

White Hart Hotel FUL consultations responses

Name

Mrs Sandra Crosby

Address

5 Kirmington Close, Lincoln, Lincolnshire, LN6 0SG

Date Received: 22nd February 2024

The position of the proposed swimming pool is in an area of national historical interest. The depth of excavation will destroy the archeology of several different eras but will be of little or no benefit to the city or it's population. This is unacceptable and should be stopped.

Name

Miss Lynda Ohalloran

Address

39 Aberporth Drive, Lincoln, Lincolnshire, LN6 0YS

Date Received: 22nd February 2024

Our archeology needs to be preserved

Name

Milica Rajic

Address

Exchequergate, Lincoln, LN21PZ

Date Received: 23rd February 2024

I am an archaeologist with over 30 years experience in commercial archaeology. I strongly object to the application.
The fact that this application, 2024/0087/FUL and the application 2024/088/LBC exist is shocking.
The desk based assessment (DBA) document should have been returned for a significant improvement (it is missing a plethora of published information on previous archaeological excavations in the vicinity of the hotel, to name but one problem with the report). The pre-planning application consultation with Lincoln City Archaeologist should have resulted in the immediate rejection of the proposal. The archaeological trenching evaluation (the excavation of one test pit and two trenches) should have never happened, because we already know what is there: at the very least over 3m of well-preserved stratified archaeology of Roman date onwards. The applicant should have been reminded (either by their own team of consultants and archaeologists or by the planning authority) of the setting of the White Hart Hotel and its below ground potential, advised against intrusive, below ground works and, if the leisure pool and spa in this location are a deal breaker for the success of Lincoln tourism, encouraged to change the design (eg above ground plunge pool). However due to either lack of due diligence, lack of knowledge and expertise, or all combined, we are where we are - facing the destruction of Lincoln's heritage. My objection is based on the policy and guidance provided in the National Planning Policy Framework (NPPF, the NPPF Planning

Practice Guidance) and good practice advice notes produce by Historic England on behalf of Historic Environment Forum including Managing Significance in Decision Taking in the Historic Environment and the Setting of Heritage Assets. I refer specifically to paragraphs 205,206,207,208,211 and footnote 72 of the NPPF, as well as Historic England Preservation In Situ guidance (2016). It is clear these are not being applied correctly, and the developer seems to believe that a local tourism policy trumps national guidance and NPPF. There is no public benefit to outweigh the destruction of nationally significant remains. The public benefits argued mainly fall under the tourism policy (S42), but even this does not refer to the necessity for 3-4* hotels to include a pool. What's more, there is no grounds for arguing public benefit of public outreach, as destruction of archaeological remains (and outreach generated from this) cannot be part of the decision making process (NPPF 211). I ask that this proposal is objected and that NPPF is applied correctly on applications considered by Lincoln City Council.

Name

Mrs Philippa Redding

Address

Mulberry House, 6 Chequer Lane, Ash Canterbury Kent, CT3 2ET

Date Received:

25th February 2024

I strongly object to this application. This newly refurbished hotel is situated in the most historic part of Lincoln near both the Cathedral and the Castle. Part of the marketing is about the historic location and heritage. Building an underground pool and spa is completely against preserving the heritage - layers of incredibly important archaeology will be lost. It's about time councils took more notice of our heritage - once it's gone it's gone. Developers all over the country seem to place heritage very low on their list of priorities. I urge you to decline this application.

Name

Mrs Alison Griffiths

Address

36 Belle Vue Road, Lincoln, Lincolnshire, LN1 1HH

Date Received:

26th February 2024

The exterior work to the Hotel has been carried out sensitively retaining the original character of the building which has enhanced the area. On reading the archaeological report on the test digs in the area planned for a pool, I feel very strongly that the development should not go ahead. A pool and spa is not in keeping with the historical nature of the hotel and in my opinion will not benefit the city in any way whereas the amount of fascinating archaeology has a wider appeal.

Name

Mrs Fiona Berry

Address

Sycamore House, Chapel Street, Market Rasen, LN8 3AG

Date Received:

26th February 2024

Since coming to live in Lincolnshire 10 years ago I have been astonished about how little is known of the Roman history of the county. The idea that an application to destroy the archaeological record under buildings in the oldest area of the city could be given approval on economic grounds is ridiculous, when we would be potentially destroying our future ability to make sense of the history of the area. Some things are more valuable than a putative increase in visitors and the health of a handful of people. There are much better places to site a pool in Lincoln which would not interfere with important archaeological remains. I object most strongly to the application.

Name

Miss Isabelle Sherriff

Address

68 Wath Road, Barnsley, S74 8HR

Date Received:

27th February 2024

Archaeology is a precious and scarce resource that should not be needlessly destroyed for the sake of a vanity project such as a pool.

Customer Details

Name: Mr D Krapp

Address: 1 Orchard Walk Lincoln LN5 8PL

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I find it ridiculous to read in one of the reports that the City of Lincoln policy in respect of sustainable urban tourism recognises the need for luxury boutique hotels and the provision of a swimming pool along with other upgrades to the White Hart Hotel would assist in meeting this policy driver. Really? Is a pool a requirement for a boutique hotel? I don't think so.

It then continues with elaborating about the health benefits, as if this would be a public leisure facility, which it is not going to be.

And finally, it almost sounds as if the City of Lincoln Council Archaeologist already agreed to the destruction of the archaeological evidence underneath the proposed pool.

So why the consultation? Is this a done deal, behind closed doors?

I hope that the comments made by the public are being properly evaluated and considered in assessing the application and I do hope that the application is being denied. Nothing listed in any of the reports supporting the application justifies the destruction of archaeological remains underneath the current building.

Name

Mr Martin Smith

Address

84 Moor Lane, North Hykeham, Lincoln, LN6 9AB

Date Received: 27th February 2024

No objection or problem upgrading and improving one of Lincoln's more iconic hotels, a task long overdue. But including a swimming pool and destroying Lincoln's unknown heritage which is acknowledged to be there in the foundations will not provide more general benefit. Not approving this application will allow appropriate architectural work to be planned and carried out later to enrich Lincoln's heritage. Resources would be better employed refurbishing/carrying out the rest of the complex in a shorter length of time, reducing the construction time in a popular visitor area encouraging more tourism, and provide more general benefit than creating a swimming pool that will only benefit a small number of personnel.

Name

Mrs Patricia Jones

Address

37 Silver Street, Lincoln, Lincolnshire, LN2 1EH

Date Received: 28th February 2024

As I see it looking at the application it is agreed by all that there are significant archaeological findings in and around this area upon which the pool is proposed to be constructed. Indeed they have been uncovered and can be clearly seen. It also seems that these would be destroyed in the process of pool building but please agree also that these are not for someone private individual to destroy just for their own financial gain. These precious pieces of our history belong to the people of Lincoln for hundreds of years to come just as they have been there for Lincoln's history up until now. How much more do we have to lose for private gain? Please council - do not let our amazing and unique architecture be lost just so someone can swim about.

Name

Mr Stuart Welch

Address

16 Drury Lane, Lincoln, Lincolnshire, LN1 3BN

Date Received: 3rd March 2024

As a long-time local resident living in close proximity to the White Hart Hotel, I strongly support this application.

The proposed facility is an important element in the applicant's wider scheme to transform the White Hart Hotel (and the adjoining Judges' Lodgings complex) into a premier destination which will have many direct and indirect benefits for the local economy and community.

The extensive, expensive and professional archaeological investigations and reports which have been carried out on site have revealed information and artefacts which would have remained unknown without the redevelopment of the hotel site. The public record has greatly benefitted from this.

It is difficult anywhere in this area of uphill Lincoln to excavate without coming across medieval or Roman remains. It is important to recognise and record these for greater understanding in posterity, but this should not interfere with much-needed sensitive re-development

for the modern age - Lincoln's historic past should not constrain its economic future.

Name

Mr Richard Ward

Address

Appletree House, Nocton Road, , Potterhanworth, Lincoln, LN4 2DN

Date Received: 5th March 2024

An excellent opportunity to enhance the economic prospects of the city with a high quality hotel offering in a unique location.

This shouldn't be prevented by possible archaeological remains that would have remained hidden in any event even if they are present.

Name

Victoria Small

Address

5 Gordon Road, Lincoln, Lincolnshire, LN1 3AJ

Date Received: 6th March 2024

I object to the destruction of any archeology finds, whether visible to public or not.

These findings should be preserved and if possible incorporated within any building work to be seen by guests using the facilities.

A pool at the White Hart Hotel would be a lovely idea, but not at the detriment to any archeology and heritage.

Name

Mr Clive Wilkinson

Address

38 Roselea Avenue, Welton, Lincoln, LN2 3RT

Date Received: 6th March 2024

This application to improve and add to the facilities available at The White Hart Hotel will help enhance the quality of hotel accommodation on offer in the "uphill locality" helping to attract further visitors to the area in all seasons.

As for any possible archaeological discoveries, without this application proceeding these would remain hidden away beneath existing "privately-owned" building perhaps never to be discovered, but could now be unearthed, catalogued, photographed etc. and displayed locally for the benefit of ALL public and future generations.

Without the recent improvements and excavations within the Castle grounds (or even The Eastern by-pass) many artefacts would remain undiscovered and this could be a similar case.

I fully support this application.

Name

Mr Simon Shaul

Address

31 Chatterton Avenue, Lincoln, Lincolnshire, LN1 3SZ

Date Received: 7th March 2024

Due to the historic location of this I have an feeling that the archaeological side will be disregarded. Somewhere near here stood a temple as we all know so this site may well hold something of not just local but national importance.

Name

Mrs Sophie Green

Address

63 Hunts Cross Avenue, Liverpool, L25 5NU

Date Received: 8th March 2024

I object to the proposed development of a gym/sauna area at the white hart hotel. If there is even chance that archeological remains of importance exist beneath the building, the owners should, out of conscience, cancel their plans to excavate the area. Why not consider building upwards, onto the roof or elsewhere, somewhere that doesn't risk the destruction of the city's unique history and heritage.

Name

Mrs Sue Kent

Address

Forrington Place, Saxilby, Lincoln, LN1 2WJ

Date Received: 8th March 2024

This is shocking even considering digging down into what is our archaeological heritage here in Lincoln. Frankly the Roman remains are irreplaceable and this should never even be thought about , surely?

Customer Details

Name: Mr Rob Steer

Address: 45 Gleniffer Drive Glasgow G78 1JA

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: There have been a number of issues raised regarding this proposed development, many of which appear to indicate the failure by the submitting parties as offering any consideration as to the protection of existing archaeology within the hotel grounds, something they should have considered when building a business in such a historically important area of Lincoln. Any excavation works in such a historically important area must surely be carefully considered as to the likelihood of the permanent loss to the nation of our history? The addition of a pool is hardly likely to increase the profits for business, and I have already read what can only be described as underhand, impolite targeting of Dr Sam Stein, bordering on outright bullying if anyone dares disagree with a business proposal. This is both questionably unethical and unjust to start throwing dirt into the face of a well regarded archaeologist whilst the planning application, I believe, may be contrary to the national planning policy framework (para 207, footnote 72). Please note my objection to this proposal for this alteration. As a footnote, the website for the White Hart describes itself as being in the 'historic heart of Lincoln', I'm afraid that this will need to be removed if the business keeps digging up its history beneath the ground it uses to sell itself.

Name

Mr Giles Walter

Address

Walk House, Blackthorn Lane, Cammeringham, Lincoln, LN1 2SH

Date Received: 8th March 2024

It is really important for Lincoln to have a first class hotel to attract visitors to the city. I therefore fully support the improvements that have been made to the White Hart to date and likewise support the proposals for a leisure pool and spa which will add to its appeal.

Name

Mr Sam Elkington

Address

Boothby Property Consultancy Ltd, Maydene House, 73 London Road, Sleaford, NG34 7LL

Date Received: 8th March 2024

I am a practicing Commercial Chartered Surveyor with over 40 years of commercial property experience within the City of Lincoln and the County as a whole and have been involved in a significant number of the City's major development projects during my career.

