

Nonsuch Market and Viability Assessment

Executive Summary

This Marketing and Viability Assessment has been prepared to support a planning application for the restoration and reuse of Nonsuch Estate, a designated heritage asset of the great local significance. 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.

Introduction and Purpose

This report has been prepared to inform the Local Planning Authority's consideration of proposals for the restoration and reuse of Nonsuch Estate. It is submitted in response to specific pre-application feedback requesting more detailed evidence of the financial need for the proposed new development and a clearer explanation of how that development is required to support the conservation of the listed building.

In particular, the Authority advised that any future submission should attempt to demonstrate, through financial evidence, why additional development beyond the conversion of existing buildings is necessary, and how the scale and form of that development relates directly to the costs of restoration and the long-term viability of the heritage asset.

The purpose of this report is threefold.

First, it establishes the market context for the proposed use, drawing on Wiltshire and regional evidence to demonstrate that the assumed levels of demand, occupancy, and revenue are realistic and grounded in comparable operating environments.

Second, it provides a structured, scenario-based financial assessment comparing alternative development approaches. This includes a reduced scheme with no new buildings, an intensified scheme relying on subdivision of the historic interiors, and the proposed scheme incorporating a purpose-built Welcome Building. Each scenario is assessed on a consistent basis using transparent, planning-stage assumptions.

Third, it considers the implications of each scenario for the significance of the listed building. In doing so, it demonstrates that the proposed development is not only financially necessary but also results in a more sensitive and legible use of the historic fabric than the alternatives.

Although this report is not labelled as an enabling development assessment, it is prepared in accordance with the principles set out in Historic England's guidance on enabling development. In particular, it addresses the questions of necessity, minimum scale, and the relationship between development value and conservation benefit, as required by national planning policy and the development plan.

Policy and Heritage Framework

Nonsuch House is a designated heritage asset and is subject to the statutory duty in section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. In determining an application which affects a listed building or its setting, the decision maker must have special regard to the desirability of preserving the listed building, its setting, and any features of special architectural or historic interest.¹ The courts have confirmed that this duty requires decision makers to give considerable importance and weight to the desirability of preserving the heritage asset, irrespective of whether harm is categorised as substantial or less than substantial.²

National policy is set out in the National Planning Policy Framework (NPPF). The NPPF requires decision makers to take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.³ It also requires that great weight be given to the conservation of designated heritage assets, and that any harm to the significance of a designated heritage asset should require clear and convincing justification.⁴ Where a development proposal would lead to less than substantial harm, that harm must be weighed against the public benefits of the proposal, including, where appropriate, securing the asset's

¹ Planning (Listed Buildings and Conservation Areas) Act 1990, section 66(1).
Legislation.gov.uk.
<https://www.legislation.gov.uk/ukpga/1990/9/section/66>

² *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] EWCA Civ 137.
Court of Appeal (Civil Division).
<https://www.bailii.org/ew/cases/EWCA/Civ/2014/137.html>

³ Ministry of Housing, Communities and Local Government, National Planning Policy Framework (London: MHCLG, amended 7 February 2025), paragraph 210(a).
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁴ Ibid, pgh 212–213.

optimum viable use.⁵ The NPPF also confirms that decision makers should assess whether the benefits of enabling development, which would otherwise conflict with policy, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.⁶

Historic England's Good Practice Advice provides the relevant interpretive framework. GPA2 sets out the approach to assessing significance and the effects of change, including the need to understand how proposals affect the elements which contribute to significance.⁷ GPA4 provides specific guidance on enabling development and the evidential tests typically expected, including necessity, minimum intervention, exploration of alternatives, and proportionality between conservation benefit and development impact.⁸

At the development plan level, the Wiltshire Core Strategy (adopted January 2015) is a key component of the statutory development plan. Core Policy 58 requires proposals affecting heritage assets to conserve or enhance their significance and setting and to ensure that any harm is justified.⁹ Core Policy 39 supports sustainable tourism development where it is compatible with the character of the countryside and contributes positively to the local economy.¹⁰ In addition, Wiltshire Council has progressed the Local Plan Review through Regulation 19 consultation (autumn 2023), which is relevant as an emerging material consideration insofar as it reinforces the plan-led approach and the requirement for evidence-based justification.¹¹

The combined effect of the statutory duty, national policy, Historic England guidance and the development plan is 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.

