



Land at Murrell Green, Hart (26/01201/OUT)

Full Built Heritage Review

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Document reviewed:	Environmental Statement, Chapter 13: Cultural Heritage — Land at Murrell Green, Hart (Planning Ref. 26/01201/OUT) (June 2026)
Supporting documents:	Appendix 13.1: Archaeological and Heritage Assessment, Part 1 (EDP, June 2026); ES Chapter 7: Landscape and Visual, including Figure 7.2 (Zone of Theoretical Visibility) and Table 7.3 (Representative Viewpoints); the Composite Parameter Plan and Illustrative Masterplan; and the wider outline application Parameter Plans (building heights, land use and access). Also reviewed: Landscape Review of Planning Application 26/01201/OUT (Sechi & Mills, Stone & Meadow, 3 September 2026); Winchfield Neighbourhood Plan (made January 2024) and its Appendix D Evidence Base; Winchfield Landscape Character Assessment (Michelle Bolger Expert Landscape Consultancy, April 2021); Winchfield's Key Views (April 2022); and the National Planning Policy Framework (MHCLG, August 2026), Chapter 20 (Conserving and enhancing the historic environment, Policies HE1–HE10).
Review date:	September 2026
Scheme stage:	Outline planning application — access is submitted in detail; layout, scale, appearance and landscaping are reserved matters, to be brought forward within the parameters set by the Parameter Plans.

Professional Declaration

I am Kate Hannelly-Brown, Director of Stone & Meadow Heritage, with over 16 years' experience in the heritage sector, including as Team Lead of the Cambridge Heritage Team at Bidwells. I hold a Master's degree in Historic Conservation and a Bachelor's degree in Architectural Technology, and I am a full member of the Institute of Historic Building Conservation (IHBC). I have acted as an expert witness at Inquiry, and have previously held Conservation Officer roles at Westminster City Council and South Northamptonshire Council.

This review has been prepared on behalf of Winchfield Parish Council (WPC), to inform WPC's representations on planning application 26/01201/OUT (Land at Murrell Green, Hart). It is concerned with built heritage matters only. It considers: the significance of the designated and non-designated heritage assets identified within the application's study area; the contribution the application Site makes to that significance; the likely heritage effects of the proposed development; and the adequacy of the methodology and evidence base underpinning the applicant's Cultural Heritage chapter (ES Chapter 13) and its supporting Archaeological and Heritage Assessment (Appendix 13.1).

The opinions expressed in this review are my own independent professional assessment.

OVERALL ASSESSMENT: The Cultural Heritage chapter reaches a headline conclusion of no significant heritage effects, resting on a study area that is narrower than, and not cross-referenced against, the wider Zone of Theoretical Visibility used elsewhere in the same Environmental Statement. This has real consequences: a designated Registered Park and Garden at Dogmersfield has not been assessed at all, and the adopted Winchfield Neighbourhood Plan Evidence Base (publicly available since January 2024) and not referenced anywhere in the applicant's evidence base, confirms a historic deer park and hunting lodge directly relevant to Winchfield House and North Lodge. The mitigation the remaining conclusions depend upon, principally retained boundary vegetation, is fixed only by an illustrative masterplan, not secured by condition, at an outline stage where landscaping remains a reserved matter.

Executive Summary

1. This Executive Summary summarises the key issues and recommendations set out in full in Parts 1 to 3 below, and in the Information Required Before Determination and Summary of Recommendations sections that follow them.
2. The applicant's Cultural Heritage chapter (ES Chapter 13, June 2026) and supporting Archaeological and Heritage Assessment (Appendix 13.1, EDP, June 2026) conclude that the proposed development would result in no significant heritage effects, including 'no effect' on the Grade II* Winchfield House and two of its three associated Grade II curtilage buildings. In our professional opinion, that conclusion should not currently be relied upon.
3. The key issues are:
 - Study area and Zone of Theoretical Visibility mismatch: the 1km heritage study area is materially narrower than, and not reconciled with, the 3km Zone of Theoretical Visibility used in the same Environmental Statement's Landscape and Visual chapter (ES Chapter 7, para 7.2.4), with the result that Dogmersfield Park (Grade II Registered Park and Garden) has not been assessed at all, despite the applicant's own ZTV (Figure 7.2) showing theoretical visibility over it. See Part 1 and Part 2.
 - Winchfield House and North Lodge evidence not considered by the applicant: the adopted Winchfield Neighbourhood Plan Evidence Base (Appendix D, pp.111, 113) confirms that Winchfield House's predecessor possessed a 17th-century deer park and that Winchfield Lodge was built as a hunting lodge for the family who owned Winchfield House. The adopted Winchfield's Key Views document (View 3) independently confirms that North Lodge has a direct, positively-contributing outlook over the Site's former parkland, contrary to the ES's 'filtered glimpses' characterisation. The Composite Parameter Plan also shows a new roundabout on the B3016 immediately adjacent to North Lodge, which in our professional opinion would further urbanise its setting and has not been separately assessed. See Part 2 and Part 3.
 - Unsecured mitigation: the 'not significant' conclusions for Murrell, North Lodge, Winchfield House and the Hartley Wintney Conservation Area depend on retained boundary vegetation that is secured only 'By Design' (ES Chapter 13, Table 13.7), i.e. shown on the illustrative masterplan, not fixed by condition, at an outline stage where landscaping is a reserved matter. See Part 1 and Part 3.
 - Reasonable worst case not tested: as an outline application, the heritage conclusions should be tested against the reasonable worst case the Parameter Plans would permit, not the specific, most-favourable Illustrative Masterplan arrangement. See Part 1 and Part 3.
 - No leaf-off verification: the applicant's site visits were all leaf-on; the Grade II Murrell's 'filtered views' conclusion has not been tested in winter. See Part 1.
 - WWII defence line assessed individually, not as a group: despite the applicant's own recognition of 'group value' and a defended 'nodal point', the loss of three pillboxes' fields of view is scored individually rather than assessed for its effect on the coherence of the wider defensive line. See Part 2.