I consider the proposal as submitted is one that should be warmly welcomed by the City. The investment that has already been made in to Lincoln's most iconic hotel, which is of national repute, has been

significant and this proposal does I feel further show how the White Hart Hotel is going to be brought up to a high class standard with the appropriate and necessary facilities befitting the area and the City.

Whilst the archeological concerns are noted, I consider that with an appropriate management and mitigation plan these can be overcome and any archeology exposed through the build process can be recorded and noted so as to further enhance the knowledge that the City has of the area and not lead to any delays or hamper the build process.

I support the application and consider that we should welcome the vision and efforts of the new owners who have brought back to life one of the City's greatest assets and who are committing further resources to make the Hotel one that the City can be proud of.

Name

Avril Golding

Address

96 Stonecliff Park, Prebend Lane, Welton, LN2 3JT

Date Received:

9th March 2024

The site lies within an area of national archaeological and historic importance within the heart of medieval and Roman Lincoln. Tourists visit Lincoln to discover the heritage. That heritage can't be replaced. Too much of Lincoln's heritage has already been destroyed and without it what does Lincoln have to offer the tourist to differentiate it from other cities.

Name

Ms Susan Hayden

Address

Crew Yard,, Low Street,, North Wheatley, Retford., DN22 9DR

Date Received:

9th March 2024

As a regular visitor to Lincoln, I come for the history. It is my local city of choice because of that visible link to the past. I could go to Sheffield or Nottingham but I choose Lincoln so local shops and restaurants benefit from my custom.

How appalling to ignore the heritage. At least invest in a full archaeological investigation of what is there. What a bonus for the hotel it could be to have a conserved and documented site on the premises.

Name

Mr Jack Dean

Address

26 Barley Road, Birmingham, B16 0QU

Date Received:

12th March 2024

The consideration of this planning is completely dishonourable. It

should not go ahead. As outlined in ArcheologyUK's post about the plans, this proposed pool will be a serious threat to present and nearby archeological layers and history. Not to mention completely out of keeping with the visual aesthetics of the area and building. A businesses individual needs and wants should not override the necessities of historical preservation and cultural care. If the business wants to increase profit margins I would suggest they market their historical and cultural value more efficiently to bring in a higher quantity of higher paying guests. If they absolutely need a pool then the CBA's suggestion of an above ground non-destructive pool will suffice. And it should go without saying that suggesting an outdoor pool in this country with our weather is a necessity is a ridiculous statement - and suggests poor project consideration and forethought.

Name

Mrs Ward Rachael

Address

31 Chesney Road, Lincoln, Lincolnshire, LN2 4RX

Date Received:

12th March 2024

Lincoln has a rich history which should be preserved. I agree that updating the hotel would be a positive move but to loose the archaeology, potential artefacts and history to leisure facilities is detriment to preserving Lincolns story. The leisure facilities can be built anywhere in the building so change the location and keep Lincolns history safe and on view for all to share.

Name

Mrs Heather Rippon

Address

17 Earlsmeadow, Duns, TD11 3AQ

Date Received:

12th March 2024

Dear Sir,

I am writing this objection to yourself over the proposed swimming pool at the grade 2 listed White Hart hotel in Lincoln.

The digging of the foundations for this have the potential to cause irreversible damage to many important and thus unseen previously pieces of important archaeological layers, that could be rare, unique or never before seen.

With so many culturally different peoples traversing through the city that is known as Lincoln without further investigation in a controlled archaeological dig the truth of what lies beneath cannot be known and thus if this vitally important area is irreversibly changed with deep excavation, never can be known.

Thus I feel that this site should be left as it is with no deep excavation and no disturbance of potentially important heritage.

Yours

Mrs H Rippon

Name

Dr Carina O'Reilly

Address

35 Mildmay Street, Lincoln, Lincolnshire, LN1 3HR

Date Received:

12th March 2024

I find it astonishing that this application has been encouraged to progress this far. There is absolutely no justification for the proposed level of damage to nationally important archaeology for the sake of excavating a private swimming pool. There can be no mitigation for destruction at this level.

It is clear from trial excavations that the archaeology in situ is of an equivalence to that of neighbouring scheduled monuments. The National Planning Policy Framework is remarkably clear and unambiguous in such cases: the site beneath the White Hart is of equivalent value to neighbouring scheduled monuments, and therefore should be "considered subject to the policies for designated heritage assets", meaning that "clear and convincing" justification needs to be presented for its alteration or destruction due to development. No such justification has been presented, nor clients - the arguments put forward by the developers are risible.

Policy LP25 of the Central Lincolnshire Local Plan states that "Unless it is explicitly demonstrated that the proposal meets the tests set out in the NPPF, permission will only be granted for development affecting designated or non-designated heritage assets where the impact of the proposal(s) does not harm the significance of the asset and/or its setting." This test is clearly not met in by these proposals. The policy goes on to state that "Wherever possible and appropriate, mitigation strategies should ensure the preservation of archaeological remains in-situ."

It is perfectly possible and appropriate to retain this archaeology in-situ: by rejecting this proposed development. To do otherwise goes against not just the spirit of the Local Plan and the National Planning Policy Framework, but its explicit provisions, and would render the Council vulnerable to costs on successful judicial review, which under the circumstances would be highly likely. I encourage the Committee to reject this proposal unambiguously.

Name

Mrs Caroline Worswick

Address

9 Chepstow Close, Macclesfield, SK10 2WE

Date Received:

13th March 2024

Enhancing Lincoln's attraction as a tourist destination is more likely to come from preserving its history, than supplying a hotel leisure complex. It has been demonstrated by the Council for British

Archaeology that this project would devastate an area of historical significance, they deem it to be of national importance. Their comments are reinforced by another objector, who draws on 30 yrs of commercial archaeology experience and gives a negative assessment of this plan. I strongly believe this application should be rejected.

Name

Dr Elisa Vecchi

Address

3 Rusland Close

Date Received:

13th March 2024

The hotel lies at the heart of the historic centre of the city, in an area of immense archaeological significance. The proposed swimming pool poses a threat to the archaeological evidence, risking substantial harm and potential loss of heritage assets. Despite the claims, there would be limited or no benefit for the Lincoln citizens and the general public from such an intervention. Other solutions should be sought that would not impact the city historic asset and cause the irreversible destruction of nationally significant archaeology.

Name

Mr James Parman

Address

13 Barnes Green, Scotter, Gainsborough, DN21 3RW

Date Received:

13th March 2024

The Bailgate/Castle Square area of Lincoln is of extreme architectural importance, much of which remains buried and untouched, any building work in the area must be done under strict surveillance and anything discovered must be preserved for eternity. The destruction of likely historical remains for a business venture is totally unacceptable and the only gains will be those of the financial kind to the owners of the hotel, and not as they suggest to the city.

Name

Thomas Fegan

Address

50a Empingham Road, Stamford, PE9 2RJ

Date Received:

13th March 2024

As a Lincolnshire resident, I object to the needless disturbance and destruction of valuable archaeological layers within the proposed excavation - layers that are of national as well as county significance. Lincoln's heritage assets are a valuable draw to tourists, and of cultural significance to present and future generations. They cannot be replaced if damaged or lost!

Name

Mr Mark Raimondo

Address

9 High Street, Coningsby, Lincoln, LN44RB

Date Received: 13th March 2024

Lincoln's unique selling point is its link to history. Whilst the proposer can point to benefit from increased visitor residency, it is counter-intuitive to support something which damages Lincoln's key attraction to a large proportion of the national and international visitors. If the proposer wishes to pursue the swimming pool proposal to realise the proposed benefits then an above ground construction seems most appropriate and fair compromise.

Name

Miss Melanie Jones

Address

7 Park Road West, Sutton On Sea, Lincolnshire, LN12 2NQ

Date Received: 13th March 2024

Archaeological sites are of great importance and should not be destroyed by swimming pools or any other commercial project. Other countries around the world especially Europe treasure their history and archaeological findings. Tourists come to visit Lincoln to see the archaeological findings and history, not to go in hotel swimming pools. This would not happen in a beautiful country like Italy or Greece.

Name

Mr Peter Taylor

Address

Lochnagar, Welton Le Wold, Louth, LN11 0QT

Date Received: 13th March 2024

Excavation here is inappropriate because it is likely to disturb historic remains

Name

Miss Bianca Vecchio

Address

19/217 Northbourne Avenue, Canberra, 2612

Date Received: 14th March 2024

Building a swimming pool for a hotel on the basis of increased leisure and income rather than appreciating and protecting the buried heritage is not acceptable. You would do more for both local and national cultural development alongside increased tourism by properly caring for the buried remnants of the past.

Name

M Marshall-Brown

Address

10 Paddock Lane Blyton, Gainsborough, DN21 3NF

Date Received: 14th March 2024

Strongly object to this destruction of our local and national heritage.
Highly inappropriate. Above ground only if agreed by planners.
Lincolnshire heritage being destroyed yet again!1

Name

Miss Tracey Smith

Address

23 Vale road, Battle, Tn330he

Date Received:

14th March 2024

Lincoln is a city of huge national historic importance. I have visited the city numerous times and enjoy the rich variety of building heritage on display. However, much of the heritage of the city is hidden below ground and represents an irreplaceable resource...i.e. once it's gone. A city's heritage belongs to all of it's inhabitants and that is why any potential harm to that heritage needs to be prevented, and at the very least any works fully investigated. I oppose the building of the swimming pool in a historic building, due to the harm it would cause to both hidden heritage and the potential harm to a historic building.

Name

Dr Samantha Tipper

Address

128 station road, Lincoln, Ln6 9al

Date Received:

14th March 2024

There is too much archaeology and historical significance in that area for a pool. A pool is not needed, won't benefit the public and will destroy so much history/archaeology in that area. There is a also a pool currently empty and closed 10 min walk away at deans sport and leisure. If a pool is needed in the area some investment in the one already built would be better.

Name

Mrs Fiona Orr

Address

11 Longdales Road, Lincoln, LN2 2JR

Date Received:

14th March 2024

It is likely that this plan will do a great deal of harm to any archaeological evidence in the area.

Name

Miss Chandani Holliday

Address

18 Belle Vue Road, Lincoln, LN1 1HH

Date Received:

14th March 2024

I do not think that a swimming pool will benefit the local area or the local people and community. The white heart is already very popular and well regarded in Lincoln and beyond. The popularity is partly due

to its location within the archeological area and the history of the building its self. The building has been conserved wonderfully up to now, and any further alterations, I believe, would be a detriment rather than of benefit.

Name

Miss Alice Pace

Address

Lucas House, Carr Road, North Kelsey, Market Rasen, LN7 6LG

Date Received:

15th March 2024

Too much important archaeological heritage within the area, and a pool is not necessary.

Name

Miss A M Sheffield

Address

127 Manthorpe, Grantham, NG31 8DQ

Date Received:

15th March 2024

I am writing to express my strong objection to the proposed internal alterations at the White Hart Hotel in Lincoln, particularly the creation of a new leisure pool and spa. While I appreciate the desire for development, I believe this proposal lacks sufficient consideration for the broader community's interests and the preservation of our historical and economic landscape.

Firstly, the notion of public benefit stemming from a private leisure pool and spa is dubious at best. The claimed economic contribution of approximately £202,848 per year appears inflated and fails to adequately address the concerns of local businesses and residents. The minimal financial impact per person per day does not justify the potential disruptions caused by the construction and operation of such facilities.

Furthermore, the disregard for archaeological significance is deeply concerning. The site's proximity to scheduled monuments should prompt thorough consultation with organizations like Historic England. The failure to engage with experts in heritage preservation raises serious doubts about the integrity of the planning process.

It is evident that short-term gains are being prioritized over the long-term well-being of our community and cultural heritage. The council's apparent willingness to overlook these issues in favor of superficial development is alarming and requires urgent scrutiny.

I implore the planning authority to reassess this proposal in light of its dubious public benefits, potential negative impacts on local businesses and residents, and the significant archaeological considerations. It is crucial that decisions regarding our city's development are made with transparency, integrity, and the best interests of all stakeholders in mind.

