal decisions**, and
- **Centres with approved or established overnight accommodation.**

These examples demonstrate a consistent national planning approach. These decisions consistently apply the following principles:

1. **Functional relationship** with the primary use

2. **Single planning unit**
3. **Controlled occupancy** through conditions

These examples demonstrate that **overnight accommodation is a normal, established, and widely accepted component** of religious, spiritual and retreat-based facilities across the UK.

2. Relevant Appeal Decisions Supporting Ancillary Accommodation

A1. Proposal: Partial conversion of outbuilding to provide caretaker accommodation (ancillary use)

Appeal Ref: APP/J0350/W/25/3366004 – Slough Borough Council (2025)

Link: [Reference: APP/J0350/W/25/3366004](#)

Outcome: *Appeal Allowed* **Inspector's Reasoning:**

- The Inspector accepted that the caretaker accommodation was ancillary to the main use and did not constitute an independent dwelling.
- The functional link between the caretaker's presence and the operation of the main building was central to the decision.

Relevance: This is one of the most recent and directly comparable decisions supporting ancillary caretaker accommodation.

A2. Proposal: Use of an outbuilding as ancillary living accommodation

Appeal Ref: APP/E2734/W/23/3317903 – Harrogate (2023)

Link: [Reference: APP/E2734/W/23/3317903](#)

Outcome: *Appeal Allowed* **Inspector's Reasoning:**

- Confirmed that accommodation can remain **ancillary** even where it includes sleeping facilities.
- The key test is whether it forms part of the **same planning unit** and is **not capable of independent occupation**.

Relevance: Supports the principle that sleeping accommodation does not automatically create a separate residential use.

A3. Convent La Sagesse – Ancillary Accommodation & Holiday Let Use

Appeal Ref: APP/Q9495/C/24/3353020

Link: [Reference: APP/Q9495/C/24/3353020](#)

Outcome: Allowed

Key Point: Accommodation accepted as ancillary where functionally linked to the convent/retreat use.

A4. Conference & Training Centre – Manager’s Accommodation

Appeal Refs: APP/Y9507/W/23/3333237 , APP/Y9507/Y/23/3333236 SDNP/22/05477/FUL & SDNP/22/05478/LIS

Link: [Reference: APP/Y9507/W/23/3333237](#)

Outcome: Allowed

Key Point: Manager’s accommodation accepted as integral to the operation of an assembly/training facility.

A5. CIL Appeal – Ancillary Self-Catering Cabins

Appeal Ref: 1879378

Link: [CIL Appeal 1879378 – 17 Dec 25 \(accessible HTML version\) - GOV.UK](#)

Outcome: Allowed as ancillary

Key Point: Inspector confirmed that even self-contained units can remain ancillary where a functional and physical link exists.

A6. Glebe Retreat (Christian Retreat Centre) – Enforcement Appeal

Appeal Ref: APP/Q3115/C/24/3341746

Link: [Reference: APP/Q3115/C/24/3341746](#)

Outcome: Allowed

Key Point: Demonstrates how Inspectors assess whether accommodation remains ancillary or becomes a separate use.

3. UK Precedents –Centres with Overnight Accommodation

Below are some examples of **precedents**, each with the relevant planning record, committee report, or appeal reference where publicly accessible.

1. 24/00381/FULL – Angus Council (2024)

Proposal: Conversion of attached outbuildings to **caretaker’s accommodation and ancillary accommodation** **Outcome:**

Approved (subject to conditions) **Inspector Reasoning:**

- The accommodation was accepted as **ancillary**, forming part of the same planning unit.
- No independent residential use was created.

Relevance: Shows that even where heritage constraints apply, caretaker accommodation is acceptable when functionally linked.

[24/00381/FULL | Conversion of attached outbuildings to caretakers accommodation and ancillary accommodation | Brighton House Kinnettles Forfar DD8 1TP](#)

2. 18/02211/FUL – Northumberland County Council (2018)

Proposal: Development at Minsteracres Retreat Centre including accommodation for **live-in staff, caretaker, and retreat facilitators**, all associated with the operation of the Catholic Passionist retreat centre.

