



Planning Applications Sub-Committee

SUPPLEMENTARY PACK 2

Comments on Listed Building Consent (LBC) Applications

Date: TUESDAY, 10 FEBRUARY 2026

Time: 1.45 pm

Venue: LIVERY HALL, GUILDHALL

4. SITE COMPRISING LIVERPOOL STREET STATION, 50 LIVERPOOL STREET, SUN STREET PASSAGE, 40 LIVERPOOL STREET (IN PART), HOPE SQUARE AND BISHOPSGATE PLAZA LONDON, EC2M 7PY (25/00494/FULEIA AND ASSOCIATED LISTED BUILDING CONSENTS 25/00474/LBC, 25/00479/LBC, 25/00475/LBC, 25/00476LBC AND 25/00477/LBC)

Report of the Chief Planning Officer and Development Director.

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For Decision
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THE SOCIETY FOR THE PROTECTION OF ANCIENT BUILDINGS
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F.A.O Kieran McCallum

By email

15th September 2025

PLNComments@cityoflondon.gov.uk

Our ref 209415

Your ref 25/00474/LBC

Liverpool Street Station, Liverpool Street, London EC2M 7QH

Phased development comprising partial demolition of Liverpool Street Station, including (in part) including station concourse, trainsheds, and truss/columns, demolition of 50 Liverpool Street, demolition of Bishopsgate Square entrance and Hope Square entrance; Works of reconstruction and remodelling of station basement, lower and upper concourse levels, new station columns/truss and roof (in part); introduction of new lifts, escalators and stairs and service spine at basement; increased operational space; insertion of new ticket gates; creation of new station entrances from Hope Square and Bishopsgate Square; creation of new units at lower and upper concourse levels for Class E (shops, cafe, restaurants), hot food takeaway (Sui Generis) and pub/bar (Sui Generis); creation of new upper concourses and associated new public access from Exchange Square including new walkways; works associated with the construction of a new Over-station development (OSD) reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business), including new station roof, truss and columns (in part), creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; new station and office entrances to Liverpool Street and Bishopsgate; and all other associated listed building works.

Dear Kieran,

Thank you for notifying the SPAB of the above application. Having considered the proposals and associated documentation, we now write with the Society's response.

The SPAB supports and concurs with the views expressed by other National Amenity Societies, SAVE Britain's Heritage, and Historic England, all of whom have raised significant concerns about the impact of the proposals on designated heritage assets, and the wider historic environment.

While we recognise that the scheme currently proposed has been revised from the previous application 25/00494/FULEIA, the proposals continue to result in the extensive demolition of elements of the Grade II listed station, in our view these losses have not been sufficiently justified. Additionally, the over-site development which although reduced in mass, remains an over-bearing presence on the Grade II* listed former Great Eastern Hotel.

The negative impact on the Bishopsgate Conservation Area and St Botolph's Church has also not been mitigated by the revisions. In our view, the fabric, design integrity, setting, roofscapes, skyline, and context of the historic environment will be irreversibly harmed by the scheme.

Despite the revised scheme, the Society remains extremely concerned by the proposals and does not consider that they are supported by the requisite clear and convincing justification, or that the public benefits are sufficient to outweigh the substantial harm and losses.

We remind the authority of its statutory duty under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires special regard to be given to the desirability of preserving listed buildings and their settings.

This requirement is reinforced by Chapter 16 of the National Planning Policy Framework (NPPF), which states that great weight should be given to the conservation of designated heritage assets, and that any harm must be clearly and convincingly justified.

We therefore urge the local planning authority to refuse consent, as the scheme remains contrary to both the statutory requirements of the Act and the National Planning Policy Framework as set out in the NPPF December 2024, Chapter 16.

With best wishes

Matthew Slocombe

Director



Twentieth
Century
Society

Emailed to: [REDACTED]

16/09/2025

Dear Kieran McCallum,

SITE: Liverpool Street Station, Liverpool Street, London, EC2M 7QH

Ref: 25/00474/LBC

The Twentieth Century Society is the National Amenity Society charged with the protection and appreciation of post-1914 heritage. We have been notified of the above listed building consent application for the development at Liverpool Street Station. The Society strongly objects to the application because it would result in *substantial harm* to the Grade II-Liverpool Street Station and Bishopsgate Conservation Area.

Background

The Twentieth Century Society were involved in a previous, similar scheme for Liverpool Street Station (23/00453/FULEIA), developed by Sellar and designed by Herzog and de Meuron. This involvement included a pre-application meeting. The Society provided a letter of objection to the planning application on 7 December 2023. This scheme is still under consideration on the City of London's planning portal.

The Society has been involved in this application (25/00474/LBC and the associated planning permission application 25/00494/FULEIA), including at pre-application stage. The Society provided letters of response to pre-application consultations on 26 November 2024 and 19 February 2025. In these pre-application consultation responses we expressed strong concerns about the proposed scheme and the potential for *substantial harm* to the significance of the Grade II-listed station.

Significance

In the 1970s, British Rail sought to redevelop the 19th-century Liverpool Street station. A very vociferous and successful heritage campaign—the Liverpool Street Station Campaign (LISSCA)—figure-headed by lawyer George Allan and involving the poet John Betjeman thwarted British Rail's demolition plans and led to the Grade II listing of the Liverpool Street offices and western train shed in 1975. At the urging of the Greater London Council, British Rail came forward with a new scheme

The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

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Registered Charity no 1110244

proposing the greater retention, extension and upgrade of the Victorian station. This was a significant cultural realignment which was both emblematic of a changing attitude to historic architecture and city planning and encouraged future campaigns which in themselves made a decisive difference to how Victorian architecture, and in particular Victorian railway architecture was perceived and valued.

The radically revised scheme was carried out between 1985 and 1992 by British Rail's Architecture and Design Group, directed by Nick Derbyshire, working with the project architect Alistair Lansley. The work involved extending the Victorian western train shed with a second transept over a new concourse, containing shops on elevated walkways, rebuilding an office at 50 Liverpool St and creating two new entrances on Liverpool St and Bishopsgate. The 1985-92 work was sensitively handled and executed to the highest standards. New additions borrowed from the design of the Victorian station and sought to enhance what remained of it. The architects took a conservation-led approach, which was applauded by contemporary architectural critics: 50 Liverpool Street was rebuilt in facsimile “in [a] full-blooded Victorian style” (Building Design, 1992); new entrances were “distinguished”, “echoing the architecture of the adjoining Great Eastern Hotel” (Architects’ Journal, 1988); the new transept to the concourse imitated the original further north; and roof trusses to the extension carefully replicated those on the 19th-century train shed. The new work showcased intelligent design and careful attention to detail in response to a demanding site and brief. The late 20th-century work is an important part of the history and development of Liverpool Street and its architecture is of a very high standard.

Policy

As the proposed development would directly impact on a listed building, the local authority should be mindful of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990: “In considering whether to grant planning permission [...] for development which affects a listed building or its setting, the local planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

The development will also have an impact on the Bishopsgate Conservation Area and so Section 72(1) applies: “In the exercise, with respect to any buildings or other land in a conservation area [...] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

The local authority should also be mindful of heritage policies in section 16 of the National Planning Policy Framework (NPPF; 2024), particularly at Paragraph 202: “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.”

At Paragraph 203:

Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; f) the desirability of new development making a positive contribution to local character and distinctiveness; and g) opportunities to draw on the contribution made by the historic environment to the character of a place (our emphasis).

At Paragraph 212:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (our emphasis).

At Paragraph 213 (a):

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: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional (our emphasis).

At Paragraph 214:

Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use (our emphasis).

And at Paragraph 219:

Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive

contribution to the asset (or which better reveal its significance) should be treated favourably (our emphasis).

The City of London Local Plan 2040 (Revised Proposed Submission Draft April 2024) states at Strategic Policy S12 (8.a-d):

Tall buildings must have regard to: a. the potential effect on the City skyline, the wider London skyline and historic skyline features; b. the character and amenity of their surroundings, including the relationship with existing and consented tall buildings; c. the significance of heritage assets and their immediate and wider settings; d. the environmental impact on the surrounding buildings and public realm, including daylight and sunlight, solar glare, solar convergence, overshadowing and wind shear, and the capacity of the City's streets and spaces to accommodate the development (our emphasis).

At Policy HE1: Managing Change to the Historic Environment (2, 6):

2. There will be a presumption against heritage harm and development causing harm to, or total loss of, the significance of designated heritage assets will be refused unless it is clearly demonstrated that the heritage and/or wider public benefits outweigh that harm or loss.

Applicants should clearly demonstrate that all reasonable efforts have been made to sustain the existing use, find new appropriate uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset (our emphasis);

6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be considered (our emphasis).

The Society's Assessment

Consultation and engagement

The Twentieth Century Society was consulted twice at pre-application stage on these proposals, in October 2024 and February 2025. In both of these pre-application consultations, we took the view that the proposed development would cause substantial harm to the significance of the Grade II-listed station. We note that the applicant's response to our pre-application concerns is documented in Table 8-1 of part 8.3 Consultation of the Environmental Statement Volume I, with the response stating that: 'the degree of demolition is needed to create the funding which allows the necessary Station upgrade.' An alternative scheme has been presented to the Society, which indicates that it may be possible to provide the necessary station upgrades with less demolition, including the retention of the vast majority of the 1985-91 work which is considered significant by the Society. This suggests that the proposed works in this application are not the 'minimum required to secure

the long-term use of the asset', as set out as a requirement in the City of London Local Plan 2040 HE1(2).

Paragraph 1.8 of the Public Benefits Statement states that 'the applications are submitted... on the basis that the proposed development would be self-funding, with no reliance on the public purse.' It is clear that the requirement for the project to be wholly self-funding on the same site is not viable. As noted in the planning permission consultation letter of 25 June 2025 by SAVE Britain's Heritage, based on the financial viability statement the application in its current form is not viable, concluding that "the Proposed Development is not technically viable, as a surplus is not generated once the costs of the Station Improvement Works are taken into consideration" (Financial Viability Assessment, Paragraph 8.2).

The Statement of Community Involvement included in this application demonstrates that public opinion is against the use of an Over-Station Development (OSD) to facilitate the development of Liverpool Street Station. While feedback is overwhelmingly positively in favour of improving the station's accessibility and usability, a majority of respondents do not support the development of an OSD to bankroll the necessary station improvements. Responses to the engagement emphasise how 'the designs don't seem to align with the historical importance of the station' and that 'the transformation plans seem to prioritise commercial interests over passenger needs.' It is clear that these proposals are unpopular both within the heritage sector and with the greater public.

Comments

The proposals would amount to substantial harm to the Grade II-listed Liverpool Street Station and Bishopsgate Conservation Area.

Our assessment of substantial harm is based on Planning Policy Guidance, which states that "an important consideration" in the determination of whether work constitutes 'substantial harm', "would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting."

The Heritage Impact Assessment for this application states at part 5.2.1 that the demolition of the grade II-listed concourse roof would result in 'low-level, less than substantial harm to the significance of the listed station building', with justification that 'the replacement of the roof with a... roof that reflects the same volume and proportions of the space... would mitigate this harm to a large degree'. The Society does not agree with this assessment. It is our view that the demolition of a large portion of the listed station roof would result in significant fabric loss and would severely compromise the station's historic character, and ought to be classified, in combination with the adverse impact from the OSD on the quality of the space of the station trainshed, as substantial harm. It is also our assessment that the proposed replacement roof is unnecessarily complex and oversized, with the requirement for transfer trusses, lateral arches and oversized columns resulting from the additional loads of the OSD. This lower-quality roof, compared to the historicist 1985-1992

British Rail Architects' Department roof, does not mitigate the substantial harm that will result from the demolition of the concourse roof as suggested in the Heritage Impact Assessment.

The proposed demolition of a very sizeable section of the 1985-92 trainshed and the entire concourse would cause substantial harm to the Grade II-listed station. Following the recent review of the station's listing (Dec 2022), the decision was made to designate the extended trainshed and concourse at Grade II. As recorded in the newly-updated list entry, the station is Grade II listed for its historic and architectural interest. Historic interest includes "the 1985-92 remodelling by the British Rail Architects' Department, which was a major historicist infrastructure project of the period, standing in stark contrast to the preceding Modernist schemes for the site" (our emphasis). And under architectural interest, Historic England note "the quality of the trainshed extension of 1985-1992, which carefully follows the detailing, form and proportions of the 1870s Wilson structure to integrate a second transept that enhances the spatial quality and cohesiveness of the remodelled station's unified concourse" (our emphasis). The demolition of a very large portion of the listed station would result in significant fabric loss and would severely compromise the station's historic character.

The loss of the two entrances on Liverpool Street and Bishopsgate and no.50 Liverpool Street would also seriously harm the setting of the Grade II station and Grade II* Great Eastern Hotel as well as the character of the Bishopsgate Conservation Area. While the decision was made to exclude these structures from the station's listing, these late 20th-century additions nonetheless have heritage value as an integral part of the station's post-war development and they positively contribute to the setting of the listed station and hotel. When Bishopsgate Conservation Area was designated in 2007, the decision was made to include the Liverpool Street entrance and 50 Liverpool Street within the conservation area's boundaries. This was clearly a deliberate and surprising move, given the young age of these additions (then only 15 years old), and suggests that planners recognised early the contribution made by the late 20th-century work.

Not only would the planned development cause major heritage harm through fabric loss, but the proposed 97.67m Above Ordnance Datum (AOD) office-led development would also seriously harm the setting of the station and hotel and have a major detrimental impact on the character and appearance of the Bishopsgate Conservation Area. It would overshadow the listed buildings and dominate the streetscape, diminishing the legibility and impact of the station and hotel within it.

Network Rail's Needs Report makes the argument that Liverpool Street Station does not currently provide adequate accessibility provision. The report also reasons that the station has an insufficient gate line and concourse capacity. The applicant states that the development would improve accessibility through the provision of additional fully-accessible lifts and escalators. It is our view that these improvements to the operation and capacity of the station could easily be achieved through interventions within the existing station envelope. If sensitively done, such interventions could have a limited impact on the listed station.

Fundamentally, little has changed in this application from the previous application 23/00453/FULEIA in terms of harm to twentieth century heritage fabric. The historicist concourse

and trainshed roof of 1985-1992, designed by British Rail Architects' Department, was recognised as highly significant by Historic England as recently as 2022. As with that prior application, which we also objected to, this application proposes the demolition of this highly significant fabric for the sake of the OSD.

The listed station would be partly demolished to allow for an office-led development which would extend over and above the station. This development would not only impact on the listed fabric and character of the interiors, but would also overshadow the listed building and dominate the streetscape, diminishing the legibility and presence of the station within it. The two unlisted but high-quality station entrances and 50 Liverpool Street would also be demolished as part of the development.

The significance of the Grade II* Andaz Hotel (Great Eastern Hotel) will be harmed due to the proximity of the proposed OSD. The Society regards the substantial 3-storey mansard roof by Manser Associates (1997-2000) as a carefully-engineered and creative addition to the hotel, and one informed by a thorough understanding of the building's existing structure and historic character. The applicant attempts to minimize the harm that will be done to the Andaz Hotel, stating in the Façade section of the Design and Access Statement that 'the scale, massing and façade articulation of the building, placed behind the Andaz, seeks to reduce its visual impact. While it remains visible behind the hotel it will not be perceived as one volume but as two separate components.' The Society disagrees with this assessment. The massing and bulk of the OSD, as shown, for example, in the proposed south elevation, is such that it will have a harmful impact on the hotel. It will be perceived as a single, monolithic volume, and have a harmful impact on the setting of the Grade II* Andaz Hotel.

The City of London Local Plan 2040 (Revised Proposed Submission Draft April 2024) states at paragraph 11.5.4 that outside the identified tall building areas [the City Cluster and Fleet Valley areas], tall buildings would be likely to very significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area. This is the case for the proposed Liverpool Street development, contrary to Strategic Policy S12(8.c) of the plan, which states that tall buildings must have regard for... the significance of heritage assets. Given the potential significant harm posed by the OSD, it runs contrary to the Local Plan.

Since the submission of our letter of objection to planning permission application 25/00494/FULEIA of 04/07/2025 Simon Sturgis, founder of Targeting Zero and expert consultant on carbon cost and viability, has provided an Embodied Carbon Assessment on the scheme on behalf of LISSCA. This embodied carbon assessment clearly shows that the proposed scheme fails to meet the relevant policy of NPPF 161, NPPF 164, GLA London Plan Policy S12 and Strategic Policies S4, S8 and Policy DE1 of the City of London's 'City Plan 2040' – Draft April 2024. This assessment was provided to you by SAVE Britain's Heritage on 29/08/2025.

Given the *significant harm* that will be done to the designated heritage asset that is the Grade II-listed Liverpool Street Station, and the harm to the designated heritage assets that are the Grade II* Great Eastern Hotel and the Bishopsgate Conservation Area, we strongly object to this application.

It is our view that the development would cause *substantial harm* to the significance of the listed station. This would amount from the loss of original fabric and changes to the character of the interiors, and from the detrimental impact on its setting. The development would also seriously adversely impact on the character and appearance of the Bishopsgate Conservation Area. We understand the need to improve the station's operational efficiency and accessibility, which would deliver public benefits. However, we are not convinced that the only way to deliver this essential work is through a development of this scale on this site.

Yours sincerely,

Gus Wray

Caseworker

The Twentieth Century Society
70 Cowcross Street
London, EC1M 6EJ

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the *Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.



