



## **Planning Applications Sub-Committee**

### **SUPPLEMENTARY PACK 4**

### **Comments from Statutory Consultees**

**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.

- External Consultees Page 3
- Internal Consultees Page 269

**For Decision**  
(Pages 3 - 278)

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**From:** [Active Travel England Planning](#)  
**To:** [PLN - Comments](#)  
**Subject:** LPA Reference: 25/00494/FULEIA Standing Advice Response  
**Date:** 05 June 2025 17:20:41

THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 25/00494/FULEIA

**ATE Reference:** ATE/25/00793/FULL

**Site Address:** ANDAZ HOTEL, 40 LIVERPOOL STREET, LONDON, EC2M 7QN

**Proposal:** 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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed

comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,



**Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

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Instagram [@activetravelengland](https://www.instagram.com/activetravelengland) and on [LinkedIn](#)

]]>

[ ref:a0zTw000004Js5dIAC;3a7048f94b2165e86acab88d9b5089e7:ref ]



**From:** [REDACTED]  
**To:**  
**Subject:** Re: 25/00494/FULEIA - Planning Application - Consultation  
**Date:** 05 June 2025 13:58:18  
**Attachments:** [image.png](#)

THIS IS AN EXTERNAL EMAIL

Classification: Internal

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, if a crane is needed for installation purposes? We would like to draw your attention to the following:

**CAA Crane Notification**

where a crane is 100m or higher, crane operators are advised to notify the CAA ([arops@caa.co.uk](mailto:arops@caa.co.uk)) and Defence Geographic Centre ([dvofo@mod.gov.uk](mailto:dvofo@mod.gov.uk)) via Crane notification | Civil Aviation Authority ([caa.co.uk](http://caa.co.uk))

<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

**Simon Vince** | Airport Planning Manager

On behalf of Heathrow Airport Ltd.



Airport Safeguarding Limited | Admin Building (EDC), Teesside  
International Airport, Darlington, DL2 1LU  
United Kingdom

[WEBSITE](#)

Visit our website: [Home - Airport Safeguarding Limited](#) or connect on LinkedIn - Airport Safeguarding Limited.



**From:** PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
**Sent:** 05 June 2025 09:38  
**Cc:** PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
**Subject:** 25/00494/FULEIA - Planning Application - Consultation

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Dear Sir or Madam,

Please see the attached letter pertaining to consultation for planning application 25/00494/FULEIA.

Kind regards,

Planning Administration Team

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**From:** [NATS Safeguarding](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: 25/00494/FULEIA - Planning Application - Consultation [SG36348]  
**Date:** 05 June 2025 15:26:43  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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THIS IS AN EXTERNAL EMAIL

Our Ref: SG36348

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

**NATS**

**NATS Safeguarding**

E: [natssafeguarding@nats.co.uk](mailto:natssafeguarding@nats.co.uk)

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)



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NATS Internal

**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>

**Sent:** 05 June 2025 09:38

**Cc:** PLN - Comments <PLNComments@cityoflondon.gov.uk>

**Subject:** [EXTERNAL] 25/00494/FULEIA - Planning Application - Consultation

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Dear Sir or Madam,

Please see the attached letter pertaining to consultation for planning application 25/00494/FULEIA.

Kind regards,

Planning Administration Team

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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

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From: [REDACTED]  
To: [REDACTED]  
Subject: RE: 25/00494/FULEIA - Planning Application - Consultation  
Date: 05 June 2025 15:26:02  
Attachments: [image001.png](#)

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THIS IS AN EXTERNAL EMAIL

Official

Good afternoon

This is not in the Wandsworth Council area.

Best Regards

**Planning Technical Support**  
Planning Department

**Chief Executive Directorate**  
Serving Richmond and Wandsworth Councils  
[www.wandsworth.gov.uk](http://www.wandsworth.gov.uk)



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From: PLN - Comments <PLNComments@cityoflondon.gov.uk>  
Sent: 05 June 2025 09:38  
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>  
Subject: 25/00494/FULEIA - Planning Application - Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to consultation for planning application 25/00494/FULEIA.