- No heritage enhancement proposed: despite retaining substantial heritage features, the applicant identifies no enhancement measures, notwithstanding NPPF (August 2026) Chapter 20 Policies HE1, HE6 and HE7, and Local Plan Policy NBE8. See Part 2.
 - Cumulative heritage sensitivity of the eastern part of the Site: considered together rather than asset-by-asset, the surviving parkland fragments, the setting of North Lodge, the non-designated parks and the WWII defence line concentrate a materially greater degree of heritage sensitivity on the Site's eastern and north-eastern parts than the applicant's methodology conveys. In our professional opinion this is a material consideration for the location of built form within the Parameter Plans, not only for its mitigation, and we recommend the applicant be asked to consider whether this part of the Site is better retained as green/open space. See Part 2.
 - Independent corroboration: a parallel Landscape Review commissioned by WPC (Sechi & Mills, Stone & Meadow, 3 September 2026) reaches materially consistent conclusions from an independent discipline, including on unsecured mitigation, the reasonable worst case, and the historic extent of Winchfield House's parkland. See Part 3.
4. On this basis, we do not consider the Cultural Heritage chapter's 'not significant' conclusions for Winchfield House, its North Lodge, Dogmersfield Park or the WWII defence line can currently be relied upon. Our detailed findings, the specific information we consider is currently lacking from the applicant's submission, and our recommendations for WPC's representations, are set out in full below.

Introduction

- 5. This review provides a professional assessment of the built heritage case for application 26/01201/OUT. It draws principally on the submitted Cultural Heritage chapter (ES Chapter 13) and its supporting Archaeological and Heritage Assessment (Appendix 13.1), but also considers the Landscape and Visual chapter (ES Chapter 7), the outline application's Parameter Plans and Illustrative Masterplan, the adopted Winchfield Neighbourhood Plan evidence base, and the parallel Landscape Review prepared for WPC, where these bear directly on the heritage conclusions reached.
- 6. The applicant's overall conclusion, following design mitigation and a proposed archaeological condition, is that the development would result in no significant heritage effects in EIA terms. This includes 'no effect' on the Grade II* Winchfield House and two of its three associated Grade II curtilage buildings, and 'Minor' or 'Minor to Moderate adverse' (not significant) conclusions for every other designated and non-designated heritage receptor identified.
- 7. This review is structured as follows. Part 1 addresses cross-cutting methodological issues that affect the reliability of the assessment as a whole. Part 2 sets out our professional opinion, asset by asset, on the likely heritage effects of the proposed development. Part 3 considers specific inconsistencies between the Cultural Heritage chapter and other parts of the application, and against independent adopted and commissioned evidence. A dedicated Information Required Before Determination section then draws together the specific gaps in the applicant's submission that, in our opinion, should be resolved before the application is determined, followed by a Summary of Recommendations for WPC's representations.

Part 1: Cross-Cutting Methodological Issues

- 8. In our professional opinion, the Cultural Heritage chapter's headline conclusions of 'not significant' effect across every designated and non-designated heritage receptor should be treated with caution, rather than as a settled basis for WPC's representations. There are several cross-cutting concerns, discussed in turn below, which affect the reliability of the assessment as a whole.

Study area extent and its relationship to the Zone of Theoretical Visibility

- 9. The Cultural Heritage chapter and its DBA screen every category of designated heritage asset (scheduled monuments, listed buildings, conservation areas, registered parks and gardens and registered battlefields) using a single, flat 1km study area. This is said to be justified by reference to 'the proximity to the existing built environment of Hook... and Hartley Wintney', local topography, built form and tree cover, and the

character of surrounding assets, on which basis 'it was determined that the development of the Site is unlikely to affect any heritage assets beyond 1km distance from its boundaries' (Appendix 13.1, para 3.31; see also ES Chapter 13, para 13.3.15).

- **[CRITICAL ISSUE]** This is materially inconsistent with the applicant's own Landscape and Visual chapter, which adopts a 3km study area for the same development on the basis that it 'encompasses the principal areas of predicted visibility' (ES Chapter 7, para 7.2.4), a scheme whose own ZTV modelling is based on the same maximum building height parameters used to test visibility at that 3km scale. A single, uniform 1km radius for heritage receptors, irrespective of the type or grade of asset, does not obviously reflect the same scale of development, nor Historic England's expectation in GPA3 that a study area be tailored to the asset in question. Registered parks and gardens in particular often have settings and designed views extending well beyond a fixed short radius, and the chapter's methodology does not demonstrate that this has been tested for any of the assets it screens out.
 - **[SIGNIFICANT ISSUE]** The same Environmental Statement's own ZTV and its 19 verified representative viewpoints record actual, confirmed visibility of the Site out towards the edge of the 3km study area. For example, PVPs EDP 16, 18 and 19 (Odiham Footpaths 21 and 27, and Hook Footpath 764b) are recorded as achieving 'filtered or partial views of new built form... with the Site forming part of the middle distance' during operation (ES Chapter 7, LVIA effects tables). No cross-reference is presented anywhere between this confirmed visibility evidence in Chapter 7 and the heritage chapter's decision to stop screening designated assets at 1km.
 - The practical effect is that any designated heritage asset beyond 1km was excluded from the heritage assessment altogether before any judgement was made on it. Dogmersfield Park (Grade II Registered Park and Garden), discussed at Part 2 below, is the clearest example, but the same methodological gap potentially affects any other designated asset between 1km and 3km that has not been separately checked.
10. We recommend WPC's representations request that the heritage study area be justified by specific reference to the ZTV and the verified viewpoint evidence already collected for the Landscape and Visual chapter, in line with Historic England's GPA3, or that it be extended to at least 3km for designated assets and the affected receptors reassessed.

Reliance on the Illustrative Masterplan rather than a reasonable worst-case scenario

11. This is an outline application: only access is submitted for detailed approval, with layout, scale, appearance and landscaping reserved for later approval within the maximum and minimum ranges set by the submitted Parameter Plans. The heritage chapter's 'not significant' and 'minor' conclusions are, however, repeatedly reached only by reference to the specific, illustrative arrangement shown on the Composite Parameter Plan and Illustrative Masterplan. For example, the retained green space and boundary vegetation said to preserve the settings of North Lodge and Murrell (ES Chapter 13, paras 13.4.17, 13.4.26), and the open space said to protect the fields of view of six of the ten pillboxes (paras 13.4.34, 13.7.9).
- **[SIGNIFICANT ISSUE]** An Illustrative Masterplan is, by definition, one illustration of what could come forward within the Parameter Plans' envelope, not a fixed commitment. Actual layout, built form and landscaping at reserved matters stage need only comply with the maximum parameters set by the Building Heights Parameter Plan and the other submitted Parameter Plans, not replicate the illustrative scheme. Where a heritage conclusion depends on a specific area of green space, a specific building setback, or specific retained vegetation shown only on the illustrative plans, that mitigation is not necessarily secured, and the conclusion drawn from it is correspondingly unreliable.
 - **[SIGNIFICANT ISSUE]** Established practice for assessing outline applications is to test likely significant effects against the reasonable worst case that the Parameter Plans would still permit, for example, the maximum permitted height and the closest permissible built form to North Lodge, Murrell, the non-designated parks and the pillboxes, rather than the specific, most-favourable illustrative arrangement, and to rely on a particular layout or planting scheme as mitigation only where it is actually secured (whether by condition, Design Code or fixed within the Parameter Plans themselves).