New Life for
Remarkable Buildings

Mr Kieran McCallum
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

By email to: [REDACTED]

Our reference: 250445

25.06.25

Dear Mr McCallum,

25/00494/FULEIA | Phased development comprising partial demolition and alterations, including station concourse, trainsheds, and truss/columns, demolition of 50 Liverpool Street, demolition of Bishopsgate Square entrance and Hope Square entrance; works to Sun Street Passage; Works of reconstruction and remodelling of station basement, lower and upper concourse levels, new station columns/truss and roof (in part); introduction of new lifts, escalators and stairs and service spine at basement; creation of new units at lower and upper concourse levels for Class E | Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza, London, EC2M 7PY

Thank you for consulting SAVE Britain Heritage on the above planning application for Liverpool Street Station. Following careful assessment of the planning documents submitted, we write to **object** to this application in the strongest terms on heritage grounds. The proposed scheme would cause substantial harm to a grade II listed building, the setting of multiple heritage assets of all listing grades and the Bishopsgate Conservation Area.

We acknowledge a need to improve the accessibility and operational functionality of the station. However, in our view, the scale of harm proposed is neither justified nor outweighed by the proposed public benefits. We have not seen evidence that alternative options to over-station development were considered, such as providing a baseline minimum harm scheme or considering alternative sites for development to fund the station improvement works. Furthermore, the proposed development is not found by the applicant to be currently viable.

For these reasons we do not consider the proposals satisfy local, regional and national planning policy for the preservation and enhancement of the City of London's historic environment, and we therefore recommend that the Local Planning Authority refuse planning and listed building consent.

If your authority proposes to determine the applications in their current form and is minded to grant consent, we will request them to be called in for determination by the Secretary of State.

Proposals

This application seeks permission for an over-station office development which will reach a height of 97.67m AOD. This amounts to 19-storeys, plus a one-storey rooftop building located to the east. The listed 20th century concourse roof and supporting columns would be demolished. In their place, columns of increased bulk would be introduced into the concourse and a new roof structure installed to support the over-station development. Permission is sought to demolish 50 Liverpool Street and the entrance towers onto Hope Square and Bishopsgate, for replacement with new entrances, including access to the office development above. Seven additional lifts would be installed, the majority of these to facilitate movement between the upper and lower concourse, and four additional escalators would be installed bringing the total to eight escalators. New retail and restaurant units would be introduced, including along the platform at upper concourse level. The existing upper concourse would be demolished.

Significance

See the appendix for detail on the history and significance of Liverpool Street Station.

Assessment

SAVE objects to this application for the following reasons:

1. Substantial harm to Liverpool Street Station

We consider that the proposed demolition of the grade II listed, 20th century concourse station roof and supporting structure would be substantially harmful in heritage terms. The 1985-1991 reconfiguration of the station was recognised in Historic England's recent reassessment of the station's statutory listing in 2022 as a key element of the station's historic and architectural significance. The entry states that Derbyshire's work "*enhances the spatial quality and cohesiveness of the remodelled station's unified concourse*" (LEN 1286133). The loss of listed 20th century fabric of sensitive and high-quality design would almost entirely remove the historic and architectural significance of the 1990s remodelling

and permanently compromise the architectural continuity, harmony and cohesiveness of the station as a whole.

The special interest derived from the station's spatial quality in its entirety is recognised in the applicant's own Heritage Statement (para 4.2.4) as being of the "*highest significance*". It states (para 4.2.1) "*with respect to the general spatial character of the roof, the original (1873-75) and the modern (1985-91) parts make a similar contribution to the spatial quality and, therefore, to the special interest of the listed building*". It is therefore considered extremely contradictory that, in light of this assessment, the level of harm attributed to the loss of a significant portion of the 20th century roof is deduced to be "*low-level, less than substantial harm*" (para 5.2.1).

The cathedral-like spatial quality of the 20th century and Victorian roof is created by the natural light which floods through the glass-vaulted roof. The erection of a vast office building above the concourse would cast the station below into shadow. We do not consider that the proposed stepped-back massing of the over-station development can mitigate the loss of daylight into the station. The proposed lighting scheme and reflective base of the underside of the office development would be a poor imitation of natural daylight, which is a key characteristic of the station's design.

The proposed the loss of highly ornate existing columns, which comprise part of Derbyshire's listed 1985-1991 remodelling would further erode the significance of the station. In our view, the proposed replacement columns are an over-scaled and over-engineered design solution to supporting immense over-station development. The increased massing and form of these columns from 930mm to 1500mm would disrupt the visual rhythm of the station's carefully conceived interior.

When read as a whole, the proposed development would amount to substantial harm to a designated heritage asset by demolishing and disrupting heritage features which are recognised as being of fundamental importance to the character and significance of this listed building.

We note that a revision of the Sellar's proposal, which we have been consulted on, involves much less demolition of, and therefore less harm to, listed station fabric.

Policy

- We consider the harm caused through the extensive demolition of the grade II listed station to be substantial when assessed against NPPF (2024) policies 212, 213 and 214. Such harm cannot therefore accord with the Local Planning Authority's legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- The application contravenes Policy HC1 of the London Plan (2021) which requires that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets significance and appreciation of their surroundings.
- The substantial harm identified would generate further policy conflict in respect of Policy CS12 of the City Plan (2015) [Historic Environment].
- The National Planning Practice Guidance (PPG) states that: *"in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed."* In our view, the harm identified above to the grade II listed station clearly reaches this threshold for substantial harm.

2. Substantial harm to the Bishopsgate Conservation Area

We object to the construction of a building up to 97.67m AOD (19 storeys) within the Bishopsgate Conservation Area. The City of London's reappraisal of the Bishopsgate Conservation Area (BCA) in 2007 saw the station entrance onto Liverpool Street, 50 Liverpool Street and the Great Eastern Hotel included within its boundaries. The BCA Character Summary and Management Strategy SPD (2014) characterises Liverpool Street Station as *"one of London's principal gothic revival buildings"* which, when considered alongside the hotel, forms *"a notable Victorian townscape group"*.

We consider that introducing a building of this vast bulk, scale and massing into this significant group of Victorian buildings would be substantially harmful to the character and appearance of the BCA. The proposed vast height would grossly dominate this historic streetscape and harm the setting of the Grade II* Great Eastern Hotel.

The demolition of 50 Liverpool Street and the station's existing entrances would see a further erosion of the character of the conservation area and a key layer of its historical evolution. Whilst not included in the station's listing, 50 Liverpool Street was designed to replicate the former Victorian station range and contributes positively to the prevailing character and scale of the surrounding BCA.

Policy

- We consider the harm caused by the proposed office building would cause substantial harm to the listed station's setting and the positive contribution it currently makes to the BCA. This harm would contravene the duty to preserve the BCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- We also consider the total loss of 50LS to be substantially harmful in NPPF terms (para 216).

3. Substantial harm to setting of Grade II* Great Eastern Hotel

SAVE is opposed to the proposed 19-storey tall development within the setting of the grade II* listed hotel. The Great Eastern Hotel is a building of landmark quality, whose striking silhouette defines the corner of Liverpool Street and Bishopsgate. Development of this scale and massing within the hotel's setting would drastically diminish the building's architectural legibility and an appreciation of its significance and would amount to substantial harm.

Policy

- NPPF (2024) para 213 provides that substantial harm to assets of the highest significance, including listing grades II* and I, should be wholly exceptional.
- Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings.

4. Public Benefits and Justification

We acknowledge the need to upgrade the accessibility and operational functionality of the station which would provide public benefits. NPPF Para 214 requires that where a proposed development will lead to substantial harm to a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. It is our view that a case for enabling development has not been made to outweigh the substantial heritage harms set out above for the following reasons:

- 1) The proposed scheme is not currently viable: The justification for the proposed over-station development is reliant upon its purported need to fund upgrades to the station (Financial Viability Assessment, para 2.2). However, the submitted financial viability assessment concludes that in the current market conditions *"the Proposed Development is not technically viable, as a surplus is not generated once the costs of the Station Improvement Works are taken into consideration"* (para 8.2). The viability of the scheme is reliant on an 'upswing in market conditions' over the 8+ year construction period. In our view, this is wholly inadequate to justify the substantial harm caused by the proposed scheme. We note that design elements, such as the roof garden, adds unnecessary cost to an already expensive scheme that is supposed to pay for station improvements.

2) Inadequate consideration of alternative options –baseline scheme: We have not seen evidence that alternative options to over-station development have been given adequate consideration. A costed, baseline minimum harm scheme is needed to set out clearly the cost of necessary station upgrades versus the cost of the over-station development works. This is not clear in the submitted cost summary which, for example, includes as part of the station improvement costs over £13m for the station roof and £10m for the 'transfer structure' without clarity as to whether these costs are actually part of the intrusive works to the station for the purpose of an office development above.¹

We request that the LPA satisfies itself that all alternative options to over-station development have been explored and evidenced, including a costed, minimum harm baseline scheme for station improvement works. Without this information, there is inadequate justification for the economic need for the proposed over-station development.

3) Inadequate consideration of alternative options –alternative sites: Para 3.7.1 of the Environment Statement, Vol I, Chapter 3 states that, "*no other sites were considered*" for the proposed development. As alternative approaches to station upgrades which do not rely on extensive loss of fabric, setting and significance and to heritage assets have not been considered, in our view the substantial harm proposed cannot be justified.

5. Acceptability of a tall building in this location

The application site, located outside the City of London's Eastern Cluster, is within an area designated inappropriate for tall buildings. Policy CS14: Tall Buildings of the current City Plan (2015) indicates that a tall building on the majority of the application site would be inappropriate (see also: Figure N of CS14). Policy D9: Tall Buildings of the London Plan (2021) clearly states in para B (3) that, "*tall buildings should only be developed in locations that are identified as suitable in Development Plans.*" At a proposed total height of 97.67m AOD, and largely within the BCA, this application for a tall building runs counter to both of these local and regional policies.

6. Disruption to travel & timescales for delivery

The application provides that the indicative timescale for scheme completion is 2036. We consider that improvements to the station's functionality and accessibility could be

¹ Appendix 2, Financial Viability Assessment

delivered more efficiently and quickly without the time required for over-station works, which in turn would reduce the disruption to travellers. A minimum harm base scheme is needed to fully examine this option.

7. Views of St Paul's

The primacy of St Paul's Cathedral is recognised as a key component of London's skyline and is recognised in the London View Management Framework (LVMF). The proposed development appears visible within LVMF Views 17B.1 and 17B.2 (Golden Jubilee/Hungerford Bridges), and we have serious concerns regarding how View 15B.1 would be impacted in wintertime, without tree cover. The visibility of the scheme in these views appear to be visually intrusive on the setting and appreciation of St Paul's Cathedral, which is a grade I listed building of national importance. We consider the proposals contravene Policy HC4 of the London Plan (2021) which requires that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.

Conclusion

We **object** to this application in the strongest terms on heritage grounds. The proposed scheme would cause substantial harm to a grade II listed building, the setting of multiple heritage assets of all listing grades and the Bishopsgate Conservation Area.

Due to serious concerns regarding the scheme's viability, we do not consider this harm would be outweighed by the public benefits claimed by the applicant or sufficiently justified to the exceptional degree required under the NPPF and The Planning Act.

For these reasons, we recommend that the Local Planning Authority to refuse planning and listed building consent for this application.

Yours sincerely,



Lydia Franklin
Conservation Officer

Appendix

History and Significance of Liverpool Street Station

Liverpool Street Station and the adjoining former Great Eastern Hotel are two of the City of London's most important historic landmarks. Their individual and collective heritage significance is recognised in their recent listing reappraisals which saw the listing entries for both listed buildings substantially updated, and the hotel's listing grade upgraded from II to II*. Together, they form a highly significant and complimentary ensemble of historic railway buildings and remain a seminal testament to the development of railways in London and the country at large in the 19th century.

Liverpool Street Station was built between 1873-1875 to designs by great Scottish railway engineer Edward Wilson. A unique element of the station's special historic and architectural interest is its partial rebuilding in 1985-1991 by architect Nick Derbyshire in a historically complementary and conservation-led style, which was of an extremely high standard.

The remodelled concourse was designed as a second transept to match Wilson's original further to the north, allowing the station's architectural unity and 'cathedral-like' spatial character to be preserved. Derbyshire's designs emphasise a defining characteristic of the station: natural light pouring in through the glass roofs of both concourse and shed. The quality and volume of light is key to the building's historic and architectural significance and is a defining feature of the passenger experience which places Liverpool Street amongst the great historic railway termini of London.

The former Great Eastern Hotel (now Andaz) adjoins the station, facing both into the concourse and out onto the prominent corner of Liverpool Street and Bishopsgate. Built in two phases, the western section was completed in 1884 to designs of Charles and Edward Barry, with the eastern section added in 1901 by Col. Edis. The composition as a whole is highly unified and characterised by striking red Essex brick with decorative stone dressings and attractive projecting bands between floors. The hotel has long street elevations and is designed to dominate the corner of Liverpool Street and Bishopsgate.

The enduring contribution of these listed buildings to their wider setting is also enshrined and recognised in their inclusion within the Bishopsgate Conservation Area (BCA) which was expanded in 2007 to include part of the station and former Great Eastern Hotel.

The BCA Supplementary Planning Document (SPD) notes that Liverpool Street Station is one of "*London's great Victorian stations*" and when considered as a whole with the Great Eastern Hotel forms a notable Victorian townscape group. This includes the neo-gothic

style entrance towers onto Hope Square and Bishopsgate which are striking outward looking features of the station's 1985 remodelling and pay homage to the station's evolution over time. Liverpool Street Station, its 20th century remodelling and the Great Eastern Hotel contribute positively to the architectural character of the surrounding conservation area.



Mr Kieran McCallum

Direct Dial: [REDACTED]

City of London

PO Box 270

Our ref: L01597214

Guildhall

London

EC2P 2EJ

3 September 2025

Dear Mr McCallum

Arrangements for Handling Heritage Applications Direction 2021

Authorisation to Determine an Application for Listed Building Consent as Seen Fit

LIVERPOOL STREET RAILWAY STATION LIVERPOOL STREET LONDON EC2M 7PY
Application No 25/00474/LBC

Applicant:	Network Rail Infrastructure Limited
Grade of building(s):	II
Proposed works:	Phased development comprising partial demolition of Liverpool Street Station, including (in part) including station concourse, trainsheds, and truss/columns, demolition of 50 Liverpool Street, demolition of Bishopsgate Square entrance and Hope Square entrance; Works of reconstruction and remodelling of station basement, lower and upper concourse levels, new station columns/truss and roof (in part); introduction of new lifts, escalators and stairs and service spine at basement; increased operational space; insertion of new



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



ticket gates; creation of new station entrances from Hope Square and Bishopsgate Square; creation of new units at lower and upper concourse levels for Class E (shops, cafe, restaurants), hot food takeaway (Sui Generis) and pub/bar (Sui Generis); creation of new upper concourses and associated new public access from Exchange Square including new walkways; works associated with the construction of a new Over-station development (OSD) reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business), including new station roof, truss and columns (in part), creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; new station and office entrances to Liverpool Street and Bishopsgate; and all other associated listed building works.

Drawing numbers: Drawings as approved

Date of application: 8 April 2025
Date of referral by Council: 26 August 2025
Date received by Historic England: 26 August 2025
Date referred to MHCLG:

You are hereby authorised to determine the application for listed building consent referred to above as you think fit.

Yours sincerely

Claire Brady
Team Leader, Development Advice
E-mail: [REDACTED]

NB: This authorisation is not valid unless it has been appropriately endorsed by the Secretary of State.

Officials have considered the information given above on behalf of the Secretary of State, and do not intend to require the application concerned be referred.

Signed *Edward Chapman*

Date 10.10.2025



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

From: [REDACTED]
To: [REDACTED]
Subject: Liverpool Street Station - 25/00474/LBC
Date: 17 September 2025 14:41:38

THIS IS AN EXTERNAL EMAIL

Dear Mr McCallum,

We previously submitted a detailed objection to application 25/00494/FULEIA concerning the proposed development at Liverpool Street Station. We request that those comments be applied to the application 25/00479/LBC, the concerns remain directly relevant.

Our objection is as follows:

- The application site is located within an area designated as inappropriate for tall buildings under the City of London Local Plan. The proposed development is therefore contrary to policy CS14(2) of the Local Plan and policy D9(B) of the London Plan.
- The location, height, and massing of the proposed development would cause considerable harm to heritage assets of the highest importance. Harm to St Paul's Cathedral is evident from views from Waterloo Bridge and the Golden Jubilee/Hungerford Bridge, both protected within the London View Management Framework SPG. Further harm would be caused to the relationship between St Paul's Cathedral and the City churches, negatively impacting London's wider historic environment.
- The impact on 18th and 19th century buildings within the Bishopsgate Conservation Area would be significant, particularly in relation to St Botolph's Church and its important views. Additionally, Devonshire Square and New Street would have their setting negatively impacted due to the scale of the proposed development, compounding harm to the Bishopsgate Conservation Area.
- National and local policy requires that harm to heritage assets and their setting should be avoided. Where harm occurs, it must be clearly and convincingly justified and should be given the greatest weight in decision-making.

For these reasons, the Georgian Group objects to this application and recommends that consent be refused.

