



**For the attention of Nick Baxter**

**6 Queen Square London WC1N 3AT  
Full Planning Application Ref. 2019/0343/P**

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews applications for listed building consent and seeks to ensure a sustainable future for vital aspects of London's built heritage.

The Committee reviewed the documents for the above application at its meetings on Tuesday, 26<sup>th</sup> February 2019, and made the following observations.

No. 6 Queen Square is a building erected *circa* 1713, re-fronted in the later 18th century and subject to alterations and additions in the early 20th century associated with its use as the headquarters of the Art Workers' Guild. It is listed at Grade II\* by Historic England (List Entry Number 1139091), making it a designated heritage asset of considerable national significance.

The Committee believes that the proposed changes to the vaults should be **refused** for the following reasons:

**Rarity** - To quote from the Heritage Impact on page 3 of the Design & Access Statement submitted in support of the application; "The coal vaults currently retain their original character of brick vaulted roofs and earth floors [...] the vaults are unremarkable, like many hundreds in the local area, so no special interest will be harmed or any notable character lost". This is not accurate. There are not hundreds of buildings from *circa* 1713 in the local area – possibly dozens. We believe a few only, if any, still have original vaults. Therefore, unless the applicant can prove otherwise, these vaults are a remarkable and valuable survival.

**Historic brickwork** - The proposed tanking of the brick arches of the vaults would obscure much of the 18th-century brickwork, and cause localised harm to smaller portions of this historic fabric where the covering is affixed to the vaulting. The retention of a portion of the central vault without tanking is described in the Heritage Impact assessment as having a 'neutral' impact sufficient to mitigate the harm caused to the other vaults. The Committee challenges this assertion on the basis that there can be no neutrality in the level of harm caused when a much greater proportion of the historic brick vaulting will be concealed than will be left visible.

**New openings** - The insertion of openings between the arches would cause loss of considerable amounts of historic fabric. It is questionable whether such internal circulation is necessary for an archival facility, especially given its relatively small size would mean moving between the vaults by means of exiting and entering external doors.

**Lowering of floors** - The proposed formation of new lower floor levels through the removal of 600mm depth of material would result in the loss of earth floors that are either original or historic features of the vaults, made all the more significant by the early date and Grade II\* listing of No. 6.

The Committee was also concerned that application claims the proposed use of the arches would be as 'archive and storage' yet the submitted Proposed Basement Plan shows tables and seating, including what looks to be a sofa, giving the appearance of a fully-habitable library as the actual outcome.

National Planning Policy Framework (NPPF) paragraph 193 stipulates that consideration of the impact of proposed developments should afford 'great weight [...] to the asset's conservation (and the more important the asset, the greater the weight should be)'. As structures not just associated with No. 6 Queen Square but coeval with the original phase of the Grade II\* listed building, we conclude that the applicant has not been sufficiently aware of the heritage importance of the vaults in the formation of their proposals.

Therefore, in view of NPPF paragraph 193, we ask that Camden refuses planning permission for this application in its present form. We look forward to your action to prevent this destruction of a valuable historic survival.

Vicki Fox (Hon. Secretary)

**LAMAS – Historic Buildings & Conservation Committee**

**22 March 2019**