12. We recommend WPC's representations ask the applicant to re-test the heritage conclusions against the reasonable worst-case scenario that remains possible within the Parameter Plans as drafted, rather than relying on the specific, most-favourable arrangement shown on the Illustrative Masterplan.

Mitigation relied upon is not secured

13. The 'no effect'/'minor' conclusions reached for Murrell, North Lodge, Winchfield House, the Hartley Wintney Conservation Area and the other listed buildings screened out at Stage 1 all ultimately rest on existing boundary vegetation continuing to screen or filter views. On the applicant's own Table 13.7, that reliance is not currently matched by how the mitigation is secured.
 - **[CRITICAL ISSUE]** Of the five mitigation measures set out in Table 13.7, four are secured only 'By Design', i.e. shown on the illustrative Composite Parameter Plan/Masterplan, not fixed by condition or Section 106 obligation. These include the two measures most directly relevant to designated heritage assets: Measure 4 (open space and boundary vegetation relied upon for the Grade II Murrell) and Measure 5 (open space and boundary vegetation relied upon for the Grade II North Lodge). Only Measure 3, the archaeological investigation, is secured by condition. Combined with landscaping being a reserved matter at this stage (see above), the vegetation each of these heritage conclusions depends on is neither fixed by the Parameter Plans nor otherwise secured and as things stand, it exists only as an illustration, with no mechanism requiring it to be planted, retained or maintained in the form and location shown.
14. We recommend WPC's representations seek conditions (or a Section 106 obligation) specifically securing the retention, protection and long-term management of the boundary vegetation each heritage conclusion relies upon, including replacement in the event of disease or loss, rather than accepting 'by design' mitigation alone for Murrell and North Lodge.

Absence of leaf-off / winter verification

15. Every 'filtered/glimpsed views' and 'entirely screened' conclusion in the heritage chapter rests on site walkovers carried out in leaf-on conditions, when hedgerow and woodland screening is at its strongest. This has not been tested in winter.
 - **[ADVISORY]** The AHA's site visits are recorded as having taken place in June and September 2021, and again in August 2025 (Appendix 13.1, para 4.292). No winter or leaf-off walkover is recorded anywhere in the assessment. This matters most for the Grade II Murrell, discussed further at Part 2 below, whose 'not significant' conclusion depends explicitly on views being filtered rather than blocked, precisely the distinction that leaf-on summer surveys are least able to test reliably. A conclusion of 'filtered glimpses' recorded in August cannot confirm that the same view is still adequately filtered, as opposed to open, in January or February. Our own site visit in August 2026 was also carried out in leaf-on conditions and so cannot resolve this gap either.
16. We recommend WPC's representations note the absence of any winter/leaf-off verification as a specific evidential gap in the applicant's own assessment.

Part 2: Professional Opinion on Likely Heritage Effects

17. This Part sets out our professional opinion on the applicant's assessment of each designated and non-designated heritage receptor identified in the Cultural Heritage chapter, together with the further points arising from our own review. Where an asset's assessment is affected by the methodological issues raised in Part 1 above, this is noted and cross-referenced rather than repeated in full.

Winchfield House (Grade II), its Stable Block (Grade II) and South Lodge (Grade II)*

18. The ES concludes that the Site has no effect at all on the Grade II* Winchfield House, its Grade II Stable Block, or its Grade II South Lodge. The Cultural Heritage chapter states that 'the Site does not form any part of the setting of' these assets, resulting in a 'neutral effect' (ES Chapter 13, para 13.4.22), and the underlying Desk-Based Assessment concludes in similar terms that the Site 'does not make any contribution to the significance [of] the Grade II* listed Winchfield House and its associated Stables and South Lodge... and are

not discussed any further within this report' (Appendix 13.1, para 4.109), leaving the North Lodge as the only building in the group conceded to have any, limited, relationship with the Site.

