



Committee Report

Planning committee - 16 December 2025

Application no. DC/25/1945/FUL

Location

Fynn Valley Golf Club

Rose Hill

Witnesham

Ipswich

Suffolk

IP6 9JA

Statutory determination date 9 July 2025

Application type Full Application

Applicant Mr Robert Cawley

Parish Witnesham

Proposal Change of Use from staff room/office to full time Warden's accommodation

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Authorising Officer Katherine Scott, Principal Planner (Development Management)

Determination route This application is before Planning Committee for determination because applicant is either a member of staff or elected member of East Suffolk Council.

1. Summary

- 1.1. This application seeks planning permission 'change of Use from staff room/office to full time Warden's accommodation'.
- 1.2. This application is before Members because the applicant is an elected member of East Suffolk Council and the application is therefore required to be determined by the Planning Committee.
- 1.3. The application is recommended for refusal.

2. Site Description

- 2.1. The development site comprises land associated with Fynn Valley Golf Club. Fynn Valley Golf Club is located on the east side of Witnesham Road, to the north-east of Witnesham village, but is outside of a defined settlement boundary and is therefore located in the Countryside. The surrounding land is agricultural.
- 2.2. The site is not within a Conservation Area or within the Suffolk Coast and Heaths National Landscape.
- 2.3. The golf club's vehicular access off Witnesham Road is shared by several residential properties and holiday letting accommodation situated further east.
- 2.4. The application site comprises a self-contained residential unit positioned on an area of hardstanding. This unit is understood to be currently vacant, but it is subject to an enforcement case, and evidence suggests that it was previously occupied for residential use.
- 2.5. A previous application (DC/24/2596/FUL) sought to retain the unit for use as chef's accommodation; however, this was refused on the grounds of non-compliance with Policy SCLP5.6.
- 2.6. On the wider area of hardstanding, permission was granted under application DC/24/3458/FUL for the siting of a storage unit and the retention of another unit for storage purposes.

3. Proposal

- 3.1. Permission is sought for the retention of the unit for use as warden's accommodation at Fynn Valley Golf Club
- 3.2. The unit contains two bedrooms, a bathroom, and an open plan kitchen/dining/sitting area.
- 3.3. The applicant has indicated that the unit may be intended for dual use as wardens' and chefs' accommodation. However, the application has been submitted on the basis of wardens' accommodation only.

4. Background to the Application

- 4.1. The unit is currently subject to an open enforcement case. During a site visit in September 2023, officers observed several portacabins, containers, and caravans being used for residential purposes, including the unit that is the subject of this application. This constituted a breach of planning control.
- 4.2. Following this visit an application was submitted which proposed to retain the subject unit for residential use to accommodate a chef, along with the retention of other portacabins for storage and office use (Ref: DC/24/2596/FUL). The application was refused under delegated authority as the proposed residential use of the unit was found to be contrary to Policy SCLP5.6 (Rural Workers Dwellings).
- 4.3. A subsequent application (Ref: DC/24/3458/FUL) was submitted seeking to retain a number of portacabins for storage and office use. This application did not include the unit that is the subject of the current proposal and was subsequently approved.
- 4.4. The unit remains on site without any authorised use. As a result, the enforcement case remains open pending determination of the current application.

5. Consultations/comments

- 5.1. No third party representations have been received. The consultation period has expired.

Consultee	Date consulted	Date reply received
Witnesham Parish Council	22 May 2025	12 June 2025
Summary of comments: "No Objection Following consideration at Planning and Property Committee meeting 9th June 2025"		

Consultee	Date consulted	Date reply received
SCC Highways Department	22 May 2025	10 June 2025
Summary of comments: Recommend a condition to secure parking areas.		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	22 May 2025	29 May 2025
Summary of comments: No comments to make.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	22 May 2025	2 June 2025

Summary of comments: Informative for protected species recommended.

Consultee	Date consulted	Date reply received
SCC Fire And Rescue Service	22 May 2025	2 June 2025
Summary of comments: Comments provided on access and fire fighting facilities, and water supplies.		

