

PLANNING STATEMENT

**PROPOSED RESTORATION AND CHANGE OF USE OF NONSUCH
HOUSE (GRADE II* LISTED) AND THE SENSITIVE CONVERSION
OF ASSOCIATED OUTBUILDINGS TO A BOUTIQUE HOTEL,
ALONG WITH THE ERECTION OF ANCILLARY HEALTH AND
WELLBEING FACILITIES, STAFF ACCOMMODATION,
ASSOCIATED LANDSCAPING AND ACCESS IMPROVEMENTS;
PROPOSED RURAL BUILDINGS FOR THE MANAGEMENT OF
NONSUCH ESTATE;
PROPOSED DEMOLITION OF DENBANKS AND ERECTION OF A
REPLACEMENT DWELLING, INCLUDING NEW BUILD DWELLING**

**NONSUCH ESTATE, WESTBROOK ROAD,
BROMHAM, WILTSHIRE, SN15 2ED**

Prepared by

**Morgan Jones, BSc (Hons) MSc, MRTPI
Associate Director
LPC (Trull) Ltd**

Our Reference: LPC.6184

July 2026

CONTENTS

ITEM	TITLE	PAGE
1.0	Introduction	3
2.0	Site Description & Planning History	4
3.0	Pre-application Enquiry	8
4.0	Proposed Development	13
5.0	Planning Policy Context	17
6.0	Planning Assessment	20
7.0	Local Plan Status & Tilted Balance	40
8.0	Conclusion & Planning Balance	41

Appendices

Appendix A: A.1. Pre-application Planning Statement

A.2. Pre-application Heritage Statement

A.3. Pre-application Design and Access Statement

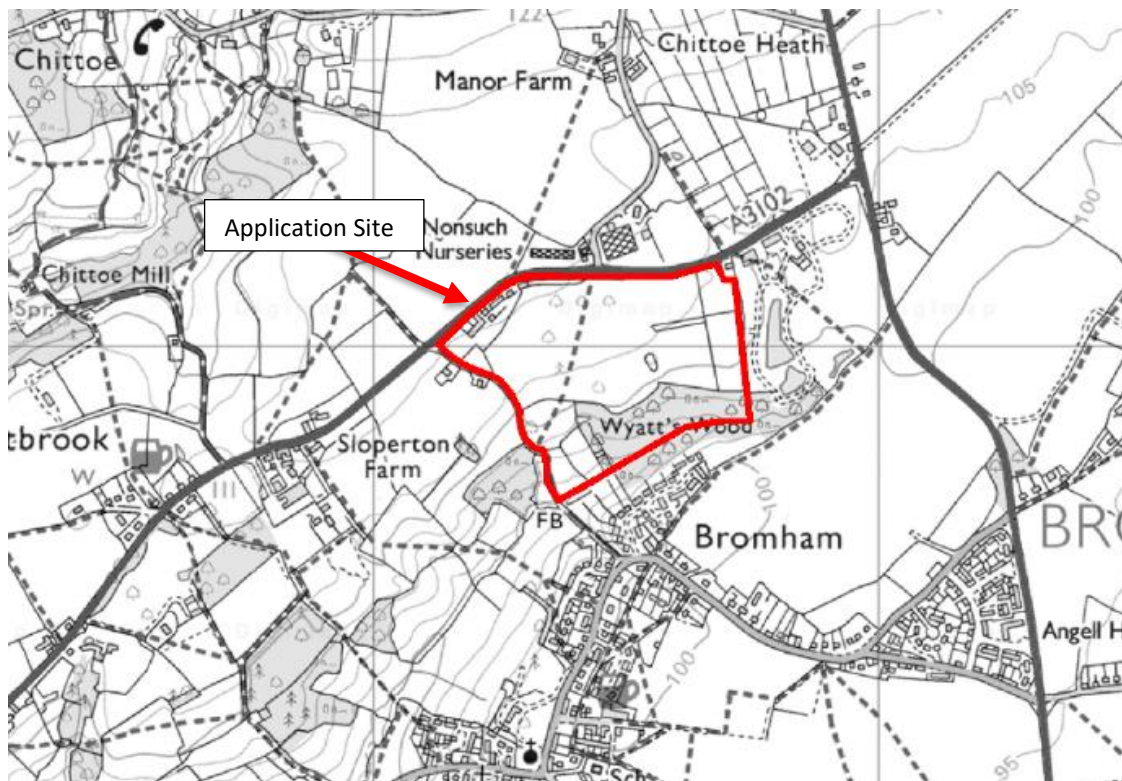
Appendix B: Schedule of Drawings Submitted

INTRODUCTION

- 1.1 This Planning Statement has been prepared to support the submission of a planning application seeking full planning permission and listed building consent for the comprehensive restoration, reconstruction and redevelopment of Nonsuch House, Westbrook Road, Bromham, Wiltshire, SN15 2ED, along with its gardens and the wider estate.
- 1.2 The proposal involves the conversion of the principal Grade II* Listed Building to a boutique hotel, the sensitive adaptation and conversion of associated outbuildings, the introduction of ancillary health and wellbeing facilities, staff accommodation, and associated landscape and access improvements to secure the optimum viable use of the historic property. The application also includes new build agricultural buildings for the management of the estate, and the demolition of Denbanks, which lies on the periphery of the estate, and its replacement with two new dwellings.
- 1.3 The application follows positive pre-application application discussions with Historic England and Wiltshire Council which have informed the evolution of the scheme. The proposed developments have been updated and refined to address the feedback received and the application tailored towards addressing the advice provided. The applicant and the wider project team wish to continue the collaborative and proactive discussions to enable full details of the proposed developments to be agreed to enable the scheme to be delivered to secure the long term future of the heritage asset which is currently at risk.
- 1.4 This statement will describe the location of the site and will set out what is proposed by the planning and listed building consent applications. The statement will then provide an overview of the planning policy context and an assessment of the key material planning considerations, demonstrating the proposal's acceptability.

2.0 SITE DESCRIPTION & PLANNING HISTORY

2.1 The application site comprises the Nonsuch House & Estate which is located on the southern flank of the A3102 Westbrook Road immediately north of the village of Bromham. The estate is on mainly flat ground but Wyatt's Wood to the south slopes down towards Clackers Brook which flows along the southern boundary of the property.



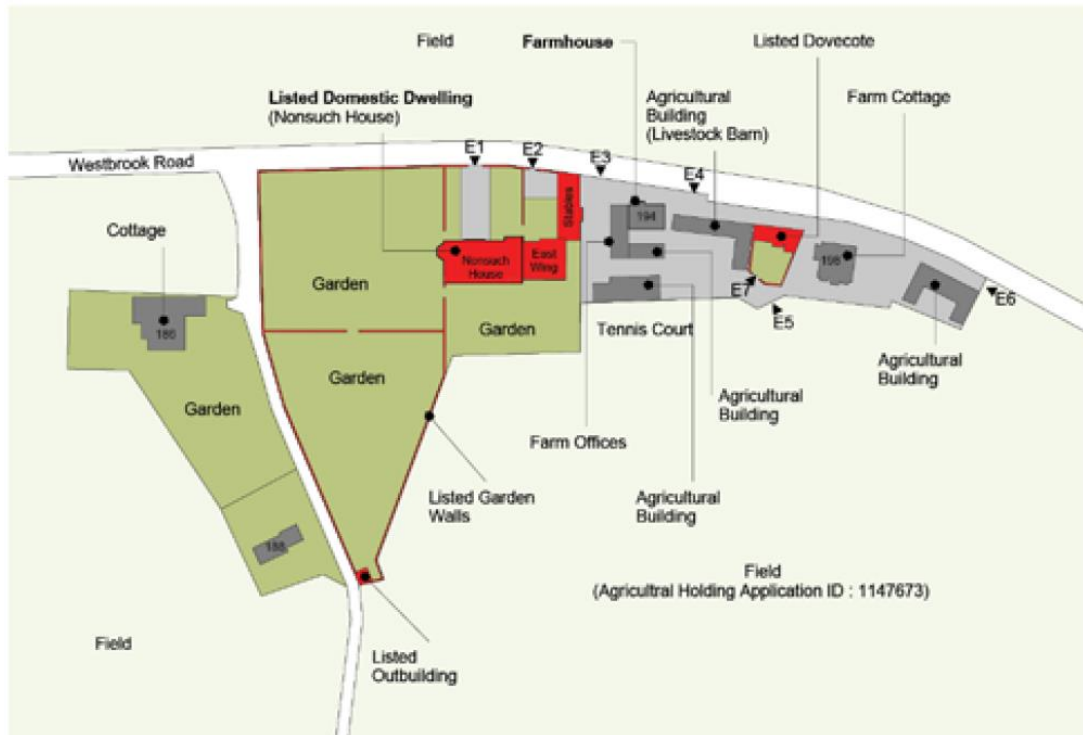
Location Plan (Source: LVIA by ADSDF)

2.2 Nonsuch House is a Grade II* Listed Building dating back to the early 18th century but has evolved significantly every century since. In 2022 the building was damaged by fire which destroyed the entirety of the roof structure and much of the ground and first floors.