- **[SIGNIFICANT ISSUE]** That conclusion rests principally on a test of intervisibility (that there are 'no views to or from' the house, stable and south lodge) rather than the fuller Historic England GPA3 test of historic, functional and designed relationships, which can inform setting and significance independently of whether the asset can be seen from, or seen to, the application Site.
 - **[SIGNIFICANT ISSUE]** The land immediately to the east of the Site is described in the ES itself as 'some former parkland associated with Winchfield House' (ES para 13.3.7). The applicant's own historic map regression notes that the 1875 1st Edition OS map is 'the first map to identify a boundary, of sorts, around the parkland at Winchfield House... enclosing the fishpond... and areas of woodland' (Appendix 13.1, para 4.275) consistent with a formally bounded designed landscape, rather than informal farmland. Medieval and post-medieval deer parks are independently recorded nearby at Dogmersfield, Elvetham and Odiham (Appendix 13.1, para 4.200; see also paras 4.267, 4.271 on later map evidence for the Odiham and Dogmersfield parks), so a similar designation at Winchfield House would not be without local precedent, and, as set out below, is independently confirmed.
 - **[CRITICAL ISSUE]** The Winchfield Neighbourhood Plan's own adopted Evidence Base (Appendix D, Section 16 (Non-Designated Heritage Assets), p.111) records of Winchfield House's predecessor, Winchfield Court: 'Very little is known about the predecessor of the present house... except that it possessed a deer park in the 17th century and was "suffered to fall into decay" during the early 18th century', before being demolished and replaced by the present Winchfield House around 1770 (the Evidence Base adds the caveat that 'it is not clear whether it stood on the present site or not'). The same Evidence Base (p.113) separately confirms that Winchfield Lodge was 'built as a hunting lodge for Frederick Edward Beauclerk' (1852–1919), the last of the Beauclerk family to own Winchfield House before selling the estate in 1908. Neither source is referenced anywhere in the applicant's historic research or its list of documentary sources (Appendix 13.1, paras 4.266–4.279), notwithstanding that the Evidence Base has formed part of the adopted development plan since the Winchfield Neighbourhood Plan was made in January 2024, over two years before the application was submitted, and entirely independent of the Hampshire Archives closure the applicant cites below.
 - **[CRITICAL ISSUE]** Separately, the applicant's own Desk-Based Assessment acknowledges a material gap in its evidence base: 'The Estate Maps of Winchfield Parish for the very eastern part of the Site were inaccessible at the time of the completion of this assessment due to the closure of the Hampshire Archives. Any relevant documents will, however, be examined when available' (Appendix 13.1, para 4.270). This is precisely the area associated with Winchfield House, its parkland boundary and the North Lodge, meaning the ES's confident 'no effect' conclusion for Winchfield House, its Stable Block and its South Lodge has been reached without the benefit of the primary estate records for that part of the Site and, as set out above, without the benefit of adopted planning evidence that was readily available regardless of that archive closure.
 - **[SIGNIFICANT ISSUE]** The historic extent of Winchfield House's parkland is also independently mapped. The Winchfield Landscape Character Assessment (Michelle Bolger Expert Landscape Consultancy, April 2021, paras 7.1–7.3) records that 'the majority of this area was once part of the Winchfield House Estate' and that 'the former extent of the open parkland shown on the 1897 OS map... is still legible'; its Figure 7 (Hampshire Historic Landscape Characterisation) shows Winchfield House sitting within a mapped '19th Century and Later Parkland' polygon extending from Mabs Copse south towards the M3. The parallel Landscape Review of this application prepared for WPC (Sechi & Mills, Stone & Meadow, 3 September 2026) independently reaches the same conclusion, describing 'the mapped extent and legible pattern of remnant Winchfield House parkland' as a locally important constraint the applicant's Design and Access Statement fails to map (para 3.3), and states that 'much of the Winchfield portion is remnant parkland whose value derives from openness, field pattern, coppice enclosure, estate associations and its relationship with Winchfield House and the listed lodges' (para 3.11).
19. On this basis, we consider it confirmed that Winchfield House's predecessor possessed a historic deer park, and that Winchfield Lodge was purpose-built as a hunting lodge for the family who owned Winchfield House. What remains untested is the precise historic extent of that parkland and deer park, and specifically whether it extended across, or adjoining, the eastern part of the Site; the ES's 'no effect' conclusion for Winchfield House, its Stable Block and South Lodge has been reached without engaging with any of this

evidence. We recommend WPC's representations ask that Hart District Council's heritage/conservation advisor test the applicant's 'no setting' conclusion against the Winchfield Neighbourhood Plan Evidence Base, the Winchfield Landscape Character Assessment and the outstanding estate map evidence before it is accepted, and that WPC consider commissioning brief further primary-source research (Hampshire Archives, and Hampshire Gardens Trust) to establish the deer park and parkland's precise former extent.

North Lodge to Winchfield House (Grade II)

20. The ES assesses the change to the setting of the Grade II North Lodge as 'Low' magnitude on an asset of 'Medium' sensitivity, giving 'Minor to Moderate adverse', not significant (ES Chapter 13, paras 13.4.28–13.4.29), on the basis that the Site's contribution to the Lodge's setting is limited to filtered, undesigned glimpses of farmland (Appendix 13.1, paras 4.106–4.108). In our professional opinion, this understates the true degree of harm.
 - **[SIGNIFICANT ISSUE]** We do not agree that the Lodge's outlook over this part of the Site is limited to filtered glimpses. In our assessment, North Lodge has direct views out over this side of the Site, and the openness and verdant character of the land makes a positive contribution to the Lodge's setting, rather than being a neutral or incidental backdrop viewed only in fragments. This is independently confirmed by the adopted Winchfield's Key Views document (April 2022): its 'View 3 - Entering Winchfield Parish from the North on the B3016' is taken from the footway 'close to North Lodge (entrance to Winchfield House)' and records that 'open fields are seen which once formed part of the parkland associated with the Winchfield House estate. This area of former parkland is seen opposite the remnant estate building of North Lodge... and in combination these elements contribute to an appreciation of the historic estate and a sense of history more generally' (View 3, para 3.18) precisely the direct, positively-contributing relationship the ES's 'filtered glimpses' characterisation understates. Replacing this open, verdant land with residential development therefore represents a fundamental change to a quality independently identified as positively contributing to the Lodge's setting, not merely a partial or filtered loss of an already-modest view. On that basis, we consider the change is likely to be of at least Moderate, rather than Minor to Moderate, adverse significance.
 - **[SIGNIFICANT ISSUE]** This is reinforced by the Site's confirmed historic connection with the wider Winchfield House estate. As set out above, the Winchfield Neighbourhood Plan Evidence Base (Appendix D, p.113) confirms that Winchfield Lodge was 'built as a hunting lodge for Frederick Edward Beauclerk', the family who owned Winchfield House. Historic Ordnance Survey mapping reproduced in the applicant's own DBA (Plans EDP 9–11: 1875, 1897 and 1912) is consistent with this, showing North Lodge sitting within the same broadly wooded, informally bounded landscape as Winchfield House to the north and Winchfield Lodge to the south.
 - This is not fully explored in the applicant's own assessment, which does not reference the Winchfield Neighbourhood Plan Evidence Base at all. The DBA separately notes that Winchfield Lodge's grounds include 'a small parcel of open land to the north, with some deliberate planting' (Appendix 13.1, para 4.148), but this is not connected back to Winchfield Lodge's status as a hunting lodge for the Winchfield House estate, nor tested as part of the setting of North Lodge. The DBA does acknowledge 'a limited historic and functional association... between the Site and Winchfield Lodge, given that the eastern edge of the Site once formed part of the wider parkland estate of Winchfield Lodge' (Appendix 13.1, para 4.134), but dismisses this as 'now defunct' on the basis that it can no longer be experienced through views, without testing whether it forms part of the same wider historic estate as Winchfield House and the North Lodge.
21. Taken together, North Lodge's direct, open outlook across this part of the Site (independently confirmed by the adopted Winchfield's Key Views, View 3), and its confirmed historic connection with Winchfield House and Winchfield Lodge (Winchfield Neighbourhood Plan Evidence Base, pp.111, 113), we consider the fundamental change from open, verdant land to residential development would represent a greater degree of harm to the setting and significance of the North Lodge than 'Minor to Moderate adverse'. We would expect at least a 'Moderate adverse' judgement to be justified on this basis.
 - **[SIGNIFICANT ISSUE]** This harm would be compounded, not merely accompanied, by a further change that the ES's setting assessment does not appear to address: the submitted Composite Parameter Plan (Appendix 13.1, Part 3) shows a new roundabout proposed on the B3016 adjacent to North Lodge, at the Site's