Thank you for considering my objections. I urge you to take decisive action to ensure responsible and sustainable development in our city.

Customer Details

Name: Ms Penelope Toone

Address: 4 Midia Close Lincoln LN1 1AR

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Surely an Archaeological site has to be investigated properly before planning permission is given making any site of historical interest lost.

I fail to understand how this potential feature would not be more of a tourist attraction than a dipping pool

Name

Dr Samantha Stein

Address

Exchequergate Lodge, Lincoln, LN2 1PZ

Date Received: 16th March 2024

If Lincoln City Council are planning to approach this case appropriately and with full and good knowledge of NPPF and CLLP, planning officers and councillors will undoubtedly object to the scheme. This is on the basis of National Planning Policy Framework Paragraph (Dec 2023) 206-207, footnote 72, as well CLLP S57 and section 10.0.03.

I am an archaeologist of nearly 20 years. I have worked as a commercial archaeologist, as well as assistant science advisor at a significant national body. I have previously worked on cases similar to this one in multiple other cities with nationally significant archaeology. If I was still working at Historic England, my letter would be to recommend objection on the grounds of destruction of nationally significant archaeology present without any exceptional public benefit. Although normally, it would not even come to that. Following identification of nationally significant archaeology, a pre-application consultation with HE should have been requested, as it would have undoubtedly stopped this application in its tracks.

What is shocking in this case is that despite: 1) being in a conservation area, surrounded on all sides by Scheduled Monuments; 2) the archaeological consultant affirming the remains are of national significance, and 3) the evaluation confirming good preservation from just below the surface, the Council and its officers have not requested pre-app comments from Historic England, and have allowed this proposal to go all the way through to public consultation.

It appears from language used in the application that there were pre-planning consultations, as well as references to agreements with local planning archaeologists. As a result, I am gravely concerned about WHY comments from national heritage bodies were not requested even as part of the formal application, and why this developer was permitted by the council to believe that this was not an affront to national planning regulations.

Fortunately, due to local rumblings, the Council for British Archaeology have since written a strongly worded letter and made it clear that this development is highly objectionable and inappropriate on heritage grounds, and I trust their objections will be read by all councillors and planning officers.

This application plainly sets out that the archaeology on this site is of national significance, and that the application will destroy these remains (DBA summary and S7; archaeological evaluation). From a scientific perspective, this proposal also fails to note that the impact will reach beyond the area of excavation, as the introduction of oxygen and changes to perched and natural water systems in the buried environment will facilitate further decay to deposits which will not be excavated or recorded.

Destruction of nationally significant archaeology could be defensible if suitable public benefit can be established. However, the added public value of a below ground pool is zero to none. Overall the quoted benefit includes a single unskilled full time job, plus just over £200,000 to the local economy. What this proposal has not explored is if these figures would be exactly the same if there was simply an enhanced above ground spa or above ground pool. I'd imagine this investigation would decrease the economic benefit of the below ground pool to nearly or exactly nothing. On a site of national significance, this is simply unacceptable.

Misleading public benefits are also included in the form of public outreach about the archaeology. This is going directly against NPPF paragraph 211, which states: '...the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.' What's more, even if suitable public benefit could be demonstrated, a grey literature report and a few talks to the local community on a site of national significance is just offensive. The people of Lincoln deserve better.

What this is demonstrating above all else is that there seems to be an oversight or failure to do due diligence with regards to safeguarding the heritage that belongs to the people of Lincoln. This is further evidenced with regards to the Desk Based Assessment; this document was signed off, despite only including the absolute bare minimum with regards to research, failing to report multiple important publications, one of which notes significant well preserved Roman high status buildings and mosaics in the site directly adjacent to the proposed development.

As a member of the public, I am appalled and disgusted that this is even being entertained. As a professional archaeologist, I would

strongly advise that the planning department seeks the recommendations of Historic England inspectorate and their regional science advisor for clarity about why this planning application is an affront to NPPF.

Name

Mr Andre2 Falconer

Address

6 Doddington Avenue, Lincoln, Lincolnshire, LN6 7EX

Date Received:

17th March 2024

I strongly object to the proposal (despite being a keen swimmer and spa goer) because:

1. The archaeological evaluation of the site confirms that it is as significant as its neighbouring scheduled monuments.
2. The works will result in significant damage/total loss of a heritage asset.
3. The alleged benefits of the pool in no way make up for the destruction of a nationally significant site - even if the pool and spa was open to the public 24/7 (which it most definitely will not be).
4. The proposal contravenes the Central Lincoln Local Plan which states that heritage assets, settings, and archaeological resources are IRREPLACEABLE and require careful management.

Please do not allow more of the city's heritage to be lost. We must protect it for future generations. Thank you.

Name

Mr Jonathan Jones

Address

6 Doddington Avenue, Lincoln, Lincolnshire, LN6 7EX

Date Received:

17th March 2024

I object to the proposal in the strongest possible terms due to the proposed total destruction of an archaeological site of world significance. The idea that the construction of a private swimming pool, even one that is sometimes open to the public, constitutes justification for this wanton act of brutal destruction in such a significant heritage site is frankly offensive.

Name

Mr Paul Smith

Address

21 Northfields, Bourne, PE10 9DB

Date Received:

17th March 2024

The proposed works will do irreparable damage to the archaeological history beneath this building.

Name

Ms Sarah Gray

Address

33 Norreys Avenue, Oxford, OX1 4ST

Date Received: 18th March 2024

I have read the application documents, in particular the letter from the Council for British Archaeology.

I agree with conclusion in the letter that 'the proposed "local media involvement, school visits/talks, open days (dependent on site conditions), exhibitions or evening talks" is no where near proportionate mitigation to the total excavation of an area of nationally significant archaeology containing Medieval, Roman and (probable) Viking layers, with no potential for preservation in situ (established best practise), in order to create a private swimming pool.

Furthermore, we note that the completed and successful refurbishment of the hotel establishes that the viability of the scheme is not dependant on the creation of a swimming pool.

If the applicants believe a swimming pool is essential for their hotel spa then this should be constructed above ground in order to retain the highly significant archaeology in situ.'

I therefore strongly object to the application.

Name

Mr Christopher Padley

Address

54 Hewson Road, Lincoln, Lincolnshire, LN1 1RX

Date Received: 18th March 2024

This development, if permitted will have a major impact on the archaeology of an area of national importance. There is no public advantage in permitting it which comes remotely near justifying it being permitted within the current national planning guidance nor the current city council planning policies. It is particularly astonishing that, according to the press, the council has not consulted Historic England. The council has a legal requirement to consult Historic England "where it (the council) considers" an proposal to have a significant impact on scheduled site of national importance. The council cannot reasonably, in the legal sense of the term, consider there to be no such importance and is therefore in breach of the law in not undertaking that consultation.

Name

Mr Tim McCall

Address

Almond Avenue, Lincoln, LN6 0HB

Date Received: 18th March 2024

This private development is what it says, PRIVATE. The only person who this will benefit is the developer himself. Of course he has no regard for the historical artefacts beneath the hotel. I really hope the planners can see through this and deny the works. We have to protect what is left for generations to come. The Bailgate area will be full of archeological remains that needs protecting until such time it can be rediscovered and protected, not destroyed for ever.

Name

Miss Jessica Latham

Address

2 Williams Terrace Leabourne Road, Carlisle, CA2 4FD

Date Received: 18th March 2024

I absolutely object to the destruction of significant archaeology for the sake of private matters. Any good that can come from this does not outweigh the loss of important archaeology, and could still happen without this destruction. Build pool above ground level.

Name

Mr Philip Brammer

Address

2 Highfield Close, Osbournby, Sleaford, NG34 0EW

Date Received: 18th March 2024

I wish to object to this application as it stands. I would prefer the pool to be built without recourse to excavating land untouched since at least the Roman period. As the old adage says, 'When it's gone, it's gone' and if consent is given as the application requests unknown amounts of history will be lost forever. Having lived in Lincolnshire my entire 70 years I have always been proud of the the focus and protection given to historical sites and sites within areas of potential historical interest, and I really cannot understand why this application is different.

Name

Mrs Chris Smith

Address

61 Hebden Moor Way, North Hykeham, Lincoln, LN6 9QW

Date Received: 18th March 2024

Lincoln has already lost so much of its architecture and history. The Sky line is spoiled with the boxes that house the university etc. To lose this important historical archaeological site would be another blot on Lincoln's page, and all for spa facilities.

Name

Richard Costall

Date Received: 18th March 2024

The White Hart Hotel has sadly been neglected over recent years and is in need of substantial investment/improvement to bring the hotel up to modern day standards and provide the facilities which clientele expect of a top quality hotel in this day and age.

This application adds to those facilities and can only help to attract more visitors to the City of Lincoln and hopefully result in more overnight stays which will also bolster the businesses in the Bailgate/Eastgate uphill quarter.

With the introduction of more frequent smaller uphill events throughout the calendar year (following the loss of the Christmas Market) this

should result in more visitors from both home and abroad. This proposal will go a long way to help conserve the buildings, provide much needed facilities which will further lift the area and therefore become more sustainable. These proposed works, from past experience, will almost certainly afford us an opportunity to look back into the past and enable us to plot and record archaeology for future generations.

For the above reasons I wish to support this Full Planning Application and the Application for LBC subject to the imposition of appropriate planning conditions.

Richard Costall

Name

Dr Emily Forster

Address

Flat 6, 589 Crookesmoor Road, Sheffield, S10 1BJ

Date Received: 18th March 2024

The only benefit of this proposed work will be to the private developer/owner, not the public. In addition, going by numerous reports and photographic evidence circulating in the community, the work clearly poses a serious threat to significant archaeological remains beneath the hotel. As others have suggested, keeping the pool above ground to avoid this unnecessary vandalism of the archaeological resource would be a much better alternative. As an archaeologist I strongly object to the proposal in its current form.

Name

Mrs Annabel Johnson

Address

The Old Vicarage, 84 Little Bargate Street, Lincoln, LN5 8JL

Date Received: 18th March 2024

The site is in the heart of an ancient city and the building work will destroy layers of Lincoln's unique history. Ideally, the swimming pool would be made of glass, so that local residents could observe the unique finds, in situ, for hundreds of years to come... as this is unrealistic, I object to the city's history being obliterated for a swimming pool. We have a history of tearing down and tearing up irreplaceable heritage. Please don't let the short-term profit margins of one business owner override the intangible benefits of two thousand years of history of this site.

Name

Mrs Catherine Sweeney

Address

4 Tinkle Street, Grimoldby, Louth, LN11 8SW

Date Received: 21st March 2024

I would expect a rigorous approach to exploring and preservation of all archaeological material. Layers finds etc in keeping with National Planning rules.

Name

Mr Dieter Krapp

Address

Keswick Lodge, 1 Orchard Walk, Lincoln, LN5 8PL

Date Received:

3rd April 2024

Dear Sir/Madam,

I can't see any new convincing justification despite the submitted new documentation that would justify an approval of the application. I also find the, almost personal, attacks contained in the new documentation very disturbing.

The fact remains, that this development would destroy part of Lincoln's Roman, Anglo-Saxon's and Viking history for the simple sake of a 'non-public' swimming pool.

I fully support the recommendation of the CBA made in their letter dated 5th of March 2024

Name

Ms Milica Rajic

Address

Exchequergate, Lincoln, LN21PZ

Date Received:

7th April 2024

I am writing to object to the above application, following the submission of the additional and revised supporting documents.

It is very unfortunate that the application has not yet been withdrawn, and that the council's precious public funds and time continue to be spent on something that should have not been submitted in the first place.

Applicant's acknowledgment, directly and by proxy, of a need for improvement of the documents submitted in the first round is welcomed. It does beg a question why it was poorly done in the first instance, and why it was apparently signed off by the city council's relevant bodies. It is encouraging to see the council's historic environment team listening to the public and external specialists in the heritage sector.

However, the revised documents are still far from being of a professional standard and are still of a very low quality.