⁵ Ibid, pgh 215.

⁶ Ibid, 221

⁷ Historic England, Managing Significance in Decision-Taking in the Historic Environment (Good Practice Advice in Planning Note 2) (London: Historic England, 27 March 2015).
<https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

⁸ Historic England, Enabling Development and Heritage Assets (Good Practice Advice in Planning Note 4) (London: Historic England, 30 June 2020).
<https://historicengland.org.uk/images-books/publications/gpa4-enabling-development-heritage-assets/>

⁹ Wiltshire Council, Wiltshire Core Strategy (adopted January 2015), Core Policy 58.
<https://www.wiltshire.gov.uk/planning-strategic-planning-core-strategy>

¹⁰ Wiltshire Council, Wiltshire Core Strategy (2015), Core Policy 39.

¹¹ Wiltshire Council, Wiltshire Local Plan Review: Regulation 19 Consultation Document (autumn 2023).
<https://www.wiltshire.gov.uk/planning-policy-local-plan-review>

Heritage and Operational Constraints

The significance of Nonsuch House derives not only from its architectural fabric but from the legibility of its internal plan, the hierarchy of principal rooms, and the capacity to experience the building's historic layout as a coherent whole. The operational requirements of a modern hospitality use place particular pressure on these attributes.

Hotel operations require extensive non-revenue-generating accommodation, including commercial kitchens and stores, plant rooms, laundry, staff facilities, guest WCs, fire-protected circulation and servicing. Where these functions are forced into a listed building, they typically result in functional intrusion and subdivision, which can erode plan form and diminish the evidential and aesthetic values that contribute to significance. This is a recognised issue in Historic England's decision-taking guidance, which emphasises the need to assess impacts on significance and to avoid unnecessary harm through inappropriate internal arrangements.¹²

The operational constraint is therefore directly linked to the heritage assessment. If ancillary functions must be accommodated within the listed building, bedroom capacity reduces materially and internal subdivision increases. Conversely, where those functions are accommodated elsewhere in a purpose-built structure designed to carry them, the listed building can be used more efficiently for bedrooms and principal guest spaces, allowing a more legible plan form and reducing intrusive servicing interventions. This relationship between operational configuration, viability and heritage impact underpins the scenario testing set out in the next chapter.

Development Scenarios and Quantitative Comparison

5.1 Methodology and evidence base

Three scenarios are tested using consistent, evidenced assumptions for pricing, occupancy and operating performance. Occupancy assumptions are anchored to VisitBritain/VisitEngland occupancy reporting and are cross-checked against Wiltshire-specific research outputs made available through Visit Wiltshire's industry research portal.¹³

Operating margin assumptions are referenced to publicly available UK hotel market benchmarking, including Savills' UK hotel market reporting and Knight Frank's UK Hotel Dashboard, which report recent nationwide profit margin conditions and sensitivity to labour and operating cost inflation.¹⁴

¹² Historic England, *Managing Significance in Decision-Taking in the Historic Environment (GPA2)* (2015), section on internal alteration and functional intrusion.

¹³ VisitBritain and VisitEngland, *UK Tourism Data Dashboard: Accommodation Occupancy – England (2023–2024)*; and Visit Wiltshire, *Wiltshire Accommodation Occupancy and Performance Reports* (industry research portal, accessed December 2025).

