Nimble
PLANNING AND DEVELOPMENT

Tuesday, 15 September 2026

Objection to Application PL/2026/05223

Site Address: Nonsuch House and Nonsuch Estate, Westbrook Road, Bromham, Wiltshire, SN15 2ED

Description: Proposed 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; Proposed rural buildings for the management of Nonsuch Estate; & Proposed demolition of Denbanks and erection of replacement dwelling, including a new build dwelling.

Introduction

This representation has been prepared and submitted on behalf of concerned local residents of Bromham and the surrounding area, in response to the above application for the restoration and change of use of Nonsuch House to a boutique hotel, the erection of associated new buildings and staff accommodation, and the demolition and replacement of Denbanks.

Residents recognise the need to secure the long-term future of a Grade II* listed building at risk, and do not object to the principle of a sensitively scaled scheme that achieves that outcome. Their concern is that the application as submitted has not demonstrated that the scale and form of development proposed is necessary to achieve it.

Discussion of Scheme:

Planning Balance Test:

The Planning Balance Rests on a Superseded Version of the NPPF

The principle of development outside settlements is now governed by policy S5, which sets out a closed list of circumstances in which development outside settlements may be acceptable and, at S5(1)(c), states explicitly that a replacement building must be for the same use and not disproportionately larger than the building it replaces. The separate test for isolated homes in the countryside is now consolidated at policy HO11. The historic environment and sustainable transport policies now sit at Chapters 20 (HE1 to HE10) and 15 (TR1 to TR8) respectively. Because the planning balance set out in the Statement, and in particular its heritage and housing arguments is conducted against the superseded Framework, the Council should treat that balance as unreliable until it has been re-run against the policies that actually apply at decision date, and should not simply read across the applicant's old paragraph references to their nearest current equivalent.

Section 7 of the Planning Statement argues that, because the Council can currently demonstrate only 2.42 years of housing land supply, the Wiltshire Core Strategy's Spatial Strategy should be treated as out of date and only limited weight given to any conflict with it. That argument is built entirely on the pre-August 2026 'tilted balance' under the former paragraph 11(d) of the NPPF,

which allowed an out-of-date development plan to trigger a general presumption in favour of granting permission. The current Framework replaces it with the location-based presumption at policies S3 to S6, under which a shortfall in housing land supply operates, at most, as evidence of unmet need capable of engaging policy S5(1)(j), a route which applies specifically to housing proposals that are physically well-related to an existing settlement. This application is not a housing proposal; Denbanks aside, its principal component is a hotel, and the Council's housing land supply position has no bearing on whether that use is acceptable in this location.

Threshold Test:

The Conservation Officer's pre-application advice, reproduced within the applicant's Planning Statement, welcomed the commitment to repair the house and accepted that re-use of the already-residential associated buildings was uncontroversial. It went on to record that a model of short-term, flexible letting of the house and associated buildings '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'.

That advice concluded that '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'. The Case Officer's covering letter reaffirmed the Conservation Officer's overall position, noting that any broader tourism or economic benefit of a hotel use 'does not necessarily justify the proposals', because the central question is whether the scale of works proposed is required to secure the optimum viable use of the heritage asset.

The Nonsuch Market and Viability Assessment tests three development scenarios: a reduced scheme relying solely on the conversion of existing buildings, a more intensive alternative involving subdivision of the principal historic interiors to add bedrooms, and the proposed scheme incorporating the Welcome Building and the other new-build elements. The reduced scheme is said to be 'structurally incapable of generating sufficient and sustainable income to fund the restoration of Nonsuch House or to support its ongoing maintenance'; the subdivision option is rejected on heritage rather than viability grounds; only the proposed scheme is found to be both financially viable and heritage-appropriate.

Every alternative or reduced-scale use is rejected in the same way, by narrative assertion rather than quantified evidence. The Assessment of Future Use Options for Nonsuch Estate dismisses private residential use, commercial office space, educational use, agricultural expansion, livery, a dedicated wedding and events venue, a boutique shopping village, and an exclusive private members' club, in each case on the basis of generalised reasoning, without reference to any costed appraisal specific to this site.