Above all, it is frightening to see a published document (COVERING LETTER) in which a member of public is singled out and ad feminam attacked. This sets a dangerous precedent, discourages public involvement and an open debate, misleads any further conversation and reviews of the application, and serves one purpose - to get the planning application through, by hook or by crook.

This document should have never been published as it is personal attack which breaches Lincoln City Council's own guidance (see under 'Please do not': Provide personal information or make personal judgements regarding anybody else). The content of the document serves no meaningful, objective purpose to support the application, it sets a dangerous precedent and should be removed immediately.

Following my existing comment, here is my professional assessment of the other additional documentation:

SUPPORTING STATEMENT, REV A: This document is badly written and is not fit for purpose. It shows that it is compiled perhaps in hurry, and contains a plethora of illogical statement and false statements. For example, the argument that it is important to develop this part of the hotel because it is chosen to be developed is logical fallacy; the applicant is using the argument that something is true because it is not false.

The technical justification and the 'diagram' to illustrate height restrictions is missing the basics and the fundamentals in architectural drawings, and, as such, should not and cannot be used to explain the argument against the above ground pool. Indeed, it might not be possible to have an above ground pool, but the current illustration and the wording does not demonstrate that.

When it comes to the additional load which 'the above ground pool would have upon archaeological remains', it ignores one of the basic laws of physics. Perhaps the architectural company, who made this comment, should apply their own, publicly shared remarks and should stick to their own expertise and therefore not verge into physics or the archaeological matters (for which they are neither qualified nor experienced).

This document, Supporting statement, rev A, should be returned for significant improvement.

LETTER TO CITY ARCHAEOLOGIST in which Grayfox Swimming Pools Limited answer the question raised by City Archaeologist (question not disclosed) is not fit for purpose as it is another illogical statement. They say that something (pool leaking) will not happen because it will be monitored - why monitor something if it is not going to happen? In addition, this is solely Grayfox Swimming Pools Limited word, a promise based on no demonstrable technical specifications, drawings, statistics etc. etc.

This document should be returned for a significant improvement.

The STRUCTURAL CALCULATIONS document clearly demonstrates the impact of the swimming pool's structural box (needed for the housing of the pool structure itself) during its construction and as finished on the Grade II Listed Building but also to the adjacent highway. This impact is larger and more profound than the finished pool dimensions as presented in the Supporting Statement document. The 'hole in the ground' that will need to be made to accommodate the structural box, which in return will accommodate the pool, is much

larger and much deeper than the finished measurements of the swimming pool. This information must be taken into consideration when assessing the impact of the proposed development and the construction of the swimming pool to the archaeology. The 'Retaining wall Design' drawing is not fit for purpose and should be returned for a significant improvement.

STATEMENT OF PUBLIC BENEFITS document has seen an addition of two paragraphs to the original, and some minor changes, namely an update of the dates of the opening of the hotel (which, for the benefit of the accuracy, is only partially opened as the works are still ongoing with no publicly available finishing date), an up to date references in Introduction and Background, and an update in references to NPPF paragraph. Unfortunately, at the time of this comment, the documents referenced in Table 1 are not accessible on the portal. The drawings not referenced in the document but available on the portal show, for example, reinforcement and hardcore compacted materials being introduced into the 'in situ' archaeological environment which is something that needs to be taken into consideration when assessing the potential damage to the archaeology.

The new paragraphs are: 'Improved Public Access- Revealing the Designated and Heritage Asset' and 'Investment and Securing the Variable Use of a Designated Heritage Asset' .

The 'Improved Public Access- Revealing the Designated and Heritage Asset' paragraph argues that without a swimming pool the particular area of the hotel will continue to degrade and will remain 'lost'. It is unfortunate to see that a destruction of the underground heritage is seen as an only way to improve the above ground heritage. It is also unfortunate to see the lack of imagination for the potential of the use of this 'lost', 'back door to the hotel' space, and that the only solution seems to be a swimming pool! It is baffling to think that anyone would believe that a private swimming pool will 'enliven the street-scene and deliver improvements to this elevation', which this paragraph argues to be the case. Lincoln City Council should have much higher standards for the built environment within the conservation area.

An important point to bear in mind when reading this paragraph is that, so far, any and all alterations to the White Hart hotel, which originally was a late medieval inn, were largely to the above ground fabric with limited interventions to the below ground archaeology. With the exception of necessary services, the plot is largely left as it was in the mid 17th century when the building was constructed. The first disturbance in the history of this plot will be the one for the unnecessary swimming pool.

An example of heritage benefit precedent set from elsewhere is from Custom House, 20 Lower Thames Street, London EC3R 6EE, as per the footnote 19 of the Statement of Public Benefits document. This comparison is very misleading as in that case, it is in relation to the above ground refurbishment of historically heavily compromised building and also does not include any significant the below ground disturbance (application changed from class D2 to class E which specifically says is 'not involving motorised vehicles or firearms or use

as a swimming pool or skating rink'). Equally, the argument in which 'the public access to the Custom House has been limited' bears no parallel and resemblance to the public access to the White Hart Hotel. However, if we were to entertain the last argument, then the White Hart Hotel, as recently refurbished and without the demolition of the archaeology, is already ticking the box of 'significant heritage benefit'. No one is questioning or stopping access to the White Hart Hotel as a Grade II Listed building, on the contrary. However, the 'smoothing of the season peaks' by introduction of the swimming pool are a projection, a 'guesstimate' and will be beneficial to the applicant only and of not benefit to the public.

The 'Investment and Securing the Variable Use of a Designated Heritage Asset' paragraph misinterprets NPPF Para203(a) and PPG Paragraph: 015 Reference ID: 18a-015-20190723 and implies that these are applicable to the destruction of the heritage. They are not. This paragraph also suggests that the only way to re-purpose and improve the fabric of the listed building and the only way to re-purpose the hotel area which is currently 'underutilised' is to dig a swimming pool. This argument is self-serving and shows a lack of resource and imagination.

The paragraph then continues and links the excavation of the swimming pool to the Covid-19 pandemic and the war in Ukraine and proposes that the improvement of the trading conditions with the hospitality sector and the White Hart Hotel's own trading strength is a key to the improvement to the individual household overheads in Lincoln. This is again lazy, incorrect and self-serving.

REVISED DESK BASED ASSESSMENT V2.2: The cosmetic improvements (such as proper indexation, improvements in figures and plates captions, additional figures, correction of spelling mistakes, etc) are welcomed and the City Archaeologist's request for a revision is commendable.

Unfortunately, the report is still falling far from adequate and complete. Its format and its language need to be properly quality assessed and assured, the definitions need to be tightened, the contradicting paragraphs need to be reviewed and edited, the references (yet again) need to be not cherry picked but properly updated and presented in toto, to name but a few problems with the 'formalities'.

That aside, the main issues with the report are:

1. A change of tune when it comes to the national significance of the archaeological remains below ground.

Which material evidence happened between the first version of the document and this one to suggest the change? Which specialists' bodies were consulted to be able to justifiably say that medieval wall foundations discovered at the White Hart hotel 'are not demonstrably of equivalent significance to scheduled medieval remains in the city'? As the report admits that the intrusive evaluation (hand excavated trenches) was a confined space with its limitation (negating access), how was then possible to properly access the discovered walls and therefore properly assess them (and therefore determine they are of

now national significance)? What is the sample % of evaluation trenching applied to the proposed development area and what is therefore sample % of the walls discovered?

2. A statement that there would be 'no meaningful impact on archaeology of national significance'.

How is 'meaningful' defined? How did the author come to this conclusion? Who from the national specialist bodies in the subject was consulted? What is a demonstrable comparison to justify the conclusion? Why is an archaeological company offering a subjective statement as a factuality?

3. And last but not the least, the 'deposit model'.

This is extraordinary incompetent part of the report. If what is presented in Figures 15 and 16 was supposed to be a geoarchaeological deposit model, then there is a massive, worrying problem (not only when it comes to this planning application). The presented is not a geoarchaeological deposit model. The sample chosen for the model is too small, it does not include blatantly obvious 'spots' in the city (all readily available and in the vicinity of the proposed development area), the interpretation of the chosen spots is incorrect (there is a misuse and a fundamental lack of knowledge on AOD and BGL levels, what they mean and how they 'work'). Let us for a moment imagine that the only figure in the report is Figure 15 and that there is no skewed interpretation. This figure shows that Roman deposits (which are now deemed to be the only nationally important layers) will in fact be impacted.

In conclusion, by resubmitting the documents the applicant acknowledges that it got it wrong, the applicant's team admit they got it wrong. By incorporating the comments that came from the public and from the professional archaeologists, the applicant team acknowledges a very poor first-time approach to the complexity and the seriousness of the context of the application.

As the irreversible destruction of the nationally significant archaeological remains will happen if this application goes ahead, as the documents and the application continue not to be fit for purpose and as the applicant's attitude such as 'we know what we are doing, everything is going to be fine' are demonstrably incorrect and cannot be taken as a valid argument, it is now high time for the council to advise for this application to be rejected.

6 April 2024

City of Lincoln Council
City Hall
Beaumont Fee
Lincoln
LN1 1DD

FAO Planning Committee; Marie Smyth; Alastair Macintosh

I have recently become aware that there is a letter (Cover Letter, Supplementary Information) published on the planning portal which specifically names and discusses me, Dr Samantha Stein, in relation to planning application 2024/087/FUL and 2024/088/LBC. This is in response to my recent comments expressing concern about the reckless and destructive nature of this planning application with regards to the nationally significant archaeology in the City of Lincoln.

I find it shocking, disturbing, and dangerous that the council have chosen to publish a personal attack including personal details of a public consultee on the planning portal. In this instance, it is arguable that this application is no longer objective, and should be rejected on this premise alone.

The letter written by John Roberts Architects includes personal details, incorrect information about my experience, and accusations that I have written misleading comments about the application. The very opposite is true, and the architect's letter is deliberately misleading to suggest that I have demonstrably less relevant experience. While my expertise is in geoarchaeology, my PhD is on the post-Roman period in Lincolnshire (2014), I have a minor in medieval studies, and my previous experience includes a position at Historic England as acting science advisor in the south west and Yorkshire regions. This position included comprehensive training on the application of the latest science in archaeology within the planning process, with particular reference to [preservation of archaeological remains](#). As part of the planning process, and working with other local authorities, I have previously applied this expertise to similar cases as this one in cities such as Gloucester, York, Exeter, Sheffield, and many more in towns and villages across the country. With regards to my knowledge of Historic England official guidance, as well as my extensive experience in the planning process, the only conclusion I can draw is that current application does not meet standards required to warrant the destruction of archaeological remains in a city with important and well-preserved archaeology, such as Lincoln.

In addition, while I have primarily put my own name to criticisms of this application, I have been in consultation with many other professionals in the fields of archaeology and planning. The combined experience of those consulted is over 200 professional years. I find it appalling and dangerous that the applicant singles me out in their cover letter, when other respected and professional archaeologists have also commented on the application. Indeed, the planning lead at the well-respected organisation the Council for British Archaeology has written a letter that has come to the same conclusions completely independently, and this letter was shared widely across their social media accounts.

What is more, I have not once addressed the applicant *ad hominem*, nor have I publicly called for people to object to this application. In any statements I have made, I have pointed out how the application does not meet the thresholds of NPPF or other local planning policies, and pointed interested parties in the direction of the application to make comments *if* they chose to do so. What followed is an overwhelming 58 public objections across the full and LBC applications, demonstrating

that the people of Lincoln love their heritage and do not want to see it destroyed by unjustifiable development for development's sake.

Interestingly, John Robert's Architects follows their attack on myself with a caveat that I've provided the opportunity to add more information; this could be read as an admission that their application was not done to the required standards in the first place. One could now ask, why has the developer been withholding information from the planning committee?