<https://www.visitbritain.org>

<https://www.visitwiltshire.co.uk/industry>

¹⁴ Savills, *UK Hotel Market Update 2024–2025* (London: Savills Research, 2024), section 'Operating Performance and Cost Pressures'; Knight Frank, *UK Hotels Dashboard Q3 2024* (London: Knight Frank Research, 2024).

https://www.savills.co.uk/research_articles

<https://www.knightfrank.co.uk/research>

ADR assumptions are positioned within the Wiltshire market using publicly available rate ranges for comparable destination hotels and a conservative blended approach. For example, Bowood Hotel (Wiltshire) is publicly reported as exhibiting a wide range of average rates for standard rooms, providing an anchor for mid to upper market positioning in the county.¹⁵

5.2 Scenario definitions

Scenario	Description	Welcome Building	Total Keys	Heritage implication
A	Estate hotel with centralised facilities	Yes	50	Lowest harm. Minimal subdivision within the listed building. Rooms to follow historic footprint
B	Reduced scheme using existing buildings only	No	30	Functional intrusion within the listed building reduces bedrooms with some increased harm. Ground and large portions of first floor altered to accommodate guest provisions/services
C	Intensified scheme without Welcome Building	No	35	Additional keys achieved through greater subdivision of the listed building. Highest harm.

5.3 Room numbers and configuration

Scenario	Rooms in Nonsuch House + East Wing	Rooms in estate buildings	Total rooms
A	18	32	50
B	2	28	30
C	7	28	35

In Scenarios B and C, the estate buildings are held constant. The variation is confined to the treatment of Nonsuch House and East Wing. This structure isolates the heritage and operational consequences of displacing ancillary functions into the listed building and, in Scenario C, intensifying subdivision to recover additional bedrooms. This reflects the approach expected in alternative options testing for heritage-led enabling development.¹⁶

¹⁵ Tripadvisor, Bowood Hotel, Spa and Golf Resort: Prices and Availability, aggregated standard room rate data, accessed December 2025.
https://www.tripadvisor.co.uk/Hotel_Review-g503845-d211487-Reviews-Bowood_Hotel_Spa_and_Golf_Resort.html

¹⁶ Historic England, Enabling Development and Heritage Assets (GPA4) (2020), section on alternative options testing and proportionality.

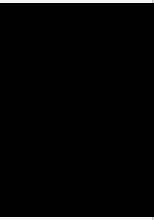
5.4 Pricing assumptions, Average Daily Rate (ADR)

Scenario	Average ADR/ £ across all room types	Evidence basis for positioning
A	250	Destination estate hotel positioning, conservative relative to published Wiltshire comparables and county benchmarks.
B	225	Discounted due to reduced amenity offer and weaker destination pull without a dedicated facilities building.
C	210	Discounted due to compromised room size and character arising from subdivision within the listed building.

5.5 Occupancy assumptions

Scenario	Stabilised occupancy	Evidence basis
A	70%	VisitBritain/VisitEngland reporting indicates strong occupancy patterns, with seasonal peaks and robust performance in recent reporting.
B	60%	Lower occupancy reflects reduced facilities and weaker ability to drive event and wellness demand without centralised amenities.
C	68%	Intermediate occupancy reflects a modestly larger key count with lower ADR, but still constrained by layout and experience impacts.

5.6 Annual room revenue

Scenario	Calculation	Annual room revenue (£)
A	$50 \times 250 \times 70\% \times 365$	
B	$30 \times 225 \times 60\% \times 365$	
C	$35 \times 210 \times 68\% \times 365$	

5.7 Ancillary revenue assumptions

Ancillary revenue covers food and beverage, spa and wellness and events. These functions are treated as small-profit and demand-supporting rather than high-margin profit centres, but are still expected to generate material turnover in Scenario A because the facilities are properly accommodated and marketable.

Scenario	Ancillary revenue assumption (multiple of room revenue)	Rationale
A	0.8x	Centralised restaurant, spa and flexible event space capable of driving meaningful secondary spend.
B	0.6x	Reduced amenity offer and limited capacity for events and wellness spend.
C	0.7x	Moderate spend supported by higher key count than B, but constrained by operational inefficiency and compromised guest experience.

5.8 Total revenue and operating performance

Operating performance is expressed as gross operating profit (GOP) margin on total revenue. The margin assumptions are conservative within the context of publicly reported nationwide hotel profit margin data and recent UK benchmarking commentary.¹⁷

Scenario	Total revenue (£)	GOP margin	Operating profit (£)
A		30%	
B		15%	
C		22%	

¹⁷ Savills, *UK Hotel Market Update 2024–2025* (London: Savills Research, 2024), section ‘Operating Performance and Cost Pressures’; Knight Frank, *UK Hotels Dashboard Q3 2024* (London: Knight Frank Research, 2024).