Because the countryside location of the site means the new-build elements, including the Welcome Building, the spa building, the Boat House and the Yoga Studio, can only be justified as an exception to normal policy restraint under Wiltshire Core Strategy Core Policies 39 and 40 and NPPF policy S5, Residents ask that the Council commission an independent review of the underlying viability appraisal, including the cost and revenue assumptions for each scenario tested, and that the outcome of that review, redacted if necessary to protect commercial confidentiality, be made available to residents.

Given the Conservation Officer's doubts about whether the short-term letting model has been fully tested, and given the absence of costed, site-specific evidence for any of the alternatives considered,

it is difficult to see how the Council could be satisfied that this proposal, at this scale and intensity, represents the only means by which the heritage asset can be secured. Until that evidence gap is closed, the case for departing from normal policy restraint under Core Policy 39, Core Policy 40 and NPPF policy S5 remains unmade.

Core Policy 38: Retail and Leisure Impact Assessment and Sequential Test Are Missing

Wiltshire Core Strategy Core Policy 38 requires that any retail or leisure use on a site outside a town centre, in excess of 200 sqm gross floorspace, be accompanied by an impact assessment demonstrating no harm to the vitality or viability of nearby centres, and that it comply with the sequential approach to ensure development is directed to the most central site available. The applicant's Planning Statement lists Core Policy 38 among the policies relevant to this application. No impact assessment and no sequential test addressing Devizes or Calne town centres accompanies this application.

The applicant's pre-application submission acknowledges in terms that 'the proposals do not neatly accord with Core Policy 38 regarding town centre siting and sequential test', and seeks to excuse this by describing the scheme as 'clearly an exceptional case' and relying on national guidance that the sequential approach should not be applied to small scale rural development.

Whether this is genuinely small-scale rural development is itself doubtful. The Welcome Building's hospitality wing includes a restaurant, a bar, a commercial kitchen and flexible event space, and its wellbeing wing includes a gym, a yoga studio, and a full wet spa suite with an indoor pool, sauna, steam room and treatment rooms. This is not simply ancillary hotel infrastructure: the Design and Access Statement states that the Welcome Building 'is designed to accommodate a wide range of users including overnight guests, day visitors, staff and local users of the wellbeing facilities'. A building expressly designed to draw in day visitors and local users of a spa, restaurant and bar is a leisure destination in its own right, and the facilities exceed the 200 sqm threshold at which Core Policy 38 applies. The Council should require the impact assessment and sequential test that Core Policy 38 requires, rather than accept the applicant's own view that this is an exceptional case to which the policy should not apply.

Unsustainable Location Contrary to Local and National Planning Policy

The location of this development conflicts with the basic spatial strategy that both national and local planning policy apply to development of this scale. The application site lies within the countryside for planning policy purposes, outside the Limits of Development of any settlement. Wiltshire Core Strategy Core Policies 1 and 2 direct new development toward the Principal Settlements, Market Towns, Local Service Centres and Large Villages identified in the settlement hierarchy, of which Bromham itself is one, and restrict development elsewhere to a closed list of 'exception policies', including Core Policies 39 and 40, on which this application depends. NPPF policy S4 treats development within settlements as the norm, with policy S5 permitting development outside settlements only in the limited circumstances set out there.

The applicant's answer is that the site is 'not remote or isolated, being within walking distance of Bromham', and has 'good access to the primary transport network'. That characterisation does not survive contact with the applicant's Transport Statement which relies on a new car-oriented entrance and 91 parking spaces, describes pedestrian and cycle arrival by guests as 'expected to be limited', and identifies no meaningful bus or rail accessibility. A site that functions as a car-dependent destination is not a sustainably located site in the sense that NPPF policy S3 and the Core

Strategy's settlement strategy actually require, regardless of the straight-line distance to the nearest village.

The scheme combines a substantial boutique hotel, a spa and wellness building, farmstay accommodation, function space, a new Gatehouse with staff accommodation, a separate estate manager's dwelling, and two further houses at Denbanks: a significant quantum of new floorspace and additional residential accommodation, all directed to a location with none of the accessibility or service provision that the settlement hierarchy exists to secure. The scale of what is proposed goes well beyond what Core Policy 40 was designed to accommodate, and the unsustainable location of the scheme should weigh against it in its right, separately from whether the heritage and viability tests addressed elsewhere in this letter are ultimately satisfied.