Site notices

Site Notice Type	Date Posted	Expiry date	Reason
General Site Notice	4 June 2025	25 June 2025	General Site Notice

6. Planning policy

National Planning Policy Framework 2024

SCLP3.3 - Settlement Boundaries (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.2 - New Employment Development (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP5.3 - Housing Development in the Countryside (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP5.6 - Rural Workers Dwellings (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP7.2 - Parking Proposals and Standards (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP10.1 - Biodiversity and Geodiversity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP10.4 - Landscape Character (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.1 - Design Quality (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.2 - Residential Amenity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

Rural Development Supplementary Planning Document (East Suffolk Council, Adopted April 2024)

7. Planning Considerations

- 7.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.2. The East Suffolk Council - Suffolk Coastal Local Plan was adopted on 23 September 2020 and forms part of the Development Plan.
- 7.3. The Rural Development Supplementary Planning Document was adopted in April 2024 and forms a material consideration for this application.
- 7.4. The revised National Planning Policy Framework (The Framework) and National Planning Policy Guidance (NPPG) also form material planning considerations in the determination of planning applications.

Principle of Development

- 7.5. The proposal seeks the retention of a residential unit for use as full-time wardens' accommodation.
- 7.6. The Design and Access Statement states that a warden is "*required to be on site 24 hours to provide security, access, and take charge of deliveries.*"
- 7.7. The statement also notes that planning permission has been granted for an extension to the clubhouse, which is expected to increase customer capacity, with evening events accommodating over 300 people. In addition, the golf club currently has four holiday lodges, with permission for ten more.
- 7.8. It is suggested that the warden will support functions at the clubhouse and manage the holiday accommodation, alongside the daily operation of the golf club for golfing activities.
- 7.9. The proposal, as submitted, would effectively constitute a new residential dwelling in the countryside and therefore requires assessment against Policy SCLP5.3.
- 7.10. In accordance with Policy SCLP5.3, outside of the defined Settlement Boundaries, new residential development will be limited to:
 - a) Affordable housing to meet identified local needs on exception sites adjacent to, or well related to, Settlement Boundaries or clusters of housing in the countryside (in accordance with Policy SCLP5.11 and Policy SCLP5.4);
 - b) Limited development within existing clusters (in accordance with Policy SCLP5.4);
 - c) Replacement dwellings on a one to one basis where these are no more visually intrusive in the countryside than the building to be replaced;
 - d) Subdivision of an existing larger dwelling;
 - e) Conversion of an existing building (in accordance with Policy SCLP5.5);
 - f) Rural workers dwellings, where there is an essential need for a rural worker to live permanently at or near their place of work (in accordance with Policy SCLP5.6);

g) Other residential development consistent with policy on residential development in the countryside contained in the National Planning Policy Framework.

- 7.11. The supporting information provided with this application is limited. The Design and Access Statement does not specify which criterion of Policy SCLP5.3 the proposal seeks to satisfy. Nevertheless, officers have assessed the scheme against this policy and concluded that it does not meet criteria (a) to (e). Further consideration is given below in relation to rural workers' dwellings (criteria f and g).
- 7.12. The proposal has been considered under criterion f of Policy SCLP5.6 (Rural Workers Dwellings). The application documents do not refer to this policy, and the application does not fully address the requirements of the policy (guidance for which can be found in the Rural Development Supplementary Planning Document).
- 7.13. The proposal has not been presented as a temporary use. However, if it had been, policy SCLP6.5 would not be applicable as this policy relates to permanent dwellings, although the considerations would be similar. Instead, paragraph 84 of the NPPF would be key. This sets out that "*planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply: a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*". It is not considered that this paragraph could be met for wardens accommodation.
- 7.14. In consideration under SCLP5.6, there are a number of rural activities that require a worker to be accommodated either on-site or nearby. In particular there are some agricultural, horticultural and forestry practices which may require a worker to attend at short notice and to be available during the night and day. In addition, accommodation within the area may be unaffordable or in short supply to house the worker. This may then result in the need for a rural worker dwelling. However, it is important that this does not result in a proliferation of housing in the countryside often in unsustainable locations. Accordingly, there must be a strong, evidenced need that the dwelling is essential to the functioning of the rural business that the rural worker dwelling will be associated with. An application would also need to demonstrate that there is need for the worker to be accommodated permanently.
- 7.15. Policy SCLP5.6 states that proposals for permanent dwellings in the countryside for rural workers will only be permitted where:
- a) There is a clearly established existing functional need for a worker to be accommodated;
 - b) The need could not be fulfilled by another existing dwelling or accommodation in the area which is suitable and available for the occupied workers or, could be converted to do so;
 - c) The need relates to a full time worker, or one who is primarily employed in the rural sector, and does not relate to a part time requirement;
 - d) The unit and the rural activity concerned has been established for at least three years, has been profitable for at least one of them, is financially sound and has a clear prospect of remaining so; and
 - e) The proposed dwelling is sensitively designed, landscaped and located to fit in with its surroundings and of a scale that reflects its functional role to support the agricultural activity.