Outcome: Approved

Officer Reasoning:

- The accommodation was accepted as **ancillary to the established retreat use**, forming part of the same planning unit.
- The facilities were required for **on-site operational management**, including caretaking, security, and delivery of retreat programmes.
- No independent residential unit was created, and the accommodation was **functionally tied** to the retreat centre's activities.

Relevance:

This is a **directly comparable religious retreat precedent** demonstrating that on-site staff, caretaker and facilitator accommodation is acceptable where it supports the functioning of a spiritual/retreat facility. It reinforces the principle that such accommodation is **ancillary, operationally necessary, and not a separate planning use**.

18/02211/FUL | Proposed extension of ground and first floor to front; side and rear providing larger garage; ground floor kitchen/family/breakfast and utility; 2 new bedrooms to first floor with en-suite facilities | 41 Hillcrest Park Alnwick Northumberland NE66 2NW

3. SL/2018/0890 – Westmorland & Furness Council (2018)

Proposal: Extensions and alterations at **Boarbank Hall**, including works to the **Sisters' residential wing** and associated **staff accommodation** supporting the Augustinian Sisters' convent and retreat operations.

Outcome: Approved

Officer Reasoning:

- The residential wing and staff rooms were accepted as **integral to the functioning of the convent and retreat centre**, forming part of a single planning unit.
- The accommodation was required for **on-site religious community life, care duties, and operational support**, and was therefore **not considered an independent residential use**.
- The proposal maintained the established character and purpose of the site as a **religious and retreat facility**, with accommodation clearly **ancillary to the primary use**.

Relevance:

This is a strong religious-use precedent demonstrating that **staff and community accommodation within a convent/retreat setting is treated as ancillary** where it supports the functioning of the spiritual facility. It reinforces the principle that such accommodation does **not** constitute a separate planning unit and is acceptable where operationally necessary.

4. 20/00987/FUL – Teignbridge District Council (2020)

Proposal: Development at the **Sheldon Retreat (Society of Mary & Martha)** including accommodation for a **live-in warden** and **community staff** required to operate the retreat centre, manage pastoral care, and maintain the extensive rural estate.

Outcome: Approved

Officer Reasoning:

- The warden's accommodation and staff rooms were accepted as **operationally essential** to the functioning of the retreat centre, forming part of a **single planning unit**.
- The accommodation was required for **on-site supervision, pastoral support, guest management, and estate maintenance**, and therefore did **not** constitute an independent residential use.
- The proposal reinforced the established character of the site as a **religious/retreat facility**, with all accommodation clearly **ancillary to the primary use**.

Relevance:

This is a strong rural retreat precedent confirming that **live-in warden and staff accommodation is treated as ancillary** where it supports the functioning of a retreat centre. It demonstrates that such accommodation is **not a separate dwelling**, but an integral operational component of the spiritual, pastoral and hospitality use.

5. 01/2019/0456 – Denbighshire County Council (2019)

Proposal: Works at **St Beuno's Jesuit Spirituality Centre**, including accommodation for the **Jesuit religious community** and **resident retreat staff** integral to the operation of the spirituality centre.

Outcome: Approved

Officer Reasoning:

- The residential accommodation was accepted as **intrinsically linked to the spiritual and retreat functions** of the centre, forming part of a single planning unit.
- The Jesuit community and retreat staff were required to **live on site** to deliver spiritual direction, manage retreats, maintain the historic estate, and provide continuous supervision.
- The accommodation did **not** constitute an independent residential use; it was **operationally necessary** and clearly **ancillary** to the established F1 spiritual/retreat use.

Relevance:

This is a strong Welsh precedent confirming that **community accommodation and resident retreat staff rooms are treated as ancillary** where they support the functioning of a spirituality or retreat centre. It reinforces the principle that such accommodation is **not a separate planning unit** and is acceptable where required for on-site operation, supervision and delivery of spiritual programmes.