In determining this application, you should bear in mind the statutory duty of section 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

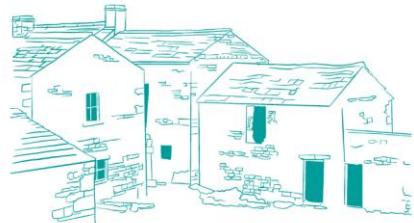
Kind regards,

Eddie Waller IHBC
Senior Conservation Adviser
London and South East England



[Support the Georgian Group, become a member | georgiangroup.org.uk](#)

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Buildings Archaeology Team

A National Amenity Society

Kieran McCallum
Planning Case Officer
City of London Corporation
Via email: PLNComments@cityoflondon.gov.uk

04 July 2025

Dear Kieran,

Liverpool Street Station, Liverpool Street, London, EC2M 7QH. Application No. 25/00494/FULEIA

Thank you for notifying the Council for British Archaeology of this application. We offer the following comments to assist your local authority in determining this application.

Summary

The CBA **object** to the proposals for this site, which we consider to be excessive in scale and massing and which would cause unjustified and considerable harm to a popular and highly visible heritage site and the wider conservation area. We recommend that the applicants revise their plans to reduce the impact of the proposals and the scale of development. If revised plans are not submitted, we recommend that the application be **refused**.

Due to the harm which would be caused by the proposals and the national importance of the site, if your authority proposes to determine the applications in their current form and is minded to grant consent, we will request them to be **called in** for determination by the Secretary of State.

Significance

Liverpool Street Station is an iconic part of London's Industrial Revolution-era heritage, one of the main termini which connects the capital to the rest of the country and a key legacy of the development of the city as a whole. The site contains two listed buildings, the former Great Eastern Hotel and the station itself, and several listed memorials. The station complex retains a legibly Victorian aesthetic character with sensitive modern additions, and its location, layout and phased development hold considerable evidential value; these are a record of the development of key infrastructure which changed this area of the city and the wider British landscape. The whole site's historic fabric and considered design and layout hold evidence about changing construction techniques and patterns of travel due to developing technologies and lifestyles. The combination of the functional but high-quality architecture of the station, including the airy feeling of the high glass

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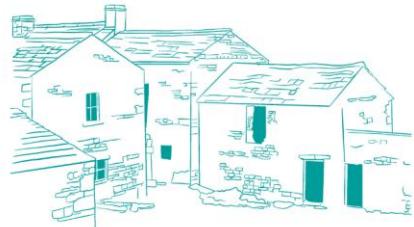
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roof, and the elaborate aesthetic statement of the hotel demonstrate the economic and social importance of the railways and the pride of their Victorian constructors.

The original station (Grade II, NHLE No. 1286133) was completed in 1975 for the Great Eastern Railway, with an additional trainshed constructed to the east by 1894. Only minimal changes followed until the 1980s, when after a high-profile campaign to conserve the Victorian heritage of the station, a sensitive scheme of extension and updating was undertaken which replaced the eastern trainshed with a new concourse and created a new neo-Victorian extension to the south of the station including entrances off Bishopsgate and Liverpool Street.

The station has historical value, as a key part of London's infrastructure and a legacy of the city's Victorian wealth and expansion, facilitated by the arrival of the railways. It also has evidential value in its surviving historic fabric and legible phased evolution, aesthetic value in its striking structural forms, and high communal value in its functional use for large numbers of travellers. The sensitive 1980s redevelopment work served to conserve the station's aesthetic and communal value, through its use of complementary materials and the public campaign which resulted in the partial retention of the station's Victorian heritage, and is specifically included in the station's updated 2022 List Description.

The communal and historical value of the station is further enhanced by the presence of memorials, including two Grade II listed WWI memorials within the station building and the 2006 sculpture to the south of the station which commemorates the arrival of fleeing Jewish children arriving into London as part of the WWII Kindertransport.

The Andaz Hotel (formerly the Great Eastern Hotel, Grade II*, NHLE 1252272) was constructed by the railway company to serve the railway's passengers, and was intended as a public visual representation of their wealth and status. The hotel has a typically elaborate high Victorian exterior inspired by Flemish Renaissance architecture in red brick with stone dressings, marked by octagonal turrets and stepped gables. After its original construction in 1883-1884, to designs by noted architects Charles Barry Junior and Charles Edward Barry, it was altered and extended in 1901, in a style which reflected the high-quality detailing of the earlier sections. In the 1990s the hotel was refurbished and extended upwards in a sympathetic style utilising high-quality materials and designs by the Manser Practice.

The hotel's exceptional architectural and aesthetic character and historical significance is recognised in its Grade II* listing, which indicates that it is of more than national importance. Its fine architectural detail and prominence within the streetscape, communicating the grand arrival of the railway age, are central components of the site's significance and contribution to the multi-phased development of the conservation area. The building's historic and visual connection to the train station is a key part of its character and purpose.

Comments

Council for British Archaeology

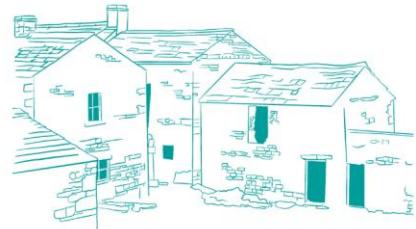
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The CBA recognise that following our strong objections to application 23/00453/FULEIA, our comments have been taken into consideration and pre-application discussions have been undertaken with heritage bodies to help evolve this scheme. There are a number of improved elements within this scheme in comparison to the last, including the omission of plans to cantilever a new structure above the Grade II* listed hotel.

The CBA do not object to the principle of new entranceways into the station, provided these are sensitively located and designed, and we recognise the public benefit of improved access, facilities and permeability within the station building.

However, our serious concerns over the principle and impacts of a new tower block constructed above a listed building remain. We continue to consider that the current proposals will amount to **considerable harm** to Liverpool Street Station.

While CBA support the principle of updating the station concourse and platform access to ensure the station remains functional and accessible, the current proposals include a number of intrusive and excessive additions and alterations to the historic station; the CBA advise that lighter-touch scheme which would require considerably less development to be financially viable would be preferable.

The CBA are particularly concerned by the following elements of the proposal:

1. The creation of a new tall building wrapping around the Great Eastern / Andaz Hotel.

Although the CBA welcome the removal of former proposals to construct a new building above the Grade II* hotel, the existing building would wrap around the hotel, visually and architecturally cutting it off from the rest of the historic station structure. This would cause harm to the building's historic character, harming the legibility of its intended function serving railway passengers.

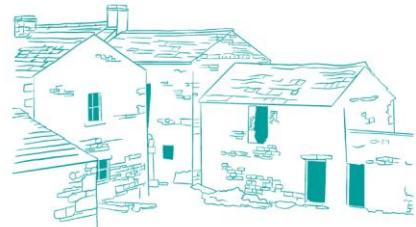
The grand scale and ornate architectural style of the hotel are fundamental to the original design intention of this Grade II* building. Its dominant presence in the surrounding streetscape, establishing the building as an imposing landmark, contributes to its designated special interest.

This new structure would also cause harm to the Bishopsgate Conservation Area through the loss of the hotel's prominence; the 2014 SPD specifically notes that:

'The former Great Eastern Hotel is an imposing landmark, viewed from Devonshire Square and west along Devonshire Row, which is dramatically framed at the opening of the street, highlighting its intricate detailing and roofline', and;

'The Hotel dominates the corner, in terms of its size and elaborate decorative treatment.'

The scale, massing and materiality of the proposed development would be overly dominant in these views, affecting the Hotel's character as a designed status symbol,



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representative of the industrial boom era for railway construction and the nineteenth-century development of the area.

The CBA consider that the construction of a large modern building in this location is contrary to NPPF paragraph 212 and section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act; the loss of the hotel's prominence and the creation of a dominant new building which would envelop the hotel in the street scene would cause considerable harm to the hotel's significance and to the character and appearance of Bishopsgate Conservation Area.

The existing Local Plan 2015 -2026 designates the site as an 'area inappropriate for tall buildings' (Figure N, page 121). The emerging Local Plan identifies tall buildings as those over 75m *above sea level*. The proposed building, at its tallest, is more than 97m above sea level, with the main bulk of the structure sitting around 90m above sea level. In local policy terms, it is therefore around 15m above an acceptable height for the historic character of this area of the city. The application disregards the detailed and considered policies of the Local Plan, which exists to guide sustainable development in the City.

The CBA object to the proposed development on these grounds. We advise that any additions to the existing station height should remain subservient to the historic buildings, allowing the Great Eastern Hotel to remain dominant in the street scene and legibly connected to the station.

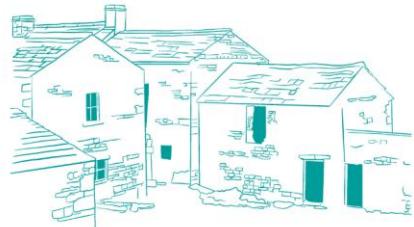
National Policy requires 'clear and convincing justification' for harm, which for a Grade II* building should be 'wholly exceptional' (NPPF, paragraph 213). As a reduced level of intervention to the station complex would require a smaller scale of development to achieve, we do not consider that this criterion has been met.

2. The creation of a new building above the station.

The CBA consider that the insertion of a tall building over an existing historic site is a highly unsuitable approach. The historic and architectural character of listed buildings is fundamentally altered by the construction of additional height elements; in this case, as the tower would measure over 97m at its tallest, the proportions and horizontal, open character of the station building would be drastically affected. The CBA consider that this new tall structure would cause **considerable harm** to the Grade II listed station.

The construction of a new building above the existing light-filled station concourse will affect the daylight permeation into the building, harming the internal character of the space and creating a more enclosed and darker station. This will harm the legibility of the site's historic airy architectural design and affect the way it is experienced by its users, causing harm to its historic and architectural significance and the heritage value of the station to the public.

The creation of buildings above historic structures also has physical and structural impacts on the historic structures. In this case the areas to be removed date from the later, sensitive



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restoration; while not of the same historic interest as the Victorian elements, the later addition to the concourse was specifically included in the station's revised listing, recognising that the new work was of high architectural quality and an excellent example of heritage-led restoration. This would be lost and replaced by a new structure which fails to respect the proportions or character of the station.

While we recognise the applicants' intention to construct supports for the new building which reflect the character of the historic arches within the station building, the proposals would require the removal of listed fabric from within the building. The proposed replacement columns would be of a different proportion to the carefully considered existing structure, which were created to reflect the historic Victorian design, and would change the elegant and symmetrical character of the station interior.

While the applicants have correctly identified the more recent trainshed as the most suitable area of the station for alterations, its loss will cause permanent harm to the evolved and architecturally distinct character of the station.

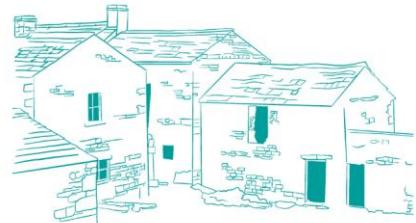
The CBA consider that these internal alterations to the 1990s trainshed in isolation would cause less than substantial harm to the Grade II listed building; some alterations and additional construction in this area could be achieved without causing an unjustified level of harm to the listed building's significance. However, the scale of the current proposed upward construction is unsuitable and will cause undoubtedly substantial harm to the station and hotel.

We are concerned that permitting a tall building above the listed structure would create an unwelcome precedent, allowing for further harmful development above the station in future. While the existing historic station structure has existed, with maintenance, for 150 years, the expected life span of the new structure (based on the applicant's Whole Life Carbon Assessment) would be 60 years; at the time of its replacement, the precedent for harmful development above the listed structure would already have been set.

3. Alterations to the existing station entrances.

While the 1990s entranceways from Liverpool Street and Bishopsgate are not listed, and could be replaced by a sensitive new entranceway without causing a high level of harm to the building's historic significance, they are nevertheless sensitively designed to reflect the character and proportions of the Victorian buildings and allow the station's historic character to be recognised from the streetscape. Any new design should aim to retain or improve on this responsive design approach which permits an awareness of the station's historic character from the street.

In contrast, the proposed new entrance in Hope Square would be designed to support the massive new building above. The existence of a Victorian Station would be impossible to see from Liverpool Street itself and from the primary entrance on Bishopsgate. The open space, lightweight glass porches, and Gothic-inspired towers of the modern entranceways would



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be replaced by an overhanging, narrow, and far more solid new construction, appearing more as a modern office block than as a historic station building.

Moreover, the relocation of the poignant Kindertransport Memorial away from its existing highly visible location at the entrance to the station to a location within the building will affect its visibility, impact and communal value, harming public understanding of the station's history.

The cumulative impacts of the demolition of listed fabric, external alterations to the existing station entrances, and the construction of a large new tower above the concourse will amount to a considerable level of harm to the Grade II listed station and the Grade II* listed Hotel. Para. 213 of the NPPF requires 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' (emphasis added). We do not consider that it has been adequately demonstrated that this development is the only possible solution to improve the station facilities, as a more iterative and lighter-touch approach would be less disruptive and expensive. We therefore do not consider that this required threshold of justification has been met.

The CBA also consider that this application could set a highly damaging precedent for over-scaled developments above listed buildings, and recommend that the applicants explore alternative options which would not require the creation of a tall new structure above the station.

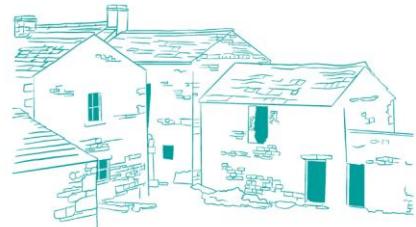
4. The creation of a new upper level along the station concourse.

The proposals would also see the construction of a new upper retail level along the length of both sides of the Victorian trainshed. This will have a negative impact on the proportions and open nature of the existing trainshed, obscuring historic features including full-height columns. It will cause harm to the listed Victorian building's architectural and historic character.

While the removal of the existing lateral upper-level retail units at the approach to the trainshed is a positive alteration, the CBA are not convinced that this justifies the creation of additional commercial spaces. As the application correctly identifies, Liverpool Street Station sits within a busy area with plenty of food and shopping opportunities, so the public benefit of additional commercial space is low.

We understand the benefit of an upper-level pedestrian walkway to improve connectivity through the station. However, it would be preferable for this to be lightweight and visually permeable to allow the historic station's character to be legible. The insertion of commercial spaces at this level will require a larger space to occupy and create considerable aesthetic clutter which will detract from the station's internal design and spatial character.

The CBA therefore do not consider that harm caused by the creation of new upper-level shopping lanes within the existing Victorian station is justified, particularly when considered in combination with the other proposed changes to the historic fabric and setting of the



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station. Consequently, we do not consider that this element of the proposals meets the requirements of paras. 212 or 213 of the NPPF.

Overall, the CBA do not consider that these proposals have been designed in a way which recognises and conserves the significance of the historic station and hotel. The proposals would cause a high level of harm to the Liverpool Street Station complex as a whole, including the Grade II* listed Hotel and the Grade II listed station.

In addition, the scheme will cause harm to the Bishopsgate Conservation Area more widely. The City of London's SPD document for the Bishopsgate Conservation Area notes that key characteristics of the area are 'predominantly Victorian and Edwardian buildings with small-scale commercial uses, alongside notable examples of the City's Georgian townscape' and 'An area distinct in the east of the City in terms of building scale and diversity of use, contrasting with the large-scale office buildings to the north, south and west' (p. 7).

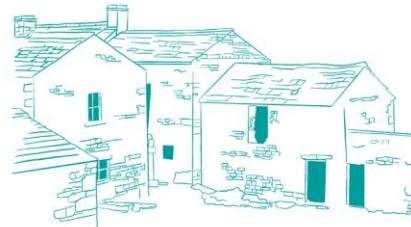
The legibility, historic character and street scene prominence of the station and hotel are noted parts of the Conservation Area, which was extended in 2007 to specifically include the hotel and Hope Square. The scale and massing of the proposed new development on and above the site would have a strong negative impact on the architecture of the station group and views to the retained historic elements. In particular, the insertion of a new tall element above the site would prevent appreciation of its designed architectural dominance, the scale of the linear station development, and its legibly Victorian character.

The new structure on and above Hope Square would also largely obscure views of the iconic hotel and train shed from Old Broad Street and Sun Street Passage (both noted views in the Conservation Area SPD). This is contrary to NPPF paragraph 212 and section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act.

Overdevelopment within what is still currently a pocket of the City with surviving historic character would negatively affect the setting of nearby heritage assets, which maintain a consistent height and nineteenth-century character. The new tower block would overly dominate and negatively affect the setting of the Church of St Botolph (Grade II*), 162-164 Bishopsgate (Grade II), and 76-80 Old Broad Street (Grade II), among others.

The CBA do not consider that adequate justification has been submitted to justify the scale of the proposed development. In particular, we have concerns with the following elements of the proposal's rationale:

1. The difficulties of constructing a new building above a highly sensitive site (both in heritage and infrastructure terms) will result an extremely complex and expensive new development; this affects the viability of the scheme as a whole. Your Local Planning Authority should be satisfied that the scale, cost and complexity of any new development



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is kept to a minimum to ensure the viability of the regeneration work to the station, in addition to the heritage considerations.

2. The public benefits of the proposed station re-organisation must be weighed against the impacts of the long-term disruption caused by the extensive redevelopment of the site, under paras. 214 and 215 of the NPPF. The CBA also note that some access work is has already been undertaken (with funding allocated) at the station, including a new lift and improved flow around the existing gatelines. In combination, these factors mean that the urgency of the need for improvements to the concourse is somewhat reduced. This could allow for a far less disruptive incremental scheme of access improvements, with the benefits and impacts of these assessed against evolving passenger needs.

