



LRJ PLANNING

Planning, Design and Development

PLANNING STATEMENT

**APPLICATION SITE: WHITEHALL FARM, USK ROAD, CAERLEON,
NEWPORT, NP18 1LP**

CLIENT: MR GARY MCDONALD

PREPARED BY: LRJ PLANNING LTD

DATE: SEPTEMBER 2026



1.0 Introduction

- 1.1 This Planning Statement has been prepared by LRJ Planning in support of an application for the change of use of an existing agricultural barn at Whitehall Farm, Usk Road, Caerleon, Newport, NP18 1LP, to short-term holiday accommodation within Use Class C6, and the installation of a first floor balcony.
- 1.2 The proposal seeks to secure an appropriate and sustainable use for an existing rural building.
- 1.3 The application is supported by an ecological assessment and structural appraisal. These documents demonstrate that the building is suitable for the proposed reuse, subject to the recommended ecological mitigation and normal works associated with the conversion.
- 1.4 The proposal will provide short-term visitor accommodation and support the tourism economy whilst retaining the established rural character of the site.

2.0 Site and Surroundings

- 2.1 The application site is located at Whitehall Farm, Whitehall Farmhouse, Usk Road, Caerleon, Newport, NP18 1LP, to the east of Caerleon and outside the built-up area.
- 2.2 The application building is a two-storey reconstructed agricultural barn of generous proportions.
- 2.3 The building comprises stone/block cavity walls with a dual-pitched roof and modern timber structure. The surrounding area is predominantly rural, comprising agricultural fields, mature hedgerows and areas of scrub, together with a small number of dwellings in the wider locality.



2.4 The Afon Lwyd is located nearby, with the River Usk approximately 400m from the site and woodland to the north-west.

2.5 The barn is accessed via the existing private farm track connecting Whitehall Farm with Usk Road. No change to the existing access is proposed.

3.0 Proposed Development

3.1 The application seeks permission for the change of use of the existing barn from agricultural/storage use to short-term holiday accommodation within Use Class C6.

3.2 Apart from the installation of a balcony, the proposal does not involve the construction of an extension or any fundamental alteration to the existing building. The existing access arrangements will remain unchanged.

3.3 The proposed use is specifically intended to provide short-term visitor accommodation rather than permanent residential occupation.

4.0 Planning Policy Context

4.1 The proposal has been considered against the relevant national and local planning policy framework identified in the supporting planning material.

Planning Policy Wales

4.2 Planning Policy Wales (Edition 12) recognises the importance of tourism to the Welsh economy and supports appropriate tourism development which contributes to the economic, social and cultural well-being of Wales.

4.3 Paragraphs 5.5.1–5.5.3 address tourism and recognise the contribution that tourism can make to the Welsh economy and communities.



- 4.4 Paragraphs 5.6.2, 5.6.3 and 5.6.10 also support rural economic activity, diversification and the appropriate reuse of existing rural buildings, subject to environmental and amenity considerations.
- 4.5 The proposal accords with these principles by reusing an existing rural building for visitor accommodation without requiring a new-build tourism facility.

Newport Local Development Plan

- 4.6 Relevant Newport City Council Local Development Plan policies include:
- SP1 – Sustainability
 - SP5 – Countryside
 - SP9 – Conservation of Natural, Historic and Built Environment
 - SP13 – Planning Obligations
 - SP21 – Minerals
 - GP1 – Climate Change
 - GP2 – General Amenity
 - GP3 – Service Infrastructure
 - GP4 – Highways and Accessibility
 - GP5 – Natural Environment
 - GP6 – Quality of Design
 - GP7 – Environmental Protection and Public Health
 - H10 – Conversions in the Countryside



- H11 – Outbuildings and Extensions
- T4 – Parking
- T5 – Walking and Cycling
- T7 – Public Rights of Way
- W3 – Waste Management
- CF8 – Tourism

4.7 Of particular relevance are SP5 – Countryside and CF8 – Tourism, together with the policies relating to design, amenity, highways, parking and the natural environment.

4.8 The proposal represents the reuse of an existing rural building for a tourism use and should therefore be assessed in the context of these policies.

5.0 Planning History

5.1 The site has a relevant planning history concerning the conversion of the barn for residential purposes.

5.2 Application 13/1283 – Conversion of Farm Barn to Residential Use (Resubmission) related to Glebe Barn, Whitehall Farm, Usk Road, Caerleon, Newport and was subsequently withdrawn.