Where a rural dwelling is permitted, the occupancy will be restricted by condition to ensure that it is occupied by a person, or persons, currently or last employed in local rural employment.

- 7.16. The council has published the Rural Development Supplementary Planning Document which provides detailed guidance on what should be submitted to support such applications.
- 7.17. Very limited information has been provided by the applicant to justify the need for a rural worker's dwelling in this location. The submitted documents have made no reference to the policies within the local plan, or to the Rural Development SPD. These were key concerns raised in refused application DC/24/2596/FUL, and this should have highlighted to the applicant the importance of providing clear and comprehensive supporting information to justify the proposal.
- 7.18. The applicant was given additional time within the current application to provide further supporting information. However, no details relevant to the proposed wardens' accommodation were submitted. Additional material was later provided outside the agreed timeframe, relating instead to chef's accommodation, and the applicant requested that this information remain confidential. As such, it has not been taken into account in the assessment of this application, both due to its lack of relevance and because not publishing supporting information would disadvantage the public and committee members.
- 7.19. Overall, officers consider that the application fails to demonstrate a functional need for on-site accommodation in connection with the golf club business or to explain why this need could not be met by existing housing within the locality. The criteria of policy SCLP5.6 will be considered in turn below, in conjunction with the guidance contained within the Rural Development SPD.

SCLP5.6 (a)

- 7.20. The Rural Development SPD sets out that; the applicant will need to demonstrate that there is a functional need for a worker(s) to live on site. The worker should be essential to the operation of the business and not merely convenient. The applicant will be expected to demonstrate why a person is required on site and that should a rural worker dwelling not be provided then the business would not be able to function properly. The worker should be required to live on site through-out the year as well as day and night.
- 7.21. Particular reference needs to be made to the tasks that require a year-round, day-night worker to be physically onsite. It should be supported with details of how many expected staff-hours each task is expected to take and why these tasks are essential for the business to function. Consideration will be given to the nature of the tasks, and which require a permanent presence from the worker on site, as well as how alternative methods including the use of technology have been explored and if/why they are not deemed appropriate.
- 7.22. The application has stated that a warden is required to be on site 24hrs to provide security, access, take charge of deliveries. However, the effectiveness of the proposed accommodation for this purpose is questionable. The unit is located some distance from the main entrance and from the golf club building, with a number of other intervening

buildings. It is therefore does not appear well situated to fulfil these purposes and no information has been provided to explain this further.