5.9 Comparative summary

Criterion	Scenario A	Scenario B	Scenario C
Total rooms	50	30	35
House rooms	18	2	7
Estate rooms	32	28	28
Operating surplus	High	Low	Moderate
Primary constraint	None	Insufficient scale	Heritage harm through subdivision
Heritage outcome	Lowest harm	Moderate harm with functional intrusion	Highest harm, remodelling of Nonsuch House required
Policy alignment	Strong	Weak due to harm and viability	Weak due to harm

5.10 Interim conclusion

Scenario A is the only scenario that resolves the core policy tension. It generates a materially stronger operating surplus and does so while reducing pressure to subdivide or functionally compromise Nonsuch House. Scenario B avoids new build but does so by displacing intensive functions into the listed building, reducing bedroom capacity and undermining viability. Scenario C improves trading performance only by intensifying subdivision of the listed building, increasing heritage harm and moving further from the objective of optimum viable use consistent with conservation.

Capita; Costs and Restoration Liabilities

6.1 Purpose and approach

This section provides a planning-stage assessment of the capital costs associated with the restoration and reuse of Nonsuch Estate under each scenario. It responds directly to the Local Planning Authority's request for evidence demonstrating the financial necessity of the proposed additional development by comparing:

- the fixed conservation liability associated with restoring Nonsuch House
- the way in which different operational configurations materially affect the cost, complexity and risk of that restoration.

All costs are expressed as benchmark-based estimates, appropriate to the planning stage, and are explicitly caveated as subject to refinement at detailed design and QS stage. This approach accords with Historic England guidance and established practice in heritage-led viability assessment.¹⁸

¹⁸ Historic England, *Enabling Development and the Conservation of Heritage Assets* (London: Historic England, 2020), esp. sections 2.3–2.5.

6.2 Gross internal areas relied upon

The following GIAs form the basis of the benchmark appraisal.

Element	GIA (sq m)
Nonsuch House and East Wing	approx. 1,300
Welcome Building	1,480
Estate buildings (barns, piggery etc.)	approx. 1,000

These figures are sufficient for order-of-magnitude comparison between scenarios, which is the purpose of this report.

6.3 Scenario-specific benchmark cost assumptions

The cost of restoring Nonsuch House varies materially by scenario. Where intensive hotel functions are introduced into the listed building, benchmark rates must be uplifted to reflect:

- higher servicing density,
- insertion of commercial kitchens, spa and plant,
- increased compartmentation and fire strategy complexity,
- greater intervention in historic fabric,
- and higher delivery risk.

This approach is consistent with UK cost guidance and Historic England commentary on the cost and risk implications of functional intrusion into heritage assets.¹⁹

Building element	Scenario A (£/sq m)	Scenario B (£/sq m)	Scenario C (£/sq m)	Rationale
Nonsuch House restoration				Progressive uplift reflecting servicing intensity and subdivision
Estate building conversions				Comparable scope across scenarios
Welcome Building		n/a	n/a	Purpose-built leisure and F&B

¹⁹ Historic England, Managing Significance in Decision-Taking in the Historic Environment (GPA2) (London: Historic England, 2015), paras 25–30; BCIS, Guide to Heritage and Refurbishment Costs (2024).

6.4 Base construction costs by component

Applying the scenario-specific benchmark rates produces the following base construction costs.

Component	Scenario A (£m)	Scenario B (£m)	Scenario C (£m)
Nonsuch House restoration			
Estate building conversions			
Welcome Building			
External works and services			
Subtotal build cost			

6.5 Professional fees, contingency and abnormal allowance

Given the listed status of the principal building and the increased intervention required in Scenarios B and C, allowances have been applied proportionately to reflect differing risk profiles.