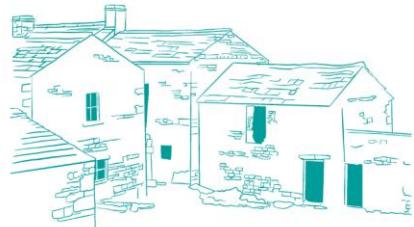
The recent refurbishment of Kings Cross and St Pancras stations and the Grade I listed former Midland Grand Hotel demonstrate how a heritage-led scheme can achieve a high-quality, economically successful site which makes a positive first impression for visitors to the city. This should be the aim of any scheme for Liverpool Street Station.

It is concerning that the alternative application for the site, 23/00453/FULEIA, has not been withdrawn, and therefore there are simultaneously two parallel applications under consideration. We understand that there are two separate teams working on alternative proposals for the site, which suggests a lack of co-ordination and communication from Network Rail. It is possible that a revised scheme put forward by Herzog and de Meuron (who created the proposals for the 2023 application) will find a more sensitive and heritage-led solution for the site. The CBA therefore recommend that no decision is made on this application until application 23/00453/FULEIA is either withdrawn or revised.

Policy

The 1990 Planning (Listed Buildings and Conservation Areas) Act Section 16(2) requires that decision-makers give 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. The Act also requires that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance' of Conservation Areas (Section 72(1)). Due to the harm this application would cause to the highly significant special architectural and historic interest of the station complex, the Grade II* and Grade II listed buildings, and the character and appearance of the Bishopsgate Conservation Area, the CBA do not consider that this application can be found to meet these requirements.

The application therefore does not meet the requirements of the NPPF, paras. 212 or 213, which require that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation' and 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.'



Buildings Archaeology Team

The CBA do not consider that the applicants have demonstrated that a more sensitive, heritage-led scheme could not deliver improvements to the station while simultaneously conserving the heritage significance of the station, hotel, and wider area. The public benefits of a heritage-led scheme would include the conservation of a highly significant and popular transport heritage site, a reduced level of disruption resulting from large-scale construction, as well as improved passenger facilities; this would be a far preferable alternative for all. The current scheme has not demonstrated that a smaller-scale scheme would not be possible, and therefore the current scheme is not justified.

The application therefore does not meet the requirements of paras. 214 or 215 of the NPPF, which require that harms to the significance of designated heritage assets should be outweighed by sufficient public benefit.

The 2021 Greater London Plan's guidance on a design led approach (Policy D3) requires that developers should:

1. 'enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions'

and;

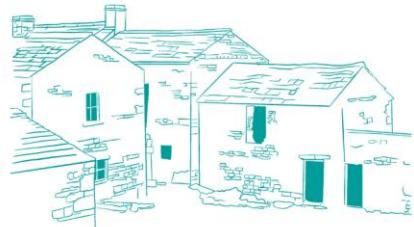
11. 'respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character'.

This scheme is contrary to these requirements, as it fails to demonstrate an awareness or understanding of the local character, or the scale, external character and linear proportions of the site, and will damage the heritage assets and architectural features of the site instead of enhancing them.

The City of London's Adopted Local Plan (2015) Core Strategic Policy CS10: Design requires that 'the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces' and that 'development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces'. Due to the height, scale and massing of the proposed development (more than 15m above the permitted height for the site), its dominance in the streetscape, and the negative impacts on the existing heritage assets on the site, the CBA do not consider that this application meets these requirements.

Recommendation

Council for British Archaeology



Buildings Archaeology Team

The CBA **object** to this application, which would cause **considerable harm** to a highly significant heritage site (Liverpool Street Station and the former Great Eastern Hotel), and harm to the Bishopsgate Conservation Area and the wider heritage of the City of London.

The CBA **strongly recommend** that the applicants revise the proposals to reduce the impacts on the listed site. A lighter-touch scheme with a reduced quantum of development would considerably reduce the harmful impacts of these proposals on the site and wider area, at a greatly reduced cost for the developer to recoup.

In particular, we recommend that the scale and massing of any upwards extension to the site is minimised to respect the scale and intentional dominance of the historic buildings.

We also recommend that your Local Authority does not make any decision on this application while the previous application, 23/00453/FULEIA, remains live on the planning portal. The current situation creates confusion and uncertainty, and we recommend that all options are fully explored to ensure the best possible future for this iconic historic place.

If this application is not revised, we recommend that it be **refused**. Moreover, if application 23/00453/FULEIA is neither withdrawn nor substantially revised, we also recommend that this be **refused** to allow for a clear future pathway towards station improvements.

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

Kind Regards,

Dr Alison Edwards
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**.

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

 archaeologyuk.org

 info@archaeologyuk.org

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Application Ref: Ref: 25/00474/LBC - Liverpool Street Station: Phased development/partial demolition

We object strongly to this planning application, as we did to the planning application 25/00494/FULEIA.

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

LAMAS is a member of the Liverpool Street Station Campaign (LISSCA) and we object to this planning application primarily on the following grounds:

- The substantial harm that would be caused to (a) the setting of the Grade II* listed former Great Eastern Hotel and Liverpool Street Station by the new 97m, twenty storey building being erected over the station, and to (b) the setting of the Bishopsgate Conservation Area as a whole, which is generally an area of low-rise buildings.
- The destruction of the Grade II listed roof of the concourse. Its destruction is reported as necessary as it would be unable to bear the weight of the new tower above it. We remain unconvinced that such a large building is required to fund the necessary upgrades to Liverpool Street station.
- The extension of the high-level walkways along the east and west sides of the trainshed to house a large number of additional retail units, which will have a harmful impact on the special interest and significance of the Grade II listed trainshed.

The [Bishopsgate Conservation Area SPD 2014](#) states (p22) that '*The [Liverpool Street] station, its 1990s additions, its Gothic style office wing on Liverpool Street and the former Great Eastern Hotel (1880-84) collectively form a notable Victorian townscape group*'. The setting of this 'grouping' would be materially damaged by the proposed new building. The importance of this 'group value' is highlighted also in Historic England's Listing Particulars for Liverpool Street Station.

The harm to the settings caused by the new tower would be contrary to the relevant planning guidelines in (a) the NPPF, (b) the London Plan, (c) the 2015 City of London Local Plan, and (d) the City Plan 2040, currently being consulted on:

1) [NPPF \(December 2024 version\)](#): Paragraphs 212-214. We do not believe that any 'substantial public benefits' have been demonstrated which would outweigh the substantial harm that would be caused to the settings.

2) [London Plan](#): Policy D9 (Tall Buildings), particularly (C)(1)(d). We do not believe that 'clear and convincing justification' of the harm to heritage assets and their settings has been demonstrated, or that the proposed new buildings 'positively contribute to the character of the area' (the Bishopsgate Conservation Area). Also, Policy HC1 Heritage conservation and growth is relevant.

3) [City of London Local Plan 2015](#): We consider that the proposed development most certainly 'detracts from' the settings of the heritage assets, and would contravene (a) **Core Strategic Policy CS12**; (b) **Policy DM 12.1**; and (c) **Policy DM 12.2**.

4) [City Plan 2040](#): This proposed new Local Plan constitutes a material consideration in planning terms. **Policy HE1: Managing Change to Heritage Assets** sets out three sets of criteria that development proposals should meet in relation to heritage assets. None of these criteria have been met by the proposed development. Also, **Strategic Policy S12: Tall Buildings** is relevant, as is **Strategic Policy S21: City Cluster**: there is no 'contribution to' or 'preservation of heritage assets and their settings in the proposed scheme.

The Heritage Statement prepared by Donald Insall Associates concludes (p9) that '*In summary, the proposals comply in part with the development plan comprised of the heritage policies in the City of London Local Plan, the draft City of London Plan, and the London Plan, although some harm will be caused to heritage assets which prevents full compliance with certain policies*'. We believe strongly that the harm caused will be material, and that the proposals represent an unacceptable contravention of these planning policies.

We therefore strongly recommend that this planning application be refused.

Vanessa Harding
President
London and Middlesex Archaeological Society

John Ricketts
Chair
LAMAS Historic Buildings and Conservation Committee

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Twentieth
Century
Society

Emailed to: [REDACTED]

16/09/2025

Dear Kieran McCallum,

SITE: Liverpool Street Station, Liverpool Street, London, EC2M 7QH

Ref: 25/00477/LBC; 25/00476/LBC; 25/00475/LBC; 25/00479/LBC

The Twentieth Century Society is the National Amenity Society charged with the protection and appreciation of post-1914 heritage. We have been notified of the above listed building consent applications for the development at Liverpool Street Station. The Society strongly objects to the applications because their approval, and the approval of the related listed building consent application **25/00474/LBC** would result in *substantial harm* to the Grade II-listed Liverpool Street Station and Bishopsgate Conservation Area.

Background

The Twentieth Century Society were involved in a previous, similar scheme for Liverpool Street Station (**23/00453/FULEIA**), developed by Sellar and designed by Herzog and de Meuron. This involvement included a pre-application meeting. The Society provided a letter of objection to the planning application on 7 December 2023. This scheme is still under consideration on the City of London's planning portal.

The Society has been involved in this application (**25/00474/LBC** and the associated planning permission application **25/00494/FULEIA**), including at pre-application stage. The Society provided letters of response to pre-application consultations on 26 November 2024 and 19 February 2025. In these pre-application consultation responses we expressed strong concerns about the proposed scheme and the potential for *substantial harm* to the significance of the Grade II-listed station. We have provided letters of objection to planning permission application **25/00494/FULEIA** and listed building consent application **25/00474/LBC** on 04/07/25 and 16/09/25 respectively.

Significance

In the 1970s, British Rail sought to redevelop the 19th-century Liverpool Street station. A very vociferous and successful heritage campaign—the Liverpool Street Station Campaign (LISSCA)—

The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

Registered office: 70 Cowcross Street, London EC1M 6EJ

Registered Charity no 1110244

figure-headed by lawyer George Allan and involving the poet John Betjeman thwarted British Rail's demolition plans and led to the Grade II listing of the Liverpool Street offices and western train shed in 1975. At the urging of the Greater London Council, British Rail came forward with a new scheme proposing the greater retention, extension and upgrade of the Victorian station. This was a significant cultural realignment which was both emblematic of a changing attitude to historic architecture and city planning and encouraged future campaigns which in themselves made a decisive difference to how Victorian architecture, and in particular Victorian railway architecture was perceived and valued.

The radically revised scheme was carried out between 1985 and 1992 by British Rail's Architecture and Design Group, directed by Nick Derbyshire, working with the project architect Alistair Lansley. The work involved extending the Victorian western train shed with a second transept over a new concourse, containing shops on elevated walkways, rebuilding an office at 50 Liverpool St and creating two new entrances on Liverpool St and Bishopsgate. The 1985-92 work was sensitively handled and executed to the highest standards. New additions borrowed from the design of the Victorian station and sought to enhance what remained of it. The architects took a conservation-led approach, which was applauded by contemporary architectural critics: 50 Liverpool Street was rebuilt in facsimile "in [a] full-blooded Victorian style" (Building Design, 1992); new entrances were "distinguished", "echoing the architecture of the adjoining Great Eastern Hotel" (Architects' Journal, 1988); the new transept to the concourse imitated the original further north; and roof trusses to the extension carefully replicated those on the 19th-century train shed. The new work showcased intelligent design and careful attention to detail in response to a demanding site and brief. The late 20th-century work is an important part of the history and development of Liverpool Street and its architecture is of a very high standard.

Policy

As the proposed development would directly impact on a listed building, the local authority should be mindful of **Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990**: "*In considering whether to grant planning permission [...] for development which affects a listed building or its setting, the local planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*"

The local authority should also be mindful of heritage policies in section 16 of the **National Planning Policy Framework (NPPF; 2024)**, particularly at **Paragraph 202**: "*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.*"

At **Paragraph 212**:

*When considering the impact of a proposed development on the significance of a designated heritage asset, **great weight should be given to the asset's conservation** (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (our emphasis).*

At Paragraph 213 (a):

***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** (our emphasis).**

The City of London Local Plan 2040 (Revised Proposed Submission Draft April 2024) states at **Policy HE1: Managing Change to the Historic Environment (2)**:

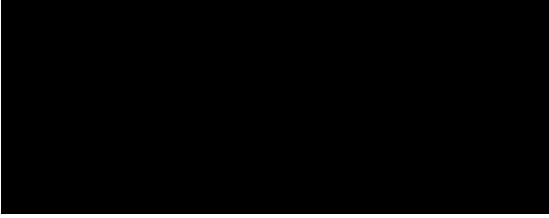
2. There will be a presumption against heritage harm and development causing harm to, or total loss of, the significance of designated heritage assets will be refused unless it is clearly demonstrated that the heritage and/or wider public benefits outweigh that harm or loss.
Applicants should clearly demonstrate that all reasonable efforts have been made to sustain the existing use, find new appropriate uses, or mitigate the extent of the harm to the significance of the asset; **and whether the works proposed are the minimum required to secure the long-term use of the asset** (our emphasis).

The Society's Assessment

It is our assessment that the above listed building consent applications, in addition to listed building consent application **25/00474/LBC**, would result in harm to the relevant heritage assets from the degree of demolition and alteration proposed to their settings, and in *substantial harm* to the designated heritage assets that are the Grade II-listed Liverpool Street Station and Bishopsgate Conservation Area. Because of this, the Society objects to the above listed building consent applications.

Yours sincerely,

Gus Wray



Caseworker

The Twentieth Century Society
70 Cowcross Street
London, EC1M 6EJ



Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the *Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.



New Life for
Remarkable Buildings

Mr Kieran McCallum
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

By email to: [REDACTED]

Our reference: 250445

25.06.25

Dear Mr McCallum,

25/00494/FULEIA | Phased development comprising partial demolition and alterations, including station concourse, trainsheds, and truss/columns, demolition of 50 Liverpool Street, demolition of Bishopsgate Square entrance and Hope Square entrance; works to Sun Street Passage; Works of reconstruction and remodelling of station basement, lower and upper concourse levels, new station columns/truss and roof (in part); introduction of new lifts, escalators and stairs and service spine at basement; creation of new units at lower and upper concourse levels for Class E | Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza, London, EC2M 7PY

Thank you for consulting SAVE Britain Heritage on the above planning application for Liverpool Street Station. Following careful assessment of the planning documents submitted, we write to **object** to this application in the strongest terms on heritage grounds. The proposed scheme would cause substantial harm to a grade II listed building, the setting of multiple heritage assets of all listing grades and the Bishopsgate Conservation Area.

We acknowledge a need to improve the accessibility and operational functionality of the station. However, in our view, the scale of harm proposed is neither justified nor outweighed by the proposed public benefits. We have not seen evidence that alternative options to over-station development were considered, such as providing a baseline minimum harm scheme or considering alternative sites for development to fund the station improvement works. Furthermore, the proposed development is not found by the applicant to be currently viable.

For these reasons we do not consider the proposals satisfy local, regional and national planning policy for the preservation and enhancement of the City of London's historic environment, and we therefore recommend that the Local Planning Authority refuse planning and listed building consent.

If your authority proposes to determine the applications in their current form and is minded to grant consent, we will request them to be called in for determination by the Secretary of State.

Proposals

This application seeks permission for an over-station office development which will reach a height of 97.67m AOD. This amounts to 19-storeys, plus a one-storey rooftop building located to the east. The listed 20th century concourse roof and supporting columns would be demolished. In their place, columns of increased bulk would be introduced into the concourse and a new roof structure installed to support the over-station development. Permission is sought to demolish 50 Liverpool Street and the entrance towers onto Hope Square and Bishopsgate, for replacement with new entrances, including access to the office development above. Seven additional lifts would be installed, the majority of these to facilitate movement between the upper and lower concourse, and four additional escalators would be installed bringing the total to eight escalators. New retail and restaurant units would be introduced, including along the platform at upper concourse level. The existing upper concourse would be demolished.

Significance

See the appendix for detail on the history and significance of Liverpool Street Station.

Assessment

SAVE objects to this application for the following reasons:

1. Substantial harm to Liverpool Street Station

We consider that the proposed demolition of the grade II listed, 20th century concourse station roof and supporting structure would be substantially harmful in heritage terms. The 1985-1991 reconfiguration of the station was recognised in Historic England's recent reassessment of the station's statutory listing in 2022 as a key element of the station's historic and architectural significance. The entry states that Derbyshire's work "*enhances the spatial quality and cohesiveness of the remodelled station's unified concourse*" (LEN 1286133). The loss of listed 20th century fabric of sensitive and high-quality design would almost entirely remove the historic and architectural significance of the 1990s remodelling

and permanently compromise the architectural continuity, harmony and cohesiveness of the station as a whole.

The special interest derived from the station's spatial quality in its entirety is recognised in the applicant's own Heritage Statement (para 4.2.4) as being of the "*highest significance*". It states (para 4.2.1) "*with respect to the general spatial character of the roof, the original (1873-75) and the modern (1985-91) parts make a similar contribution to the spatial quality and, therefore, to the special interest of the listed building*". It is therefore considered extremely contradictory that, in light of this assessment, the level of harm attributed to the loss of a significant portion of the 20th century roof is deduced to be "*low-level, less than substantial harm*" (para 5.2.1).