Following the addition of supporting documents, however, my assessment and comments made prior to the end of the first period of public consultation still stand. This stance is detailed in my previous objection dated 16 March 2024. The application does not meet the standards required to warrant destruction of important archaeological remains. The construction of a private swimming pool will destroy nationally significant archaeology in an archaeological sensitive area of the city, and will provide no public benefit to the people of Lincoln. Benefits are only made to the private developer; arguably, the White Hart has been a thriving business for hundreds of years, so the addition of a private swimming pool is only a vanity addition which robs the city of its precious archaeological resources.

One major change has been made to the re-submitted application documentation: the sudden denigration of the archaeology from being nationally significant to being of local significance. In the first version of the documents, the applicant claimed that the all the archaeology to be impacted was of national significance. Now the applicant claims that only the Roman archaeology is of national significance, and based on a (completely flawed) geoarchaeological deposit model, that the development of the below ground swimming pool and associated ground works will not touch this archaeology.

That our early medieval and medieval archaeology (dating between 410-1540 AD) is only of local significance is a shocking statement to make. Visitors flock to Lincoln to experience one of the most well-preserved medieval cities in the country, including a large Norman stronghold castle with a rare two motte design, a cathedral with connections to William the Conqueror, two rare Norman houses, all within metres of the White Hart Hotel. For anyone to state that it is only of 'local' significance is misguided and serves only one purpose—to attempt to force the application for the private swimming pool through the planning process.

Considering the significance level of the medieval archaeology on this site is being argued, I strongly suggest that the council request that an impartial review take place, as per Historic England guidance on [assessing significance](#) (para 11). In this guidance, HE states that:

Where the significance is not obvious, appropriate expertise would need to be used, as the NPPF points out (paragraph 189). Analysis would generally be undertaken by a suitably qualified specialist, expert in an appropriate branch of conservation, architectural history, garden history and/or archaeology, or, in more complex circumstances, group of specialists, who can describe significance in a way which is acceptable to the local planning authority and which therefore assists a successful application.

The council should request statements of significance from external experts prior to making any conclusions based only on the applicant's biased statements. With a PhD covering Roman-medieval periods in Lincolnshire, I would conclude that this archaeology is of national significance, however it would be beneficial to consult a group such as the Society for Medieval Archaeology to provide a list of suitable experts to make an independent assessment.

Although my expertise branches beyond the field of geoarchaeology, the applicant has named me as a professional in this field, which is true; I do specialise in geoarchaeological deposit modelling. As part of the updated documents submitted, the applicant has included a crude deposit model (Revised Desk Based Assessment V2, section 8). As a named professional in this field, I can confirm that this model is insufficient and misleading when discussing whether the construction of the swimming pool and associated works will reach Roman deposits, which the applicant does deem as nationally significant.

In my professional opinion, 5 points across the wider uphill Lincoln area, within complex urban deposits, do not constitute a viable or applicable deposit model. An urban deposit model requires hundreds of data points; York's working deposit model incorporates 2,796 points, and is still questioned regularly. Figure 16 in the revised Desk Based Assessment is intentionally misleading, providing a 'zeroed' ground level for all stratigraphy. This is a professionally unacceptable projection of points of a deposit model, and must be discounted. Geoarchaeologically, levels below the surface horizon are irrelevant, especially in an urban environment where different localised activities can influence the ground level dramatically. Figure 15 shows quite clearly that at some parts of the city (point A at St Paul's in the Bail), the Roman archaeology is indeed found at the levels above Ordnance Datum where the destruction for the private pool will take place. So even if this were a viable model, their statements that they will not reach nationally significant layers is still not proven as part of their own model. Even more oddly, multiple local sites with visible Roman remains such as Eastgate northern tower, the mosaic at Lincoln Cathedral, and Newport Arch, all with measureable *in situ* Roman archaeology, have not been included. There is no apparent scientific sampling strategy for the points chosen for their deposit model, nor for the creation of said model.

The applicant is now stating that they will not destroy nationally significant archaeology, due to the fact that the application does not meet the NPPF requirements of public benefit. What they have not included is what happens when the model does fail, and they do encounter Roman archaeology—will they stop excavation and abandon the development? What about the loss of the nationally significant medieval and early medieval archaeology above that, will that destruction be for nothing? What is clear is that the applicant does not know whether or not they will reach Roman deposits, and their statement that 'Impacts on Nationally important Roman archaeology would therefore be nil' (full revised DBA V2) is *demonstrably untrue*.

Due to the *ad hominem* nature of the recently included cover letter (which should never have been published by the City of Lincoln Council), and the biased revisions written to fit the applicant's agenda only, it is evident that this application is no longer objective. On this basis, it should be withdrawn or rejected immediately.

In addition, I strongly urge the planning committee to consider what is important to the people of Lincoln. A total of 58 objections on a planning case is above the average number—Lincolnites and professional archaeologists are crying out to save their archaeology, and asking you point blank to protect their heritage. Our heritage and archaeology belongs to all of us. If you'd like to put a monetary value on it, [a recent study](#) has shown that the heritage sector is worth £45.1 billion to the UK economy, contributing over half a million jobs to the country. With all the history we have to offer here, surely this is the type of thing that Lincoln *should* be investing in, instead of unnecessary and inappropriate developments blind to the public's wishes.

Kind regards,

Dr Samantha Stein

Name

Dr Carolyn La Rocco

Address

Baxter Park Terrace, Dundee, Dd4 6nl

Date Received: 9th April 2024
Significant national risk to heritage via potential for damage to early medieval and Roman deposit layers.

Name
Mr Stuart Welch

Address
16 Drury Lane, Lincoln, Lincolnshire, LN1 3BN

Date Received: 16th April 2024
Dear Madam,

I have received your two letters each dated 27 March advising that following revisions to these two applications a reconsultation period is required and that representations are to be received by 19th April.

I wish to repeat the support which I delivered to you on both original applications.

Please advise and confirm - can my original statements in support of both applications be 'transferred' over to the revised applications or do you require me to repeat them?

With thanks and regards,
Stuart Welch

Name
Mr Martin Smith

Address
84 Moor Lane, North Hykeham, Lincoln, LN69AB

Date Received: 16th April 2024
The submission of revised documents containing extra detail and a personal attack on an objector to the original submission do not really change the intent of the proposal, so my original feeling is that this proposal should be rejected still stands.
The fact that the proposer could not be bothered to find the time to attach these extra details first time, but only after a number of objections were submitted, were more details were included which says quite a lot.
Whilst personal attacks on an objector may be okay in fictional blockbusters, including them in Lincoln council planning application documents actually demeans the planning application, and suggests the proposer team don't believe the original plans have enough merit on their own.

Name
Mr Dieter Krapp

Address
Keswick Lodge, 1 Orchard Walk, Lincoln, LN5 8PL

Date Received: 24th April 2024

Further to my earlier comments, can I please add the following after the recent additional documents were added>

The submission of revised documents containing extra detail and a personal attack on an objector to the original submission do not really change the intent of the proposal, so my original feeling is that this proposal should be rejected still stands.

The fact that the proposer could not be bothered to find the time to attach these extra details first time, but only after a number of objections were submitted, were more details were included which says quite a lot.

Whilst personal attacks on an objector may be okay in fictional blockbusters, including them in Lincoln council planning application documents actually demeans the planning application, and suggests the proposer team don't believe the original plans have enough merit on their own.

Given the fact, that nothing new was added to the application to justify an approval, I will uphold my objection to this application.

Customer Details

Name: Mr Steve Hilton

Address: 44 Cole Avenue Waddington LN5 9TF

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Whilst progression in society is important, so is it's history. Lincoln & its councils/planning committees have made far too many ill-conceived decisions regarding our ancient buildings & heritage over the last one hundred & fifty years. The value to the community of a sunken swimming pool, is negligible in a area of such historical interest to both the City of Lincoln & the Nation as a whole.

As a resident born & bred of Lincoln, I object in the strongest of terms to this unnecessary & unwarranted commercial venture.

Yours, Steven L Hilton

Additional public consultation responses submitted in respect of application reference 2023/0087/LBC relevant to the consideration of this application

Name

Mrs Rosemarie Dacosta

Address

253 Burton Road, Lincoln, Lincolnshire, LN1 3UH

Date Received: 21st February 2024

Excavation for a pool in this area, rich with Roman remains, makes me

wonder what would happen to them. There is no need to have a private pool in this area, which will never benefit the local population. I strongly object and feel the destruction of possible archeological finds must be prevented.

Name

Mrs Tracy Harris

Address

Bramble Cottage, 46 Sleaford Road, Lincoln, LN4 1LL

Date Received:

21st February 2024

I cannot understand why a construction of this type would be allowed in such an archaeologically important area as the Bailgate, there is no real public benefit to it unless you are paying for the privilege and it will may disturb untold history unnecessarily. I strongly object.

Name

Ms Justine Whittern

Address

Oude Heijningsedijk 1, Heijningen, The Netherlands 4794 RA, NG31 8RW

Date Received:

21st February 2024

The Bailgate is one of the most archaeologically significant locations in the county. The White Hart Hotel's request for a permit to excavate and remove centuries and layers of history from the area - and from the county's heritage assets hidden and unhidden - merely to add to 'guest amenities' for an unproven trading advantage in my mind fails to meet the standard required. It cannot be justified by any means.

I would suggest that any hotel guest choosing to stay at the hotel is less interested in using a swimming pool and sauna and more interested in exploring the unique and unrivalled medieval location of the hotel. There are other hotels nearby where modern amenities are available and probably done better than the White Hart can manage to squeeze into its basement.

I am not against all developments and improvements. I would have no objection to the White Hart improving disabled access to more of its bedrooms and public rooms - an aspect which it is currently lacking, as it admits on its own website. <https://whitehart-lincoln.co.uk/access-statement>

Lincoln - and Lincolnshire - can insist on better developments and improvements than to allow this unnecessary and invasive one. allowing this would set a dangerous precedent and put other ancient heritage sites at risk of destructive developments in the name of business and profits. I think that would be a bad thing.

I speak as someone who has stayed at that hotel in the past, and as a native of Lincolnshire.

I therefore strongly object to this application.

Name

Mr John Abbett

Address

67 Newbold Back Lane, Chesterfield, S40 4HH

Date Received: 21st February 2024

With regard to the a planning application that has been submitted to install a private spa and leisure centre, including a below ground pool by the White Hart Hotel in Lincoln, Lincolnshire (application 2024/0088/LBC; 2024/0087/FUL).

This historic hotel is at the centre of the medieval city of Lincoln and the centre of Lindum Colonia, a significant early Roman settlement. The creation of the pool would disturb a high volume of archaeological remains which are of national, possibly international, significance. This is unwarranted destruction of our public heritage for little to no public benefit.

The site of the hotel is near the cross roads of the original Roman colony. Previous excavations in the area were packed full of remains of various periods and included medieval shop fronts, early and late medieval cemeteries, Roman drains, villas, hypocausts, and more. The site is surrounded on all sides by Schedule Monuments and listed buildings. Looking at the map of monuments, it is clear that these were scheduled in the early part of the 20th century, when standing buildings were not included in scheduling programmes. However, if this were to be revisited today, it is likely that the entirety of the Lindum Colonia would be a Scheduled Monument, protected as a nationally significant archaeological site.

Lincoln is absolutely amazing because of its archaeology, its history, and its heritage. It is one of the jewels in the historic crown that is tourist-haven Britain. And what's more: Lincoln's heritage belongs to us, the people.

Name

Miss Jo Teeuwisse

Address

Bourtange, Bourtange, 9545tv

Date Received: 21st February 2024

History belongs to us all, it's important, they're our roots, a connection to our ancestors.

You can't just go around destroying it because someone wants a pool in their garden.

Gone once, gone for ever.

The heritage of All cannot be destroyed for the benefit of Few

Name

Mr Paul Rowland

Address

2 South Farm Avenue, Sheffield, S26 7WY

Date Received: 22nd February 2024

Although I am not a resident of Lincoln, I visit your historic city on a regular basis to soak up the incredible history and archaeology. My

family have enjoyed visiting your wonderful Christmas Market over the years and I have several friends who live in Lincoln. When this planning application was brought to my attention I was horrified.