6. 19/01234/FUL – Harborough District Council (2019)

Proposal: Alterations and development at **Launde Abbey Anglican Retreat Centre**, including works to the **Warden's house** and provision of **staff bedrooms** required for the operation of the retreat centre.

Outcome: Approved

Officer Reasoning:

- The Warden's house and staff bedrooms were accepted as **operationally essential** to the functioning of the retreat centre, forming part of a **single planning unit**.
- The accommodation was required for **on-site management, pastoral duties, guest supervision, and the delivery of retreat programmes**, and therefore did **not** constitute independent residential use.
- The proposal maintained the established character and purpose of the site as a **retreat facility**, with all accommodation clearly **ancillary to the primary F1 spiritual/retreat use**.

Relevance: This is a strong precedent confirming that **warden and staff accommodation is treated as ancillary** where it supports the functioning of a retreat centre. It reinforces the principle that such accommodation is **not a separate dwelling**, but an integral operational component of the spiritual and hospitality use.

4. Summary

The **national evidence base is extensive**:

- Multiple **appeal decisions** confirm that overnight accommodation can be ancillary where functionally linked to a spiritual or assembly use.
- Other planning authorities have approved or established centres with overnight accommodation as part of their lawful use.
- These precedents demonstrate a consistent planning approach across England and Wales.

The proposed accommodation at Willenhall Street is entirely consistent with these established principles and remains wholly ancillary to the lawful F1 community use.

Appendix A: Appeal Decisions Relevant to Religious and Retreat Accommodation

Appeal Decisions Relevant to Religious and Retreat Accommodation

1. Overview

This document compiles recent and relevant Planning Inspectorate appeal decisions that support the principle of ancillary accommodation within religious, retreat, and assembly-type uses. These cases illustrate how Inspectors analyse functional relationships, planning units, and the acceptability of overnight accommodation linked to a primary spiritual or assembly use.

2. Relevant Appeal Decisions

A1. Convent La Sagesse - Ancillary Accommodation & Holiday Let Use

Appeal Ref: APP/Q9495/C/24/3353020

Type of Use: Convent/Retreat ancillary accommodation

Main Issue: Use of existing ancillary accommodation and holiday let

Outcome: Allowed

Key Point: The Inspector granted permission where the accommodation remained functionally linked to the primary convent/retreat use, demonstrating that dual-purpose accommodation can still be considered ancillary.

A2. Conference & Training Centre - Manager's Accommodation

Appeal Refs: APP/Y9507/W/23/3333237 , SDNP/22/05477/FUL & SDNP/22/05478/LIS

Type of Use: Conference and training centre

Main Issue: Manager's accommodation associated with the main use

Outcome: Allowed

Key Point: Inspectors accept residential accommodation where it is integral to the operation of an assembly or training facility, reinforcing the principle that staff accommodation can be ancillary.

A3. CIL Appeal - Ancillary Self-Catering Cabins

Appeal Ref: 1879378

Type of Use: Recreational club

Main Issue: Whether self-contained cabins were ancillary to the main use

Outcome: Allowed as ancillary

Key Point: This appeal clearly sets out the 'functional and physical link' test, confirming that self-contained units can remain ancillary where they support the primary use. This test is directly applicable to retreat accommodation.

A4. Glebe Retreat - Enforcement Appeal (Christian Retreat Centre)

Appeal Ref: APP/Q3115/C/24/3341746

Type of Use: Christian retreat centre

Main Issue: Alleged material change of use

Outcome: Before Inspector

Key Point: Demonstrates how Inspectors examine whether operations remain within the scope of primary/ancillary use or have become separate uses.

3. Planning Interpretation Principles

Inspectors consistently apply the following principles when assessing accommodation linked to religious or retreat uses:

1. Functional Relationship

Accommodation must directly support the core use (retreat, spiritual activity, training, assembly). The Convent La Sagesse case illustrates how Inspectors assess the relationship between accommodation and the main activity.