5.3 There is also a relevant previous appeal, APP/G6935/A/12/2182913, concerning the residential conversion of Glebe Barn at Whitehall Farm. The appeal was dismissed.

5.4 The Inspector considered a number of matters, including:

- the principle of residential reuse;



- the historic and architectural interest of the building;
- highway safety;
- parking and turning;
- outdoor amenity; and
- protected species.

5.5 The previous appeal is an important material consideration. However, the current proposal is materially different from the scheme considered at appeal because it is not an application for a permanent dwelling.

5.6 The previous proposal sought unrestricted residential occupation. The current proposal seeks a defined short-term holiday accommodation use within Use Class C6.

5.7 The previous appeal also considered ecological information that identified bat use of the building and concluded that further survey information was required. The current application is supported by an updated 2026 ecological assessment, including emergence surveys which have confirmed current bat use and informed a detailed mitigation package.

5.8 The current application should therefore be assessed against the actual use now proposed and the updated technical evidence submitted with the application.

6.0 Principle of Development and Tourism

6.1 The proposal involves the reuse of an existing rural building for short-term visitor accommodation.

6.2 The development would make productive use of an established building and provide tourism accommodation within the rural area without requiring



a new-build tourism facility. This approach is consistent with the general objectives of national and local policy supporting tourism, rural economic activity and the appropriate reuse of existing buildings.

- 6.3 The proposal is also distinguishable from a permanent dwelling. It is intended to operate as commercial visitor accommodation, with occupation by guests for short periods rather than providing a person's sole or main residence.
- 6.4 The proposal therefore provides an opportunity to support tourism and the rural economy whilst retaining the existing building and its established relationship with the farm.

7.0 Short-Term Holiday Accommodation and Permanent Residential Use

- 7.1 The distinction between the current proposal and the historic residential application is fundamental to the planning assessment.
- 7.2 The previous proposal sought permission for the barn to operate as a permanent residential dwelling. The current application instead seeks permission for short-term holiday accommodation within Use Class C6.
- 7.3 These are materially different forms of occupation.
- 7.4 A permanent dwelling is occupied as the sole or main residence of a household and generates the regular and continuing movements associated with normal residential life.
- 7.5 The proposed C6 use is instead intended to provide temporary visitor accommodation. Occupation will be by guests for short periods and the building will not operate as an unrestricted permanent home. This distinction is particularly important when considering the highway issues raised in the previous appeal.



- 7.6 The current proposal should not simply be assessed on the assumption that the barn would generate the same pattern of movements as a permanent rural dwelling. The actual nature, duration and purpose of occupation are different.

8.0 Highways, Access and Parking

- 8.1 There is no change proposed to the existing access serving the barn. The site will continue to use the established private farm track connecting Whitehall Farm with Usk Road.
- 8.2 The previous appeal decision is acknowledged. At that time, the Inspector considered the visibility available at the junction with Usk Road and the additional vehicle movements that were anticipated from the proposed permanent residential use. Those conclusions need to be considered in the context of the use then proposed and the circumstances prevailing at that time.
- 8.3 The current application is not seeking permission for unrestricted permanent residential occupation. It is seeking a C6 short-term holiday use. The nature and pattern of vehicle movements associated with short-term visitor accommodation are different from those associated with a permanent household.
- 8.4 A permanent dwelling generates regular, year-round movements associated with employment, education, shopping, appointments, social activities and other day-to-day residential trips. The proposed holiday accommodation will instead be occupied by visitors for limited periods. Vehicle movements will principally be associated with arrival, departure and normal visitor activity during the period of a booking.



- 8.5 The physical relationship between the site and Usk Road remains unchanged. The existing access will continue to serve the barn and there is no proposal to alter the junction or public highway.
- 8.6 The application therefore does not seek to overcome any historic highway concern through a new access arrangement. Instead, it relies upon the established access serving the existing farm and building.
- 8.7 There has also been a change in the speed limit applying to Usk Road since the earlier planning considerations. The available historic photographs indicate that, at the time of the earlier application in 2012, the road was subject to the national speed limit. The speed limit has subsequently been reduced to 40 mph, as evidenced by the current signage approaching the site. This represents a change in the highway circumstances since the previous assessment and is relevant to consideration of the current access arrangements and visibility.
- 8.8 The site contains sufficient land in the vicinity of the barn to accommodate visitor parking and vehicle manoeuvring. Vehicles can therefore enter the site, park and manoeuvre within the existing land associated with the farm without requiring vehicles to wait on Usk Road.
- 8.9 Overall, the proposal represents the reuse of an existing rural building using an established access and parking arrangement. There is no change to the established access, junction with Usk Road, or parking and turning arrangements. The previous highway assessment related to permanent residential occupation, whereas the current proposal is for short-term C6 visitor accommodation and will not provide a sole or main residence. In addition, the speed limit on Usk Road has subsequently been reduced from the national speed limit to 40 mph. The proposal should therefore be assessed on its own characteristics and the current highway



circumstances, and is not considered to result in an unacceptable highway or access impact.