The cathedral-like spatial quality of the 20th century and Victorian roof is created by the natural light which floods through the glass-vaulted roof. The erection of a vast office building above the concourse would cast the station below into shadow. We do not consider that the proposed stepped-back massing of the over-station development can mitigate the loss of daylight into the station. The proposed lighting scheme and reflective base of the underside of the office development would be a poor imitation of natural daylight, which is a key characteristic of the station's design.

The proposed the loss of highly ornate existing columns, which comprise part of Derbyshire's listed 1985-1991 remodelling would further erode the significance of the station. In our view, the proposed replacement columns are an over-scaled and over-engineered design solution to supporting immense over-station development. The increased massing and form of these columns from 930mm to 1500mm would disrupt the visual rhythm of the station's carefully conceived interior.

When read as a whole, the proposed development would amount to substantial harm to a designated heritage asset by demolishing and disrupting heritage features which are recognised as being of fundamental importance to the character and significance of this listed building.

We note that a revision of the Sellar's proposal, which we have been consulted on, involves much less demolition of, and therefore less harm to, listed station fabric.

Policy

- We consider the harm caused through the extensive demolition of the grade II listed station to be substantial when assessed against NPPF (2024) policies 212, 213 and 214. Such harm cannot therefore accord with the Local Planning Authority's legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- The application contravenes Policy HC1 of the London Plan (2021) which requires that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets significance and appreciation of their surroundings.
- The substantial harm identified would generate further policy conflict in respect of Policy CS12 of the City Plan (2015) [Historic Environment].
- The National Planning Practice Guidance (PPG) states that: *"in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed."* In our view, the harm identified above to the grade II listed station clearly reaches this threshold for substantial harm.

2. Substantial harm to the Bishopsgate Conservation Area

We object to the construction of a building up to 97.67m AOD (19 storeys) within the Bishopsgate Conservation Area. The City of London's reappraisal of the Bishopsgate Conservation Area (BCA) in 2007 saw the station entrance onto Liverpool Street, 50 Liverpool Street and the Great Eastern Hotel included within its boundaries. The BCA Character Summary and Management Strategy SPD (2014) characterises Liverpool Street Station as *"one of London's principal gothic revival buildings"* which, when considered alongside the hotel, forms *"a notable Victorian townscape group"*.

We consider that introducing a building of this vast bulk, scale and massing into this significant group of Victorian buildings would be substantially harmful to the character and appearance of the BCA. The proposed vast height would grossly dominate this historic streetscape and harm the setting of the Grade II* Great Eastern Hotel.

The demolition of 50 Liverpool Street and the station's existing entrances would see a further erosion of the character of the conservation area and a key layer of its historical evolution. Whilst not included in the station's listing, 50 Liverpool Street was designed to replicate the former Victorian station range and contributes positively to the prevailing character and scale of the surrounding BCA.

Policy

- We consider the harm caused by the proposed office building would cause substantial harm to the listed station's setting and the positive contribution it currently makes to the BCA. This harm would contravene the duty to preserve the BCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- We also consider the total loss of 50LS to be substantially harmful in NPPF terms (para 216).

3. Substantial harm to setting of Grade II* Great Eastern Hotel

SAVE is opposed to the proposed 19-storey tall development within the setting of the grade II* listed hotel. The Great Eastern Hotel is a building of landmark quality, whose striking silhouette defines the corner of Liverpool Street and Bishopsgate. Development of this scale and massing within the hotel's setting would drastically diminish the building's architectural legibility and an appreciation of its significance and would amount to substantial harm.

Policy

- NPPF (2024) para 213 provides that substantial harm to assets of the highest significance, including listing grades II* and I, should be wholly exceptional.
- Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings.

4. Public Benefits and Justification

We acknowledge the need to upgrade the accessibility and operational functionality of the station which would provide public benefits. NPPF Para 214 requires that where a proposed development will lead to substantial harm to a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. It is our view that a case for enabling development has not been made to outweigh the substantial heritage harms set out above for the following reasons:

- 1) The proposed scheme is not currently viable: The justification for the proposed over-station development is reliant upon its purported need to fund upgrades to the station (Financial Viability Assessment, para 2.2). However, the submitted financial viability assessment concludes that in the current market conditions *"the Proposed Development is not technically viable, as a surplus is not generated once the costs of the Station Improvement Works are taken into consideration"* (para 8.2). The viability of the scheme is reliant on an 'upswing in market conditions' over the 8+ year construction period. In our view, this is wholly inadequate to justify the substantial harm caused by the proposed scheme. We note that design elements, such as the roof garden, adds unnecessary cost to an already expensive scheme that is supposed to pay for station improvements.

2) Inadequate consideration of alternative options –baseline scheme: We have not seen evidence that alternative options to over-station development have been given adequate consideration. A costed, baseline minimum harm scheme is needed to set out clearly the cost of necessary station upgrades versus the cost of the over-station development works. This is not clear in the submitted cost summary which, for example, includes as part of the station improvement costs over £13m for the station roof and £10m for the 'transfer structure' without clarity as to whether these costs are actually part of the intrusive works to the station for the purpose of an office development above.¹

We request that the LPA satisfies itself that all alternative options to over-station development have been explored and evidenced, including a costed, minimum harm baseline scheme for station improvement works. Without this information, there is inadequate justification for the economic need for the proposed over-station development.

3) Inadequate consideration of alternative options –alternative sites: Para 3.7.1 of the Environment Statement, Vol I, Chapter 3 states that, "*no other sites were considered*" for the proposed development. As alternative approaches to station upgrades which do not rely on extensive loss of fabric, setting and significance and to heritage assets have not been considered, in our view the substantial harm proposed cannot be justified.

5. Acceptability of a tall building in this location

The application site, located outside the City of London's Eastern Cluster, is within an area designated inappropriate for tall buildings. Policy CS14: Tall Buildings of the current City Plan (2015) indicates that a tall building on the majority of the application site would be inappropriate (see also: Figure N of CS14). Policy D9: Tall Buildings of the London Plan (2021) clearly states in para B (3) that, "*tall buildings should only be developed in locations that are identified as suitable in Development Plans.*" At a proposed total height of 97.67m AOD, and largely within the BCA, this application for a tall building runs counter to both of these local and regional policies.

6. Disruption to travel & timescales for delivery

The application provides that the indicative timescale for scheme completion is 2036. We consider that improvements to the station's functionality and accessibility could be

¹ Appendix 2, Financial Viability Assessment

delivered more efficiently and quickly without the time required for over-station works, which in turn would reduce the disruption to travellers. A minimum harm base scheme is needed to fully examine this option.

7. Views of St Paul's

The primacy of St Paul's Cathedral is recognised as a key component of London's skyline and is recognised in the London View Management Framework (LVMF). The proposed development appears visible within LVMF Views 17B.1 and 17B.2 (Golden Jubilee/Hungerford Bridges), and we have serious concerns regarding how View 15B.1 would be impacted in wintertime, without tree cover. The visibility of the scheme in these views appear to be visually intrusive on the setting and appreciation of St Paul's Cathedral, which is a grade I listed building of national importance. We consider the proposals contravene Policy HC4 of the London Plan (2021) which requires that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.

Conclusion

We **object** to this application in the strongest terms on heritage grounds. The proposed scheme would cause substantial harm to a grade II listed building, the setting of multiple heritage assets of all listing grades and the Bishopsgate Conservation Area.

Due to serious concerns regarding the scheme's viability, we do not consider this harm would be outweighed by the public benefits claimed by the applicant or sufficiently justified to the exceptional degree required under the NPPF and The Planning Act.

For these reasons, we recommend that the Local Planning Authority to refuse planning and listed building consent for this application.

Yours sincerely,



Lydia Franklin
Conservation Officer

Appendix

History and Significance of Liverpool Street Station

Liverpool Street Station and the adjoining former Great Eastern Hotel are two of the City of London's most important historic landmarks. Their individual and collective heritage significance is recognised in their recent listing reappraisals which saw the listing entries for both listed buildings substantially updated, and the hotel's listing grade upgraded from II to II*. Together, they form a highly significant and complimentary ensemble of historic railway buildings and remain a seminal testament to the development of railways in London and the country at large in the 19th century.

Liverpool Street Station was built between 1873-1875 to designs by great Scottish railway engineer Edward Wilson. A unique element of the station's special historic and architectural interest is its partial rebuilding in 1985-1991 by architect Nick Derbyshire in a historically complementary and conservation-led style, which was of an extremely high standard.

The remodelled concourse was designed as a second transept to match Wilson's original further to the north, allowing the station's architectural unity and 'cathedral-like' spatial character to be preserved. Derbyshire's designs emphasise a defining characteristic of the station: natural light pouring in through the glass roofs of both concourse and shed. The quality and volume of light is key to the building's historic and architectural significance and is a defining feature of the passenger experience which places Liverpool Street amongst the great historic railway termini of London.

The former Great Eastern Hotel (now Andaz) adjoins the station, facing both into the concourse and out onto the prominent corner of Liverpool Street and Bishopsgate. Built in two phases, the western section was completed in 1884 to designs of Charles and Edward Barry, with the eastern section added in 1901 by Col. Edis. The composition as a whole is highly unified and characterised by striking red Essex brick with decorative stone dressings and attractive projecting bands between floors. The hotel has long street elevations and is designed to dominate the corner of Liverpool Street and Bishopsgate.

The enduring contribution of these listed buildings to their wider setting is also enshrined and recognised in their inclusion within the Bishopsgate Conservation Area (BCA) which was expanded in 2007 to include part of the station and former Great Eastern Hotel.

The BCA Supplementary Planning Document (SPD) notes that Liverpool Street Station is one of "*London's great Victorian stations*" and when considered as a whole with the Great Eastern Hotel forms a notable Victorian townscape group. This includes the neo-gothic

style entrance towers onto Hope Square and Bishopsgate which are striking outward looking features of the station's 1985 remodelling and pay homage to the station's evolution over time. Liverpool Street Station, its 20th century remodelling and the Great Eastern Hotel contribute positively to the architectural character of the surrounding conservation area.



Mr Kieran McCallum
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: [REDACTED]

Our ref: L01597272

3 September 2025

Dear Mr McCallum

Arrangements for Handling Heritage Applications Direction 2021

Authorisation to Determine an Application for Listed Building Consent as Seen Fit

**ANDAZ HOTEL 40 LIVERPOOL STREET LONDON EC2M 7QN
Application No 25/00475/LBC**

Applicant:	Network Rail Infrastructure Limited
Grade of building(s):	II*
Proposed works:	Works to 40 Liverpool Street (Andaz, Great Eastern Hotel) including works to rear, north elevation to disconnect station roof and concourse, 50 Liverpool Street, and elements of the 1980s station; (ii) refurbishment works within the basement demise leased to Network Rail; (iii) works to disconnect two WW1 War Memorials; and all associated listed building works.
Drawing numbers:	Drawings as approved
Date of application:	8 April 2025
Date of referral by Council:	27 August 2025
Date received by Historic England:	27 August 2025
Date referred to MHCLG:	

You are hereby authorised to determine the application for listed building consent referred to above as you think fit.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Yours sincerely

Claire Brady

Team Leader, Development Advice

E-mail: [REDACTED]

NB: This authorisation is not valid unless it has been appropriately endorsed by the Secretary of State.

Officials have considered the information given above on behalf of the Secretary of State, and do not intend to require the application concerned be referred.

Signed *Edward Chapman*

Date 10.10.2025



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700

HistoricEngland.org.uk

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Twentieth
Century
Society

Emailed to: [REDACTED]

16/09/2025

Dear Kieran McCallum,

SITE: Liverpool Street Station, Liverpool Street, London, EC2M 7QH

Ref: 25/00477/LBC; 25/00476/LBC; 25/00475/LBC; 25/00479/LBC

The Twentieth Century Society is the National Amenity Society charged with the protection and appreciation of post-1914 heritage. We have been notified of the above listed building consent applications for the development at Liverpool Street Station. The Society strongly objects to the applications because their approval, and the approval of the related listed building consent application **25/00474/LBC** would result in *substantial harm* to the Grade II-listed Liverpool Street Station and Bishopsgate Conservation Area.

Background

The Twentieth Century Society were involved in a previous, similar scheme for Liverpool Street Station (**23/00453/FULEIA**), developed by Sellar and designed by Herzog and de Meuron. This involvement included a pre-application meeting. The Society provided a letter of objection to the planning application on 7 December 2023. This scheme is still under consideration on the City of London's planning portal.

The Society has been involved in this application (**25/00474/LBC** and the associated planning permission application **25/00494/FULEIA**), including at pre-application stage. The Society provided letters of response to pre-application consultations on 26 November 2024 and 19 February 2025. In these pre-application consultation responses we expressed strong concerns about the proposed scheme and the potential for *substantial harm* to the significance of the Grade II-listed station. We have provided letters of objection to planning permission application **25/00494/FULEIA** and listed building consent application **25/00474/LBC** on 04/07/25 and 16/09/25 respectively.

Significance

In the 1970s, British Rail sought to redevelop the 19th-century Liverpool Street station. A very vociferous and successful heritage campaign—the Liverpool Street Station Campaign (LISSCA)—

The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

Registered office: 70 Cowcross Street, London EC1M 6EJ
Registered Charity no 1110244

figure-headed by lawyer George Allan and involving the poet John Betjeman thwarted British Rail's demolition plans and led to the Grade II listing of the Liverpool Street offices and western train shed in 1975. At the urging of the Greater London Council, British Rail came forward with a new scheme proposing the greater retention, extension and upgrade of the Victorian station. This was a significant cultural realignment which was both emblematic of a changing attitude to historic architecture and city planning and encouraged future campaigns which in themselves made a decisive difference to how Victorian architecture, and in particular Victorian railway architecture was perceived and valued.

The radically revised scheme was carried out between 1985 and 1992 by British Rail's Architecture and Design Group, directed by Nick Derbyshire, working with the project architect Alistair Lansley. The work involved extending the Victorian western train shed with a second transept over a new concourse, containing shops on elevated walkways, rebuilding an office at 50 Liverpool St and creating two new entrances on Liverpool St and Bishopsgate. The 1985-92 work was sensitively handled and executed to the highest standards. New additions borrowed from the design of the Victorian station and sought to enhance what remained of it. The architects took a conservation-led approach, which was applauded by contemporary architectural critics: 50 Liverpool Street was rebuilt in facsimile "in [a] full-blooded Victorian style" (Building Design, 1992); new entrances were "distinguished", "echoing the architecture of the adjoining Great Eastern Hotel" (Architects' Journal, 1988); the new transept to the concourse imitated the original further north; and roof trusses to the extension carefully replicated those on the 19th-century train shed. The new work showcased intelligent design and careful attention to detail in response to a demanding site and brief. The late 20th-century work is an important part of the history and development of Liverpool Street and its architecture is of a very high standard.

Policy

As the proposed development would directly impact on a listed building, the local authority should be mindful of **Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990**: "*In considering whether to grant planning permission [...] for development which affects a listed building or its setting, the local planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*"

The local authority should also be mindful of heritage policies in section 16 of the **National Planning Policy Framework (NPPF; 2024)**, particularly at **Paragraph 202**: "*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.*"

At **Paragraph 212**:

*When considering the impact of a proposed development on the significance of a designated heritage asset, **great weight should be given to the asset's conservation** (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (our emphasis).*

At Paragraph 213 (a):

***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** (our emphasis).**

The City of London Local Plan 2040 (Revised Proposed Submission Draft April 2024) states at **Policy HE1: Managing Change to the Historic Environment (2)**:

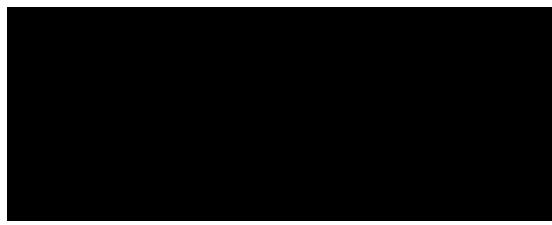
2. There will be a presumption against heritage harm and development causing harm to, or total loss of, the significance of designated heritage assets will be refused unless it is clearly demonstrated that the heritage and/or wider public benefits outweigh that harm or loss.
Applicants should clearly demonstrate that all reasonable efforts have been made to sustain the existing use, find new appropriate uses, or mitigate the extent of the harm to the significance of the asset; ***and whether the works proposed are the minimum required to secure the long-term use of the asset*** (our emphasis).

The Society's Assessment

It is our assessment that the above listed building consent applications, in addition to listed building consent application **25/00474/LBC**, would result in harm to the relevant heritage assets from the degree of demolition and alteration proposed to their settings, and in *substantial harm* to the designated heritage assets that are the Grade II-listed Liverpool Street Station and Bishopsgate Conservation Area. Because of this, the Society objects to the above listed building consent applications.

Yours sincerely,

Gus Wray



Caseworker

The Twentieth Century Society
70 Cowcross Street
London, EC1M 6EJ

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the *Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.