- 7.23. While the application refers to security requirements, the Rural Development SPD makes clear that an on-site presence for security purposes is unlikely to constitute a functional need where alternative measures, such as enhanced CCTV, alarms, motion and temperature monitoring and fencing, could reasonably provide adequate security. It is considered that alternative security measures could reasonably be implemented and, accordingly, security considerations do not justify the proposed accommodation.
- 7.24. It is acknowledged that the golf club will have the capacity to host functions, some of which may extend into the late evening. However, this is a common feature of similar establishments and does not ordinarily necessitate the presence of a permanent warden on site, as events are often covered by shift workers. The application provides no substantive evidence or justification to demonstrate why, in this instance, such functions require a member of staff to reside permanently on the site.
- 7.25. Wardens' accommodation for campsites or tourist facilities is not uncommon; however, it is generally associated with larger-scale operations or those which provide specialist holiday sites for guests with disabilities. Although tourism accommodation expansion is proposed for this site, it has not yet been implemented, and the number of holiday units permitted are not of a scale which would require permanent on-site presence of a warden.
- 7.26. No evidence has been presented to provide a convincing argument that there is a functional need for a warden to be physically accommodated on the site, attend at short notice, or be available day and night for the business, as required by SCLP5.6(a).

SCLP5.6 (b)

- 7.27. The Rural Development SPD sets out that there may be existing suitable dwellings either on-site or nearby which would negate the need for a new dwelling. Preference should always be given to existing suitable dwellings over creating new dwellings in what are largely unsustainable locations. The SPD sets out what would need to be provided to demonstrate compliance with criterion b.
- 7.28. No evidence has been provided to demonstrate that the identified need could not be met by existing dwellings or other suitable accommodation within the locality, or through the conversion of an existing building, as required by SCLP5.6(b). Given the site's proximity to Ipswich, it is highly likely that appropriate accommodation is available within a reasonable distance to house staff.

SCLP5.6 (c)

- 7.29. The Rural Development SPD sets out that the Rural Worker Dwelling Statement should provide details of how many expected staff-hours each task is expected to take justifying that a full-time worker is required. Consideration will be given to the nature of the tasks and which require a permanent presence from the worker on site. Tasks that require a small number of checks over a 24-hour period that could be undertaken remotely through the use of technology are unlikely to require a full-time worker on their own. Consideration should also be given to the business's staffing levels and whether other employees can meet the need rather than creating a rural worker dwelling.

- 7.30. The application has not demonstrated a clear need for a full-time warden, as required by SCLP5.6(c).

SCLP5.6 (d)

- 7.31. The Rural Development SPD sets out that in order to allow a rural worker dwelling the Local Authority must be satisfied that the business is a viable enterprise ensuring a future connection between the dwelling and the business. The applicant will need to show it is an established business operating for at least 3 years. The prospect of the business remaining viable for the future also needs to be demonstrated. The SPD sets out what would need to be provided to demonstrate compliance with criterion d.

- 7.32. It is understood that the golf club is long-established, however, no substantive evidence has been provided for as required by SCLP5.6(d). To assess whether the existing business is viable, financial information from the last three years prior to the planning application is required to show that the business was profitable for at least one of those years.

SCLP5.6 (e)

- 7.33. In regard to criterion e), the unit is of a modest scale which would not be visible from public areas. However, the unit does not appear to be well situated for the function which it has been proposed for, given its distance from the clubhouse and entrance of the site. As such the dwelling does not appear to be well located to reflect the proposed functional role.

- 7.34. As a rural workers dwelling it is expected the design of dwelling would reflect the functional role of the dwelling, which can allow for smaller dwellings. That being said, future occupiers should still be able to expect a reasonable level of amenity provision.

- 7.35. The scheme does not include any private amenity space for the unit. Furthermore, the submitted floor plans indicate that the unit would contain two bedrooms and have an internal floor area of approximately 40 sqm, which, when assessed against the Nationally Described Space Standards, falls below the minimum requirement for a two-bedroom dwelling. This would result in a poor level of amenity for future occupants unless the unit were occupied by a single person.

- 7.36. No further information has been provided on the expected occupancy of the unit, and as set out above there is insufficient justification for the functional need for the residential unit. Therefore, the proposal would result in the addition of a new residential dwelling in the countryside with a poor level of amenity provision for future occupiers, for which there is no demonstrated justification.

- 7.37. As such the proposal does not appear to fulfil the requirements of criterion e and would also conflict with SCLP11.2.

Conclusion on SCLP5.6

- 7.38. On the basis of the above assessment, the proposal is considered to conflict with policy SCLP5.6.