2.3 There are other designated heritage assets alongside the Grade II* Listed Nonsuch House, they are as follows:

- Garden Walls and Summerhouse at Nonsuch House (Grade II)
- Walls and Gate Piers at Nonsuch House (Grade II)
- Outbuilding at Nonsuch House (formerly listed as Dovecote) (Grade II)

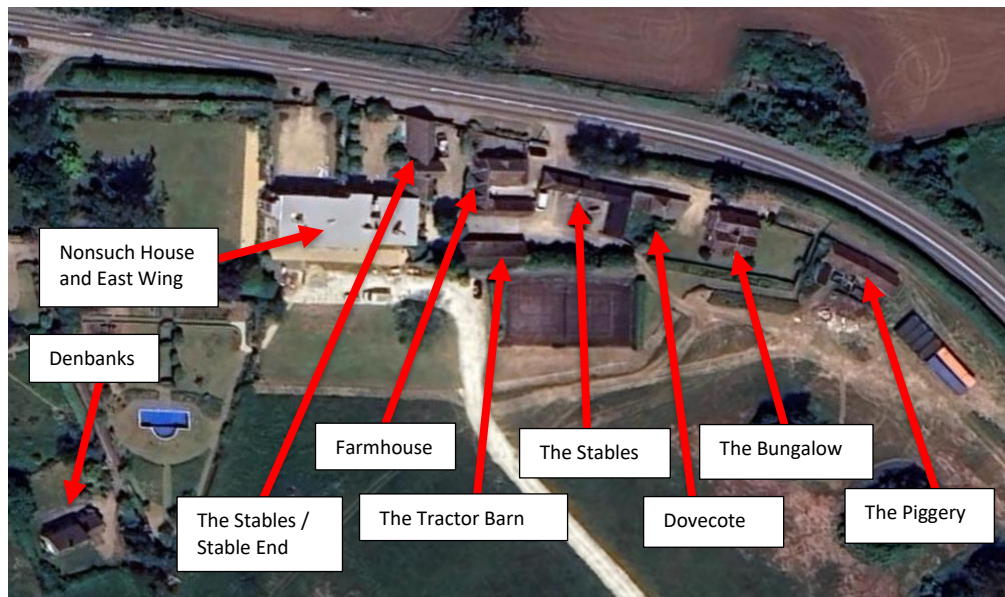
- Stable Block at Nonsuch House, consisting of the Stables / Stable End (Grade II)



Existing Buildings & Listing Status Plan by Boyce Group

2.4 The application site covers 18 hectares and comprises the following buildings:

- Nonsuch House and East Wing – large building (Grade II* listed) containing two dwellings, extensively fire damaged, with associated gardens, pool, tennis court etc.;
- The Stables / Stable End / Farmhouse / The Bungalow – four dwellings located to the north-east of Nonsuch House, with independent vehicle access;
- Agricultural barns - The Tractor Barn, The Stables, The Piggery, and Dovecote located to the north-east of Nonsuch House;
- Access drive from an existing field gate on Westbrook Road (formerly a main entrance into the site), providing a safe access for large vehicles associated with temporary works to stabilise Nonsuch House following fire damage.
- Denbanks, 118 Westbrook Road, Bromham, SN15 2ED – a two storey, 3 bedroom house with annexed single storey ancillary building.



Aerial Photograph 08.06.23 (Source: Google Earth Pro)

- 2.5 The property was acquired by the current owner in early 2023 and has since been working alongside an experienced professional team to analyse and understand the place and the works required to reconstruct Nonsuch House as close as possible to a previous known state while securing its optimum viable use. The work resulted in the submission of a pre-application enquiry to the Local Planning Authority and Historic England in January 2025 as discussed below.
- 2.6 The Council's records reveal only a few historic planning application within the application site boundary which are as follows:

Nonsuch Estate

- **Planning Application K/86/1085** - Divide existing bungalow into two units and provide new road access - The Bungalow, 198 Westbrook, Bromham – Approved 19/02/1987
- **Planning Application K/32612** - Conversion of former workshop into an office - 192, Westbrook, Bromham – Approved 16/04/1996
- **Planning Application PL/2022/09303** – Prior notification for the siting and means of construction of a private way to be used as an Agricultural & Forestry track – Agricultural Unit off Westbrook Road, Westbrook Road, SN15 2ED – Refused 30.12.2022

- **Planning Application PL/2023/00030** – Prior Approval Part 3 Class Q - Change of use of the existing agricultural buildings into 3no. larger dwelling houses – Agricultural Unit off Westbrook Road, Westbrook Road, SN15 2ED – Refused 12.05.2023
- **Planning Application PL/2025/08030** – A general purpose agricultural / forestry building – Land at Westbrook, Bromham, Wiltshire, SN15 2ED – Prior Approval Not Required 01.11.2025

Denbanks

- **Planning Application PL/2023/07258** - Two storey rear extension with the amalgamation of the existing attached outhouse to the side incorporated into the proposed dwellings footprint – 118 Westbrook Road, Bromham, SN15 2ED – Prior Approval Refused 26.01.2024
- **Planning Application PL/2024/07519** - Erection of rear single and double storey extension and loft conversion to form a 5 bedrooms family home with spacious kitchen and living accommodation – Refused 22.11.2024
- **Planning Application PL/2025/05767** - Two-storey and single-storey rear extension, loft conversion, external alterations and associated works – 118 Westbrook Road, Bromham, SN15 2ED – Approved 05.09.2025

3.0 PRE-APPLICATION ENQUIRY

Local Planning Authority

3.1 A pre-application enquiry, reference ENQ/2024/01788, was submitted to the Local Planning Authority in January 2025, it included the following documents and drawings:-

- Pre-Application Planning Statement (AZ Urban Studio Limited)
- Design and Access Statement (Clifton Development Studio)
- Existing and proposed drawings (Clifton Development Studio)
- Heritage Statement (Cursus Archaeology)
- Landscape and Visual Impact Assessment (ADSDF)
- Transport Assessment (Transport Planning Associates)
- Marketing Assessment (Lloyd Williams with Carter Jonas / Allsop)
- Ecology Assessment (Abricon)

3.2 The pre-application Planning Statement, Heritage Statement, and Design and Access Statement provide a detailed analysis of the history of Nonsuch House, its heritage status and its current condition, and are available to view at Appendix A. The Pre-Application Planning Statement explained that the core components of the scheme were as follows:

- a) Repair and appropriate alteration to Nonsuch House and gardens, together with change of use to hotel accommodation;
- b) Use of existing adjacent dwellings and buildings suitable for conversion as short-stay accommodation;
- c) Erection of new buildings for guest facilities (Welcome Building; Wellness Building, Artist's Studio, Yoga Studio)
- d) Erection of Estate Manager's house and associated Estate Office and farm / forestry buildings
- e) Associated drainage, irrigation, primary and internal access, and parking infrastructure enhancements;
- f) Associated landscape enhancements;

3.3 The Pre-Application Planning Statement presented an overview of the case for the development which is as follows:

- *Nonsuch Estate has been in decline over recent decades, leading to the long-term owners (over 100 years) to put the estate on the market in 2019. After a difficult and extended sale process, a devastating fire occurred in February 2022 at the Grade II* listed Nonsuch House resulting in extensive loss of the roof and upper floors, and the estate to be marketed once again with sale at auction. Having failed to sell at auction, Boyce Group purchased the estate by private treaty;*
- *Nonsuch House has been placed on the Historic England ‘Heritage at Risk Register’ in Category A following the fire, reflecting the possible total loss of the building. Upon purchasing the estate Boyce Group immediately erected a temporary roof covering on the building and boarded broken windows to prevent further water / weather damage. The building is in a perilous state. Other designated heritage assets at the estate associated with Nonsuch House are not at risk, but require investment and new uses to sustain them. The wider group of buildings that forms the setting of Nonsuch House similarly requires investment and future viable uses to sustain them;*
- *Boyce Group has assessed options for the future of Nonsuch House and the wider estate, and concluded that reconstruction and conservation of the house as a dwelling is not viable, as the cost of the required works do not justify the end value of what is a constrained country house;*
- *The estate as a whole is in a general state of disrepair and requires significant investment to restore buildings and landscape, and future uses that will be able to maintain them. There is much scope for enhancement of what has become a rather barren landscape setting to the buildings*

3.4 The Local Planning Authority provided a written response following a site visit by the Case Officer and Senior Conservation Officer. The Conservation Officer subsequently provided a detailed consultation response, the summary of which is as follows:

“The commitment to the repair of house is welcomed although further and clearer information about the detail of the proposals is required.