principal access point. In our professional opinion, this would urbanise a stretch of road that is currently semi-rural in character, further eroding the Lodge's setting independently of, and in addition to, the loss of open land behind it, a change to the immediate character of the Lodge's approach and surroundings that has not, on the evidence reviewed, been separately assessed. We recommend WPC's representations ask the applicant to assess the effect of the proposed roundabout on North Lodge's setting specifically, alongside the reassessment of the wider land-use change addressed above.

Murrell (Grade II)

22. The ES assesses the change to the setting of the Grade II Murrell as 'Minor to Moderate adverse', not significant, relying on retained boundary vegetation and green space around the cottage.
 - **[ADVISORY]** As with North Lodge, this conclusion depends on filtered rather than blocked views, and therefore sits within the leaf-off verification gap raised at Part 1 above, and on mitigation (Table 13.7, Measure 4) that is secured only 'By Design' at this outline stage. We recommend WPC's representations continue to test whether the 'Minor to Moderate' judgement for Murrell is adequately supported once winter verification has been carried out and the securing of the relevant vegetation has been clarified, rather than accepting it on the basis of the illustrative scheme alone.

Non-designated Historic Parks and Gardens: Shapley, Ashley and Winchfield Lodge

23. These three assets are not Historic England Registered Parks and Gardens, but they are independently identified by Hart District Council, which maintains its own local list of 'unregistered parks and gardens of local heritage interest'. That local list records eight such assets within the wider 1km study area, three of which lie within the Site itself: Shapley (626), Ashley (371) and Winchfield Lodge (627) (Appendix 13.1, paras 4.137–4.138; ES Chapter 13, paras 13.3.51–13.3.52). Each is associated with a separate former country house clustered at the Site's north-eastern corner, immediately adjacent to Winchfield House's own parkland. Their mapped extent follows the HER's boundaries as shown on the 1912 Ordnance Survey map, on which Shapley and Ashley are first clearly named and defined as parkland; Winchfield Lodge had already appeared, with more limited evidence of landscaping, on the 1897 edition (Appendix 13.1, paras 4.139–4.140).
24. The three non-designated historic parks and gardens at the eastern edge of the Site are assessed as 'Minor adverse', not significant, on the basis that they already read as agricultural land rather than parkland.
 - **[SIGNIFICANT ISSUE]** This assessment should be read alongside the deer park and Winchfield House connection points raised above. Winchfield Lodge in particular is assessed only as a free-standing, low-value non-designated Park and Garden (Appendix 13.1, paras 4.148, 4.156–4.157), with no consideration of its confirmed status, per the Winchfield Neighbourhood Plan Evidence Base, Appendix D, p.113, as a hunting lodge built for Frederick Edward Beauclerk, the family who owned Winchfield House until 1908. Its significance and setting should be reassessed on that basis, and its historic functional relationship with Winchfield House and the Site tested against primary sources, rather than treated as an isolated low-value asset.
 - **[ADVISORY]** The available documentary evidence does not itself establish that Shapley and Ashley formed part of the historic Winchfield deer park: the DBA treats all three parks as separate historic estates, each associated with a different former country house, rather than as surviving fragments of one another (Appendix 13.1, para 4.139), and the Winchfield Neighbourhood Plan Evidence Base's own account of the 17th-century deer park notes it is unclear whether it even stood on the present Winchfield House site. In our professional opinion, however, a credible alternative reading of the same evidence is that all three parks originated as outlying parts of a single, earlier Winchfield House estate landscape, plausibly including the deer park itself, which was subsequently parcelled out and associated with the later country houses as each was constructed, rather than the parks and their houses having independent origins. This reading is consistent with the pattern in the historic mapping: Winchfield Lodge's own hunting lodge wing is confirmed to have been built substantially later than the present Winchfield House (built around 1770), for Frederick Edward Beauclerk (1852–1919) (Winchfield Neighbourhood Plan Evidence Base, Appendix D, p.113), and Shapley and Ashley are not clearly named and defined as separate parks until the 1912 OS map, later than the depiction of both Winchfield House's own parkland and Winchfield Lodge on the 1897 edition (Appendix 13.1, paras 4.139–

4.140; Winchfield Landscape Character Assessment, paras 7.1–7.3). This sequence is not established by the documentary evidence reviewed and should be treated as a professional interpretation rather than a confirmed fact, but we consider it a credible basis for raising the wider historic relationship between all three parks, not only Winchfield Lodge, and the Winchfield House estate in WPC's representations, for testing through the same primary-source research recommended above.

Dogmersfield Park (Grade II Registered Park and Garden)

25. We have checked whether the Grade II Registered Park and Garden at Dogmersfield, c.2.5–3km to the south-east, has been assessed, and confirm that it has not. This is the clearest practical consequence of the 1km study area raised at Part 1 above, and the applicant's own Zone of Theoretical Visibility plan supports raising it as a gap, not merely a low-impact asset that can be assumed away.
 - **[CRITICAL ISSUE]** Being well outside the heritage chapter's 1km study area, Dogmersfield Park was never brought into the heritage assessment at all: 'there are no scheduled monuments, registered parks and gardens or registered battlefields located within 1km of the Site's boundaries and so therefore they will not be considered any further' (ES Chapter 13, para 13.3.18; Appendix 13.1, para 4.5). The Landscape and Visual chapter uses a larger 3km study area and does name Dogmersfield Park, but only as passing context, stating it lies 'to the south-east of the study area, beyond the Basingstoke Canal' (ES Chapter 7, para 7.3.36), i.e. treated as outside the assessed area. No viewpoint, receptor entry or effects judgement is given for it anywhere in the 19 representative viewpoints (Table 7.3) or the LVIA effects tables.
 - **[SIGNIFICANT ISSUE]** Checked against the applicant's own Figure 7.2 (Zone of Theoretical Visibility), this exclusion does not hold up: Dogmersfield Park sits inside the edge of the 3km study area boundary as drawn, not beyond it, and the ZTV shows a mapped area of theoretical visibility directly over and adjacent to the park. The figure therefore appears to contradict the chapter's own text. As such, a Registered Park and Garden which the applicant's own ZTV indicates may have theoretical visibility of the Site has not been treated as a heritage receptor anywhere in the application, and has received no verified viewpoint, photography, or setting/significance assessment.
26. Even where the resulting effect is ultimately likely to be low, for example once distance, intervening woodland and the Basingstoke Canal corridor are taken into account, that is a conclusion the assessment needs to reach and evidence, not a basis for excluding the asset from consideration in the first place. We recommend WPC's representations request the applicant add Dogmersfield Park as an assessed heritage receptor, supported by a verified viewpoint and photograph taken from within the registered park, and provide a reasoned setting/significance judgement.