- 7.39. It is acknowledged that employment within the hospitality industry can be difficult to sustain and manage. However, hospitality is not in isolation in that respect. While there

may be a functional benefit of a warden being in close proximity to their place of work, it would not be a necessity, and the application has not demonstrated otherwise.

- 7.40. On the basis of the information available, officers consider that the proposal would not fulfil the requirements of SCLP5.6. In addition, the lack of supporting information to justify the proposed development remains a significant concern.

Visual Amenity and Landscape Impact

- 7.41. The unit is a modest scale and will not be visible from public areas and will be contained within the existing golf course. As such, the proposal presents no meaningful adverse landscape or visual impacts given their location within the existing golf course landscape context and existing surrounding tree cover. Therefore, there is no identified conflict with SCLP11.1 or SCLP10.4.

Residential Amenity

- 7.42. The unit is located far enough from neighbours that it would not lead to any loss of privacy, loss of light or oppression to neighbouring properties. The scheme would therefore not harm the residential amenity of neighbours.
- 7.43. The functional need for the dwelling has not been evidenced in the application. As such, the proposal would result in a new dwelling in the countryside which falls below the Nationally Described Space Standards and offers no private amenity space. The proposal would therefore result in the creation of a new dwelling with substandard amenity provision for future occupiers, and without justification for this. As such, it is considered that the proposal provides insufficient amenity space for a new dwelling, which would be contrary to policy SCLP11.2.

Parking and Highway Safety

- 7.44. It is judged that sufficient parking could be provided for the proposed residential unit. The Highways Authority have not objected and no adverse impact to highway safety is expected.

Biodiversity

- 7.45. The Ecology Team have been consulted and have not raised concerns or requested any additional surveys. Based on the available information the proposed development appears unlikely to result in a significant adverse impact on protected species or UK Priority habitats or species (under section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)).
- 7.46. The development is not eligible for mandatory Biodiversity Net Gain as it meets the de minimis exemption criteria.
- 7.47. The site is within the Suffolk Coast RAMS Zone of Influence (Zone B - within 13km of the Stour and Orwell Estuaries SPA/Ramsar, Deben Estuary SPA/Ramsar and Sandlings SPA) and therefore a financial contribution to the scheme or equivalent mitigation identified via a Habitats Regulations Assessment (HRA) is required in order to mitigate in-combination recreational disturbance impacts on habitats sites (European designated sites) arising from new residential development. Two residential units have been proposed. No RAMS

payment has been submitted; a conclusion of no adverse effect on the integrity of Habitats Sites can therefore not be reached and the application must be refused in accordance with the requirements of Local Plan Policy SCLP10.1 and NPPF Chapter 15.

Planning Balance

- 7.48. In light of the published NPPF update and the most recent Regulation 10A reviews East Suffolk Council is not able to demonstrate a 5-year housing land supply in both Local Plan areas (Waveney Local Plan area and Suffolk Coastal Local Plan area).
- 7.49. Paragraph 11(d) of the NPPF, the 'presumption in favour of sustainable development', will therefore apply in decision making on planning applications for housing development in the East Suffolk Local Planning Authority area.
- 7.50. While the proposal would technically add a dwelling to the Council's housing supply, it would not represent sustainable development. The site is physically detached from any defined settlement and would be heavily reliant on private car use. The unit is small, provides minimal amenity space, and is located within an operational golf course. If permission were granted, occupancy would need to be restricted to a warden employed at Fynn Valley Golf Club. Consequently, the scheme would not make a meaningful contribution to meeting the district's housing needs.
- 7.51. In applying the tilted balance under paragraph 11(d) of the NPPF, the benefits of delivering an additional dwelling carry only limited weight given the proposal's restricted occupancy and unsustainable location. The benefits are significantly outweighed by the harm arising from conflict with Policies SCLP5.3 and SCLP5.6, as it would result in a new dwelling within an unsustainable countryside location without any demonstrated justification.