The re-use of the associated buildings which are currently in residential use is uncontroversial and any harm resulting from the sensitive conversion of others to residential use is likely to be offset by securing the benefits of repair and a viable long-term use.

A proposed model of use for short-term letting of the house and associated buildings on a flexible basis appears to have some potential to be achieved via relatively low-key changes, avoiding significant pressure on the fabric or setting of the buildings and therefore could be acceptable in principle.

It is acknowledged that the subdivision into separate permanent full-time residential curtilages would be likely to result in a greater level of harm within the setting of the listed buildings. (n.b. even so, it is noted that the currently proposed changes at first and second floor within the main house appear to increase the potential for future proposals which include the permanent subdivision of the house and mechanisms would need to be considered to avoid the fragmentation of the estate).

However, it has not been clearly demonstrated that the proposed short-term letting use model cannot be achieved without need for some or all of the additional new development associated with the more sophisticated hotel use. Whilst much of this may only have a limited impact on setting of the heritage assets, I am conscious that the policies in the Core Strategy that have been quoted as being supportive of the proposed development also focus primarily on re-using and developing existing buildings where the development will be in open countryside as this site is. Without clear justification for the quantum of development that is proposed there will presumably also be a policy objection to the new development within this open countryside location. At present that justification has not been demonstrated and there is no clear heritage benefit which might justify setting aside usual policy.”

- 3.5 The Case Officer reaffirmed the comments of the Conservation Officer within the overarching pre-application response letter which came to the following conclusion:

“The LPA considers there is a broad need for this type of hotel development within the locality of the site and its provision would appear likely to offer some benefits to wider tourism based businesses and local food/service suppliers as well as generating employment (hopefully able to be secured within the local population). However, these benefits do not necessarily justify the proposals as the main consideration will be the justification for the works required to conserve the heritage assets and whether the proposed change of use would secure the ‘optimum viable use’.

Heritage matters will be given the greatest weight in any future planning application assessment and robust evidence must therefore be submitted to justify the quantum of the development and any harm to the heritage assets that may be required to secure the long term conservation.

- 3.6 A further pre-application meeting was held with the Case Officer online on the 08 October 2025 to discuss the scope of the information required to be submitted in support of the full planning and listed building consent applications. The Officer noted that while the restoration and redevelopment of the site was being positively approached, the proposed use and amount of development had to be justified and shown to be the 'Optimum Viable Use'.

Historic England

- 3.7 A pre-application enquiry (reference PA01202717) was also submitted to Historic England in January 2025 which included the same documents and drawings outlined above. The written response from Historic England on the 26 June 2025 advised that following a site visit in February 2025 several amended and additional details were provided as outlined below:

- 4992-003A - Proposed Site Layout - superseding 22NHD - 3-1-MP-GA-PL-103 (B) Masterplan - Site Plan - Proposed site plan
- Vision for Nonsuch Estate
- Assessment of Future Use Options for Nonsuch Estate
- Vale Garden Houses Ltd Orangery Design Proposal

- 3.8 Detailed documents relating to the condition, proposed repair and restoration of the leather wallpaper in the entrance lobby of Nonsuch House were also provided:

- Sturge Conservation Studio - Survey of gilt leather in entrance hall, Nonsuch Estate, 31 March 2025
- Identification of leather
- Plans of walls
- Cleaning and Flaking

- 3.9 The written pre-application feedback states that "In general, Historic England is supportive of the overarching aim to repair and restore Nonsuch house and find it and its wider estate a viable long-term use, however, we

are concerned with the overall impact that the proposed changes will have on the setting of this Grade II* house and its associated buildings. We would recommend that these aspects of the scheme are amended prior to submission to the Local Planning Authority for Planning and Listed Building Consent”.

- 3.10 The feedback received from Historic England and the Local Planning Authority has been taken into account and the proposed development updated accordingly.
- 3.11 The Design and Access Statement by RRA Architects provides a detailed description of the proposed development, and identifies the amendments to the development originally designed to respond to the pre-application feedback from the Council and Historic England;

“In particular, the Welcome Building has been reduced in height to ensure it sits more discreetly within the landscape and relates more harmoniously to its surroundings. The previously proposed tree-lined access route has been omitted in favour of a more traditional approach through the existing yard, thereby reducing intervention within the historic landscape and preserving its established character. In addition, ancillary accommodation has been consolidated into a single structure within the Welcome Building, significantly reducing the spread and visual impact of new built form across the estate”.

4.0 PROPOSED DEVELOPMENT

4.1 The application seeks full planning permission and listed building consent for the restoration and reuse of the Nonsuch Estate. The current proposal comprises the repair and works to the Grade II* listed Nonsuch House and its associated buildings along with additional supporting development within the wider grounds to facilitate a change of use of the site into a hotel with ancillary dining and spa facilities.

4.2 The Design and Access Statement by RRA Architects provides a detailed explanation of the proposed development but in summary the separate elements can be categorised as follows:

- i. Repair and appropriate alteration to Nonsuch House and gardens, together with change of use to hotel accommodation – preventing loss of this at-risk designated heritage asset and providing a viable future use compatible with the significance of the building – the hotel use is very close to the format of a country house designed for living and entertaining guests; hotel use will contribute significantly to the local economy and create employment opportunities; opening up of the Estate to guests will provide an opportunity to explore what has been a private collection of historic buildings and associated landscape for the last four hundred years.
- ii. Use of existing adjacent dwellings and buildings suitable for conversion as short-stay accommodation – appropriate conversion and re-use of a number of redundant rural buildings (including heritage assets) and change of use of existing dwellings – the ‘Farmstay’ area of the proposals provides diversity to the accommodation with larger units and self-catering, facilitating longer stays; visitor accommodation use will contribute significantly to the local economy and create employment opportunities.
- iii. Erection of new buildings for guest facilities (Welcome Building to include Restaurant, Health and Wellebing, Reception, and Gym) -

High-quality and beautiful buildings provided in support of the accommodation use appropriately located within the site to preserve the landscape qualities and setting of heritage assets; operating in support of the primary use of the site proposed and will contribute significantly to the local economy and create employment opportunities.

- iv. Erection of Estate Manager's house and associated Estate Office and farm / forestry buildings – operational facilities required to support the estate operation and manage the landscape / farmland / woodland; located sensitively in the working landscape.
- v. Associated drainage, irrigation, access and parking infrastructure – a holistic masterplan approach is taken to the site to provide a comprehensive and sustainable approach to drainage, irrigation, and energy supply; access and parking is managed sensitively within the landscape, keeping all vehicles close to northern boundary of the site and north of the restored tree-lined avenue;
- vi. Associated landscape enhancements – a range of landscape enhancements are proposed to reinstate lost historic landscape features, introduce new elements of interest and ecological / drainage value, and significantly enhance trees and woodland within the Site.
- vii. The replacement of the existing dwelling known as Denbanks with two detached dwellings on the edge of the Nonsuch Estate.

4.3 The restoration, reconstruction and repair works to Nonsuch House provide an evidence-based, heritage-led approach that addresses the extent of fire damage while safeguarding the architectural and historic significance of the Grade II* listed building. The proposals restore the external form and character of the house, re-establish key internal hierarchies and layouts, and introduce carefully integrated modern facilities to support its long-term sustainable use as a boutique hotel.