This reflects accepted practice in heritage schemes, where contingency is directly correlated with the extent of fabric disturbance and servicing intervention.²⁰

Allowance	Scenario A	Scenario B	Scenario C
Professional fees	12%	12%	12%
Contingency	15%	17%	18%

6.6 Total capital cost by scenario

The resulting total indicative capital costs are as follows.

Cost element	Scenario A (£m)	Scenario B (£m)	Scenario C (£m)
Subtotal build cost			
Professional fees			
Contingency			
Total capital cost			

²⁰ BCIS, *Refurbishment, Alterations and Extensions Price Book* (London: RICS, 2024), methodology section; Savills, *UK Development Viability and Delivery Risk* (2023).

6.7 Interpretation

Three points arise directly from this revised appraisal.

First, the restoration of Nonsuch House represents a fixed and unavoidable conservation liability, and that liability increases where intensive hotel functions are forced into the listed building.

Second, Scenarios B and C do not avoid cost by omitting the Welcome Building. Instead, they relocate cost and risk into the listed building itself, increasing both capital expenditure and heritage harm.

Third, Scenario C is demonstrably the most expensive way to achieve additional bedrooms, as it combines higher construction cost with greater subdivision of historic fabric, without removing the underlying conservation burden.

6.8 Relationship to supporting evidence

The cost profile identified above aligns with:

- the *Assessment of Future Use Options for Nonsuch Estate*, produced by Boyce Group, which identified restoration cost and complexity as fundamental barriers to alternative uses,
- the *Vision for Nonsuch Estate*, Boyce Group, which treats the Welcome Building as essential enabling infrastructure rather than discretionary development, and
- the Carter Jonas Marketing Report, which evidences limited market appetite for ownership structures capable of absorbing elevated heritage-led capital risk.²¹

6.9 Interim conclusion

This revised analysis reinforces the core conclusion of Sections 4 and 5. Scenarios that omit the Welcome Building do not reduce the conservation burden. They intensify it. Only Scenario A controls cost, limits intervention in historic fabric, and provides a credible basis for long-term conservation.

The implications of these capital costs for overall viability and the conservation funding gap are examined in the next section.

²¹ Carter Jonas, Nonsuch Estate Marketing Report (February 2024); Boyce Group, Assessment of Future Use Options for Nonsuch Estate (2024); Vision for Nonsuch Estate (2024).

Viability appraisal and Conservation Funding Gap

7.1 Purpose and approach

This section assesses whether the operating performance of each scenario is capable of sustaining the long-term conservation of Nonsuch House, having regard to current and foreseeable operating conditions in the United Kingdom hospitality sector.

In revising this section, explicit allowance has been made for rising employment costs, staffing intensity, and wider economic uncertainty. This reflects recent and anticipated increases in the National Living Wage, employer National Insurance contributions, pension obligations and skills shortages within the hospitality sector. These pressures are particularly acute for labour-intensive, service-led estate hotels and must be reflected in any realistic appraisal.

The analysis therefore adopts deliberately conservative operating margins, consistent with a cautious planning-stage assessment and in line with Historic England guidance that enabling development cases should not rely on optimistic financial assumptions.²²

7.2 Annual operating surplus

The revised annual operating surplus figures below are derived from the revenues set out in Section 5, but apply lower operating margins to reflect employment and overhead cost pressures.

Scenario	Total annual revenue (£)	Operating margin	Annual operating surplus (£)
A		25%	
B		12%	
C		18%	

These margins are conservative for a stabilised estate hotel and materially lower than those often cited in pre-pandemic market commentary. They reflect the reality that staffing costs now account for a significantly higher proportion of turnover than historically.²³

²² Historic England, Enabling Development and the Conservation of Heritage Assets (London: Historic England, 2020), sections 3.1–3.4.

²³ British Hospitality Association, Labour and Cost Pressures in UK Hospitality (2023); Savills, UK Hotel Market Review (2024), staffing cost commentary.

7.3 Capital cost context (from Section 6)

For ease of reference, the total capital costs identified in Section 6 are restated below.

Scenario	Total capital cost (£m)
A	
B	
C	

As previously demonstrated, Scenarios B and C incur higher costs within the listed building itself due to the relocation of intensive hotel functions and increased intervention in historic fabric.