Other Matters

- 7.52. The applicant has indicated that they intend the unit to be used for both warden and chef accommodation, although only warden's accommodation has been included in the proposal. The use of the unit for chef's accommodation was considered and refused under application DC/24/2596/FUL.
- 7.53. Under the current application, the applicant provided further information to officers to justify use of the unit for chefs' accommodation. The applicant required the information to be kept confidential and so it has not been considered within this application.
- 7.54. Notwithstanding this, the submitted information is not directly relevant to the proposal for wardens' accommodation, and in any case would not be sufficient to demonstrate compliance with SCLP5.6.

8. Conclusion

- 8.1. The proposal for wardens' accommodation is not considered to accord with the rural workers dwelling policy under Policy SCLP5.6 as the application submission is devoid of any practical evidence or justification to permit such accommodation on this site.
- 8.2. Furthermore, it is considered unlikely that such justification could be provided for the proposed purpose.

- 8.3. The site also lies within the 13km zone for designated sites where no mitigation or contribution has been provided to ensure that the development would not result in adverse impacts to designated sites.

9. Recommendation

- 9.1. Refuse.

The reasons for the decision to refuse permission are:

1. The application seeks planning permission for the retention of an existing residential unit for use as wardens' accommodation at Fynn Valley Golf Club. The siting and use of the unit would result in new residential development in the countryside and requires consideration under policy SCLP5.6 (Rural Workers Dwellings).

It has not been demonstrated that there is a clearly established functional need for a worker to be accommodated on site; that there are no existing dwellings or accommodation in the area which are suitable and available for the workers; that the need relates to a full time worker who is primarily employed in the rural sector; that the unit and the rural activity concerned has been established for at least three years, has been profitable for at least one of them, is financially sound and has a clear prospect of remaining so; or that the unit is of an appropriate scale and location for the proposed functional role.

The application therefore fails to provide sufficient evidence to demonstrate compliance with SCLP5.6. Moreover, based on the information available, it is considered that the proposal could not reasonably be justified under this policy, as there is no demonstrated essential need for a warden to reside on the site, nor any realistic prospect that such a need could be evidenced for the current operations.

The proposal would otherwise result in the addition of a new dwelling in an unsustainable countryside location. The dwelling would provide substandard levels of amenity for the occupier due to the size of the unit and lack of private amenity space. There is no justification for such a dwelling as the functional need has not been evidenced in the application.

The proposal is therefore contrary to the National Planning Policy Framework and Policies SCLP5.3, SCLP5.6, and SCLP11.2 of the East Suffolk Council Suffolk Coastal Local Plan (September 2020).

2. The site is within the Suffolk Coast RAMS Zone of Influence (Zone B - within 13km of the Sandlings SPA; Deben Estuary SPA/Ramsar and Stour and the Orwell Estuaries SPA/Ramsar) and therefore a financial contribution to the scheme or equivalent mitigation identified via a Habitats Regulations Assessment (HRA) is required in order to mitigate in-combination recreational disturbance impacts on habitats sites (European designated sites) arising from new residential development. Local Plan Policy SCLP10.1 seeks to support regulation 63 of the Conservation of Habitats and Species Regulations (2017) (as amended) where proposals that would cause a direct or indirect adverse effect on the integrity of Habitats Sites (either alone or in combination with other plans or projects) will not be permitted.

The applicant has failed to submit relevant information in relation to the potential disturbance caused by additional visitors to Habitats Sites as a result of the development and measures

required to mitigate this. It therefore cannot be concluded that the development will not result in an adverse effect on the integrity of Habitats Sites and therefore the proposals are considered contrary to Policy SCLP10.1 East Suffolk Council Suffolk Coastal Local Plan (September 2020) and Section 15 of the NPPF.

Informatives:

1. The Council offers a pre-application advice service to discuss development proposals and ensure that planning applications have the best chance of being approved. The applicant did not take advantage of this service. The local planning authority has identified matters of concern with the proposal and the report clearly sets out why the development fails to comply with the adopted development plan. The report also explains why the proposal is contrary to the objectives of the National Planning Policy Framework and local plan to deliver sustainable development.

Background information

See application reference DC/25/1945/FUL on [Public Access](#)