Further to this, Core Policy 39, 'Tourist Development', sits alongside Core Policy 40 as one of two policies specifically governing tourism-related development in the countryside, and applies directly to a scheme of this kind. Policy 39 requires that, outside the Principal Settlements and Market Towns, tourist and visitor facilities should be located in or close to Local Service Centres or Large and Small Villages, and, where practicable, be located in existing or replacement buildings rather than new-build. The proposal fails to meet these criteria.

The policy's stated preference for reusing existing buildings, rather than building new ones, mirrors concerns raised at pre-application stage: whether the scale of new-build development proposed here, including the Welcome Building, the spa building, the Boat House and the Yoga Studio, has actually been shown to be necessary, rather than simply preferred. Read together with Core Policy 40, on which the applicant otherwise relies, Core Policy 39 provides a further, independent test of locational and design restraint that this application does not appear to satisfy.

Reliance on the Private Car

The application also does not demonstrate the reduction in private car dependency that Wiltshire Core Strategy Core Policies 60 and 61, and NPPF Chapter 15, require of new development. The proposal is served by a new priority junction onto the A3102 approximately 330m east of Nonsuch House, requiring translocation of sections of hedgerow to achieve visibility splays, and by 91 parking spaces sized to a 'worst-case scenario' of vehicle movements. The A3102 at this point is a derestricted, 60mph road, and the Highway Authority's pre-application advice asked for visibility splays of at least 160 metres in each direction. The Transport Statement's figures achieve 158 metres to the west and 156 metres to the east, and assert that this is nonetheless in accordance with DMRB guidance based on recorded 85th percentile vehicle speeds.

The applicant's Transport Statement also expects pedestrian and cycle arrival by guests to be limited, notwithstanding the provision of hotel bicycles. A scheme of this scale, on a site with no meaningful public transport accessibility, should be expected to demonstrate a genuine sustainable transport strategy, with binding modal-shift targets, rather than a car park and access junction sized to absorb the trips the scheme generates.

Heritage Harm

The heritage case advanced in support of the application does not resolve the concerns raised about it at pre-application stage. The Nonsuch Estate Historical Assessment sets out the Conservation Officer's original concerns about overdevelopment, the scattering of new buildings across the estate, and loss of rural setting, and later in the same document concludes that the resulting harm is 'low and firmly within the less than substantial category', reversible, and confined to areas of low

sensitivity. In relation to the Welcome Buildings specifically, the same document goes further still, concluding that the level of harm is 'demonstrably low' and 'outweighed many times over' by the benefits of the scheme.

Under NPPF Chapter 20 and Wiltshire Core Strategy Core Policies 57 and 58, harm to the significance and setting of a designated heritage asset must be independently assessed by the decision-maker and weighed against genuine public benefit. The Council should reach its view on the degree of harm, instead of adopting the applicant's characterisation of it, and test the claimed public benefits, including projected employment and tourism benefits, against the viability evidence discussed above. Those benefits are asserted only in general terms throughout the application, framed as restoration of Nonsuch House, job creation and support for the local visitor economy, without any figures for the number or nature of jobs, visitor numbers, or economic output that could actually be weighed in the balance. The Historical Assessment itself, in its concluding significance section, describes the estate as both highly sensitive and unusually vulnerable, with limited capacity for further loss of historic fabric or erosion of setting without materially diminishing significance. That conclusion is difficult to reconcile with a scheme that then proposes as many new structures as this one does.

Harm to Setting

The Historical Assessment's evidence establishes that openness, and the absence of built form beyond the historic working core, are integral to the significance of Nonsuch House's setting/ It describes the house as historically experienced within 'a deliberately composed rural setting - a sequence of approach, forecourt, gardens, falling ground and woodland edge', and concludes separately that the openness of the southern lawn is integral to how the principal elevations of the house are read, noting that 'the absence of subdivision, garden structures or domestic accretions is integral to this effect'. In relation to the meadow chosen for the Welcome Building specifically, the same document acknowledges that 'the meadow currently contributes to significance through its openness'.