Kind regards,

Planning Administration Team

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**From:**  
**To:**  
**Subject:** RE: 25/00494/FULEIA - Planning Application - Consultation (Our Ref 25-0277)  
**Date:** 07 June 2025 07:22:25  
**Attachments:** [image001.png](#)

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THIS IS AN EXTERNAL EMAIL

Good morning,

Thank you for your email in relation to 25/00494/FULEIA

HSE is the statutory consultee for planning applications that involve or may involve a relevant building. Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A(9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Once again thank you for your email, if you require further advice with regard to this application, please do not hesitate to contact the planning gateway one team quoting our reference number in all future correspondence.

Kind Regards

*Allison Gray*

Allison Gray | Operational Support Planning Gateway One | Building Safety Division

✉: [planninggatewayone@hse.gov.uk](mailto:planninggatewayone@hse.gov.uk)



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**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>

**Sent:** 05 June 2025 09:38

**Cc:** PLN - Comments <PLNComments@cityoflondon.gov.uk>

**Subject:** 25/00494/FULEIA - Planning Application - Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to consultation for planning application 25/00494/FULEIA.

Kind regards,

Planning Administration Team

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Os nad chi yw'r derbynnydd bwriadedig, mae unrhyw ddatgeliad, copïo, dosbarthu neu unrhyw gamau eraill a gymerir gan ddefnyddio'r wybodaeth sydd yn yr e-bost hwn wedi'u gwahardd yn llym. Rhwch wybod i'r anfonwr am y gwall fel y gellir dilyn gweithdrefnau mewnol, a dileu'r cyfathrebiad o'ch system ar unwaith wedi hynny.



LPA Ref: 25/00494/FULEIA

London City Airport Ref: 2025/LCY/150

Date: 12/06/2025

Dear Kieran McCallum,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found not to conflict with London City Airport's safeguarding criteria.

<b>Reference</b>	25/00494/FULEIA
<b>Proposal</b>	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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at

	Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.
Location	Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool Street, EC2M 7QN; and 50 Liverpool Street, EC2M 7PY
Borough	Kieran McCallum
Case Officer	City of London

We would however, like to make you aware of the following:

#### **CAA Crane Notification**

where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)

<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

Kind regards,

**Simon Vince**  
**On behalf of London City Airport**



[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

13 June 2025  
Crossrail Ref: CRL-IP-3450

Transport for London  
Crossrail Safeguarding  
5 Endeavour Square  
LONDON  
E20 1JN

Dear Kieran McCallum,

**25/00494/FULEIA : Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool Street, EC2M 7QN; and 50 Liverpool Street, EC2M 7P**

*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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.*

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 05 June 2025, requesting the views of TfL on the above application. I confirm that this application relates to land within the limits of land subject to consultation by the Crossrail Safeguarding Direction.

**I have no comment on the application.**

If you require any further information, please contact:

[CRL\\_Safeguarding@tfl.gov.uk](mailto:CRL_Safeguarding@tfl.gov.uk)

Yours sincerely,

**Safeguarding Officer (Elizabeth line)**

TfL Infrastructure Protection Team

Floor 7 Red Zone: 5 Endeavour Square : London : E20 1JN

.....  
Note: please send, by email, all planning application consultations that are captured by the SoS Safeguarding Direction to [CRL\\_Safeguarding@tfl.gov.uk](mailto:CRL_Safeguarding@tfl.gov.uk)  
.....

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

**From:** [Location Enquiries](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: 25/00494/FULEIA - Planning Application - Consultation  
**Date:** 16 June 2025 15:39:53  
**Attachments:** [image001.png](#)  
[image002.png](#)

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THIS IS AN EXTERNAL EMAIL

FAO Kieran McCallum,

**Application No:** 25/00494/FULEIA

**Site address:** Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool Street, EC2M 7QN; and 50 Liverpool Street, EC2M 7PY

**Proposal:** 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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.