9.0 Design and Landscape

- 9.1 The proposal makes efficient use of an existing building and does not require an extension. The external form and general character of the barn will be retained.
- 9.2 The structural appraisal confirms that the barn is in generally very good structural condition, with no obvious significant defects compromising its structural integrity.
- 9.3 The walls were found to be generally true and plumb, with no significant movement or cracking, while the roof and principal roof timbers were also considered satisfactory. The proposal therefore represents the appropriate reuse of an existing rural structure rather than the introduction of a new building into the countryside.

10.0 Ecology and Protected Species

- 10.1 Ecology is an important consideration given the known bat use of the building. The updated 2026 ecological assessment identified bat activity and confirmed roosting by common and soprano pipistrelles within the south-west gable end. Brown long-eared bat use has also been identified historically.
- 10.2 The proposed works have been informed by the ecological findings. The recommended mitigation includes:
- protection of external bat features;
 - ecological supervision of works affecting potential bat features;
 - provision of an external timber shelter;



- two Kent-style bat boxes;
- a woodcrete bat box on the south-west gable;
- provision of suitable bat access gaps within the cladding;
- a sparrow terrace;
- provision of a barn owl box; and
- appropriate control of external lighting to avoid illuminating bat roost features.

10.3 The ecological assessment also records barn owl activity and old swallow nests, with appropriate alternative opportunities proposed.

10.4 In addition to mitigation of the identified ecological constraints, the proposal provides opportunities for biodiversity enhancement.

10.5 The proposed bat boxes, bat access gaps, bird nesting provision and barn owl box will provide additional habitat opportunities associated with the existing building.

10.6 These measures provide tangible ecological enhancements as part of the conversion and are consistent with the objective of integrating biodiversity considerations into the development.

11.0 Structural Condition

11.1 A structural appraisal was undertaken by Castell Bach Engineering Ltd on 4 June 2026. The assessment found the barn to be in generally very good structural condition, with no obvious significant defects compromising its structural integrity.

11.2 The appraisal records that the walls are generally true and plumb and that there is no evidence of significant movement, cracking, roof spread or



differential settlement. The principal roof timbers and connections were also considered to be in good condition.

- 11.3 The report concludes that the building is suitable for repurposing, subject to normal engineering works associated with the conversion. The structural evidence therefore demonstrates that the existing building provides a suitable basis for the proposed change of use.

12.0 Drainage and Foul Waste

- 12.1 The structural appraisal confirms that there are currently no foul or surface water drainage connections serving the barn. The proposal will therefore incorporate an appropriate private foul drainage solution based on a BioDisc® BA-BC domestic sewage treatment plant.
- 12.2 The system will be installed in accordance with the manufacturer's requirements and relevant technical standards, with final technical details capable of being secured by condition.

13.0 Rural Economic Benefits

- 13.1 The proposal represents the sustainable reuse of an existing rural building. It avoids the need for a new tourism building and makes efficient use of an established structure and existing infrastructure.
- 13.2 The proposal also supports rural tourism by providing short-term visitor accommodation within the Newport area. The reuse of the barn will therefore provide an economic function whilst retaining the existing built form and avoiding unnecessary additional land take.

14.0 Conclusion

- 14.1 The application seeks the change of use of an existing agricultural barn at Whitehall Farm to short-term holiday accommodation within Use Class C6.



- 14.2 The previous residential planning history and appeal decision have been fully acknowledged. However, the current application must be considered having regard to the different nature of the proposed C6 use, the absence of any change to the existing access and the updated technical evidence now available.
- 14.3 In particular, the previous highway assessment should not be treated as determinative of the current application because it related to a proposal for permanent residential occupation. The current proposal is for short-term visitor accommodation with a different pattern and purpose of occupation.
- 14.4 The proposed development consequently represents an appropriate and sustainable reuse of the existing barn and is considered to accord with the relevant national and local planning policy objectives. Planning permission is therefore respectfully requested.