4.4 The planning & listed building consent application is supported by the following documents and drawings:-

Application Forms

- **Document.** Planning Application Form
- **Document.** Community Infrastructure Levy Form

Key Pre-Application Documents

- **Document:** Pre-Application Planning Statement by AZ Urban Studio Limited
- **Document:** Design and Access Statement by Clifton Development Studio
- **Document:** Heritage Statement by Cursus Archaeology

Design

- **Document:** Design & Access Statement, including Sustainability Statement, (July 2026) by RRA Architects

Heritage

- **Document:** Nonsuch Estate Historical Assessment by Boyce Group
- **Document:** Magnetometer Survey Report by Archaeological Surveys Ltd

Marketing & Viability

- **Document:** Nonsuch Market and Viability Assessment, by Boyce Group
- **Document:** Assessment of Future Use Options for Nonsuch Estate, by Boyce Group
- **Document:** Vision for Nonsuch Estate by Boyce Group
- **Document:** Marketing Report (09.02.2024) by Carter Jonas

Transport

- **Document:** Transport Statement (July 2026) by Transport Planning Associates

Landscape

- **Document:** Landscape and Visual Impact Assessment (LVIA) (December 2025) by ADSDF Ltd

Land Contamination

- **Document:** Phase 1 Geo-Environmental Desk Study Investigation (January 2023) by Earth Environmental & Geotechnical

Ecology

- **Document:** Preliminary Ecological Assessment (January 2024) by Abricon Ltd
- **Document:** Biodiversity Net Gain Assessment by Crossman Associates
Document: Bat Survey by Crossman Associates
- **Document:** Denbanks Bat Survey (June 2025) by Crossman Associates

Arboriculture

- **Document:** Arboricultural Impact Assessment & Tree Protection Plan by NB Tree Management Arboricultural Consultancy
- **Document:** Arboricultural Method Statement by NB Tree Management Arboricultural Consultancy

Flood Risk & Drainage

- **Document:** Stage 1 Flood Risk Assessment (July 2026) by Tumu Consulting

Statement of Community Involvement

- **Document:** Statement of Community Involvement comprising:-
 - Engagement with public June 2023
 - Engagement with Parish council 2025
 - Engagement with Parish council 2026
 - Engagement with members of the public via website Summer 2026

Other Supporting Information

- **Document:** Vision for Nonsuch Estate by the Owner
- **Document:** Interior design review and direction

Schedule of Drawings

A schedule of application drawings by RRA Architects can be seen in Appendix B.

5.0 PLANNING POLICY CONTEXT

National Planning Policy

5.1 The National Planning Policy Framework (NPPF), and associated Planning Practice Guidance (PPG), sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions. The policies within the following chapters of the NPPF are relevant to the assessment of the proposed development:-

- Chapter 2 – Achieving Sustainable Development
- Chapter 4 – Decision-making
- Chapter 5 – Delivering a Sufficient Supply of Homes
- Chapter 9 – Promoting Sustainable Transport
- Chapter 11 – Making Efficient Use of Land
- Chapter 12 – Achieving Well-designed Places
- Chapter 15 – Conserving and Enhancing the Natural Environment
- Chapter 16 – Conserving and Enhancing the Historic Environment

5.2 The NPPF highlights that planning law (section 70 [2] of the Town and Country Planning Act 1990 and section 38 [6] of the Planning and Compulsory Purchase Act 2004) requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

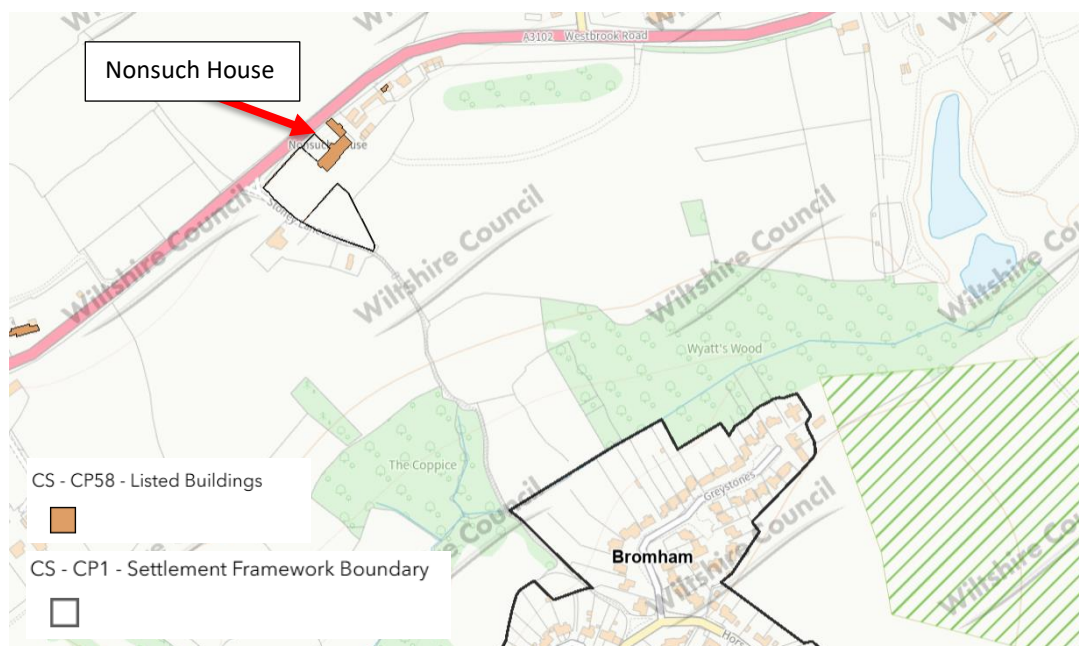
Local Planning Policy

5.3 The development plan relevant to the application include the Wiltshire Core Strategy (WCS) (adopted January 2015) (which includes saved policies from the former Kennet Local Plan). The key policies relevant to the assessment of the proposed development are considered to be:-

- **WCS** Core Policy 1: Settlement Strategy
- **WCS** Core Policy 2: Delivery Strategy

- **WCS** Core Policy 12: Spatial Strategy for Devizes Community Area
- **WCS** Core Policy 38: Retail & Leisure
- **WCS** Core Policy 40: Hotels, Bed & Breakfasts, Guest Houses and Conference Facilities
- **WCS** Core Policy 48: Supporting Rural Life
- **WCS** Core Policy 50: Biodiversity and Geodiversity
- **WCS** Core Policy 51: Landscape
- **WCS** Core Policy 52: Green Infrastructure
- **WCS** Core Policy 57: Ensuring High Quality Design
- **WCS** Core Policy 58: Conservation of the Historic Environment
- **WCS** Core Policy 60: Sustainable Transport
- **WCS** Core Policy 61: Transport and Development
- **WCS** Core Policy 64: Demand Management
- **WCS** Core Policy 67: Flood Risk

5.4 The adopted Local Plan is accompanied by the Policies Maps, which provides a spatial representation of the Local Plan policies. The site lies within Flood Zone 1 and is not subject to any national or local landscape designations.



Local Plan Policies Map – WCS

- 5.5 The site falls within a designated Neighbourhood Plan Area, however a Neighbourhood Plan has yet to be ‘made’. The Bromham Neighbourhood Plan is currently within the final preparation stages and there has been some initial informal community consultation.
- 5.6 The following Supplementary Planning Documents and Briefing Notes are also relevant in the determination of this application:
- Wiltshire Local Transport Plan 2011 – 2026: Car Park Strategy
 - Wiltshire Council Design Guide (2024)

Emerging Planning Policy

- 5.7 The WCS was adopted in 2015 and is therefore being reviewed. The review is termed the ‘Local Plan Review’. The draft Wiltshire Local Plan (WLP) was submitted to the Secretary of State for Housing Communities and Local Government for independent examination on 28 November 2024. There are no fundamental changes proposed to the Spatial Strategy of the Local Plan, as presented within Pre-Submission Draft (2020 – 2038) (Regulation 19) Wiltshire Local Plan (September 2023), however the draft plan pre-dates the recently published NPPF (12 December 2024).
- 5.8 The draft WLP was submitted to the Secretary of State for Housing Communities and Local Government for independent examination on 28 November 2024. However, following some initial hearing sessions the Planning Inspectorate raised significant concerns with the soundness of the draft WLP and subsequently wrote to the Council on the 27 February 2026 advising that the Council should either (i) withdraw the Local Plan from examination or (ii) request that the Inspectors draft a final report (which would recommend non-adoption). The Council subsequently decided to withdraw the draft WLP from the Examination process.
- 5.9 The Town and Country Planning (Local Planning) (England) Regulations 2026 introduced a new Local Plan system which came into effect in March 2026. The Council is now within the initial stages of the new plan-making process.