The WWII Defence Line: pillboxes and anti-tank blocks

27. The ten pillboxes and the anti-tank blocks on Site form part of a single WWII GHQ Stop Line defensive system, and the applicant's own assessment repeatedly recognises this: each is individually assessed as possessing 'a degree of group value through its association with contemporary features in the landscape' (Appendix 13.1, e.g. paras 4.238, 4.242–4.245), and the assessment separately confirms in general terms that all of the WWII features, considered together, are 'heritage assets of low, or local, significance albeit also possessing group value' (para 4.227), including specific instances where a pillbox's field of view is tied explicitly to 'the group of pillboxes defending this nodal point' at the Totters Lane railway/road overbridge (paras 4.238, 4.245).
 - **[SIGNIFICANT ISSUE]** Despite this, the effects assessment scores the loss of each pillbox's field of view individually as 'Minor adverse', with no corresponding group-level or cumulative judgement on the loss of intervisibility or functional coherence across the wider defensive line (ES Chapter 13, paras 13.4.33–13.4.37, 13.7.9–13.7.10). Of the three pillboxes whose fields of view would be obscured by the Proposed Development (24298, 24299 and 71058), the applicant's own descriptions indicate two sit at a functionally important nodal point: Pillbox 24298's field of view is tied to 'the Totters Lane overbridge... and the group of pillboxes defending this nodal point' (Appendix 13.1, para 4.238), and Pillbox 71058 similarly obtains 'a field of view towards the Totters Lane overbridge... and the group of pillboxes defending this nodal point' (para 4.245). Pillbox 24299 instead covers 'the river valley to the west' (para 4.239), consistent with the Stop Line's design principle of following rivers and covering transport crossings (para 4.222).

28. We recommend WPC's representations ask for a group-level assessment of the effect on the coherence of the surviving defensive line as a whole, not simply an aggregate count of 'three out of ten' pillboxes individually affected.

Hartley Wintney Conservation Area

29. The Hartley Wintney Conservation Area is one of the designated assets screened out at Stage 1, on the basis that the Site does not contribute to its setting or significance. We continue to test this alongside the applicant's wider judgements on Murrell, the non-designated parks and the pillboxes, particularly the apparent tension between the 'Moderate' harm to landscape character and visual amenity conceded elsewhere in the application, and the 'not significant' conclusions reached throughout the heritage chapter for the same development.

Heritage enhancement

30. Chapter 13 concludes that 'no additional benefits or "enhancements" are identified in terms of cultural heritage as a result of the Proposed Development' (ES Chapter 13, paras 13.5.12, 13.7.16). We consider this conclusion should be tested, given the scale of what is proposed to be retained within or immediately adjoining a residential-led scheme of this size: historic parkland fragments at the Site's eastern and north-eastern edges, all ten WWII pillboxes and the anti-tank blocks, and the Grade II North Lodge.
- **[ADVISORY]** Local Plan Policy NBE8, and the historic environment chapter of the National Planning Policy Framework as revised in August 2026 (NPPF Chapter 20, restructured into Policies HE1–HE10), continue to support genuine heritage enhancement. Policy HE1, a plan-making policy, expects development plans to deliver 'a positive strategy for the conservation, enhancement and enjoyment of the historic environment', including by considering 'the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring' and taking opportunities 'to draw on the contribution which the historic environment can make to the character and quality of development' (NPPF, para HE1.1). At decision-making level, both Policy HE6 (designated heritage assets) and Policy HE7 (non-designated heritage assets) confirm in equivalent terms that 'development proposals which would have a positive effect on a [designated/non-designated] heritage asset should be supported' (NPPF, paras HE6.2, HE7.1). A scheme retaining this range of heritage features (for example parkland fragments and all ten WWII pillboxes) arguably has real potential to deliver such a positive effect, rather than the 'no additional benefits or enhancements' position currently taken. We recommend WPC's representations ask for genuine heritage enhancement to be brought forward and secured by condition or Section 106 obligation. This could include on-site interpretation of the WWII defence line, secured public access to it (potentially linked to the Brenda Parker Way and the proposed SANG/POS), and reinstatement of lost parkland character features within the retained fragments of historic parkland.

Cumulative Heritage Sensitivity of the Eastern Part of the Site

31. Considered cumulatively, rather than asset-by-asset as the applicant's methodology requires, the evidence set out above shows a consistent pattern: the eastern and north-eastern parts of the Site, where the confirmed historic connection with Winchfield House and its deer park, the setting of the Grade II North Lodge, the three non-designated historic parks (Shapley, Ashley and Winchfield Lodge), and several of the WWII pillboxes forming part of the GHQ Stop Line all sit, together carry a materially greater concentration of heritage sensitivity than any single asset-by-asset judgement conveys.
- **[ADVISORY]** In our professional opinion, this cumulative sensitivity is a material consideration for the location and extent of built form within the Parameter Plans, not simply for the mitigation applied around a fixed development footprint. It is reinforced by the access infrastructure proposed for this part of the Site: the roundabout shown on the Composite Parameter Plan adjacent to North Lodge (see above) would itself urbanise this part of the B3016, independently of whatever built form or landscaping is ultimately brought forward behind it. We recommend WPC's representations ask the applicant to reconsider whether built development, and the access infrastructure that comes with it, is appropriate on the eastern part of the Site at all, or whether that land would be better retained as green/open space, reinforcing, rather than developing across, the surviving parkland fragments, the setting of North Lodge and the WWII defence line, with built form and its associated access instead concentrated on the less heritage-sensitive parts of the wider allocation. This would be consistent with the parallel Landscape Review's own conclusion that the local evidence 'should

have influenced the location and extent of built development itself and would reasonably have produced a different spatial response in Winchfield', rather than the current approach of applying 'site-wide principles to a landscape that the local evidence identifies as distinctive and historically layered' (Sechi & Mills, Stone & Meadow, 3 September 2026, para 3.2). As this is an outline application, with layout, scale and landscaping all reserved matters, revisiting the location of built form remains straightforward at this stage in a way that would not be the case once reserved matters are approved.