7.4 Indicative capital recovery comparison

Although capital recovery is not the sole determinant of heritage viability, it provides a useful comparative indicator of long-term sustainability.

Scenario	Capital cost (£m)	Annual operating surplus (£m)	Indicative recovery period (years)
A			approx. 10.5
B			approx. 36.1
C			approx. 19.3

This comparison shows that:

- Scenario A remains within a range that could reasonably attract long-term operational commitment.
- Scenario B is structurally unviable, with a recovery period that would be unacceptable to operators or investors.
- Scenario C improves performance relative to Scenario B, but only by increasing heritage harm.

7.5 Ongoing conservation and estate maintenance

The conservation of a large listed building requires ongoing expenditure beyond day-to-day hotel operations. Allowance must be made for cyclical repairs, specialist maintenance and estate management, which are materially higher for designated heritage assets than for non-listed properties.

For the purposes of this assessment, a conservative annual allowance of £300,000 has been made for heritage and estate maintenance. This figure is modest relative to the scale and complexity of

Nonsuch Estate and is consistent with guidance from conservation bodies on long-term stewardship.²⁴

Scenario	Annual operating surplus (£)	Heritage and estate maintenance (£)	Residual surplus (£)
A			
B			
C			

This demonstrates that:

- Scenario B is unable to meet even baseline conservation and estate costs and would operate at a structural deficit.
- Scenario C provides a limited surplus but leaves little resilience against unexpected repairs or trading downturns.
- Scenario A retains sufficient headroom to support long-term conservation and periodic major works.

7.6 Conservation funding gap

The conservation funding gap can therefore be summarised as follows.

Scenario	Ability to fund restoration	Ability to fund ongoing conservation	Overall outcome
A	Yes	Yes	Sustainable and policy-compliant
B	No	No	Structural deficit
C	Partial	Weak	Heritage-harmful compromise

This outcome aligns with Historic England's tests for enabling development, which require that development be demonstrably necessary to secure the future of a heritage asset and that less harmful alternatives are not capable of achieving that outcome.

²⁴ Historic England, *Conservation Principles, Policies and Guidance* (London: Historic England, 2008), section 6; Society for the Protection of Ancient Buildings, *Maintenance and Repair of Historic Buildings* (2017).

7.7 Relationship to supporting evidence

The conclusions reached in this section reinforce, and are reinforced by:

- the *Assessment of Future Use Options for Nonsuch Estate*, which demonstrates that alternative uses do not generate sufficient surplus to address the conservation liability;
- the *Vision for Nonsuch Estate*, which identifies the Welcome Building as essential operational infrastructure rather than discretionary development; and
- the Carter Jonas Marketing Report, which evidences limited market appetite for ownership structures capable of absorbing both high capital costs and ongoing heritage-related operating burdens.²⁵

7.8 Interim conclusion

Even when assessed using conservative operating margins that reflect current and anticipated employment cost pressures, only Scenario A is capable of sustaining the long-term conservation of Nonsuch House. Scenarios B and C either fail outright or achieve only marginal improvement at the cost of increased heritage harm.

The implications of this analysis for the planning balance and justification of the proposed development are set out in Section 8.

Planning Balance and Conclusion

8.1 Introduction

This section brings together the policy framework, heritage assessment, operational constraints and financial evidence set out in Sections 3 to 7, together with the supporting documents submitted alongside this report, in order to address the planning balance required by national and local policy.

The central question for the decision maker is whether the proposed development represents a justified and proportionate response to the conservation challenge presented by Nonsuch House and the wider estate, having regard to the statutory duty, the National Planning Policy Framework and Historic England guidance.

8.2 Statutory duty and heritage policy tests

As set out in Section 3, section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be given to the desirability of preserving the listed building, its setting and its special architectural and historic interest. Considerable importance and weight must therefore be afforded to the conservation of Nonsuch House.²⁶

²⁵ Carter Jonas, Nonsuch Estate Marketing Report (February 2024).

²⁶ Planning (Listed Buildings and Conservation Areas) Act 1990, s 66(1); *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC* [2014] EWCA Civ 137.