New Life for
Remarkable Buildings

Mr Kieran McCallum
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

By email to: [REDACTED]

Our reference: 250445

25.06.25

Dear Mr McCallum,

25/00494/FULEIA | Phased development comprising partial demolition and alterations, including station concourse, trainsheds, and truss/columns, demolition of 50 Liverpool Street, demolition of Bishopsgate Square entrance and Hope Square entrance; works to Sun Street Passage; Works of reconstruction and remodelling of station basement, lower and upper concourse levels, new station columns/truss and roof (in part); introduction of new lifts, escalators and stairs and service spine at basement; creation of new units at lower and upper concourse levels for Class E | Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza, London, EC2M 7PY

Thank you for consulting SAVE Britain Heritage on the above planning application for Liverpool Street Station. Following careful assessment of the planning documents submitted, we write to **object** to this application in the strongest terms on heritage grounds. The proposed scheme would cause substantial harm to a grade II listed building, the setting of multiple heritage assets of all listing grades and the Bishopsgate Conservation Area.

We acknowledge a need to improve the accessibility and operational functionality of the station. However, in our view, the scale of harm proposed is neither justified nor outweighed by the proposed public benefits. We have not seen evidence that alternative options to over-station development were considered, such as providing a baseline minimum harm scheme or considering alternative sites for development to fund the station improvement works. Furthermore, the proposed development is not found by the applicant to be currently viable.

For these reasons we do not consider the proposals satisfy local, regional and national planning policy for the preservation and enhancement of the City of London's historic environment, and we therefore recommend that the Local Planning Authority refuse planning and listed building consent.

If your authority proposes to determine the applications in their current form and is minded to grant consent, we will request them to be called in for determination by the Secretary of State.

Proposals

This application seeks permission for an over-station office development which will reach a height of 97.67m AOD. This amounts to 19-storeys, plus a one-storey rooftop building located to the east. The listed 20th century concourse roof and supporting columns would be demolished. In their place, columns of increased bulk would be introduced into the concourse and a new roof structure installed to support the over-station development. Permission is sought to demolish 50 Liverpool Street and the entrance towers onto Hope Square and Bishopsgate, for replacement with new entrances, including access to the office development above. Seven additional lifts would be installed, the majority of these to facilitate movement between the upper and lower concourse, and four additional escalators would be installed bringing the total to eight escalators. New retail and restaurant units would be introduced, including along the platform at upper concourse level. The existing upper concourse would be demolished.

Significance

See the appendix for detail on the history and significance of Liverpool Street Station.

Assessment

SAVE objects to this application for the following reasons:

1. Substantial harm to Liverpool Street Station

We consider that the proposed demolition of the grade II listed, 20th century concourse station roof and supporting structure would be substantially harmful in heritage terms. The 1985-1991 reconfiguration of the station was recognised in Historic England's recent reassessment of the station's statutory listing in 2022 as a key element of the station's historic and architectural significance. The entry states that Derbyshire's work "*enhances the spatial quality and cohesiveness of the remodelled station's unified concourse*" (LEN 1286133). The loss of listed 20th century fabric of sensitive and high-quality design would almost entirely remove the historic and architectural significance of the 1990s remodelling

and permanently compromise the architectural continuity, harmony and cohesiveness of the station as a whole.

The special interest derived from the station's spatial quality in its entirety is recognised in the applicant's own Heritage Statement (para 4.2.4) as being of the "*highest significance*". It states (para 4.2.1) "*with respect to the general spatial character of the roof, the original (1873-75) and the modern (1985-91) parts make a similar contribution to the spatial quality and, therefore, to the special interest of the listed building*". It is therefore considered extremely contradictory that, in light of this assessment, the level of harm attributed to the loss of a significant portion of the 20th century roof is deduced to be "*low-level, less than substantial harm*" (para 5.2.1).

The cathedral-like spatial quality of the 20th century and Victorian roof is created by the natural light which floods through the glass-vaulted roof. The erection of a vast office building above the concourse would cast the station below into shadow. We do not consider that the proposed stepped-back massing of the over-station development can mitigate the loss of daylight into the station. The proposed lighting scheme and reflective base of the underside of the office development would be a poor imitation of natural daylight, which is a key characteristic of the station's design.

The proposed the loss of highly ornate existing columns, which comprise part of Derbyshire's listed 1985-1991 remodelling would further erode the significance of the station. In our view, the proposed replacement columns are an over-scaled and over-engineered design solution to supporting immense over-station development. The increased massing and form of these columns from 930mm to 1500mm would disrupt the visual rhythm of the station's carefully conceived interior.

When read as a whole, the proposed development would amount to substantial harm to a designated heritage asset by demolishing and disrupting heritage features which are recognised as being of fundamental importance to the character and significance of this listed building.

We note that a revision of the Sellar's proposal, which we have been consulted on, involves much less demolition of, and therefore less harm to, listed station fabric.

Policy

- We consider the harm caused through the extensive demolition of the grade II listed station to be substantial when assessed against NPPF (2024) policies 212, 213 and 214. Such harm cannot therefore accord with the Local Planning Authority's legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- The application contravenes Policy HC1 of the London Plan (2021) which requires that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets significance and appreciation of their surroundings.
- The substantial harm identified would generate further policy conflict in respect of Policy CS12 of the City Plan (2015) [Historic Environment].
- The National Planning Practice Guidance (PPG) states that: *"in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed."* In our view, the harm identified above to the grade II listed station clearly reaches this threshold for substantial harm.

2. Substantial harm to the Bishopsgate Conservation Area

We object to the construction of a building up to 97.67m AOD (19 storeys) within the Bishopsgate Conservation Area. The City of London's reappraisal of the Bishopsgate Conservation Area (BCA) in 2007 saw the station entrance onto Liverpool Street, 50 Liverpool Street and the Great Eastern Hotel included within its boundaries. The BCA Character Summary and Management Strategy SPD (2014) characterises Liverpool Street Station as *"one of London's principal gothic revival buildings"* which, when considered alongside the hotel, forms *"a notable Victorian townscape group"*.

We consider that introducing a building of this vast bulk, scale and massing into this significant group of Victorian buildings would be substantially harmful to the character and appearance of the BCA. The proposed vast height would grossly dominate this historic streetscape and harm the setting of the Grade II* Great Eastern Hotel.

The demolition of 50 Liverpool Street and the station's existing entrances would see a further erosion of the character of the conservation area and a key layer of its historical evolution. Whilst not included in the station's listing, 50 Liverpool Street was designed to replicate the former Victorian station range and contributes positively to the prevailing character and scale of the surrounding BCA.

Policy

- We consider the harm caused by the proposed office building would cause substantial harm to the listed station's setting and the positive contribution it currently makes to the BCA. This harm would contravene the duty to preserve the BCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- We also consider the total loss of 50LS to be substantially harmful in NPPF terms (para 216).

3. Substantial harm to setting of Grade II* Great Eastern Hotel

SAVE is opposed to the proposed 19-storey tall development within the setting of the grade II* listed hotel. The Great Eastern Hotel is a building of landmark quality, whose striking silhouette defines the corner of Liverpool Street and Bishopsgate. Development of this scale and massing within the hotel's setting would drastically diminish the building's architectural legibility and an appreciation of its significance and would amount to substantial harm.

Policy

- NPPF (2024) para 213 provides that substantial harm to assets of the highest significance, including listing grades II* and I, should be wholly exceptional.
- Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings.

4. Public Benefits and Justification

We acknowledge the need to upgrade the accessibility and operational functionality of the station which would provide public benefits. NPPF Para 214 requires that where a proposed development will lead to substantial harm to a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. It is our view that a case for enabling development has not been made to outweigh the substantial heritage harms set out above for the following reasons:

- 1) The proposed scheme is not currently viable: The justification for the proposed over-station development is reliant upon its purported need to fund upgrades to the station (Financial Viability Assessment, para 2.2). However, the submitted financial viability assessment concludes that in the current market conditions *"the Proposed Development is not technically viable, as a surplus is not generated once the costs of the Station Improvement Works are taken into consideration"* (para 8.2). The viability of the scheme is reliant on an 'upswing in market conditions' over the 8+ year construction period. In our view, this is wholly inadequate to justify the substantial harm caused by the proposed scheme. We note that design elements, such as the roof garden, adds unnecessary cost to an already expensive scheme that is supposed to pay for station improvements.

2) Inadequate consideration of alternative options –baseline scheme: We have not seen evidence that alternative options to over-station development have been given adequate consideration. A costed, baseline minimum harm scheme is needed to set out clearly the cost of necessary station upgrades versus the cost of the over-station development works. This is not clear in the submitted cost summary which, for example, includes as part of the station improvement costs over £13m for the station roof and £10m for the 'transfer structure' without clarity as to whether these costs are actually part of the intrusive works to the station for the purpose of an office development above.¹

We request that the LPA satisfies itself that all alternative options to over-station development have been explored and evidenced, including a costed, minimum harm baseline scheme for station improvement works. Without this information, there is inadequate justification for the economic need for the proposed over-station development.

3) Inadequate consideration of alternative options –alternative sites: Para 3.7.1 of the Environment Statement, Vol I, Chapter 3 states that, "*no other sites were considered*" for the proposed development. As alternative approaches to station upgrades which do not rely on extensive loss of fabric, setting and significance and to heritage assets have not been considered, in our view the substantial harm proposed cannot be justified.

5. Acceptability of a tall building in this location

The application site, located outside the City of London's Eastern Cluster, is within an area designated inappropriate for tall buildings. Policy CS14: Tall Buildings of the current City Plan (2015) indicates that a tall building on the majority of the application site would be inappropriate (see also: Figure N of CS14). Policy D9: Tall Buildings of the London Plan (2021) clearly states in para B (3) that, "*tall buildings should only be developed in locations that are identified as suitable in Development Plans.*" At a proposed total height of 97.67m AOD, and largely within the BCA, this application for a tall building runs counter to both of these local and regional policies.

6. Disruption to travel & timescales for delivery

The application provides that the indicative timescale for scheme completion is 2036. We consider that improvements to the station's functionality and accessibility could be

¹ Appendix 2, Financial Viability Assessment

delivered more efficiently and quickly without the time required for over-station works, which in turn would reduce the disruption to travellers. A minimum harm base scheme is needed to fully examine this option.

7. Views of St Paul's

The primacy of St Paul's Cathedral is recognised as a key component of London's skyline and is recognised in the London View Management Framework (LVMF). The proposed development appears visible within LVMF Views 17B.1 and 17B.2 (Golden Jubilee/Hungerford Bridges), and we have serious concerns regarding how View 15B.1 would be impacted in wintertime, without tree cover. The visibility of the scheme in these views appear to be visually intrusive on the setting and appreciation of St Paul's Cathedral, which is a grade I listed building of national importance. We consider the proposals contravene Policy HC4 of the London Plan (2021) which requires that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.

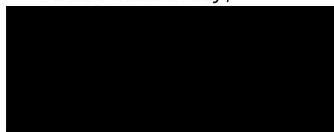
Conclusion

We **object** to this application in the strongest terms on heritage grounds. The proposed scheme would cause substantial harm to a grade II listed building, the setting of multiple heritage assets of all listing grades and the Bishopsgate Conservation Area.

Due to serious concerns regarding the scheme's viability, we do not consider this harm would be outweighed by the public benefits claimed by the applicant or sufficiently justified to the exceptional degree required under the NPPF and The Planning Act.

For these reasons, we recommend that the Local Planning Authority to refuse planning and listed building consent for this application.

Yours sincerely,



Lydia Franklin
Conservation Officer

Appendix

History and Significance of Liverpool Street Station

Liverpool Street Station and the adjoining former Great Eastern Hotel are two of the City of London's most important historic landmarks. Their individual and collective heritage significance is recognised in their recent listing reappraisals which saw the listing entries for both listed buildings substantially updated, and the hotel's listing grade upgraded from II to II*. Together, they form a highly significant and complimentary ensemble of historic railway buildings and remain a seminal testament to the development of railways in London and the country at large in the 19th century.

Liverpool Street Station was built between 1873-1875 to designs by great Scottish railway engineer Edward Wilson. A unique element of the station's special historic and architectural interest is its partial rebuilding in 1985-1991 by architect Nick Derbyshire in a historically complementary and conservation-led style, which was of an extremely high standard.

The remodelled concourse was designed as a second transept to match Wilson's original further to the north, allowing the station's architectural unity and 'cathedral-like' spatial character to be preserved. Derbyshire's designs emphasise a defining characteristic of the station: natural light pouring in through the glass roofs of both concourse and shed. The quality and volume of light is key to the building's historic and architectural significance and is a defining feature of the passenger experience which places Liverpool Street amongst the great historic railway termini of London.

The former Great Eastern Hotel (now Andaz) adjoins the station, facing both into the concourse and out onto the prominent corner of Liverpool Street and Bishopsgate. Built in two phases, the western section was completed in 1884 to designs of Charles and Edward Barry, with the eastern section added in 1901 by Col. Edis. The composition as a whole is highly unified and characterised by striking red Essex brick with decorative stone dressings and attractive projecting bands between floors. The hotel has long street elevations and is designed to dominate the corner of Liverpool Street and Bishopsgate.

The enduring contribution of these listed buildings to their wider setting is also enshrined and recognised in their inclusion within the Bishopsgate Conservation Area (BCA) which was expanded in 2007 to include part of the station and former Great Eastern Hotel.

The BCA Supplementary Planning Document (SPD) notes that Liverpool Street Station is one of "*London's great Victorian stations*" and when considered as a whole with the Great Eastern Hotel forms a notable Victorian townscape group. This includes the neo-gothic

style entrance towers onto Hope Square and Bishopsgate which are striking outward looking features of the station's 1985 remodelling and pay homage to the station's evolution over time. Liverpool Street Station, its 20th century remodelling and the Great Eastern Hotel contribute positively to the architectural character of the surrounding conservation area.



Mr Kieran McCallum
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: [REDACTED]

Our ref: L01597318

8 September 2025

Dear Mr McCallum

Arrangements for Handling Heritage Applications Direction 2021

Authorisation to Determine an Application for Listed Building Consent as Seen Fit

**ENTRANCE TO LIVERPOOL STREET STATION BISHOPSGATE LONDON
Application No 25/00476/LBC**

Applicant:	Network Rail Infrastructure
Grade of building(s):	II
Proposed works:	Phased development comprising partial demolition of Liverpool Street Station, including (in part) including station concourse, trainsheds, and truss/columns, demolition of 50 Liverpool Street, demolition of Bishopsgate Square entrance and Hope Square entrance; Works of reconstruction and remodelling of station basement, lower and upper concourse levels, new station columns/truss and roof (in part); introduction of new lifts, escalators and stairs and service spine at basement; increased operational space; insertion of new ticket gates; creation of new station entrances from Hope Square and Bishopsgate Square; creation of new units at lower and upper concourse levels for Class E (shops, cafe, restaurants), hot food takeaway (Sui Generis) and pub/bar (Sui Generis); creation of new upper concourses and associated new public access from Exchange Square including new walkways; works associated with the construction of a new Over-station development (OSD) reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business), including new station roof, truss and columns (in part), creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



entrance; new station and office entrances to Liverpool Street and Bishopsgate; and all other associated listed building works.

Drawing numbers: Drawings as approved.

Date of application: 8 April 2025

Date of referral by Council: 27 August 2025

Date received by Historic England: 27 August 2025

Date referred to MHCLG: 8 September 2025

You are hereby authorised to determine the application for listed building consent referred to above as you think fit.

Yours sincerely

Claire Brady

Team Leader, Development Advice

E-mail: [REDACTED]

NB: This authorisation is not valid unless it has been appropriately endorsed by the Secretary of State.

Officials have considered the information given above on behalf of the Secretary of State, and do not intend to require the application concerned be referred.

Signed *Edward Chapman*

Date 10.10.2025



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700

HistoricEngland.org.uk

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Twentieth
Century
Society

Emailed to: [REDACTED]

16/09/2025

Dear Kieran McCallum,

SITE: Liverpool Street Station, Liverpool Street, London, EC2M 7QH

Ref: 25/00477/LBC; 25/00476/LBC; 25/00475/LBC; 25/00479/LBC

The Twentieth Century Society is the National Amenity Society charged with the protection and appreciation of post-1914 heritage. We have been notified of the above listed building consent applications for the development at Liverpool Street Station. The Society strongly objects to the applications because their approval, and the approval of the related listed building consent application **25/00474/LBC** would result in *substantial harm* to the Grade II-listed Liverpool Street Station and Bishopsgate Conservation Area.

Background

The Twentieth Century Society were involved in a previous, similar scheme for Liverpool Street Station (**23/00453/FULEIA**), developed by Sellar and designed by Herzog and de Meuron. This involvement included a pre-application meeting. The Society provided a letter of objection to the planning application on 7 December 2023. This scheme is still under consideration on the City of London's planning portal.

The Society has been involved in this application (**25/00474/LBC** and the associated planning permission application **25/00494/FULEIA**), including at pre-application stage. The Society provided letters of response to pre-application consultations on 26 November 2024 and 19 February 2025. In these pre-application consultation responses we expressed strong concerns about the proposed scheme and the potential for *substantial harm* to the significance of the Grade II-listed station. We have provided letters of objection to planning permission application **25/00494/FULEIA** and listed building consent application **25/00474/LBC** on 04/07/25 and 16/09/25 respectively.

Significance

In the 1970s, British Rail sought to redevelop the 19th-century Liverpool Street station. A very vociferous and successful heritage campaign—the Liverpool Street Station Campaign (LISSCA)—

The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

Registered office: 70 Cowcross Street, London EC1M 6EJ
Registered Charity no 1110244

figure-headed by lawyer George Allan and involving the poet John Betjeman thwarted British Rail's demolition plans and led to the Grade II listing of the Liverpool Street offices and western train shed in 1975. At the urging of the Greater London Council, British Rail came forward with a new scheme proposing the greater retention, extension and upgrade of the Victorian station. This was a significant cultural realignment which was both emblematic of a changing attitude to historic architecture and city planning and encouraged future campaigns which in themselves made a decisive difference to how Victorian architecture, and in particular Victorian railway architecture was perceived and valued.