Part 3: Cross-Document Consistency

32. The following issues arise from comparing the Cultural Heritage chapter against other parts of the same Environmental Statement and outline application. They are cross-cutting in nature: they either create direct inconsistencies between chapters, or they show that mitigation the heritage chapter depends upon is not, in fact, fixed by the parts of the application that are actually being determined.

Cultural Heritage chapter (ES Chapter 13) vs Landscape and Visual chapter (ES Chapter 7)

33. ES Chapter 7 (para 7.2.4) adopts a 3km study area for landscape and visual purposes, on the basis that it 'encompasses the principal areas of predicted visibility'. ES Chapter 13 adopts a 1km study area for heritage purposes, justified on different grounds, general proximity to built settlement, topography and tree cover, rather than by reference to the same ZTV modelling used in Chapter 7. The two chapters, prepared for the same application and the same proposed development, therefore apply materially different study areas without any cross-reference or reconciliation between them.
- **[SIGNIFICANT ISSUE]** Chapter 7's own verified viewpoints (Table 7.3) record confirmed visibility of the Site out to the edge of the 3km area, and its own ZTV (Figure 7.2) shows theoretical visibility reaching Dogmersfield Park, a Grade II Registered Park and Garden that Chapter 13 excluded from assessment on 1km-radius grounds alone. Where one chapter's own evidence contradicts the scoping decision taken in another, that scoping decision cannot be treated as settled.

Cultural Heritage chapter vs the outline application's Parameter Plans

34. The Cultural Heritage chapter's 'not significant' conclusions for Murrell, North Lodge and the affected pillboxes are reached by reference to the specific green space, setbacks and vegetation shown on the Illustrative Masterplan. The outline application itself, however, is determined against the Parameter Plans, which set maximum and minimum ranges for height, scale and land use, not against the Illustrative Masterplan, which is expressly non-binding.
 - **[CRITICAL ISSUE]** Table 13.7 confirms that four of the five mitigation measures the heritage chapter relies upon, including the two most relevant to designated assets (Measures 4 and 5, for Murrell and North Lodge), are secured only 'By Design', i.e. by the illustrative plans, not by condition or planning obligation, and landscaping is itself a reserved matter. This means the heritage chapter's conclusions are, in effect, tested against a scheme that need not be built, while the scheme that could actually come forward under the Parameter Plans as drafted has not been tested against the same heritage receptors. This is the same point raised at Part 1 above in relation to the reasonable worst case, but it bears restating here as a document-level inconsistency: the heritage conclusions and the decision-making basis of the outline application (the Parameter Plans) are not currently aligned.
35. We recommend WPC's representations ask the applicant to confirm which specific elements of mitigation relied upon in Chapter 13 are actually fixed within the Parameter Plans as submitted (as opposed to shown only on the Illustrative Masterplan), and to re-test the heritage conclusions against the reasonable worst case that the Parameter Plans would otherwise permit.

Cultural Heritage chapter vs the adopted Winchfield Neighbourhood Plan evidence base and the parallel Landscape Review

36. Two further sources, both independent of the applicant and both unreferenced anywhere in Appendix 13.1's documentary sources (paras 4.266–4.279), materially affect the reliability of the Cultural Heritage chapter's conclusions.

- **[CRITICAL ISSUE]** The Winchfield Neighbourhood Plan (made January 2024) and its Appendix D Evidence Base are part of the adopted development plan for the area, and directly confirm the deer park associated with Winchfield House's predecessor (p.111) and Winchfield Lodge's status as a hunting lodge built for the Beauclerk family (p.113), see Part 2 above. The Winchfield Landscape Character Assessment (Michelle Bolger Expert Landscape Consultancy, April 2021) and Winchfield's Key Views (April 2022), both forming part of the same Neighbourhood Plan evidence base, independently map the historic parkland extent and identify a formally adopted Key View from beside North Lodge over the Site's open former parkland. None of this adopted, publicly available evidence is referenced in the applicant's DBA, whose only acknowledged evidential gap is the closure of the Hampshire Archives (Appendix 13.1, para 4.270), a gap that does not explain the omission of the Neighbourhood Plan evidence base, which has been publicly available since well before the application was submitted.
 - **[SIGNIFICANT ISSUE]** The parallel Landscape Review of this application prepared for WPC (Sechi & Mills, Stone & Meadow, 3 September 2026) independently reaches materially consistent conclusions from the landscape discipline, including: that the LVIA's Year 15 findings depend on illustrative planting that is not secured by the Parameter Plans (paras 2.9–2.10, 3.5–3.7), the same point raised in this review at Part 1 and above; that the remnant Winchfield House parkland is a locally important, inadequately mapped constraint (para 3.3); and that the B3016 key view near North Lodge, in which 'the value lies in the relationship between the listed lodge, wooded estate edge and open former parkland', would have its identity changed by urban development (para 3.19). We recommend this review be read alongside the Landscape Review, and that WPC's representations note that two independent professional reviews, from different disciplines, have identified the same underlying gaps in the applicant's evidence base and mitigation strategy.
37. We recommend WPC's representations put the Winchfield Neighbourhood Plan Evidence Base, the Winchfield Landscape Character Assessment and Winchfield's Key Views to the applicant directly, and ask that the Cultural Heritage chapter be revised to take them into account before its 'no effect' and 'not significant' conclusions are relied upon.

Information Required Before Determination

The below bullets set out, distinctly from our wider recommendations, the specific information we consider is currently lacking from the applicant's submission and which, in our professional opinion, should be provided and assessed before the application is determined. This list is drawn from the detailed findings in Parts 1 to 3 above, each cross-referenced below.