The National Planning Policy Framework requires that great weight be given to the conservation of designated heritage assets and that any harm must be clearly and convincingly justified. Where harm is less than substantial, it must be weighed against the public benefits of the proposal, including securing the optimum viable use of the asset.²⁷

Historic England guidance further requires that, where enabling development is proposed, it must be demonstrated to be necessary to secure the conservation of the heritage asset, to represent the minimum intervention required, and to be preferable to alternative options in heritage terms.²⁸

8.3 Assessment of harm

The proposal involves the construction of a new Welcome Building within the setting of Nonsuch House. This constitutes a degree of change to the historic environment and therefore gives rise to a level of harm.

However, as demonstrated in Sections 4 and 5, the introduction of the Welcome Building materially reduces the level of intervention required within the listed building itself. By accommodating intensive hotel functions such as food preparation, wellness facilities, plant and staff accommodation outside the historic fabric, the proposal avoids the extensive subdivision, servicing intrusion and loss of historic plan form that would otherwise arise.

By contrast, the alternative scenarios tested demonstrate that omitting the Welcome Building either results in a scheme that is not viable or requires materially greater intervention within the listed building, leading to greater heritage harm. In heritage terms, the preferred scheme therefore represents the least harmful of the realistic options available.

8.4 Public benefits

The public benefits arising from the proposal are both direct and indirect and are closely linked to the long-term conservation of Nonsuch House.

First, the proposal secures a viable and sustainable use for a listed building of considerable scale and complexity. Sections 6 and 7 demonstrate that, even on conservative assumptions reflecting current employment cost pressures, only the preferred scheme is capable of sustaining the capital and operational burden associated with long-term conservation.

Second, the proposal delivers the repair and restoration of the listed building and associated estate structures, ensuring their continued use and maintenance. This accords directly with national policy objectives which recognise the conservation of heritage assets as a public benefit in its own right.²⁹

Third, the scheme supports sustainable tourism and economic activity within the rural area, consistent with the Wiltshire Core Strategy. It provides employment opportunities and contributes to the local visitor economy, without relying on speculative or short-term uses.

²⁷ Ministry of Housing, Communities and Local Government, *National Planning Policy Framework* (February 2025), paras 200–203.

²⁸ Historic England, *Enabling Development and the Conservation of Heritage Assets* (London: Historic England, 2020).

²⁹ Ministry of Housing, Communities and Local Government, *National Planning Policy Framework* (February 2025), pgh 208.

Fourth, the proposal aligns with the strategic vision for the estate as set out in the submitted Vision document, and is supported by independent market evidence, including the Carter Jonas Marketing Report, which demonstrates the lack of viable alternative ownership or use models capable of addressing the conservation challenge.³⁰

8.5 Alternatives and necessity

The requirement to test alternative options has been addressed comprehensively through the submitted *Assessment of Future Use Options for Nonsuch Estate*, which considers a range of alternative uses and demonstrates why none are capable of securing the long-term future of the asset.

The scenario testing in this report builds on that assessment by examining alternative configurations of the proposed use. This demonstrates that smaller or less intensive schemes fail to close the conservation funding gap, while more intensive internal schemes increase heritage harm. The preferred scheme is therefore shown to be necessary and proportionate.

8.6 Overall planning balance

When considerable importance and weight are given to the conservation of Nonsuch House, the key question becomes whether the identified harm is justified by the public benefits delivered.

The evidence demonstrates that:

- the harm associated with the Welcome Building is limited and mitigated by the significant reduction in intervention within the listed building
- the public benefits are substantial, centring on the long-term conservation and viable reuse of the heritage asset
- and there are no less harmful, viable alternatives capable of achieving those outcomes.

In these circumstances, the balance required by national and local policy clearly favours the proposed development.

8.7 Conclusion

This Marketing and Viability Assessment 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.

Having regard to the statutory duty, the National Planning Policy Framework, Historic England guidance, and the development plan, the proposal is justified and should be supported.

³⁰ Carter Jonas, Nonsuch Estate Marketing Report (February 2025).