Despite this, the masterplan introduces new built form at several separated points across that same open setting: the Welcome Building and spa in the meadow, the Gatehouse at the estate entrance, an agricultural manager's cluster of buildings, and two further dwellings at Denbanks. Each is assessed individually, and in most cases found to cause no more than negligible or low harm; none of the assessments considers what happens to a setting whose defining quality is openness when built form is introduced at several of these points at once. The Historical Assessment's site-selection exercise for the Welcome Building illustrates how widely that sensitivity extends: locating the same facilities within Nonsuch House, in an extension to the East Wing, within the yard buildings, to the south of the house, or near the woodland edge were all considered and rejected, variously for harm to historic plan form, 'very high sensitivity and open views', or 'harm to tranquillity'. That every alternative location considered was found unacceptable on grounds of sensitivity, and that the location eventually chosen is itself said to derive its significance from openness, together suggest an estate that is uniformly sensitive to new development, which sits uneasily with an overall harm conclusion of 'low' and 'firmly within the less than substantial category'.

Nor has the impact of the acoustic bund been explored within the submitted heritage assessment.

The true level of harm to setting is greater than 'low', because what is being eroded is the openness of the estate as a whole, considered cumulatively across the masterplan, not any single view or building considered in isolation.

Noise Impact

The assessment of noise impact on neighbouring properties is not evidence-based; the Planning Statement relies on straight-line distances to the nearest dwellings without any acoustic or topographic modelling of how sound actually travels across this landform. It does so while acknowledging that noise complaints have already arisen from what it describes as 'isolated celebrations' at the estate, understood by residents to relate to a private party, and while itself proposing to manage future noise through 'conditions that restrict the use of amplified music'

If a single private event was sufficient to generate complaints from neighbouring residents, a commercial hotel operating year-round, with regular guest turnover and spaces in continuous use represents a materially more intensive and more frequent source of noise than the isolated incident the Planning Statement itself describes as having already caused concern.

The submitted drawings include a dedicated acoustic bund wall, the inclusion of which is itself an acknowledgement that a noise issue exists; there is no evidence that its performance has been tested or verified against a defined noise standard, nor that it has been modelled against the specific topography of the site. This conflicts with the applicant's Assessment of Future Use Options for Nonsuch Estate, which rejected a dedicated wedding and events venue specifically because 'hosting regular large-scale events would generate significant noise and activity, potentially impacting neighbours'.

Given these evidential gaps and historic issues with noise at the site, a noise assessment covering the full range of activities to take place across the estate should be submitted and considered prior to any decision being made, so that the actual acoustic impact of the completed scheme can be properly evaluated rather than assumed away by the applicant's framing of the risk. Should the Council nonetheless be minded to grant permission, this should be made subject to conditions prohibiting any outdoor amplified acoustic activity and any other activity likely to adversely affect the amenity of neighbouring occupiers, so that the impacts left unassessed at application stage are not simply left unmanaged once the hotel is in operation.

Lighting Strategy

At pre-application stage, the Landscape and Visual Impact Assessment stated that no night-time study was considered necessary because lighting would be minimal and would be designed to unspecified 'Dark Skies Policies'.. The commitment carried through to the current application remains that lighting will be 'low-level, shielded and minimised to preserve the estate's dark rural character', again with no supporting lighting assessment.

The whole-estate Bat Survey (October 2025, Crossman Associates) found a moderate assemblage of bat species using the site for roosting and foraging, sufficient that the report itself concludes a Natural England licence will be required, supported by a detailed method statement covering survey results, planned works and proposed mitigation. Lighting design is a central part of the mitigation package for such a licence, particularly for light-sensitive species; a strategy that has not been informed by that survey's findings is not the assessment Wiltshire Core Strategy Core Policy 50 and NPPF Chapter 19 require.

A 50-key hotel operating with guest movement, external circulation routes and car parking in use into the evening also has potential to affect the amenity of neighbouring occupiers whose properties presently experience a dark rural outlook.

A lighting design plan, addressing both the ecological mitigation required for the bat assemblage and the amenity impact on neighbouring dwellings should be submitted and assessed prior to any decision being made, instead of being left to a generalised assurance that lighting will be 'low-level' and 'shielded'.