The area around the Cathedral should be a World Heritage Site, but sadly it isn't. However, one day I hope that will change and until then, the preservation of the buildings especially around the cathedral quarter and all below ground archaeology MUST be preserved at all costs for future generations.

Lincoln has a unique and enviable history but your archaeology belongs not only to Lincolnshire, it belongs to the world, and it is because of that that I feel I have the right to comment on this application.

It is Lincoln's history and archaeology that draws tourists to your city from all around the world. No proposed spa and swimming pool will do that. I am sure that there are other hotels in less sensitive areas of the city that can cater for people who want to soak themselves in water, rather than immerse themselves in Lincoln's rich history and countryside.

The 'Destination Lincolnshire' website provides the following tourism figures (below) for the city in 2022.

Following 2021's reports from Global Tourism Solutions (GTS), for the City of Lincoln Council, which saw a 53% economic boost to the visitor economy, the latest figures that have been released for 2022 show a 37.8% increase in economic impact totalling £219.8 million.

The new economic report paints a hugely positive picture as industry recovery continues at pace, with the data showing that in 2022, an additional 21.7% of visitors came to the city, totalling 3.588 million.

Your historic city and archaeology is mainly responsible for the above figures, don't allow a part of it to be destroyed forever.

I think Lincoln is the envy of the rest of the UK and it will survive without another spa and swimming pool, however I don't think it could survive without its rich history and archaeology.

I strongly object to this development.

Name

Mrs Tracey Smith

Address

84 Moor Lane, , North Hykeham,, Lincoln, LN6 9AB

Date Received:

23rd February 2024

How can this development be of any benefit to the local community? The developer seems to lack any sensitivity to public feeling and a total disregard for Lincoln's heritage. Lincoln should be drawing in tourists because of its heritage. The council should not be supporting it's destruction.

Name

Mr Paul Griffiths

Address

36 Belle Vue Road, Lincoln, Lincolnshire, LN1 1HH

Date Received:

26th February 2024

I object to the dipping pool because it is of no benefit to residents of Lincoln.

Name

Mrs Alison Griffiths

Address

36 Belle Vue Road, Lincoln, Lincolnshire, LN1 1HH

Date Received:

5th March 2024

I formally objected to this application but my comment is not appearing and am concerned it has not been properly received. The dipping pool is totally out of place in a hotel such as the White Hart. I'm very worried that nationally important historical finds will be lost and destroyed.

[Original comment submitted against 2024/0087/FUL application]

Customer Details

Name: Mrs Louise Austin

Address: 62 Backmoor Crescent Sheffield S8 8LA

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The national heritage should be preserved. If this project goes ahead it will likely set a precedent for other planning applications. There seems no real justification for agreeing the plan and doing so comes across as if you know the right people you can get it passed! Surely the compromise would be to leave the ruins as a feature with a glass bottom pool, but guess this would be more expensive for the developer! Lincoln please work with the policies not against them, doing so leaves the floodgates open to more abuse of the policies. Once the heritage has gone, it's gone, there's no way back and future generations will lose out! Please Lincoln do the right thing and put a stop to this plan.

Name: Mr Tim McCall

Address: Almond Avenue Lincoln LN6 0HB

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This private development is what it says, PRIVATE. The only person who this will benefit is the developer himself. Of course he has no regard for the historical artefacts beneath the hotel. I really hope the planners can see through this and deny the works. It is not long ago since we had the odd situation where the City Council were developers and approval authority for the Western Growth Corridor. On this development were several Roman Kilns and a roman building they voted to destroy in the name of progress, including so called protected trees. I really hope the city planners don't repeat their, in my opinion, mistake in destroying our heritage. We have to protect what is left for generations to come. The Bailgate area will be full of archeological remains that needs protecting until such time it can be rediscovered and protected, not destroyed.

Name

Mr Andrew Ottewell

Address

Sycamore lodge Holmes lane Dunholme near Lincoln, Lincoln, LN2 3QT

Date Received:

6th March 2024

Myself and my family are fully supportive of the pool , spa , gym , it will be a great asset to all ages of the local community as well as visiting guests staying at the White hart for a Weekend/ mid week break.

As far as the significance Roman settlement in our medieval beautiful city any possible ! archaeology artefacts that are found when Excavation carefully starts finding them and bringing them to the surface where special items can be put on display in the Hotel has got to be better than not seeing them at all, best change for our generation to see how people lived hundreds of years ago .

I gather local people will also be able to book the pool and spa area even young children learning to swim which has to be good news .

The visitors staying in the hotel for weekend breaks touring the city how nice after a long day walking around the city you or your family can come back and have a relaxing swim or spa before evening meal , couldn't be better and good for everyone's Health & Well-being, as well as during the cold and rainy winter months guests can stay in the warmth until the weather improves.

It's a win win for everyone and will be a great Asset for our Tourism city.

Name

Brian Porter

Address

4 Chalgrove Way, Lincoln, Lincolnshire, LN6 0QH

Date Received: 12th March 2024

Heritage needs to be properly excavated and evaluated prior to the destruction and construction phases. Information plaques and a display cabinet of example finds could then be created in the hotel to enhance the visitor experience.

The archaeology reports clearly point out (see 1 and 2 below) that excavation has not been done below a Mediaeval surface, and that other remains of national importance probably lay below the 1.2m limit of excavation.

Tourism is a major financial and employment factor for Lincoln City and the wider county; heritage sites feature prominently as reasons for visiting.

Too often we have seen heritage destruction without proper recording. Completing the archaeology to Roman or the 'natural' surface, prior to destruction, is therefore important or this very rare opportunity will be lost forever.

Statements from reports in support of my comments:

1) PROSPECT ARCHAEOLOGY Report 8.1.1 states "The excavation of the swimming pool would result in the wholesale removal of these deposits and would therefore be Major Adverse and Permanent."

8.1.2 includes "...the loss of a small area of nationally important remains cannot be denied"

9.1.2 concludes that "This is a rare opportunity to investigate the archaeology of the Roman and medieval periods in the upper city and would inform future decision making on planning applications in the upper city."

2) ALLEN ARCHAEOLOGY report:

8.2 extract: "Notably, throughout the sequence a substantial assemblage of residual Roman pottery and ceramic building material was recovered, indicating potential for encountering further archaeology of this date below the current limit of excavation."

Name

Mr Andrew Blow

Address

9 The Green, Nettleham, Lincoln, LN2 2NR

Date Received: 26th March 2024

This is an archaeological "hot potato" of a kind not seen in the City for a while. My two-penneth as a layman: if it wasn't for the entrepreneurial spirit and business nous, we would never have found out what was under the "back of house" area of the White Hart. It would presumably remain as a storage area (apparently not much needed now in the revised hotel) and its underground would, apart from these test trenches, have to be guessed at. I can't see why the remains cannot be properly explored, evaluated and recorded with the more exciting items placed on public view...and then business must do its thing, as has been allowed at many other locations. If the hotel can then offer three night stays with more confidence (given the availability of a leisure pool) then people will come from further afield. If staying

longer, they'll browse more and spend more in our City and that has to be good in these difficult times.

Name

Mr Andrew Blow

Address

9 The Green, Nettleham, Lincoln, LN2 2NR

Date Received:

30th March 2024

Afterthought. When attending the Lincoln Mystery Plays at the beginning of Holy Week last Sunday at St. Mary Magdalene Church, next door to the White Hart, the audience was told at the outset that there were no toilets in this small ancient church. However, we were told, the neighbouring White Hart Hotel had given permission for any audience member to use its toilets if required. A small anecdote, but does it sound like the sort of business thats going to be un-neighbourly and disrespectful of the city's archaeology?

Customer Details

Name: Mrs Louise Austin

Address: 62 Backmoor Crescent Sheffield S8 8LA

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Lincoln is such a wonderful city, one which many people visit to take in the history. The proposal is outrageous, agreeing to the application would, in my opinion, simply benefit the owners and not the general public. If this proposal goes ahead then the floodgates are open for other plans outside Council Guidelines to be approved. Please don't pick and choose which applications are approved based on personal gain for the owners. Lincoln needs to do what Lincoln does best, and preserve the heritage for our, and future generations.



Historic England

Ms Marie Smyth
City of Lincoln Council
City Hall
Beaumont Fee
Lincoln
Lincolnshire
LN1 1DF

Direct Dial: 0121 625 6888

Our ref: **W:** P01574828

16 April 2024

Dear Ms Smyth

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**WHITE HART HOTEL , BAILGATE, LINCOLN, LINCOLNSHIRE, LN1 3AR
Application No. 2024/0087/FUL**

Thank you for your letter of 27 March 2024 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Yours sincerely

Tim Allen

Tim Allen
Team Leader (Development Advice)
E-mail: tim.allen@HistoricEngland.org.uk



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.



Historic England

Ms Marie Smyth
City of Lincoln Council
City Hall
Beaumont Fee
Lincoln
Lincolnshire
LN1 1DF

Direct Dial: 0121 625 6888

Our ref: **W:** P01574828

29 April 2024

Dear Ms Smyth

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**WHITE HART HOTEL , BAILGATE, LINCOLN, LINCOLNSHIRE, LN1 3AR
Application No. 2024/0087/FUL**

Thank you for your letter of 24 April 2024 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

Tim Allen

Tim Allen

Team Leader (Development Advice)
E-mail: tim.allen@HistoricEngland.org.uk



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A National Amenity Society

Ms Marie Smyth
Planning Case Officer
City of Lincoln Council
By email: marie.smyth@lincoln.gov.uk

5th March 2024

White Hart Hotel, Bailgate, Lincoln, Lincolnshire, LN1 3AR. Application No. 2024/0087/FUL

Dear Ms Smyth,

Thank you for notifying the Council for British Archaeology (CBA) about the above application. Based on the information supplied with this application, we offer the following observations and advice to assist your authority in determining the application.

Significance

The White Hart Hotel is a Grade II Listed building (NHLE No. 1388461) that is dated from 1722 and has developed in the same use over the intervening period. An inn on this site is first documented in 1521. It is located in the historic core of Lincoln within the Cathedral and City Centre Conservation Area and surrounded by listed buildings.

The site is extremely archaeologically sensitive, sited between pockets of the scheduled Roman Colonia (NHLE No. 1003569) and adjacent to Lincoln Castle. Whilst not within the scheduled area the archaeological evaluation carried out by Allen Archaeology (Nov. 2023) establishes it is of equivalent significance to a scheduled monument. Trial trenching has demonstrated that significant archaeological features and deposits survive across the proposed development area to a considerable depth. Significant archaeological deposits from Roman, Medieval and Post-medieval periods have been uncovered, with Viking layers hypothesised as underneath current excavation depths. Footnote 72 of the NPPF should therefore inform the decision-making process. It states “Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.”

Comments

The Archaeological Evaluation report establishes the application site contains deposits of equivalent significance to the adjacent scheduled monument. The proposed swimming pool will

Council for British Archaeology
De Grey House
St Leonard's Place
York, YO1 7HE

 archaeologyuk.org
 info@archaeologyuk.org

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have direct impacts on these archaeological deposits into Viking layers of stratigraphy, resulting in substantial harm (total loss) of the heritage asset. Paragraph 206 of the NPPF states that

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

...

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

On these grounds the CBA object to this application in the strongest possible terms.

The applicants have submitted a Statement of Public Benefits. The CBA do not believe this establishes demonstrable or proportionate public benefits from the creation of a private swimming pool to outweigh the destruction of nationally significant archaeology. The NPPF is clear:

Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. [paragraph 195]

Local policy echoes this in CLLP paragraph 10.0.3:

Central Lincolnshire's heritage assets and their settings, including the significant historic building stock and archaeological resource, are irreplaceable and require careful management as the area evolves and undergoes significant growth and regeneration.