6.0 KEY ISSUES AND PLANNING ASSESSMENT

6.1 In light of the context of the site and relevant national and local planning policies the key material planning considerations are considered to be:-

- i) Principle of Development
- ii) Heritage Impact
- iii) Impact on Highway & Pedestrian Safety
- iv) Design and impact on Neighbour Amenity
- v) Impact on Natural & Historic Environment
- vi) Impact on Ecology and Biodiversity
- vii) Impact on Local Environment (surface water, pollution etc)

Principle of Development

Proposed Hotel Use

6.2 The WCS includes a Spatial Strategy which sets the foundations for how 'sustainable development' is defined and applied within Wiltshire. It has three key elements; a Settlement Strategy, Delivery Strategy and Infrastructure Requirements. The settlement and delivery strategies define where development will be the most sustainable across Wiltshire's settlements.

6.3 Core Policy 1 'Settlement Strategy' and Core Policy 2 'Delivery Strategy' of the WCS outline that there is a presumption in favour of sustainable development within the Principal Settlements, Market Towns, Local Service Centres and Large Villages and development should be restricted to within the Limits of Development other than in exceptional circumstances, as set out within the relevant core policies contained within the plan, i.e. the 'exception policies'.

6.4 The WCS 'exception policies' that permit new development within the countryside, in line with the delivery strategy outlined in Core Policy 2, are listed within paragraph 4.25 and includes Core Policy 40 'Hotels, Bed &

Breakfasts, Guest Houses and Conference Facilities’. The policy provides support for new hotels, together with the sensitive extension, upgrading and intensification of existing tourism accommodation facilities, within settlements, or otherwise outside settlements if the proposal involves the conservation of buildings that for contextual, architectural or historic reasons should be retained.

- 6.5 In the Devizes Community Area, where the site is located, the most sustainable location to which most growth is directed is the ‘Market Town’ of Devizes, followed by the ‘Local Service Centre’ of Market Lavington, and the ‘Large Villages’ of Bromham, Potterne, Rowde, Urchfont, West Lavington / Littleton Pannell and Worton, which are capable of accommodating a modest level of housing growth to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.
- 6.6 The application site lies within the ‘countryside’ for planning policy purposes but it is not remote or isolated, being within walking distance of Bromham and a short drive of the Market Towns of Devizes to the south-east, Melksham to the west, and the Principal Settlements of Chippenham to the north. The site has good access to the primary transport network and is well placed to be able to access the plethora of historic, cultural and natural tourist sites throughout Wiltshire and further afield.
- 6.7 The pre-application feedback provided by the Council noted that the Economic Development Team had indicated that there is a deficit in high-quality hotel accommodation in Wiltshire and went on to state there is broad support for the proposed hotel use; “In addition to this deficit, the locality has various tourist attractions that additional hotel accommodation could help to support (Avebury, Lacock, Bowood House for example). So, the LPA can consider there is a need for this type of accommodation and some wider benefits to local tourism based businesses would arise”.
- 6.8 In terms of the supporting uses and facilities, the Council acknowledged that they have been designed to support the restoration and viable reuse

of the listed building and wider country estate and indicated the “additional development could be justified if a compelling evidence based argument can be put forward at formal application stage”. This application therefore presents further information to demonstrate the need for the facilities within the context of heritage policy as considered within the following section.

- 6.9 In terms of the proposed residential units, there are two key elements; the first the proposed Gatehouse and Estate Manager’s Accommodation, and second the demolition of Denbanks and its replacement with two dwellings. It is recognised that the Spatial Strategy of the Local Plan seeks to contain new residential development within key settlements, however the proposed units are an integral part of the masterplan for the restoration and change of use of the existing buildings to deliver a hotel and the ongoing and future management of the wider estate.
- 6.10 Core Policy 48 ‘Supporting Rural Life’ provides support for new residential accommodation within the ‘countryside’ where it is required to enable rural workers to live at or in the immediate vicinity of their place of work. The objective of the policy is relevant to the current proposal which seeks on-site accommodation which is essential to enable the efficient and safe running of the hotel / estate. The Gatehouse provides accommodation for security staff and staff working antisocial hours. The nature of the proposed use requires staff to be on site at all hours of the day and night to serve guests and ensure the successful operation of the hotel. The Estate Manager’s Accommodation is designed as a more permanent unit of accommodation for an employee that will oversee the management of the estate and hotel. The nature of the role requires an-on site presence around the clock to ensure the efficient operation of the estate.
- 6.11 It is not uncommon for country estates and hotels to have ancillary staff accommodation and the proposed units as part of the masterplan for Nonsuch Estate is not considered to be unusual or contentious. The replacement of Denbanks on the edge of the estate will further support the redevelopment of the estate as a whole and deliver an additional unit which will contribute towards the Council’s housing need as explained below.

Heritage Impact

Heritage Legislation

- 6.12 The duty placed on the Council under sections 16 and 66 of the Planning (Listed Building and Conservation Areas) Act 1990 is the requirement to have special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

National Heritage Policy

- 6.13 The NPPF includes the policies on conservation of the historic environment (within Chapter 16) with the main underlying policy that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It outlines that application for development should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance (paragraph 207).
- 6.14 The NPPF advises that for heritage policy, 'significance' means "the value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological, architectural, artistic or historic**. Significance derives not only from a heritage asset's physical presence, but also from its setting" (emphasis added).
- 6.15 In terms of the key components listed above which give a heritage assets its interest, the Planning Practice Guidance (Paragraph: 006 Reference ID: 18a-006-20190723) advises they can be interpreted as follows:-
- **archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
 - **architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or

fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.

- **historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

Local Heritage Policy

6.16 The development plan must be read as a whole but the following policy is of particular relevance from an historic environment perspective:-

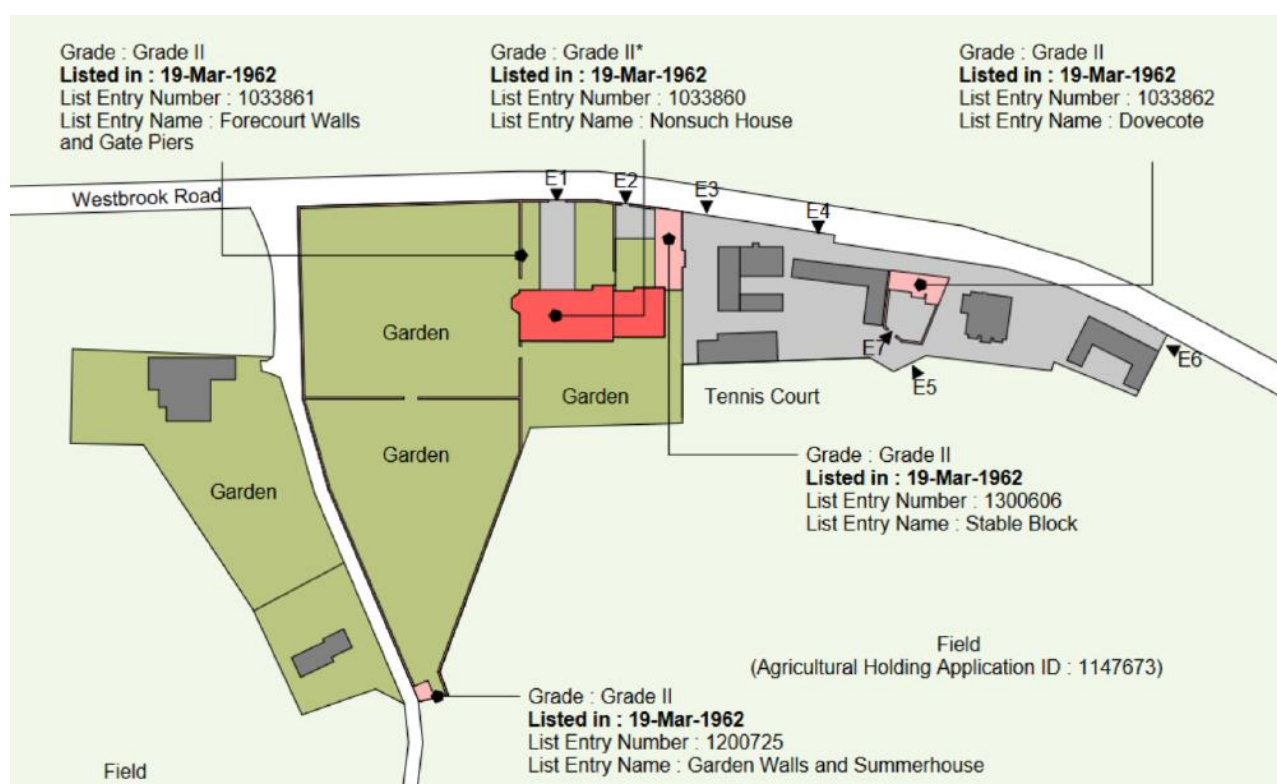
- **WCS** Core Policy 58: Conservation of the Historic Environment

Heritage Assets

6.17 The application is supported by a Heritage Statement by Boyce Group which explains that Nonsuch Estate is of high heritage significance. Its principal component, Nonsuch House (Grade II*), retains strong architectural and historic interest as an early eighteenth-century William and Mary house, despite the severe damage caused by the 2022 fire. It is recognised that the Council's Conservation Officer indicated during the pre-application stage that despite the fire, the building remains a very significant example of a multi-phased country house set within designed formal gardens. The significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression / detailing and use of high-quality design materials which have significant aesthetic and architectural interest and with the evidence of previous changes and the development of the building over time.