Denbanks

The proposed demolition of Denbanks and its replacement with two dwellings, each of approximately 239m² arranged over three floors does not fit any of the limited routes by which new housing in the countryside can be justified. NPPF policy S5(1)(c) permits the replacement of an existing building only where the replacement is for the same use and not disproportionately larger than the building it replaces; replacing one dwelling with two is neither the same quantum of use nor a proportionate replacement. Nor does the proposal satisfy policy HO11's test for isolated homes in the countryside, which, on the essential rural worker route, requires a demonstrated necessity for a worker to live permanently at or near their place of work.

The Planning Statement does not maintain a single justification for the second dwelling: it is first presented as essential staff accommodation under Wiltshire Core Strategy Core Policy 48, and shortly afterwards recharacterised as a general market dwelling that will 'contribute towards the Council's housing need'.

Obstruction of the Existing Public Right of Way

The application does not properly address its impact on the public right of way that crosses the estate and enters the site from Westbrook Road. The Design and Access Statement asserts that this route 'will be retained and protected, ensuring continued public access', and that route is shown re-entering the site to the north of the proposed parking orchard. The submitted masterplan drawings, however, show a new building sited at that same point of entry, immediately alongside the new vehicular access and turning circle, in a location that sits atop the existing route rather than beside it. Nothing in the submitted documents explains how the stated commitment to retain the route is to be reconciled with a layout that places a building on it. This should be resolved, whether by a revised layout or a formal diversion order applied for in parallel, before the application is determined.

Landscape and Visual Impact

The Landscape and Visual Impact Assessment's analysis of the footpath does not support the negligible operational impact it assigns to that route. The LVIA treats the footpath as a distinct visual receptor, labelled viewpoints S1 to S4 of medium sensitivity. Its commentary at each of these points nonetheless describes new built form that will be visible from the path: the Gatehouse and, in the distance, the workshop from viewpoint S1; the community building, referred to elsewhere as the Welcome Building, from viewpoint S2; and the Gatehouse and workshop again from viewpoint S4, the Gatehouse being described as sited 'adjacent to the boundary' that the path follows. Despite recording these buildings as visible, the LVIA assigns each of these viewpoints a negligible operational magnitude of change, generally on the reasoning that 'the value of the existing view is low' or that new planting will mature over time, rather than on any assessment of what will actually be seen from the path once built. The introduction of several new buildings along a footpath that presently crosses open agricultural land in the setting of a II* Listed Building warrants more than a negligible rating.

The LVIA's construction-phase assessment rates the impact on footpath users at viewpoints S1 and S2 as 'Moderate' during construction, and reasons this away only on the basis that 'the site may not be accessible by the public during periods of construction for health and safety reasons'. That is not mitigation of visual impact, rather, it is a proposal to exclude the public from a right of way for the duration of construction. Taken together with the conflict between the proposed Gatehouse and the line of the route addressed above, the real impact of this scheme on those who use the footpath, both what they will see and whether they will be able to use it at all has been understated.

Conclusion

Residents accept that securing a viable long-term use for Nonsuch House is necessary, and do not object in principle to a scheme capable of achieving that. What the application has not shown is that the scheme submitted, rather than the flexible short-term letting model raised by the Conservation Officer at pre-application stage, is what that repair requires

The Assessment of Future Use Options rejects nine alternative uses on similarly generalised, unquantified grounds. The same approach is repeated throughout the application: the site's rural, car-dependent location is treated as acceptable without engaging with the settlement hierarchy that Core Policies 1, 2 and 40 apply to development of this kind; harm to setting is assessed building by building rather than as the cumulative loss of openness that the Historical Assessment identifies as central to the estate's significance; noise impact is assessed by reference to straight-line distance rather than topography, notwithstanding an acknowledged history of complaints; the lighting strategy is committed to in general terms despite ecological evidence confirming that a Natural England licence will be required; and the justification advanced for the second dwelling at Denbanks shifts, within the same document, from essential staff accommodation to a general market dwelling.

No single one of these matters is necessarily determinative. Ultimately, the question is whether the quantum of new development proposed, distributed across a heritage estate in countryside location, whose setting derives its significance from openness, is genuinely necessary to secure the future of Nonsuch House, or whether a more modest scheme could achieve the same outcome with materially less harm.

Accordingly, the application should be refused.