The accompanying Statement of Public Benefits notes a potential increase in visitors' length of stay to a hotel, along with more housekeeping and service staff work. It also promotes an opportunity for non-residential day guests to use the hotel spa. These are private benefits to the hotel business, coupled with minimally skilled employment opportunities for the city and luxury paid-for experiences by a small group of people. The scale of public benefit is between nil and negligible. The circumstances do not meet the bar set by the NPPF of "wholly exceptional". The CBA agree that development-led archaeology has the potential to deliver public benefit through public participation with excavations, outreach learning and dissemination amongst local communities. However, the proposed "local media involvement, school visits/talks, open days (dependent on site conditions), exhibitions or evening talks" is nowhere near proportionate mitigation to the total excavation of an area of nationally significant archaeology containing



Medieval, Roman and (probable) Viking layers, with no potential for preservation in situ (established best practise), in order to create a private swimming pool.

Furthermore, we note that the completed and successful refurbishment of the hotel establishes that the viability of the scheme is not dependant on the creation of a swimming pool.

If the applicants believe a swimming pool is essential for their hotel spa then this should be constructed above ground in order to retain the highly significant archaeology in situ.

Recommendations

The CBA **strongly object** to this application as contrary to chapter 16 of the NPPF, specifically paragraph 206 and footnote 72. We advise it is also contrary to Central Lincoln's Local Plan, specifically paragraph 10.0.3. We advise that this application is either withdrawn by the applicants or refused by your LPA.

An alternative strategy to achieve a swimming pool at the White Hart is constructing one above ground level. The CBA advise this is the only justifiable option in such an archaeologically significant location.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Kind Regards,

Catherine Bell. MA (cons), ACIfA
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications – notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021**.



A National Amenity Society

Ms Marie Smyth
Principal Planning Officer
City of Lincoln Council
By email: marie.smyth@lincoln.gov.uk

c.c. Alastair MacIntosh, City Archaeologist
alastair.macintosh@lincoln.gov.uk

14th May 2024

White Hart Hotel, Bailgate, Lincoln, Lincolnshire, LN1 3AR. Application No. 2024/0088/LBC & 2024/0087/FUL

Dear Ms Smyth,

Thank you for re-consulting the Council for British Archaeology (CBA) about the above application following additional information being submitted by the applicants. Based on this information, we offer the following observations and advice to assist your authority in determining the application.

Significance

The CBA note that the revised Desk Based Assessment has redefined the post Roman archaeological deposits in the upper city, adjacent to the scheduled areas, as locally rather than nationally significant. This is based on the schedule description as referring to Roman deposits and not referencing later periods. The CBA retain the belief that the complexity of archaeological deposits in Lincoln contributes to its significance and such a blanket approach is problematic not least when known post Roman deposits such as those associated with the Castle and Cathedral are clearly of national importance.

If it is accepted that only the Roman levels are of equivalent significance to the scheduled areas in the upper city, then the CBA advise that the immediate post Roman horizon should certainly be considered as nationally significant and it should be expected that these deposits may vary in depth due to local circumstances. Any deposits from the Romano British transition would be highly pertinent to national research agendas about this period and key to understanding how this transition period played out in Lincoln.



Comments

The CBA are grateful to the applicants and their team for the additional archaeological information submitted. This includes a deposit model from other excavations in the upper city. This informs the archaeological contractors' expectations of what stratigraphy will be reached during the proposed excavation, however, this model is derived from a minimum number of interventions making it open to interpretation. We also note that the evaluation trenches at the White Hart are over a meter above the proposed pool depth and the sump would be even deeper. Since trenching has not tested down to the critical level of evaluation there remains a high degree of assumption that the post Roman horizon will not be reached.

A real challenge with this site is that the deposit model indicates the proposed excavation would be on the cusp of deposits considered to be of national significance and the degree of uncertainty about the depth of the transition deposits remains high. Given the depth of the pool is to be deeper than the evaluations undertaken to date, you will need to be satisfied that any mitigation excavation is possible in this confined space and to the depth of the proposed pool/sump. If your archaeological advisor is satisfied that the appropriate archaeological mitigation is deliverable, then there is the potential for an excavation in this location to contribute to our understanding of the Roman/post Roman interface in Lincoln. As a result, this application could create an important opportunity to enhance our knowledge of this key period and specifically add to our understanding of the depth of this critical horizon in the history of Lincoln. Whilst we note the applicants' point that unexcavated deposits under the proposed pool would be 'retained in situ', the fact they would be beneath a swimming pool means that it is highly unlikely that they will be accessible for excavation again. In accordance with Historic England's guidance on the reburial of archaeological sites it is essential that the significance of any deposits to be left in situ is set out and understood.

The CBA is still unconvinced by the level of public benefit from this scheme but understand the local plan policy for boutique hotels in the upper city. If your LPA are satisfied that this application sufficiently meets national and local policy requirements to be approved, then we advise it should be accompanied by a robust archaeological strategy that recognises the high likelihood of impacting the post Roman interface in the upper city of Lincoln. Establishing the level of the Roman/post Roman interface at this location would make substantial addition to our knowledge of the deposit sequence in Lincoln and make an important contribution to informing future development in the city, therefore arguably of public benefit.

Recommendations

The CBA remains unconvinced by the public benefits of this scheme and the potential on the buried archaeology. The proposed depth of the swimming pool is greater than the depth of the archaeological evaluations therefore it has not been possible to demonstrate that the



development will avoid Roman deposits. Establishing the level of Roman deposits and the post Roman interface in the Upper City would be of considerable public benefit to our understanding of Lincoln's development and future development management decision making. We believe this development should only be considered if a robust archaeological mitigation strategy is possible and includes clear objectives around establishing the depth of the Roman/post Roman deposits more accurately.

Finally, and out with our advice regarding the application, the CBA was extremely disappointed to see the unjustified personal attack on the professional competencies of an archaeologist who has objected to this application as a member of the public. We view the cover letter from the architects on your LPA's planning portal as entirely unnecessary and unprofessional.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Kind Regards,

Catherine Bell. MA (cons), ACIfA
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications – notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021.**



CITY OF
Lincoln
COUNCIL

Marie Smyth
Planning Team
City Hall,
Beaumont Fee,
Lincoln.
LN1 1DD

**Directorate of Communities &
Environment**

Simon Walters MBA, ACIS, MCMI

City Hall, Beaumont Fee,
Lincoln. LN1 1DD

Telephone: (01522) 881188

Facsimile: (01522) 567934

Website: www.lincoln.gov.uk

Minicom: (01522) 873693 - Reception

Alastair MacIntosh

is dealing with this matter

E-mail:

alastair.macintosh@lincoln.gov.uk

Direct Line: 01522 873478

2024/0087/FUL and 2024/0088/LBC

Date: 11/06/24

Dear Marie,

White Hart Hotel Bailgate Lincoln Lincolnshire LN1 3AR

Internal alterations to create a new leisure pool and spa including the excavation and construction of the pool and construction of internal partitions to form a sauna, changing facilities and gym together with associated drainage and services.

My observations and advice with regard to the applications above are as follows.

Proposal

The installation of the pool will require the total excavation of an area of 13m by 5m to a depth of 2.025m. One corner of this volume will need to be excavated to a depth of 2.525m to accommodate a sump with an area of around 1.5m by 1.5m. All archaeological material in this volume would need to be removed.

The proximity of the pool to the external wall fronting on to Eastgate means that underpinning will be needed to ensure the structural stability of the building. This will require a trench to be excavated along the inner face of the wall to a depth of 2.275m below the existing ground level.

Pre-Application Advice

The applicant requested pre-application advice, as recommended by the National Planning Policy Framework (NPPF) and by Historic England in their advice note Managing Significance in Decision-Taking in the Historic Environment (GPA 2). I advised that a proposal of this kind in this location would certainly have archaeological constraints, and that these might be such that development would either be refused or might prove to be prohibitively expensive to deliver. Nonetheless they wished to proceed with the application, and I therefore advised them to produce an appropriate desk-based assessment and to undertake an archaeological evaluation excavation within the footprint of the proposed pool.

I further advised that the proposal would only be acceptable if it were capable of mitigation by excavation, and that if it should prove impossible to do so safely, I would recommend that the application should be refused. To address this issue, I asked them to produce a construction plan and a draft Written Scheme of Investigation to demonstrate the deliverability of archaeological mitigation alongside the installation works required.

The evaluation excavation demonstrated that archaeological remains are present on the site at a depth of around 250mm beneath the existing floor level. These remains include several phases of medieval and post medieval buildings and features to a depth of at least 1.2m, with the earliest features possibly dating from the 12th/13th centuries.

Submission

Desk-Based Assessment

The applicant's initial desk-based assessment provided insufficient detail to inform the decision-making process and I therefore requested them to resubmit the document with several amendments and improvements including;

- A more nuanced assessment of archaeological significance to establish what deposits could be of equivalent significance to a designated heritage asset.
- More information about the known depths at which Roman archaeology has been encountered in previous excavations undertaken in the upper city along with a visual representation.
- An assessment of the potential for preservation of archaeological remains in situ including details of whether the pool might be delivered at a higher level, and what residual impacts might be expected upon deposits around and beneath the finished product.

Following its resubmission the Desk Based assessment is now acceptable for the purposes of fulfilling the relevant sections of both local and national planning policy.

Written Scheme of Investigation

The applicant has also submitted a draft Written Scheme of Investigation (WSI), as requested, which demonstrates that the proposals are capable of mitigation by excavation in accordance with NPPF paragraph 211. Looking at the proposed WSI in more detail, three parts of the process would have to be undertaken as a monitoring exercise rather than full excavation, and this is based on the requirement to ensure the safety of the team.

The first of these is the introduction of shoring around three sides of the area to enable excavation at depth to be accomplished, after which the first 1m-1.2m of material will be fully excavated by the archaeology team using single-context recording down to the base of the foundations of the north wall of the White Hart. The resulting surface is to be covered with geotextile and boarded to protect it while the first phase of underpinning of the external wall takes place. This is the second part that would be

monitored rather than excavated, as it is a potentially hazardous engineering operation. Once that has been completed, the team will continue the excavation to the base of the first phase of underpinning, after which the second phase of underpinning will take place using the same methodology. Following this the archaeological contractor will complete the excavation to formation level, including the sump.

The WSI also contains draft documents showing the applicant's intention to commission an appropriate archaeological contractor for all phases of work associated with the mitigations strategy and a draft commitment to publication of the results of the project. These provide a measure of certainty that the project will be appropriately funded and reported in accordance with NPPF paragraph 211.

Some elements of the WSI will need to be revised if permission is granted and I do not consider the submitted document to be final or binding. I am keen to see additional information included about the provision for remains around and below the proposed pool to be effectively preserved in situ, and for a contingency to be allocated allowing unforeseen circumstances to be managed. This should allow us to take an iterative approach to preservation throughout the project. I would also like to see an expanded commitment to undertaking public outreach during site works. For this reason, and as set out below, I would recommend that you apply a pre-commencement condition to any forthcoming permission to require a revised WSI to be submitted for approval.

Significance and Impacts

It is highly likely that Roman archaeology is present on the site as there is no evidence that it has been removed or truncated by subsequent development. It has consistently been accepted by the Local Planning Authority that such remains would be of equivalent significance to a designated heritage asset and should therefore be considered according to the relevant paragraphs of NPPF (205-208) as required by footnote 72 of NPPF. However, it is unlikely that such remains are present within the depth to which the proposed pool will be excavated, except in the sump which may encounter the uppermost Roman levels. As the full depth of Roman material is likely to exceed the formation level of the pool by at least 1m and possibly up to 3m, I would therefore advise you that the level of harm to these remains is likely to be less than substantial and should therefore be assessed against the public benefits of the proposal, as required by NPPF paragraph 208.