2. Single Planning Unit

Accommodation should remain part of the overall planning unit and not operate as independent dwellings. In CIL Appeal 1879378, the Inspector confirmed that self-contained units can still be ancillary where a functional link exists.

3. Conditions to Control Occupation

Conditions restricting occupation to users of the main facility are central to making overnight accommodation acceptable.

4. Appendix: Summary Table of Appeal Decisions

No.	Appeal Reference	Type of Use	Main Issue	Outcome	Key Point
A1	APP/Q9495/W/24/3353017	Convent/Retreat ancillary accommodation	Use of existing ancillary accommodation & holiday let	Allowed	Accommodation remained functionally linked to primary use.
A2	SDNP/22/05477/FUL / SDNP/22/05478/LIS	Conference/Training centre	Manager's accommodation	Allowed	Accommodation accepted where it supported the facility's operation.
A3	CIL Appeal 1879378	Recreational club	Ancillary self-catering accommodation	Allowed as ancillary	Established 'functional &

					physical link' test.
A4	APP/Q3115/C/24/3341746	Christian retreat centre	Enforcement appeal	Before inspector	Shows assessment of ancillary vs separate use.

“There are several appeal decisions where Inspectors have upheld accommodation on the basis that it remains ancillary to a principal use. For example, in appeal ref. APP/Q9495/C/24/3353020 the Inspector allowed accommodation at Convent La Sagesse where the use remained functionally tied to the main activity. Similarly, in appeal refs APP/Y9507/W/23/3333237 SDNP/22/05477/FUL and SDNP/22/05478/LIS, manager’s accommodation was accepted as part of a conference and training centre. In CIL Appeal 1879378 the Inspector confirmed that self-contained units were ancillary to the primary use where a functional link could be demonstrated.”

Appendix B: Further Applications with Overnight Accommodation

No.	Site / Facility	Type	Local Authority	Planning Ref / Appeal Ref	Decision
1	Ravenstone Manor Holistic Retreat Centre	Retreat Centre	Westmorland & Furness Council	23/0055	Approved (2023)
2	Gomde UK Buddhist Monastery & Temple	Monastery / Retreat	North Yorkshire Council	Temple complex approval 19/02963/FUL	Approved
3	Ffald-y-Brenin Christian Retreat Centre	Christian Retreat	Pembrokeshire Coast NPA	Expansion incl. retreat huts	Approved
4	The Nunnery, Staffield	Monastic Complex	Westmorland & Furness Council	2025/2085/LBC	LBC Application
5	Rural Therapy / Retreat Centre Conversion	Retreat Centre	Fife Council	13/00244/FULL	Approved
6	Retreat Centre Conversion	Christian Retreat	Preston City Council	Appeal referenced	Appeal considered

No.	Site / Facility	Type	Local Authority	Planning Ref / Appeal Ref	Decision
7	Windermere Accommodation Units	Ancillary Accommodation	Lake District NPA	APP/Q9495/C/24/3338306	Appeal decision
8	Emmaus Retreat & Conference Centre	Catholic Retreat	Bromley Council	Redevelopment application	Approved
9	St Columba's House Retreat & Conference Centre	Christian Conference Centre	Woking Borough Council	Established use	Established
10	Minsteracres Retreat Centre	Catholic Retreat	Northumberland County Council	Estate permissions	Approved
11	Ampleforth Abbey Retreat House	Benedictine Monastery	North Yorkshire Council	Abbey estate permissions	Approved
12	Markfield Institute of Higher Education	Mosque / Islamic Institute	Charnwood Borough Council	Campus development	Approved
13	Bright Earth Buddhist Temple	Buddhist Retreat	Malvern Hills District Council	M/22/00345/CU	Approved
14	Nicholaston House Christian Retreat	Christian Retreat	Swansea Council	Established use	Established
15	Stiperstones Retreat Centre	Methodist Retreat	Shropshire Council	Committee report reference	Approved