Thank you for your consultation.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. It will need to be demonstrated to the satisfaction of TfL Infrastructure Protection engineers that:

- our right of support is not compromised
- the development will not have any detrimental effect on our structures either in the short or long term
- the design must be such that the loading imposed on our structures is not increased or removed
- we offer no right of support to the development or land

Therefore, we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed.

1. Before the pre-commencement/Site formation/Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a. provide an overview of the overall development including both design on temporary and permanent works including superstructures, substructures and foundations;
  - b. provide demolition details;
  - c. accommodate the location of the existing London Underground structures;
  - d. before commencing any work on site, the implication and the need for upgrading of railway security must be agreed with TfL;
  - e. an assessment of railway noise and vibration shall be carried out and appropriate protective measures shall be taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration;
  - f. provide details on the use of tall plant/scaffolding for the demolition phase;
  - g. before operation of any equipment likely to emit electromagnetic radiation, an EMC assessment shall be submitted to LUL for their consideration and written approval;
  - h. an assessment shall be carried out and precautions taken to protect the property against dust, smoke and fumes generated by the railway, its equipment or operating equipment;
  - i. an assessment shall be carried out and precautions shall be taken to prevent odour, dust, smoke and fume arising from the proposed works from entering into LU shafts and ventilation system in the vicinity;
  - j. demonstrate to TfL's satisfaction that no drainage will flow on to TfL land and no existing TfL drainage ditches or pipes will be connected to or impaired;
  - k. provide ground movement impact assessment on LU structures taking into consideration short term and long term load effects due to the proposed development works.
2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
- a. provide details on the use of tall plant/scaffolding for substructure works;
  - b. provide design details of permanent works and associated temporary works and Risk Assessment Method Statement (RAMS) for foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent).
3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
- a. provide details on the use of tall plant/scaffolding for superstructure works;
  - b. provide design details of permanent works and associated temporary works and Risk Assessment Method Statement (RAMS) for all superstructure works (temporary and permanent);
  - c. before carrying any landscaping or planting works in the vicinity of railway infrastructure, TfL's agreement to such scheme should be obtained.
4. No works shall be carried out until sufficient evidence to the satisfaction of TfL, that works with the potential to impact/change LUL assets, will meet the requirements as outlined within TfL Standard S1538 – Assurance, or similar standard as may be applicable at the time, have been submitted to and approved in writing by the local planning authority. In addition to permanent works, this requirement will include any enabling works, temporary works or temporary measures to facilitate delivery;

5. No works shall be carried out within TfL assets until it has been demonstrated to the satisfaction of TfL that the proposed London Underground (LU) station works must achieve TfL Pathway Stage 2 as a minimum and must show how progress towards Stage 4 will be achieved for a Development Agreement (DA) and Section 106 (S106) to be signed.

**Reason:** To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

We also ask that the following informative is added:

1. The applicant is advised to contact TfL Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant; scaffolding; security; boundary treatment and landscaping.

*This response is made as a Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*

Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



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**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>

**Sent:** Thursday, June 5, 2025 9:38 AM

**Cc:** PLN - Comments <PLNComments@cityoflondon.gov.uk>

**Subject:** 25/00494/FULEIA - Planning Application - Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to consultation for planning application 25/00494/FULEIA.

Kind regards,

**Planning Administration Team**

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Kieran McCallum  
Development Division  
City of London Corporation

By email

**Harlow Council**  
**Civic Centre**  
The Water Gardens  
Harlow  
Essex CM20 1WG  
[www.harlow.gov.uk](http://www.harlow.gov.uk)

20 June 2025  
HDC ref: HW/CAA/25/40002

Dear Mr McCallum,

**Subject: Planning application 25/00494/FULEIA (Phased development comprising partial demolition and alterations at London Liverpool Street Station)**

Thank you for giving Harlow Council the opportunity to comment on this significant planning application.