6.18 There are other designated heritage assets alongside the Grade II* Listed Nonsuch House, they are as follows:

- Garden Walls and Summerhouse at Nonsuch House (Grade II)
- Walls and Gate Piers at Nonsuch House (Grade II)
- Outbuilding at Nonsuch House (formerly listed as Dovecote) (Grade II)
- Stable Block at Nonsuch House, consisting of the Stables / Stable End (Grade II)



Heritage Asset Plan by Boyce Group

Optimum Viable Use

- 6.19 The Council advised at the pre-application stage that if any works to the listed buildings and their settings, that are considered to cause harm to the significance of the heritage assets, will need to be justified as being essential to securing the 'optimum viable use' of the building.
- 6.20 The NPPF advises that Local Planning Authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation

(Paragraph 210). It is however critical that the ‘optimum viable use’ of a heritage asset is secured. The PPG explains how this may be secured:

“It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in [paragraphs 193 to 196](#) of the National Planning Policy Framework.”
(Paragraph: 015 Reference ID: 18a-015-20190723)

6.21 The current application is supported by a Market and Viability Assessment to demonstrate the use and developments currently proposed are essential to secure the ‘optimum viable use’ of the heritage assets. The Assessment is supplemented by other assessments, as listed below, which first consider and rule out alternative uses, or the continued private residential use of Nonsuch House, along with the lack of demand for the property when advertised on the open market as detailed within the Marketing Assessment.

- Nonsuch Market and Viability Assessment, by Boyce Group, including:
 - Assessment of Future Use Options for Nonsuch Estate, by Boyce Group
 - Vision for Nonsuch Estate by Boyce Group
 - Marketing Report (09.02.2024) by Carter Jonas

- 6.22 The Assessment of Future Use Options for Nonsuch Estate explains that options, including private residential use, commercial office space, educational functions, agricultural expansion, and livery, have been considered but found to be impractical due to financial limitations, planning restrictions, or unsustainable long-term prospects. The assessment concludes by stating that the chosen approach not only restores and preserves Nonsuch House but also contributes positively to the local economy, provides employment opportunities, and enhances the estate's ecological and cultural value.
- 6.23 The Market and Viability Assessment acknowledges that any additional development proposed to support the reuse of Nonsuch House must be justified through a clear evidential narrative and a quantified appraisal showing: (a) why reuse of the listed building is not viable without the enabling component, (b) why the enabling component is the minimum necessary, and (c) why it represents a more heritage-sensitive solution than reasonable alternatives:

“The report responds directly to pre-application advice from the Local Planning Authority, which identified that the previously submitted material did not sufficiently demonstrate that the proposed new development is essential to secure the viable reuse and long-term conservation of the listed building and wider estate.

The assessment tests three development scenarios, each representing a plausible approach to reuse. These scenarios differ in scale, configuration, and relationship to the historic fabric. They are assessed comparatively against four interrelated criteria: financial viability, operational robustness, impact on the significance of the heritage asset, and compliance with national and local planning policy and published heritage guidance.

The analysis demonstrates that a reduced scheme relying solely on the conversion of existing buildings is structurally incapable of generating sufficient and sustainable income to fund the restoration of Nonsuch House or to support its ongoing maintenance. A more intensive alternative, involving the subdivision of the principal historic interiors to increase bedroom numbers, improves financial performance but does so at the cost of materially greater harm to the significance of the listed building.

By contrast, the proposed scheme, which includes a new Welcome Building to accommodate spa, leisure, food and beverage, and back-of-

house functions, enables a higher number of guest bedrooms to be delivered across the estate while significantly reducing pressure on the historic fabric of the main house. This configuration provides the only scenario that is both financially viable and heritage-appropriate, and which secures the optimum viable use of the asset in accordance with national planning policy and Historic England guidance.”

- 6.24 The Marketing and Viability Assessment therefore demonstrates that the proposed development represents the optimum viable use of Nonsuch House, consistent with its conservation. The Welcome Building is not an optional addition, but essential infrastructure required to secure a viable and heritage-sensitive outcome.

Impact Assessment

- 6.25 The NPPF advises that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm of a designated Grade II* heritage asset should be wholly exceptional or otherwise unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm (Paragraphs 213 – 214). However, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (Paragraph 215).
- 6.26 The PPG further advises that “Where a heritage asset is capable of having a use, then securing its optimum viable use should be taken into account in assessing the public benefits of a proposed development” (Paragraph: 016 Reference ID: 18a-016-20190723). It further advises that
- “Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example,*

works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation”.*

Paragraph: 020 Reference ID: 18a-020-20190723

6.27 The Nonsuch Estate Historical Assessment by Boyce Group considers the impact of the proposed development on the significance of the heritage assets identified above along with the public benefits of the scheme. The assessment provides the following conclusion:

“11.2 The analysis in this report demonstrates that the estate is at a critical juncture. Without substantial intervention, the continuing effects of fire damage, moisture, structural loss and prolonged exposure risk accelerating deterioration within the main house and the East Wing. The scope and scale of reinstatement required to secure the building’s future are considerable, and a viable long-term use is essential if the estate is to be conserved in a manner consistent with national policy and the statutory duties of the local authority. The masterplan has been developed directly in response to this need, guided by the principles of significance-led conservation, minimum necessary intervention, and the re-establishment of a coherent and sustainable pattern of use.

11.3 The proposals set out in Sections 9 and 10 offer a coordinated strategy for repair, reinstatement and adaptive reuse. Nonsuch House will be restored as the centrepiece of the estate, with its architectural character, proportions and external form reinstated in a manner consistent with its significance. The East Wing will be repaired sensitively, providing guest rooms that restore its historic relationship with the main house. The stable block will be retained with minimal intervention as a self-contained cottage, preserving an intact historic component. The yard buildings will be repaired and reused in a manner that respects their working character, avoiding unnecessary loss of fabric while providing valuable accommodation that prevents pressure for new development elsewhere.

11.4 The introduction of the welcome buildings, together with rationalised access and parking arrangements, has been carefully located outside the most sensitive parts of the estate. Their siting behind reinforced tree belts, their low profile and their recessive architectural design ensure that they do not intrude upon key views, and that the primacy of Nonsuch

House, the East Wing and the service yard is preserved. The landscape strategy preserves the essential characteristics of the setting, reinforcing the southern lawn, the woodland edge, the Larch Garden and the Walled Garden, while avoiding development within any areas identified as highly sensitive in this assessment.

11.5 In heritage policy terms, the overall level of harm arising from the masterplan is low and firmly within the “less than substantial” category defined by the NPPF. That harm is localised, reversible, and confined primarily to areas of low sensitivity. Against this limited harm must be weighed a suite of clear, demonstrable and substantial public benefits. These include the rescue and reinstatement of a Grade II building at risk, the conservation of associated listed and curtilage structures; the strengthening of landscape character; and the creation of a sustainable, heritage-led use capable of securing the long-term stewardship of the estate.”*

- 6.28 In light of the assessments submitted in support of the planning application it can be concluded that while the proposal will lead to less than substantial harm to the significance of the designated heritage assets as a result of their alteration and change of use, it is necessary to secure the optimum viable use of the heritage assets which alongside other public benefits outweigh the harm.

Impact on Highway & Pedestrian Safety

- 6.29 Core Policy 60 ‘Sustainable Transport’ and Core Policy 61 ‘Transport and New Development’ of the WCS seek to ensure that new development is as sustainable as possible in terms of its location and design and is capable of being served by safe access to the highway network. The pre-application enquiry was therefore supported by a comprehensive Transport Statement (March 2024) by Transport Planning Associates which provided an analysis of the following transport issues:

- Review of the local transport network and accessibility for all modes of travel;
- A review of the local highway safety for the most recent five-year period available;
- A summarised review of relevant transport planning policy;
- An overview of the development proposals, including access, parking and servicing arrangements;

- Calculation of trips forecast to be generated by the scheme; and
- Assessment of transport impact on the surrounding network.