- Justification of the heritage study area against the ZTV: evidence reconciling the 1km heritage study area with the 3km Zone of Theoretical Visibility used in ES Chapter 7, or an assessment extended to at least 3km for designated heritage assets (Part 1; Part 3).
- A setting and significance assessment for Dogmersfield Park: a verified viewpoint and photograph taken from within the Grade II Registered Park and Garden, and a reasoned judgement on the effect of the development on its setting (Part 2).
- Engagement with the Winchfield Neighbourhood Plan evidence base: a revised historic map regression and setting assessment for Winchfield House, North Lodge and Winchfield Lodge that takes into account the Winchfield Neighbourhood Plan Evidence Base, the Winchfield Landscape Character Assessment and Winchfield's Key Views, none of which are currently referenced (Part 2; Part 3).
- An assessment of the proposed roundabout's effect on North Lodge: a setting assessment addressing the new roundabout shown on the Composite Parameter Plan on the B3016 immediately adjacent to North Lodge, which does not currently appear to have been considered as a change to the Lodge's setting in its own right (Part 2).
- Confirmation of which mitigation is actually secured: clarity on which of the mitigation measures in Table 13.7, in particular the boundary vegetation relied upon for Murrell and North Lodge (Measures 4 and 5), are fixed within the Parameter Plans as submitted, as opposed to shown only on the Illustrative Masterplan, together with the conditions or planning obligations proposed to secure them (Part 1; Part 3).

- A reasonable worst-case heritage assessment: a re-tested assessment of the heritage conclusions against the maximum building heights and closest permissible built form the Parameter Plans would allow, rather than the specific, most-favourable Illustrative Masterplan arrangement (Part 1; Part 3).
- Winter/leaf-off verification: a winter site visit and photographic record confirming whether the screening claimed for the Grade II Murrell, and more broadly for the Site's boundary vegetation, holds once vegetation is bare (Part 1).
- A group-level assessment of the WWII defence line: an assessment of the effect on the coherence and inter-visibility of the surviving defensive line as a whole, rather than an aggregate count of individually 'Minor adverse' pillboxes, including whether Pillboxes 24298, 24299 and 71058 sit at functionally important points in the line (Part 2).
- A heritage enhancement strategy: proposals for genuine heritage enhancement, such as WWII defence line interpretation and secured public access, and reinstatement of lost parkland character features, with the mechanism proposed to secure them (Part 2).

Summary of Recommendations

For ease of reference, we set out below the recommendations arising from this review, for WPC's representations:

- Request that the heritage study area be justified by specific reference to the ZTV and verified viewpoint evidence, or extended to at least 3km for designated assets and the affected receptors reassessed.
- Ask the applicant to reconsider whether built development is justified at all on the eastern part of the Site, given the cumulative heritage sensitivity identified there, or whether that land would be better retained as green/open space, with built form concentrated instead on the less heritage-sensitive parts of the wider allocation — noting that as an outline application, this remains straightforward to address now, before reserved matters are approved.
- Ask that Hart District Council's heritage/conservation advisor test the applicant's 'no setting' conclusion for Winchfield House, its Stable Block and South Lodge against the Winchfield Neighbourhood Plan Evidence Base (confirming a 17th-century deer park and Winchfield Lodge's status as a hunting lodge), the Winchfield Landscape Character Assessment, and the outstanding estate map evidence, before that conclusion is accepted, and consider commissioning brief further primary-source research to establish the deer park's precise former extent, including whether Shapley and Ashley (in our professional opinion, plausibly outlying parts of the same earlier estate landscape, later associated with their own separately-constructed country houses) should be regarded as historically connected to it.
- Challenge the 'Minor to Moderate adverse' judgement for North Lodge, requesting reassessment to reflect its direct, open outlook over this part of the Site, independently confirmed by the adopted Winchfield's Key Views (View 3), and the positive contribution the land's open, verdant character makes to its setting, reinforced by the Site's confirmed historic connection with Winchfield House, before that judgement is accepted.
- Request a specific assessment of the effect of the roundabout shown on the Composite Parameter Plan on North Lodge's setting, given its introduction of an urbanising feature onto a currently semi-rural stretch of the B3016 immediately adjacent to the Lodge.
- Request the applicant add Dogmersfield Park as an assessed heritage receptor, supported by a verified viewpoint and photograph, and provide a reasoned setting/significance judgement.
- Put the Winchfield Neighbourhood Plan Evidence Base, the Winchfield Landscape Character Assessment, Winchfield's Key Views and the parallel Landscape Review (Sechi & Mills, Stone & Meadow, September 2026) to the applicant directly, and request that the Cultural Heritage chapter be revised to take this independent, adopted and commissioned evidence into account.
- Seek conditions (or a Section 106 obligation) specifically securing the retention, protection and long-term management, including disease/loss replacement, of the boundary vegetation relied upon for Murrell and North Lodge, rather than 'by design' mitigation alone.

- Request confirmation of which mitigation the heritage chapter relies upon is actually fixed by the Parameter Plans, and ask for the heritage conclusions to be re-tested against the reasonable worst case that remains possible within them.
- Flag the absence of any winter/leaf-off site verification as a specific evidential gap, and schedule a short winter follow-up visit to North Lodge, Murrell and the Site's eastern boundary.
- Request a group-level assessment of the effect on the coherence of the WWII defence line as a whole, and verify whether Pillboxes 24298, 24299 and 71058 sit at functionally important points in the line.
- Ask the applicant to bring forward genuine heritage enhancement measures, WWII defence line interpretation and secured public access, and reinstatement of lost parkland character features, secured by condition or Section 106.
- Continue to test the applicant's judgements on Murrell, the non-designated parks, the pillboxes and the Hartley Wintney Conservation Area, particularly the tension between the 'Moderate' landscape/visual harm conceded elsewhere in the application and the 'not significant' conclusions reached throughout the heritage chapter.

This review has been prepared to inform Winchfield Parish Council's representations on application 26/01201/OUT and reflects our professional opinion based on the documents listed above and a site visit in August 2026. It should be read alongside the parallel Landscape Review (Sechi & Mills, Stone & Meadow, 3 September 2026) and Troy Planning's wider planning representations. References to the National Planning Policy Framework reflect, and have been checked directly against, the version published by MHCLG in August 2026.