The radically revised scheme was carried out between 1985 and 1992 by British Rail's Architecture and Design Group, directed by Nick Derbyshire, working with the project architect Alistair Lansley. The work involved extending the Victorian western train shed with a second transept over a new concourse, containing shops on elevated walkways, rebuilding an office at 50 Liverpool St and creating two new entrances on Liverpool St and Bishopsgate. The 1985-92 work was sensitively handled and executed to the highest standards. New additions borrowed from the design of the Victorian station and sought to enhance what remained of it. The architects took a conservation-led approach, which was applauded by contemporary architectural critics: 50 Liverpool Street was rebuilt in facsimile "in [a] full-blooded Victorian style" (Building Design, 1992); new entrances were "distinguished", "echoing the architecture of the adjoining Great Eastern Hotel" (Architects' Journal, 1988); the new transept to the concourse imitated the original further north; and roof trusses to the extension carefully replicated those on the 19th-century train shed. The new work showcased intelligent design and careful attention to detail in response to a demanding site and brief. The late 20th-century work is an important part of the history and development of Liverpool Street and its architecture is of a very high standard.

Policy

As the proposed development would directly impact on a listed building, the local authority should be mindful of **Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990**: "*In considering whether to grant planning permission [...] for development which affects a listed building or its setting, the local planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*"

The local authority should also be mindful of heritage policies in section 16 of the **National Planning Policy Framework (NPPF; 2024)**, particularly at **Paragraph 202**: "*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.*"

At **Paragraph 212**:

*When considering the impact of a proposed development on the significance of a designated heritage asset, **great weight should be given to the asset's conservation** (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (our emphasis).*

At Paragraph 213 (a):

***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* (our emphasis).**

The City of London Local Plan 2040 (Revised Proposed Submission Draft April 2024) states at **Policy HE1: Managing Change to the Historic Environment (2):**

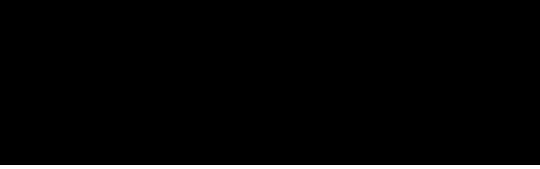
2. There will be a presumption against heritage harm and development causing harm to, or total loss of, the significance of designated heritage assets will be refused unless it is clearly demonstrated that the heritage and/or wider public benefits outweigh that harm or loss.
Applicants should clearly demonstrate that all reasonable efforts have been made to sustain the existing use, find new appropriate uses, or mitigate the extent of the harm to the significance of the asset; ***and whether the works proposed are the minimum required to secure the long-term use of the asset*** (our emphasis).

The Society's Assessment

It is our assessment that the above listed building consent applications, in addition to listed building consent application **25/00474/LBC**, would result in harm to the relevant heritage assets from the degree of demolition and alteration proposed to their settings, and in *substantial harm* to the designated heritage assets that are the Grade II-listed Liverpool Street Station and Bishopsgate Conservation Area. Because of this, the Society objects to the above listed building consent applications.

Yours sincerely,

Gus Wray



Caseworker

The Twentieth Century Society
70 Cowcross Street
London, EC1M 6EJ

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the *Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.



New Life for
Remarkable Buildings

Mr Kieran McCallum
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

By email to:

[REDACTED]

Our reference: 250445

25.06.25

Dear Mr McCallum,

25/00494/FULEIA | Phased development comprising partial demolition and alterations, including station concourse, trainsheds, and truss/columns, demolition of 50 Liverpool Street, demolition of Bishopsgate Square entrance and Hope Square entrance; works to Sun Street Passage; Works of reconstruction and remodelling of station basement, lower and upper concourse levels, new station columns/truss and roof (in part); introduction of new lifts, escalators and stairs and service spine at basement; creation of new units at lower and upper concourse levels for Class E | Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza, London, EC2M 7PY

Thank you for consulting SAVE Britain Heritage on the above planning application for Liverpool Street Station. Following careful assessment of the planning documents submitted, we write to **object** to this application in the strongest terms on heritage grounds. The proposed scheme would cause substantial harm to a grade II listed building, the setting of multiple heritage assets of all listing grades and the Bishopsgate Conservation Area.

We acknowledge a need to improve the accessibility and operational functionality of the station. However, in our view, the scale of harm proposed is neither justified nor outweighed by the proposed public benefits. We have not seen evidence that alternative options to over-station development were considered, such as providing a baseline minimum harm scheme or considering alternative sites for development to fund the station improvement works. Furthermore, the proposed development is not found by the applicant to be currently viable.

For these reasons we do not consider the proposals satisfy local, regional and national planning policy for the preservation and enhancement of the City of London's historic environment, and we therefore recommend that the Local Planning Authority refuse planning and listed building consent.

If your authority proposes to determine the applications in their current form and is minded to grant consent, we will request them to be called in for determination by the Secretary of State.

Proposals

This application seeks permission for an over-station office development which will reach a height of 97.67m AOD. This amounts to 19-storeys, plus a one-storey rooftop building located to the east. The listed 20th century concourse roof and supporting columns would be demolished. In their place, columns of increased bulk would be introduced into the concourse and a new roof structure installed to support the over-station development. Permission is sought to demolish 50 Liverpool Street and the entrance towers onto Hope Square and Bishopsgate, for replacement with new entrances, including access to the office development above. Seven additional lifts would be installed, the majority of these to facilitate movement between the upper and lower concourse, and four additional escalators would be installed bringing the total to eight escalators. New retail and restaurant units would be introduced, including along the platform at upper concourse level. The existing upper concourse would be demolished.

Significance

See the appendix for detail on the history and significance of Liverpool Street Station.

Assessment

SAVE objects to this application for the following reasons:

1. Substantial harm to Liverpool Street Station

We consider that the proposed demolition of the grade II listed, 20th century concourse station roof and supporting structure would be substantially harmful in heritage terms. The 1985-1991 reconfiguration of the station was recognised in Historic England's recent reassessment of the station's statutory listing in 2022 as a key element of the station's historic and architectural significance. The entry states that Derbyshire's work "*enhances the spatial quality and cohesiveness of the remodelled station's unified concourse*" (LEN 1286133). The loss of listed 20th century fabric of sensitive and high-quality design would almost entirely remove the historic and architectural significance of the 1990s remodelling

and permanently compromise the architectural continuity, harmony and cohesiveness of the station as a whole.

The special interest derived from the station's spatial quality in its entirety is recognised in the applicant's own Heritage Statement (para 4.2.4) as being of the "*highest significance*". It states (para 4.2.1) "*with respect to the general spatial character of the roof, the original (1873-75) and the modern (1985-91) parts make a similar contribution to the spatial quality and, therefore, to the special interest of the listed building*". It is therefore considered extremely contradictory that, in light of this assessment, the level of harm attributed to the loss of a significant portion of the 20th century roof is deduced to be "*low-level, less than substantial harm*" (para 5.2.1).

The cathedral-like spatial quality of the 20th century and Victorian roof is created by the natural light which floods through the glass-vaulted roof. The erection of a vast office building above the concourse would cast the station below into shadow. We do not consider that the proposed stepped-back massing of the over-station development can mitigate the loss of daylight into the station. The proposed lighting scheme and reflective base of the underside of the office development would be a poor imitation of natural daylight, which is a key characteristic of the station's design.

The proposed the loss of highly ornate existing columns, which comprise part of Derbyshire's listed 1985-1991 remodelling would further erode the significance of the station. In our view, the proposed replacement columns are an over-scaled and over-engineered design solution to supporting immense over-station development. The increased massing and form of these columns from 930mm to 1500mm would disrupt the visual rhythm of the station's carefully conceived interior.

When read as a whole, the proposed development would amount to substantial harm to a designated heritage asset by demolishing and disrupting heritage features which are recognised as being of fundamental importance to the character and significance of this listed building.

We note that a revision of the Sellar's proposal, which we have been consulted on, involves much less demolition of, and therefore less harm to, listed station fabric.

Policy

- We consider the harm caused through the extensive demolition of the grade II listed station to be substantial when assessed against NPPF (2024) policies 212, 213 and 214. Such harm cannot therefore accord with the Local Planning Authority's legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- The application contravenes Policy HC1 of the London Plan (2021) which requires that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets significance and appreciation of their surroundings.
- The substantial harm identified would generate further policy conflict in respect of Policy CS12 of the City Plan (2015) [Historic Environment].
- The National Planning Practice Guidance (PPG) states that: *"in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed."* In our view, the harm identified above to the grade II listed station clearly reaches this threshold for substantial harm.

2. Substantial harm to the Bishopsgate Conservation Area

We object to the construction of a building up to 97.67m AOD (19 storeys) within the Bishopsgate Conservation Area. The City of London's reappraisal of the Bishopsgate Conservation Area (BCA) in 2007 saw the station entrance onto Liverpool Street, 50 Liverpool Street and the Great Eastern Hotel included within its boundaries. The BCA Character Summary and Management Strategy SPD (2014) characterises Liverpool Street Station as *"one of London's principal gothic revival buildings"* which, when considered alongside the hotel, forms *"a notable Victorian townscape group"*.

We consider that introducing a building of this vast bulk, scale and massing into this significant group of Victorian buildings would be substantially harmful to the character and appearance of the BCA. The proposed vast height would grossly dominate this historic streetscape and harm the setting of the Grade II* Great Eastern Hotel.

The demolition of 50 Liverpool Street and the station's existing entrances would see a further erosion of the character of the conservation area and a key layer of its historical evolution. Whilst not included in the station's listing, 50 Liverpool Street was designed to replicate the former Victorian station range and contributes positively to the prevailing character and scale of the surrounding BCA.

Policy

- We consider the harm caused by the proposed office building would cause substantial harm to the listed station's setting and the positive contribution it currently makes to the BCA. This harm would contravene the duty to preserve the BCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- We also consider the total loss of 50LS to be substantially harmful in NPPF terms (para 216).

3. Substantial harm to setting of Grade II* Great Eastern Hotel

SAVE is opposed to the proposed 19-storey tall development within the setting of the grade II* listed hotel. The Great Eastern Hotel is a building of landmark quality, whose striking silhouette defines the corner of Liverpool Street and Bishopsgate. Development of this scale and massing within the hotel's setting would drastically diminish the building's architectural legibility and an appreciation of its significance and would amount to substantial harm.

Policy

- NPPF (2024) para 213 provides that substantial harm to assets of the highest significance, including listing grades II* and I, should be wholly exceptional.
- Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings.

4. Public Benefits and Justification

We acknowledge the need to upgrade the accessibility and operational functionality of the station which would provide public benefits. NPPF Para 214 requires that where a proposed development will lead to substantial harm to a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. It is our view that a case for enabling development has not been made to outweigh the substantial heritage harms set out above for the following reasons:

- 1) The proposed scheme is not currently viable: The justification for the proposed over-station development is reliant upon its purported need to fund upgrades to the station (Financial Viability Assessment, para 2.2). However, the submitted financial viability assessment concludes that in the current market conditions *"the Proposed Development is not technically viable, as a surplus is not generated once the costs of the Station Improvement Works are taken into consideration"* (para 8.2). The viability of the scheme is reliant on an 'upswing in market conditions' over the 8+ year construction period. In our view, this is wholly inadequate to justify the substantial harm caused by the proposed scheme. We note that design elements, such as the roof garden, adds unnecessary cost to an already expensive scheme that is supposed to pay for station improvements.

2) Inadequate consideration of alternative options –baseline scheme: We have not seen evidence that alternative options to over-station development have been given adequate consideration. A costed, baseline minimum harm scheme is needed to set out clearly the cost of necessary station upgrades versus the cost of the over-station development works. This is not clear in the submitted cost summary which, for example, includes as part of the station improvement costs over £13m for the station roof and £10m for the 'transfer structure' without clarity as to whether these costs are actually part of the intrusive works to the station for the purpose of an office development above.¹

We request that the LPA satisfies itself that all alternative options to over-station development have been explored and evidenced, including a costed, minimum harm baseline scheme for station improvement works. Without this information, there is inadequate justification for the economic need for the proposed over-station development.

3) Inadequate consideration of alternative options –alternative sites: Para 3.7.1 of the Environment Statement, Vol I, Chapter 3 states that, "*no other sites were considered*" for the proposed development. As alternative approaches to station upgrades which do not rely on extensive loss of fabric, setting and significance and to heritage assets have not been considered, in our view the substantial harm proposed cannot be justified.

5. Acceptability of a tall building in this location

The application site, located outside the City of London's Eastern Cluster, is within an area designated inappropriate for tall buildings. Policy CS14: Tall Buildings of the current City Plan (2015) indicates that a tall building on the majority of the application site would be inappropriate (see also: Figure N of CS14). Policy D9: Tall Buildings of the London Plan (2021) clearly states in para B (3) that, "*tall buildings should only be developed in locations that are identified as suitable in Development Plans.*" At a proposed total height of 97.67m AOD, and largely within the BCA, this application for a tall building runs counter to both of these local and regional policies.

6. Disruption to travel & timescales for delivery

The application provides that the indicative timescale for scheme completion is 2036. We consider that improvements to the station's functionality and accessibility could be

¹ Appendix 2, Financial Viability Assessment

delivered more efficiently and quickly without the time required for over-station works, which in turn would reduce the disruption to travellers. A minimum harm base scheme is needed to fully examine this option.

7. Views of St Paul's

The primacy of St Paul's Cathedral is recognised as a key component of London's skyline and is recognised in the London View Management Framework (LVMF). The proposed development appears visible within LVMF Views 17B.1 and 17B.2 (Golden Jubilee/ Hungerford Bridges), and we have serious concerns regarding how View 15B.1 would be impacted in wintertime, without tree cover. The visibility of the scheme in these views appear to be visually intrusive on the setting and appreciation of St Paul's Cathedral, which is a grade I listed building of national importance. We consider the proposals contravene Policy HC4 of the London Plan (2021) which requires that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.

Conclusion

We **object** to this application in the strongest terms on heritage grounds. The proposed scheme would cause substantial harm to a grade II listed building, the setting of multiple heritage assets of all listing grades and the Bishopsgate Conservation Area.

Due to serious concerns regarding the scheme's viability, we do not consider this harm would be outweighed by the public benefits claimed by the applicant or sufficiently justified to the exceptional degree required under the NPPF and The Planning Act.

For these reasons, we recommend that the Local Planning Authority to refuse planning and listed building consent for this application.

Yours sincerely,



Lydia Franklin
Conservation Officer

Appendix

History and Significance of Liverpool Street Station

Liverpool Street Station and the adjoining former Great Eastern Hotel are two of the City of London's most important historic landmarks. Their individual and collective heritage significance is recognised in their recent listing reappraisals which saw the listing entries for both listed buildings substantially updated, and the hotel's listing grade upgraded from II to II*. Together, they form a highly significant and complimentary ensemble of historic railway buildings and remain a seminal testament to the development of railways in London and the country at large in the 19th century.

Liverpool Street Station was built between 1873-1875 to designs by great Scottish railway engineer Edward Wilson. A unique element of the station's special historic and architectural interest is its partial rebuilding in 1985-1991 by architect Nick Derbyshire in a historically complementary and conservation-led style, which was of an extremely high standard.

The remodelled concourse was designed as a second transept to match Wilson's original further to the north, allowing the station's architectural unity and 'cathedral-like' spatial character to be preserved. Derbyshire's designs emphasise a defining characteristic of the station: natural light pouring in through the glass roofs of both concourse and shed. The quality and volume of light is key to the building's historic and architectural significance and is a defining feature of the passenger experience which places Liverpool Street amongst the great historic railway termini of London.

The former Great Eastern Hotel (now Andaz) adjoins the station, facing both into the concourse and out onto the prominent corner of Liverpool Street and Bishopsgate. Built in two phases, the western section was completed in 1884 to designs of Charles and Edward Barry, with the eastern section added in 1901 by Col. Edis. The composition as a whole is highly unified and characterised by striking red Essex brick with decorative stone dressings and attractive projecting bands between floors. The hotel has long street elevations and is designed to dominate the corner of Liverpool Street and Bishopsgate.

The enduring contribution of these listed buildings to their wider setting is also enshrined and recognised in their inclusion within the Bishopsgate Conservation Area (BCA) which was expanded in 2007 to include part of the station and former Great Eastern Hotel.

The BCA Supplementary Planning Document (SPD) notes that Liverpool Street Station is one of "*London's great Victorian stations*" and when considered as a whole with the Great Eastern Hotel forms a notable Victorian townscape group. This includes the neo-gothic

style entrance towers onto Hope Square and Bishopsgate which are striking outward looking features of the station's 1985 remodelling and pay homage to the station's evolution over time. Liverpool Street Station, its 20th century remodelling and the Great Eastern Hotel contribute positively to the architectural character of the surrounding conservation area.