In 1947, Harlow was designated as one of the first New Towns, providing a key source of much-needed houses and employment after WW2, together with a network of green, open spaces. In 2017, the district and peripheral areas were designated as the Harlow and Gilston Garden Town to deliver sustainable, inclusive growth and regeneration for new and existing communities.

This is part of a wider transformation of Harlow, focused on growth and investment in the district over the next decade and beyond, which will see over 19,000 new homes, a 50% increase in employment opportunities, a new hospital and the country's first comprehensive Sustainable Transport Corridor network. This transformation is supported by £63 million of Government funding and significant private sector investment.

This ambitious transformation of Harlow is supported by its location, with two motorway junctions on the M11 and two railway stations providing easy access to London, Cambridge, Stansted Airport and beyond. The two railway stations in the district – Harlow Town and Harlow Mill – are both on the West Anglia Main Line with six trains to London Liverpool Street per hour.

Every year around a million railway journeys start at both Harlow's stations combined, meaning thousands of Harlow residents regularly travel to Liverpool Street station. It is, therefore, important to current and future residents of Harlow – and the wider Harlow and Gilston Garden Town – that Liverpool Street station is fit for the future. By 2045 it is expected that the population of the Harlow and Gilston Garden Town area, including Harlow itself, will have increased by 45,000 residents to about 140,000. With this substantial increase in population, and annual passenger numbers at Liverpool Street station forecast to grow by 35% in the next 16 years, future-proofing it now is essential.

Harlow residents travelling to London Liverpool Street, whether it be for work or leisure purposes, expect that the station has sufficient capacity, is accessible for all, benefits from sufficient retail and commercial facilities and provides sufficient amenity space in the station's surroundings. It is recognised that at present, however, the station experiences heavy congestion at peak times and lacks step-free access, with potential for various other improvements.

Harlow Council recognises that the proposed scheme would deliver the following improvements which have the potential to benefit thousands of Harlow residents who use Liverpool Street Station annually:

- the new lifts, escalators, stairs, ticket gates and station entrances will ease the congestion which is currently experienced and provide capacity for increased usage arising from planned growth in the wider region;
- the improved accessibility will ensure the station is fit for use by all;
- the creation of new retail and commercial units in and around the station – along with new public amenity space and public realm works – will allow users of the station to make better use of it and its surroundings;
- the improved bicycle parking provision will make it easier for those who travel by railway with a bicycle and wish to stop at the station before continuing their journey.

It is expected that the Liverpool Street station improvements will, in time, encourage more people to travel by train and, therefore, travel using sustainable modes of transport. This is particularly important for the Harlow and Gilston Garden Town which is aiming for up to 60% of journeys originating there to be made by sustainable transport modes. This will primarily be delivered by the town's Sustainable Transport Corridor network, but other improvements are also being made in Harlow to improve use of sustainable transport, and rail travel in particular. For example, it is planned that Harlow Town Railway Station will be redesigned with a new northern station entrance, including modifications to the existing main building, as well as a new bus stop layout, zebra crossings and cycle route. At Harlow Mill Railway Station, new bus stops, upgraded walking and cycling paths and a signalled crossing are planned. These are in addition to other recent improvements which have been completed.

Improvements such as the ones planned at London Liverpool Street station will also encourage increased use of rail travel and, therefore, also play a part in aiding the delivery of the sustainable transport target of 60%, as well as assisting the wider regional and national aim to increase use of sustainable modes of transport.