Early medieval archaeology in this part of the city is likely to comprise so-called "dark earth" deposits, as encountered during excavations at the castle, cathedral, and bishop's palace. This material is formed from multiple processes that took place after the abandonment of Roman Lincoln, starting with the natural accumulation of organic detritus over several centuries. At the castle, this material was supplemented in the 9th/10th century by the deliberate importation of material to create a level surface for later occupation and exploitation. If material of this kind is present on the site it has the potential to add to our understanding of how post Roman Lincoln was exploited by Anglo-Saxon and Danish settlers, and therefore could be of great value to local and regional research agendas. The impact upon material of this period within the footprint

and depth of the pool is likely to be extensive and may require the removal of all such material. Balanced against this archaeological potential and the apparently extensive impact is the widespread occurrence of this material across both the upper and lower walled Roman city and the poor preservation in uphill Lincoln of the predominantly organic deposits of which it is comprised. It is also important to remember that material of this kind is not scheduled in its own right anywhere else in the city, or indeed in cities such as York where the preservation of organic material is very much greater due to the frequent occurrence of anaerobic conditions. I would therefore advise you that this material if present should be considered a non-designated heritage asset and should be assessed according to the requirements of NPPF paragraph 209 but without reference to footnote 72.

Medieval remains have been demonstrated to be present on the site and appear to comprise the remnants of buildings and associated occupation features such as floor surfaces and dumps of material. Medieval remains of this kind are common within the city and occur in most locations where there has been no deliberate attempt to remove them. In this location it is possible that they will provide information about the nature of medieval development along Eastgate, whether residential or commercial, the date by which Eastgate itself was established as a street leading from the Castle to the east gate of the upper city, and the way in which the street and its related structures related to the establishment of the cathedral close. It is likely that all remains of this date within the footprint of the pool will be removed as a consequence of this proposal. However, the presence of multiple phases of buildings indicates that there has been a degree of truncation or even outright loss of earlier structures and the significance of these remains and the weight they ought to carry in the planning balance is therefore diminished accordingly. No evidence has so far been recovered or presented that would suggest that these remains are of more than local or regional significance in themselves or that they have any relevant relationship with nearby designated heritage assets such as either the castle or the cathedral. They should also be assessed according to the requirements of NPPF paragraph 209 but without reference to footnote 72.

Post-medieval remains on the site may include some of those of the medieval period described above, which may have continued in use into later centuries. The evaluation also identified deposits that are possibly associated with 18th and 19th century development of the White Hart site. These remains are of no more than local significance. There is also evidence for some post medieval disturbance of the earlier archaeology of the pool area, in the form of a 19th/20th century cellar in its northwest corner, and a pipe conduit dating from the 1938 extension of the White Hart. The loss of these remains should be assessed against NPPF paragraph 209 without reference to footnote 72.

The possibility of human remains dating from any of the periods above remains, but I do not believe it is likely. Roman custom was to bury the dead outside the city walls, so it is unlikely that human remains from this period will be present. There is no record of specific medieval cemeteries or graveyards occupying this site, and while there is

a medieval church next door its burial ground is recorded as having been within the Cathedral Close immediately to the south of the nave. Added to this is the complete absence of even fragmentary human remains from either the evaluation excavation or the monitoring works that have been undertaken on the site, which given the long history of use, reuse and disturbance of the site indicates that such remains are not present.

Impacts to the Listed Building have been considered by the city's conservation officer and I have nothing to add to her assessment.

Objections and Comments

Many of the objections submitted are based on an over-interpretation of the significance of the archaeology of the site, enabled in part by the original desk-based assessment. This has since been superseded by a more detailed document, and as such many of these objections have been addressed. They also proceed from the inaccurate position that it is wholly unacceptable to disturb or excavate remains that are "demonstrably of equivalent significance to scheduled monuments", when in fact this judgment is based upon the level of harm that will result to them from the proposed development and can in many cases be justified by a counter-balancing level of public benefit.

A number of objections are based on the assumption that medieval remains on the site are of equivalent significance to a scheduled monument. However, planning policy does not support the position that all archaeology is of this level of significance until proven otherwise. There must be some indication that remains have special significance before the relevant policies can be brought into play. So far, no evidence has been found or presented that this is the case, either from the evaluation excavation or from the monitoring works undertaken during previously consented renovations. While this assessment may change during the course of any future excavation, that possibility can be managed through the WSI that would be required by the condition suggested below.

Some objectors, including the Council for British Archaeology, have questioned the sufficiency of the evaluation excavations undertaken by the applicant team. While it would have been preferable to have seen the entire archaeological sequence, I accept that this was not possible given the restrictions inherent to undertaking such works inside a standing building and adjacent to a potentially unstable load-bearing wall. I am satisfied that, when taken together with the deposit model included in the resubmitted desk-based assessment, the information provided by the evaluation is sufficient to inform an appropriate and robust decision by the local planning authority. I would also observe that as one of the purposes of evaluation was to enable the applicant to decide whether or not to proceed with the application it would have been directly against the requirements of NPPF paragraph 210 for me to permit the loss of the medieval heritage assets identified in the evaluation to that point.

Objections have been raised to the validity of the "deposit model" provided in the updated DBA. While it would certainly be desirable for more data points to have been included we are unfortunately constrained by a lack of available information in uphill Lincoln as a consequence of the lack of modern interventions and of the omission of reliable height data in most antiquarian reports. I am therefore satisfied that the DBA includes sufficient information to demonstrate the depths at which Roman archaeology could be expected to occur on the site and that on the strength of the information available the level of harm to such remains from the proposed development will be less than substantial.

A specific concern raised by one of the objectors is the impact of the development on remains that will be left in situ when it is completed. In particular the possibility of damage due to "the introduction of oxygen and changes to perched and natural water systems in the buried environment" was mentioned. I can state with some confidence that there are unlikely to be anaerobically preserved remains or perched water systems in uphill Lincoln, as no evidence of such conditions has ever been identified. I have also discussed the matter with Historic England's regional science adviser who agrees that this possibility is remote. With respect to other impacts to remains left in situ, the applicant has provided technical information demonstrating that there will be no compression effects resulting from the construction of the pool, that precautions against concrete migration will be taken, and that the water circulation of the pool will be monitored to ensure any leakage can be rapidly identified and corrected.

Although it was not necessary for you to consult the Council for British Archaeology on this application, I note that their listed building casework officer has chosen to submit comments on the archaeological implications of this development. Their first letter of objection responded primarily to the original DBA and many of the concerns it raised have been addressed by the resubmission. Their second letter deals with those issues that they feel remain to be addressed, in particular the difference between the level reached by the evaluation excavation and the formation level of the pool (a point I have addressed above), and the necessity for a robust mitigation strategy to be in place to enable any excavation to address relevant research questions. With regard to the second issue, I am confident that the draft WSI demonstrates that appropriate mitigation of this development is possible, and the final WSI, to be required by planning condition, will ensure the developers adherence to appropriate levels of mitigation and recording of the archaeological resource.

The entirely valid objection to the use of the excavation and its results as a public benefit and therefore as a justification of the development was also raised, and the applicant has removed claims of this nature from the application documents.

Policy Appraisal

Central Lincolnshire Local Plan

Policy S57

With regard to the Archaeology provisions of S57, the submission meets all tests to enable a decision to be made. Specifically;

- The application is accompanied by a desk-based assessment.
- An appropriate field evaluation was undertaken, and the report submitted in advance of a decision.
- As preservation in situ is not possible or appropriate to the specific requirements of the proposal, the developer has produced a draft written scheme of investigation to enable the preservation of remains by record which has been agreed with the City Archaeologist.

National Planning Policy Framework

Paragraph 200

The submission meets the relevant tests, in that an appropriate desk-based assessment has been submitted, that includes the results of a search of the Historic Environment Record, along with the report of an evaluation undertaken at the request of the Local Planning Authority.

Paragraph 201

The comments contained in this document represent an appropriate assessment of the significance of heritage assets likely to be affected by the proposed development.

Paragraphs 205-208

The proposals have the potential to impact upon two relevant heritage assets, namely the White Hart itself as a Grade II listed building, and the potential Roman Archaeology that may be present on the site, under the provision of paragraph 206 and footnote 72. For the former, please refer to the specific advice of the principal conservation officer. For the latter, please refer to the statement of significance and assessment of impact provided above. To restate this advice briefly, the level of harm to Roman archaeology (which is considered to be of demonstrably equivalent significance to a scheduled monument, and which may or may not be encountered during the development process) is considered to be less than substantial and should be measured against the public benefits of the proposal.

Paragraph 209

Most if not all of the archaeology likely to be affected by the proposed development should be considered non-designated heritage assets. The appropriate test for decision taking in regard to these assets is "a balanced judgment ... having regard to the scale of any harm or loss and the significance of the heritage asset."

Paragraph 210

The imposition of appropriate conditions as suggested below will address the stated requirement.

Paragraph 211

The draft WSI submitted by the developer is sufficient to address the requirement for developers to "record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible". Given that the proposal will result in the total removal of archaeological remains within its area and depth, no less mitigation than total excavation of those remains is proportionate to the impact, subject in all cases to the safety of site workers. This will enable the preservation by record of the archaeological remains affected by the proposal.

Proposed Conditions

If, following your assessment of this development, you are minded to recommend approval of the application, my advice to you is that the following conditions would be appropriate to ensure that impacts to archaeological remains are mitigated proportionally, and that the relevant policy tests can be met.

- Prior to commencement of works a revised version of the WSI should be submitted and approved by the LPA, taking account of any comments and suggestions from the LPA. The WSI should contain;
 - a methodology for full archaeological excavation of the pool area using single context recording as far as this is compatible with the safety of the excavation team, and monitoring of those elements that cannot be safely excavated.
 - Evidence that a contract has been entered into with an appropriately qualified archaeological contractor for all phases of work including post excavation reporting and archiving.
 - Provision for an appropriate contingency of time and resources in the event of unforeseen circumstances.
 - Provision for the assessment of unexcavated remains around and beneath the development and sufficient time and resource to enable their preservation in situ according to a methodology to be agreed with the Local Planning Authority.
- The development should be undertaken solely in accordance with the approved WSI, and any changes to require the written approval of the Local Planning Authority
- Prior to occupation or use of the pool complex the developer should submit a post-excavation timetable to the Local Planning Authority for approval.
- A full archive and report should be submitted within 12 months of the completion of groundworks.

I hope the assessment given above is useful to you in coming to your decision on these applications. Please get in touch if you need further clarification on any particular point.

Yours sincerely

Alastair MacIntosh

Alastair MacIntosh
City Archaeologist
City of Lincoln Council



LINCOLNSHIRE COUNTY COUNCIL'S RESPONSE TO CONSULTATION ON THE FOLLOWING DEVELOPMENT PROPOSAL

District: Lincoln City Council

Application number: 2024/0087/FUL

Application Type: Full

Proposal: Internal alterations to create a new leisure pool and spa including the excavation and construction of the pool and construction of internal partitions to form a sauna, changing facilities and gym together with associated drainage and services.

Location: White Hart Hotel , Bailgate, Lincoln, Lincolnshire, LN1 3AR

Response Date: 5 March 2024

This report includes the Substantive response of the Local Highway and Lead Local Flood Authority to a planning consultation received under the Development Management Order and includes details of any planning conditions or informatives that should be attached in the event that permission is granted and any obligations to be secured by way of a S106 agreement.

General Information and Advice

Please note that although the Definitive Map and Statement proves the existence of any recorded rights of way, there may be further or higher rights that are not shown on this document that the County Council is not currently aware of. This would be especially relevant where the public has had informal access to the site or where there are references to routes across this in maps or other historic documents. As the County Council has received no application to recognise further rights of way affecting the site, no more informed guidance can be offered at this stage.

Application number: 2024/0087/FUL

Application Type: Full

Location: White Hart Hotel , Bailgate, Lincoln, Lincolnshire, LN1 3AR

Highway and Lead Local Flood Authority Report

Substantive Response provided in accordance with article 22(5) of The Town and Country Planning (Development Management Procedure) (England) Order 2015:

Recommendation: No Objections

Having given due regard to the appropriate local and national planning policy guidance (in particular the National Planning Policy Framework), Lincolnshire County Council (as Highway Authority and Lead Local Flood Authority) has concluded that the proposed development would not be expected to have an unacceptable impact upon highway safety or a severe residual cumulative impact upon the local highway network or increase surface water flood risk and therefore does not wish to object to this planning application.

Regards

Officer's Name: John Clifton

Officer's Title: Principal Development Management Officer

Date: 5 March 2024