Mr Kieran McCallum
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: [REDACTED]

Our ref: L01597320

10 September 2025

Dear Mr McCallum

Arrangements for Handling Heritage Applications Direction 2021

Authorisation to Determine an Application for Listed Building Consent as Seen Fit

**POLICE CALL BOX HOPE SQUARE LONDON
Application No 25/00477/LBC**

Applicant:	Network Rail Infrastructure Limited
Grade of building(s):	II
Proposed works:	Temporary Dismantling of Police Call Box and reconstruction in same location in Hope Square, Liverpool Street.
Drawing numbers:	Drawings as approved
Date of application:	8 April 2025
Date of referral by Council:	27 August 2025
Date received by Historic England:	27 August 2025
Date referred to MHCLG:	10 September 2025

You are hereby authorised to determine the application for listed building consent referred to above as you think fit.

Yours sincerely

Claire Brady

Team Leader, Development Advice

E-mail: [REDACTED]

Officials have considered the information given above on behalf of the Secretary of State, and do not intend to require the application concerned be referred.

Signed *Edward Chapman*

Date 10.10.2025



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England

Secretary of State.



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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.

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Twentieth
Century
Society

Emailed to: [REDACTED]

16/09/2025

Dear Kieran McCallum,

SITE: Liverpool Street Station, Liverpool Street, London, EC2M 7QH

Ref: 25/00477/LBC; 25/00476/LBC; 25/00475/LBC; 25/00479/LBC

The Twentieth Century Society is the National Amenity Society charged with the protection and appreciation of post-1914 heritage. We have been notified of the above listed building consent applications for the development at Liverpool Street Station. The Society strongly objects to the applications because their approval, and the approval of the related listed building consent application **25/00474/LBC** would result in *substantial harm* to the Grade II-listed Liverpool Street Station and Bishopsgate Conservation Area.

Background

The Twentieth Century Society were involved in a previous, similar scheme for Liverpool Street Station (**23/00453/FULEIA**), developed by Sellar and designed by Herzog and de Meuron. This involvement included a pre-application meeting. The Society provided a letter of objection to the planning application on 7 December 2023. This scheme is still under consideration on the City of London's planning portal.

The Society has been involved in this application (**25/00474/LBC** and the associated planning permission application **25/00494/FULEIA**), including at pre-application stage. The Society provided letters of response to pre-application consultations on 26 November 2024 and 19 February 2025. In these pre-application consultation responses we expressed strong concerns about the proposed scheme and the potential for *substantial harm* to the significance of the Grade II-listed station. We have provided letters of objection to planning permission application **25/00494/FULEIA** and listed building consent application **25/00474/LBC** on 04/07/25 and 16/09/25 respectively.

Significance

In the 1970s, British Rail sought to redevelop the 19th-century Liverpool Street station. A very vociferous and successful heritage campaign—the Liverpool Street Station Campaign (LISSCA)—

The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

Registered office: 70 Cowcross Street, London EC1M 6EJ
Registered Charity no 1110244

figure-headed by lawyer George Allan and involving the poet John Betjeman thwarted British Rail's demolition plans and led to the Grade II listing of the Liverpool Street offices and western train shed in 1975. At the urging of the Greater London Council, British Rail came forward with a new scheme proposing the greater retention, extension and upgrade of the Victorian station. This was a significant cultural realignment which was both emblematic of a changing attitude to historic architecture and city planning and encouraged future campaigns which in themselves made a decisive difference to how Victorian architecture, and in particular Victorian railway architecture was perceived and valued.

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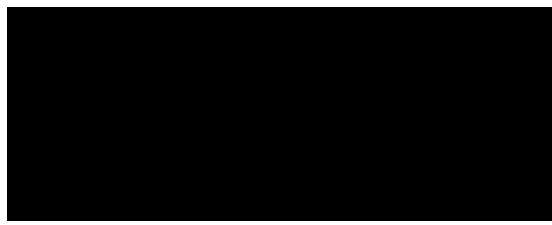
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Yours sincerely,

Gus Wray



Caseworker

The Twentieth Century Society
70 Cowcross Street
London, EC1M 6EJ

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the *Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.



New Life for
Remarkable Buildings

Mr Kieran McCallum
City of London Corporation
PO Box 270
Guildhall
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EC2P 2EJ

By email to: [REDACTED]

Our reference: 250445

25.06.25

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If your authority proposes to determine the applications in their current form and is minded to grant consent, we will request them to be called in for determination by the Secretary of State.

Proposals

This application seeks permission for an over-station office development which will reach a height of 97.67m AOD. This amounts to 19-storeys, plus a one-storey rooftop building located to the east. The listed 20th century concourse roof and supporting columns would be demolished. In their place, columns of increased bulk would be introduced into the concourse and a new roof structure installed to support the over-station development. Permission is sought to demolish 50 Liverpool Street and the entrance towers onto Hope Square and Bishopsgate, for replacement with new entrances, including access to the office development above. Seven additional lifts would be installed, the majority of these to facilitate movement between the upper and lower concourse, and four additional escalators would be installed bringing the total to eight escalators. New retail and restaurant units would be introduced, including along the platform at upper concourse level. The existing upper concourse would be demolished.

Significance

See the appendix for detail on the history and significance of Liverpool Street Station.

Assessment

SAVE objects to this application for the following reasons:

1. Substantial harm to Liverpool Street Station

We consider that the proposed demolition of the grade II listed, 20th century concourse station roof and supporting structure would be substantially harmful in heritage terms. The 1985-1991 reconfiguration of the station was recognised in Historic England's recent reassessment of the station's statutory listing in 2022 as a key element of the station's historic and architectural significance. The entry states that Derbyshire's work "*enhances the spatial quality and cohesiveness of the remodelled station's unified concourse*" (LEN 1286133). The loss of listed 20th century fabric of sensitive and high-quality design would almost entirely remove the historic and architectural significance of the 1990s remodelling

and permanently compromise the architectural continuity, harmony and cohesiveness of the station as a whole.

The special interest derived from the station's spatial quality in its entirety is recognised in the applicant's own Heritage Statement (para 4.2.4) as being of the "*highest significance*". It states (para 4.2.1) "*with respect to the general spatial character of the roof, the original (1873-75) and the modern (1985-91) parts make a similar contribution to the spatial quality and, therefore, to the special interest of the listed building*". It is therefore considered extremely contradictory that, in light of this assessment, the level of harm attributed to the loss of a significant portion of the 20th century roof is deduced to be "*low-level, less than substantial harm*" (para 5.2.1).

The cathedral-like spatial quality of the 20th century and Victorian roof is created by the natural light which floods through the glass-vaulted roof. The erection of a vast office building above the concourse would cast the station below into shadow. We do not consider that the proposed stepped-back massing of the over-station development can mitigate the loss of daylight into the station. The proposed lighting scheme and reflective base of the underside of the office development would be a poor imitation of natural daylight, which is a key characteristic of the station's design.

The proposed the loss of highly ornate existing columns, which comprise part of Derbyshire's listed 1985-1991 remodelling would further erode the significance of the station. In our view, the proposed replacement columns are an over-scaled and over-engineered design solution to supporting immense over-station development. The increased massing and form of these columns from 930mm to 1500mm would disrupt the visual rhythm of the station's carefully conceived interior.

When read as a whole, the proposed development would amount to substantial harm to a designated heritage asset by demolishing and disrupting heritage features which are recognised as being of fundamental importance to the character and significance of this listed building.

We note that a revision of the Sellar's proposal, which we have been consulted on, involves much less demolition of, and therefore less harm to, listed station fabric.

Policy

- We consider the harm caused through the extensive demolition of the grade II listed station to be substantial when assessed against NPPF (2024) policies 212, 213 and 214. Such harm cannot therefore accord with the Local Planning Authority's legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- The application contravenes Policy HC1 of the London Plan (2021) which requires that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets significance and appreciation of their surroundings.
- The substantial harm identified would generate further policy conflict in respect of Policy CS12 of the City Plan (2015) [Historic Environment].
- The National Planning Practice Guidance (PPG) states that: *"in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed."* In our view, the harm identified above to the grade II listed station clearly reaches this threshold for substantial harm.

2. Substantial harm to the Bishopsgate Conservation Area

We object to the construction of a building up to 97.67m AOD (19 storeys) within the Bishopsgate Conservation Area. The City of London's reappraisal of the Bishopsgate Conservation Area (BCA) in 2007 saw the station entrance onto Liverpool Street, 50 Liverpool Street and the Great Eastern Hotel included within its boundaries. The BCA Character Summary and Management Strategy SPD (2014) characterises Liverpool Street Station as *"one of London's principal gothic revival buildings"* which, when considered alongside the hotel, forms *"a notable Victorian townscape group"*.

We consider that introducing a building of this vast bulk, scale and massing into this significant group of Victorian buildings would be substantially harmful to the character and appearance of the BCA. The proposed vast height would grossly dominate this historic streetscape and harm the setting of the Grade II* Great Eastern Hotel.

The demolition of 50 Liverpool Street and the station's existing entrances would see a further erosion of the character of the conservation area and a key layer of its historical evolution. Whilst not included in the station's listing, 50 Liverpool Street was designed to replicate the former Victorian station range and contributes positively to the prevailing character and scale of the surrounding BCA.

Policy

- We consider the harm caused by the proposed office building would cause substantial harm to the listed station's setting and the positive contribution it currently makes to the BCA. This harm would contravene the duty to preserve the BCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- We also consider the total loss of 50LS to be substantially harmful in NPPF terms (para 216).

3. Substantial harm to setting of Grade II* Great Eastern Hotel

SAVE is opposed to the proposed 19-storey tall development within the setting of the grade II* listed hotel. The Great Eastern Hotel is a building of landmark quality, whose striking silhouette defines the corner of Liverpool Street and Bishopsgate. Development of this scale and massing within the hotel's setting would drastically diminish the building's architectural legibility and an appreciation of its significance and would amount to substantial harm.

Policy

- NPPF (2024) para 213 provides that substantial harm to assets of the highest significance, including listing grades II* and I, should be wholly exceptional.
- Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings.

4. Public Benefits and Justification

We acknowledge the need to upgrade the accessibility and operational functionality of the station which would provide public benefits. NPPF Para 214 requires that where a proposed development will lead to substantial harm to a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. It is our view that a case for enabling development has not been made to outweigh the substantial heritage harms set out above for the following reasons:

- 1) The proposed scheme is not currently viable: The justification for the proposed over-station development is reliant upon its purported need to fund upgrades to the station (Financial Viability Assessment, para 2.2). However, the submitted financial viability assessment concludes that in the current market conditions *"the Proposed Development is not technically viable, as a surplus is not generated once the costs of the Station Improvement Works are taken into consideration"* (para 8.2). The viability of the scheme is reliant on an 'upswing in market conditions' over the 8+ year construction period. In our view, this is wholly inadequate to justify the substantial harm caused by the proposed scheme. We note that design elements, such as the roof garden, adds unnecessary cost to an already expensive scheme that is supposed to pay for station improvements.

2) Inadequate consideration of alternative options –baseline scheme: We have not seen evidence that alternative options to over-station development have been given adequate consideration. A costed, baseline minimum harm scheme is needed to set out clearly the cost of necessary station upgrades versus the cost of the over-station development works. This is not clear in the submitted cost summary which, for example, includes as part of the station improvement costs over £13m for the station roof and £10m for the 'transfer structure' without clarity as to whether these costs are actually part of the intrusive works to the station for the purpose of an office development above.¹

We request that the LPA satisfies itself that all alternative options to over-station development have been explored and evidenced, including a costed, minimum harm baseline scheme for station improvement works. Without this information, there is inadequate justification for the economic need for the proposed over-station development.

3) Inadequate consideration of alternative options –alternative sites: Para 3.7.1 of the Environment Statement, Vol I, Chapter 3 states that, "*no other sites were considered*" for the proposed development. As alternative approaches to station upgrades which do not rely on extensive loss of fabric, setting and significance and to heritage assets have not been considered, in our view the substantial harm proposed cannot be justified.

5. Acceptability of a tall building in this location

The application site, located outside the City of London's Eastern Cluster, is within an area designated inappropriate for tall buildings. Policy CS14: Tall Buildings of the current City Plan (2015) indicates that a tall building on the majority of the application site would be inappropriate (see also: Figure N of CS14). Policy D9: Tall Buildings of the London Plan (2021) clearly states in para B (3) that, "*tall buildings should only be developed in locations that are identified as suitable in Development Plans.*" At a proposed total height of 97.67m AOD, and largely within the BCA, this application for a tall building runs counter to both of these local and regional policies.

6. Disruption to travel & timescales for delivery

The application provides that the indicative timescale for scheme completion is 2036. We consider that improvements to the station's functionality and accessibility could be

¹ Appendix 2, Financial Viability Assessment

delivered more efficiently and quickly without the time required for over-station works, which in turn would reduce the disruption to travellers. A minimum harm base scheme is needed to fully examine this option.

7. Views of St Paul's

The primacy of St Paul's Cathedral is recognised as a key component of London's skyline and is recognised in the London View Management Framework (LVMF). The proposed development appears visible within LVMF Views 17B.1 and 17B.2 (Golden Jubilee/Hungerford Bridges), and we have serious concerns regarding how View 15B.1 would be impacted in wintertime, without tree cover. The visibility of the scheme in these views appear to be visually intrusive on the setting and appreciation of St Paul's Cathedral, which is a grade I listed building of national importance. We consider the proposals contravene Policy HC4 of the London Plan (2021) which requires that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.

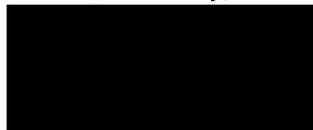
Conclusion

We **object** to this application in the strongest terms on heritage grounds. The proposed scheme would cause substantial harm to a grade II listed building, the setting of multiple heritage assets of all listing grades and the Bishopsgate Conservation Area.

Due to serious concerns regarding the scheme's viability, we do not consider this harm would be outweighed by the public benefits claimed by the applicant or sufficiently justified to the exceptional degree required under the NPPF and The Planning Act.

For these reasons, we recommend that the Local Planning Authority to refuse planning and listed building consent for this application.

Yours sincerely,



Lydia Franklin
Conservation Officer

Appendix

History and Significance of Liverpool Street Station

Liverpool Street Station and the adjoining former Great Eastern Hotel are two of the City of London's most important historic landmarks. Their individual and collective heritage significance is recognised in their recent listing reappraisals which saw the listing entries for both listed buildings substantially updated, and the hotel's listing grade upgraded from II to II*. Together, they form a highly significant and complimentary ensemble of historic railway buildings and remain a seminal testament to the development of railways in London and the country at large in the 19th century.

Liverpool Street Station was built between 1873-1875 to designs by great Scottish railway engineer Edward Wilson. A unique element of the station's special historic and architectural interest is its partial rebuilding in 1985-1991 by architect Nick Derbyshire in a historically complementary and conservation-led style, which was of an extremely high standard.

The remodelled concourse was designed as a second transept to match Wilson's original further to the north, allowing the station's architectural unity and 'cathedral-like' spatial character to be preserved. Derbyshire's designs emphasise a defining characteristic of the station: natural light pouring in through the glass roofs of both concourse and shed. The quality and volume of light is key to the building's historic and architectural significance and is a defining feature of the passenger experience which places Liverpool Street amongst the great historic railway termini of London.

The former Great Eastern Hotel (now Andaz) adjoins the station, facing both into the concourse and out onto the prominent corner of Liverpool Street and Bishopsgate. Built in two phases, the western section was completed in 1884 to designs of Charles and Edward Barry, with the eastern section added in 1901 by Col. Edis. The composition as a whole is highly unified and characterised by striking red Essex brick with decorative stone dressings and attractive projecting bands between floors. The hotel has long street elevations and is designed to dominate the corner of Liverpool Street and Bishopsgate.

The enduring contribution of these listed buildings to their wider setting is also enshrined and recognised in their inclusion within the Bishopsgate Conservation Area (BCA) which was expanded in 2007 to include part of the station and former Great Eastern Hotel.

The BCA Supplementary Planning Document (SPD) notes that Liverpool Street Station is one of "*London's great Victorian stations*" and when considered as a whole with the Great Eastern Hotel forms a notable Victorian townscape group. This includes the neo-gothic

style entrance towers onto Hope Square and Bishopsgate which are striking outward looking features of the station's 1985 remodelling and pay homage to the station's evolution over time. Liverpool Street Station, its 20th century remodelling and the Great Eastern Hotel contribute positively to the architectural character of the surrounding conservation area.



Mr Kieran McCallum
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: [REDACTED]

Our ref: L01597271

3 September 2025

Dear Mr McCallum

Arrangements for Handling Heritage Applications Direction 2021

Authorisation to Determine an Application for Listed Building Consent as Seen Fit

LONDON SOCIETY OF EAST ANGLIANS WAR MEMORIAL, LIVERPOOL STREET STATION.

Application No 25/00479/LBC

Applicant:	Network Rail Infrastructure Limited
Grade of building(s):	II
Proposed works:	Dismantling and relocation of London Society of East Anglians (LSEA) War Memorial, within Liverpool Street Station.
Drawing numbers:	Drawings as approved
Date of application:	8 April 2025
Date of referral by Council:	27 August 2025
Date received by Historic England:	27 August 2025
Date referred to MHCLG:	

You are hereby authorised to determine the application for listed building consent referred to above as you think fit.

Yours sincerely

Claire Brady
Team Leader, Development Advice
E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



NB: This authorisation is not valid unless it has been appropriately endorsed by the Secretary of State.

Officials have considered the information given above on behalf of the Secretary of State, and do not intend to require the application concerned be referred.

Signed *Edward Chapman*

Date 10.10.2025



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

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