- 6.30 The Transport Assessment explains that the proposals include for a new primary access, comprising a priority junction taken from the A3102 Westbrook Road, located approximately 330 metres east of Nonsuch House and in place of an existing agricultural field access, which before this, was the historic entrance to the site. The Highway Authority acknowledged during the pre-application stage that an existing access onto the A3102 would be utilised but recommended visibility splays be provided along the lines of DMRB; a splay a splay of a minimum of 2m x 160m was requested.
- 6.31 The Transport Assessment explains that in accordance with the recorded 85th percentile speeds presented in Table 2.2 of the report, the proposed access will provide visibility splays of 158 metres to the west and 156 metres to the east from a 2.4 metre set back distance. The report also confirms this is as per the accepted design guidance of DMRB.
- 6.32 In order to achieve the above, the report explains that it is proposed that the existing field access will be enhanced in order to form the main entrance to the boutique hotel. This will be achieved by increasing the existing visibility splays, a modest realignment of the existing dropped kerb onto the highway, and the formalisation of the turning radii with new kerbs extended into the site to the point of the new Cotswold stone wall.
- 6.33 The layout and design of the proposed developments have been updated since the pre-application Transport Assessment, albeit the trip generation assessment took a worst-case approach and concluded the proposed development would result in no material impact on the local highway network. The Transport Assessment has however been updated to reflect the current proposal and is submitted in support of this application.
- 6.34 In terms of the internal layout and design, the new scheme incorporates a sufficient amount of car parking spaces to meet the requirements of the Council Local Transport Plan and Car Parking Strategy.

- 6.35 The application drawings demonstrate the proposed development will meet the required standards outlined above and therefore it is considered the proposal will fully comply with Core Policies 60 and 61 of the WCS. Furthermore, the Transport Statement notes that within the context of the guidelines within paragraph now 116 of the NPPF, it is considered that there are no residual or severe cumulative impacts in terms of highway safety or the operational capacity of the surrounding transport network.

Design and Impact on Neighbour Amenity

- 6.36 The NPPF states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities (paragraph 131). These objectives are reflected within Core Policy 51 of the WCS which seeks to secure high quality design in all development.
- 6.37 The Design and Access Statement by RRA Architects provides a detailed overview of each element of the scheme explaining the design approach and scope of proposed works. The report concludes by stating the following which demonstrates the approach to securing high quality design:

“The scheme goes beyond simple repair. It has been developed as a landscape-led masterplan that respects the estate’s established hierarchy and historic evolution, restoring the relationship between Nonsuch House, its gardens and the wider parkland setting. The proposals retain and reinforce key landscape and heritage features, including existing lawns, woodland and formal garden elements, while introducing carefully integrated additions such as enhanced walking routes, curated gardens, and estate infrastructure to support both visitor experience and long-term land management. The masterplan therefore strengthens both the heritage significance and the environmental quality of the site.

- 6.38 In terms of the impact on neighbour amenity, Core Policy 57 of the WCS seeks to ensure that new developments have regard to the compatibility of adjoining buildings and uses. The site is within the ‘countryside’ with the closes neighbouring residential properties being Cromwells View to the

north of the A3102, 186 and 188 Westbrook directly to the west of the site, and the Greystones estate further south, over 400m away and at a lower land level. It is considered that due to the context of the site, the nature of the proposed uses, and separation distances, there is no potential to have an unacceptable impact on the amenities of the residents of neighbouring properties. It is however understood that concerns have been raised locally by isolated celebrations at the estate, however the proposed development seeks permission to deliver a boutique hotel offering a calm and relaxing place to stay within this tranquil 'countryside' location. It is however possible to manage the potential for future noise through conditions that restrict the use of amplified music etc.

Impact on the Natural & Historic Environment

Natural Environment

- 6.39 The NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscape and recognising the intrinsic character and beauty of the countryside (paragraph 187). These objectives are reinforced within Core Policy 51 of the WCS which seeks to ensure new developments do not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures.
- 6.40 The original pre-application Landscape and Visual Impact Assessment (LVIA) (February 2024) is re-submitted to support this application so the baseline landscape condition of the site is clear and to share the original landscape and visual assessment. The report reached the following conclusions:

“The site is not considered to be a nationally or regionally, or locally notable or unique, however it is considered to be typical in terms of local planning policy. It is not considered to represent a ‘Valued landscape’ in terms of National Planning Policy. The site does not contain rare, notable or unique landscape features.

The landscape design proposal both reinstates and extends historic features and adds improved landscape and biodiversity strategies to the site. All of these factors should be taken into positive material consideration when assessing the impact on views and the landscape. Given that the proposals compliment and enhance the existing context and within planning policy aspirations the proposal are considered as a positive contribution to the landscape. The proposed built and landscape features have been established to ensure successful assimilation of landscape and development.

Certain people (visual receptors) will have limited and local views of the proposal or views that are set in much wider panoramic contexts and obscured by natural hedgerow and foliage. Any features that may be visible will not be prominent or uncharacteristic.

With this in mind, any impact the proposed development may have should be weighed up with the value of the reinstatement of heritage features, the sensitive design strategies to create a more robust and coherent landscape in what is currently lacking – without resulting to pastiche (disneyfication) or overdevelopment.

The iterative design process undertaken with the design architects and ADSDF have resulted in continuous testing and analysis of the proposal resulting in a masterplan that is considered to be sensitive to the location and context.

Overall the site is a unique and suitable location for the proposed scheme. Following this study it is determined that the proposed development complies with the planning policy aspirations and the LVIA process confirms the acceptability of the proposals.”

- 6.41 The Council indicated as part of the pre-application feedback that the upgrading/extension of the formal gardens around the house, reinstatement of the estate as parkland, and creation of the irrigation pond are acceptable in principle, but it was advised that the scale, height and design of the Welcome Building should be reconsidered; “The landscape impacts would not be severe, but harm would occur, and a less tall, more subservient scale building would be preferred in the proposed location (and would seem to be able to be achieved without losing usable internal space). The use of lightweight natural materials (at least for the more visual elements of the new buildings) within a simple form, lower in height than that currently proposed, may also help to visually separate the new build from the historic buildings and reduce overall landscape impact by retaining the prominence of the historic buildings”.

- 6.42 In light of the pre-application feedback the extent of new outbuildings and their scale and design has been amended as detailed within the Design and Access Statement by RRA Architects. The revisions respond to the feedback received and will result in new additions that respect the main Grade II* Listed Building and assimilate well within the landscape.

Arboriculture

- 6.43 There are number of trees across the site including the area of woodland to the south. The Council's Arboricultural Officer indicated during the pre-application enquiry that there is no Arboricultural objection to the proposal in principle, but it was advised that an Arboricultural Impact Assessment in accordance with BS5837:2012, prepared by a suitably qualified Arboriculturist should form part of any future planning application to enable the LPA to ascertain the impact and the feasibility of the proposed development in relation to the trees on and bordering the site.
- 6.44 The application is therefore supported by an Arboricultural Impact Assessment & Tree Protection Plan and Arboricultural Method Statement by NB Tree Management Arboricultural Consultancy. The survey work has identified and classified every tree within the application site including the root protection areas. The proposed building operations will have a negligible impact on the landscape structure of the site but the overall development will result in landscape examinant though the planting of new trees as part of the landscape and ecology enhancement strategy.

Land Contamination

- 6.45 Core Policy 56 'Contaminated Land' of the WCS specifies that development proposals which are likely to be on or adjacent to land which may have been subject to contamination will need to demonstrate that measures can be taken to effectively mitigate the impacts of land contamination on public health, environmental quality, the built environment and amenity.

- 6.46 The planning application is therefore supported by a Phase 1 Geo-Environmental Desk Study Investigation (January 2023) by Earth Environmental & Geotechnical. The report notes that the preliminary risk assessment and conceptual site model have highlighted potential (Low to Moderate) contamination risks in areas of previous development and a former landfill site on the eastern boundary of the site. A low risk can be assigned to the majority of other areas on site. The report therefore recommends that if areas identified above are to be developed / redeveloped then it is recommended a targeted intrusive investigation is carried out and the following contaminants tested for in soils. The proposed developments will however be away from this area and therefore there is no requirement for any further land contamination assessment.

Historic Environment - Archaeology

- 6.47 The Council advises as part of the pre-application feedback that the site of the proposed development is covered by remnant earthworks from former medieval field systems, with a possible Bronze Age ring ditch located in the far south-west. It is entirely possible that further, as-yet unrecorded archaeological features survive within the site, which, together with those currently known about, may be impacted by the proposals. It was therefore recommended that further investigative work to be carried out in order to assess the overall potential of the site so that steps can be taken to mitigate any such impacts.
- 6.48 This current planning application is therefore supported by a Magnetometer Survey Report by Archaeological Surveys Ltd. It explains that a geophysical survey, comprising detailed magnetometry, was carried out across the site and it identified a number of discrete pit-like and linear ditch-like anomalies within the site, with a small number within but the majority outside of the areas outlined for development. Numerous naturally formed pits are evident and it is possible that many of the stronger responses may also be natural; however, some very strong responses could have an association with intense burning indicative of industrial activity, possibly iron working. These too are outside the areas outlined for

development. Several linear anomalies relate to former field boundaries while others are generally short and fragmented.

- 6.49 The results of the report can be discussed further with the Council's Archaeologist during the assessment of the application and a targeted watching brief secured via condition if considered necessary.

Impact on Ecology and Biodiversity

- 6.50 The NPPF advises that new developments should protect and enhance biodiversity and geodiversity (paragraph 192) and Core 50 'Biodiversity and Geodiversity of the Local Plan outlines that development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource.
- 6.51 The application site has some ecological value due to the boundary hedgerows and trees within and adjacent to the site and is therefore supported by a Preliminary Ecological Assessment (PEA) (January 2024) by Abricon Ltd. The report explains that the site contains a non-statutory designated site (Wyatt's Wood & The Coppice LWS) but does not contain statutory sites. The main habitats which make up the majority of the site are modified grassland with scattered trees and lowland deciduous woodland which includes ancient woodland. Other habitats on site include a pond, hedgerows, a stream and a traditional orchard (priority habitats) within the walled gardens. In addition, there are small areas of maize crops, other neutral grassland, formal gardens and a swimming pool (non-priority habitats).

- 6.52 The PEA notes that the proposed plans for the site seek to retain and protect the majority of the priority habitats identified on site (with the exception of a small section of northern hedgerow). The proposed development will result in the loss of areas of the grassland as well as cropland habitats on site, however further wildlife friendly planting (tree, woodland, and meadow planning) and habitat creation (new irrigation lake) is included in the proposed plans. The habitats on site provide suitable habitat for a wide range of species.
- 6.53 The PEA recommended that Bat Emergence Surveys and a Biodiversity Net Gain Assessment which are submitted in support of this application. The Bat Survey Report (October 2025) by Crossman Associates explains that the bat surveys undertaken identified a moderate assemblage of species using the site for roosting and foraging. As such, a Natural England licence will be required which should be supported by a detailed method statement outlining the survey results, planned works and proposed mitigation measures. The report also notes that the site contains habitats that support protected species, including boundary hedgerows and the pond. These habitats will be protected during the development by means of a Construction Ecological Management Plan, and Habitats will be retained in perpetuity by a Landscape Ecological Management Plan, both of which can be secured via condition.
- 6.54 In terms of the requirement to secure Biodiversity Net Gain (BNG), Core Policy 50 'Biodiversity' of the WCS outlines that new development should seek opportunities to enhance biodiversity, however it has become mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The requirement is to deliver 10% BNG. The application is supported by a BNG analysis, informed by the completion of the Defra Small Sites Metric, by Crossman Associates.

Impact on Local Environment

Sustainable Construction

- 6.55 The Council has a Climate Strategy which seeks to reduce emissions and work towards making Wiltshire carbon neutral and the draft sustainable construction and carbon neutral policies within the emerging Wiltshire Local Plan will play a key role. The current ‘Sustainable Construction and Low-Carbon Energy’ policy (Core Policy 41) of the WCS does however encourage new development to incorporate design measures to reduce energy demand, and retrofitting measures to improve the energy performance of existing buildings.
- 6.56 The proposed new buildings will be built to a high standard and will be as energy efficient as possible in terms of their method of construction and ongoing operation once occupied. The development will include EV charging points and will maximise the potential energy input from renewable sources through Air Source Heat Pumps as explained within the ‘Environmental Mitigation’ section of the Design and Access Statement.

Flood Risk and Surface Water

- 6.57 The site does not lie within a flood zone and is not a risk of flooding but Core Policy 67 ‘Flood Risk’ of the WCS seeks to ensure that all new development include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.
- 6.58 The application is therefore supported by a Flood Risk Assessment & Drainage Strategy by Tumu Consulting. The report has been prepared to assess flood risk to the site and produce a drainage strategy for the development to ensure full compliance with Core Policy 67 of the WCS and the requirements of the NPPF. The creation of a large irrigation reservoir is included as part of the development and drainage strategy. It is considered that full technical details could be secured via condition.

7.0 STATUS OF THE LOCAL PLAN & THE TILTED BALANCE

Status of the Local Plan

- 7.1 The Spatial Strategy of the WCS is now out of date and the Council has a significant housing land supply shortfall; the Council's most up to date Housing Land Supply Statement details that it has 2.42 years of deliverable housing land supply. As such, the weight to be attributed to the Spatial Strategy within the decision making process is significantly reduced.
- 7.2 Furthermore, the weight to be attributed to the Local Plan has further diminished following the withdrawal of the draft WLP from the examination process. A recent appeal (3374421) for a residential scheme in Melksham highlighted the perilous position the Council finds itself in and the extreme need to support and deliver new housing schemes. The Inspector noted that "The implication of this is that there will not be a strategic plan in place to lead development in Wiltshire for the foreseeable future".
- 7.3 In light of the above, due to the age of the WCS and the substantial shortfall in housing land supply, it is considered that limited weight should be attributed to any perceived conflict with the Spatial Strategy of the WCS, which as noted above is not working effectively and is failing to deliver housing in a strategic plan-led way. While this factor is an important material planning consideration for any scheme that involves new residential development, the development proposed within this application is for the restoration and change of use of the Grade II* listed Nonsuch House and its associated buildings along with additional supporting development within the wider grounds to facilitate a change of use of the site into a hotel with ancillary dining and spa facilities. The residential units proposed are an integral part of the masterplan for the estate and are key to the delivery and successful operation of the facility.

8.0 CONCLUSION & PLANNING BALANCE

- 8.1 This Planning Statement is submitted in support of a planning application seeking full planning permission and listed building consent for the comprehensive restoration, reconstruction and redevelopment of Nonsuch House, Westbrook Road, Bromham, Wiltshire, SN15 2ED, along with its gardens and the wider estate.
- 8.2 The proposed development involves the restoration and change of use of Nonsuch House (Grade II* Listed) and the sensitive conversion and change of use of associated outbuildings to a boutique hotel, along with the erection of ancillary health and wellbeing facilities, staff accommodation, and associated landscaping and access improvements. The application also proposed new rural buildings for the management of Nonsuch Estate, and the replacement of Denbannks of the edge of the estate with two new dwellings.
- 8.3 The application is supported by an 'Assessment of Future Use Options for Nonsuch Estate' and a 'Heritage Impact Assessment' which justify the quantum of development and demonstrate that while the proposal will lead to less than substantial harm to the significance of the designated heritage assets as a result of their alteration and change of use, it is necessary to secure the optimum viable use of the heritage assets which alongside other public benefits outweigh the harm. Furthermore, the range of site assessments and reports submitted in support of the application demonstrate the masterplan for the redevelopment of the site can be delivered without any harm to the surrounding environment, landscape character, highway and pedestrian safety, or neighbour amenity.
- 8.4 The purpose of the planning system is to contribute towards the achievement of sustainable development, by meeting three overarching objectives; economic, social, and environmental, which are interdependent and need to be pursued in mutually supportive ways. The development proposed will first restore the Grade II* Nonsuch House and associated listed buildings and introduce the optimum viable use to secure their long term future. The significant heritage benefit will be supplemented by

multiple social, economic, and environmental benefits through the delivery of a hotel than will boost the local economy, directly through job creation for local people and drawing people to the area to stay and visit local attractions and facilities. The Nonsuch Estate will be revitalised as part of the proposed development alongside significant landscape and ecological benefits. It is therefore requested that full planning permission and listed building consent be granted.