It is recognised, however, that London Liverpool Street station is in the Bishopsgate Conservation Area and the 19<sup>th</sup> century building itself is Grade II listed, with structures of historic interest such as 19<sup>th</sup> century train sheds. There are also a number of surrounding listed heritage assets which could be affected, in particular due to the height of the proposed development. The planning application is, however, accompanied by relevant assessments in accordance with planning legislation and the NPPF, which recognise the historic sensitivity of the buildings, as well as impacts on surrounding assets. It is noted that the impacts on surrounding assets are, importantly, mostly considered to not be significant. It is also noted that the proposals include various improvements which will improve the heritage benefits of the station, such as the removal of 1980s retail units, reopening of historic windows, reintegration of lost Victorian station buildings and introduction of a more historic colour scheme.

Harlow Council therefore supports the proposed development due to the wider benefits it will bring and, in particular, to the tens of thousands of current and future Harlow residents using London Liverpool Street station.

Yours sincerely,



**Peter Alsop**

Assistant Director – Planning and Garden Town  
Harlow Council

[peter.alsop@harlow.gov.uk](mailto:peter.alsop@harlow.gov.uk)

Date: 23 June 2025  
Our ref: 515078  
Your ref: 25/00494/FULEIA



City of London

**BY EMAIL ONLY**

PLNComments@cityoflondon.gov.uk

Hornbeam House  
Crewe Business Park  
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Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

**Planning Consultation:** Phased development comprising partial demolition and alterations, including station concourse, train sheds, 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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works

**Location:** Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool Street, EC2M 7QN; and 50 Liverpool Street, EC2M 7PY

Thank you for your consultation on the above dated 05 June 2025 which was received by Natural England on 05 June 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**SUMMARY OF NATURAL ENGLAND'S ADVICE**

**NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

## **Sites of Special Scientific Interest Impact Risk Zones**

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the [data.gov.uk](https://data.gov.uk) website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

**Helen Churchill**  
**Consultations Team**

## Annex A – Natural England general advice

### Protected Landscapes

Paragraph 189 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/1/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

### Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.landscapelinstitute.org.uk/guidelines-for-landscape-and-visual-impact-assessment-glvia3/) for further guidance.

### Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/complying-with-the-biodiversity-duty) for further information.

### Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sites-of-special-scientific-interest-public-body-responsibilities)).

### Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities - GOV.UK](https://www.gov.uk/government/publications/protected-species-and-development-advice-for-local-planning-authorities) (standing advice) to help planning authorities understand the impact of particular developments on protected species.



## Annex A – Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply](https://www.gov.uk/wildlife-licences) (www.gov.uk) for more information.

### Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK](https://www.gov.uk/local-nature-recovery-strategies) (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England](https://www.gov.uk/habitats-and-species-of-principal-importance-in-england) (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](https://www.brownfieldhub.org.uk/) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](https://data.gov.uk/open-mosaic-habitat) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

### Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/national-planning-policy-framework) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

[Biodiversity Net Gain](https://www.gov.uk/biodiversity-net-gain) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](https://www.gov.uk/biodiversity-net-gain-planning-practice-guidance) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](https://www.gov.uk/calculate-biodiversity-value) for more information. For small development sites, [The Small Sites Metric](https://www.gov.uk/the-small-sites-metric) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](https://www.gov.uk/sites-of-special-scientific-interest)

## Annex A – Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

### **Ancient woodland, ancient and veteran trees**

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### **Best and most versatile agricultural land and soils**

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### **Green Infrastructure**

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](#) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](#). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

## Annex A – Natural England general advice

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure-map) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk/gi-mapping-analysis) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

### **Access and Recreation:**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

### **Rights of Way, Access land, Coastal access and National Trails:**

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment).



Kieran McCallum  
Corporation Of London

**Our ref:** NE/2025/138249/01-L01  
**Your ref:** 25/00494/FULEIA

[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

**Date:** 24 June 2025

Dear Kieran,

**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; 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; provision of over-station development reaching a maximum height of 97.67m aod to accommodate Class E use (commercial, service and business); and creation of an auditorium (sui generis) at level 18 with ancillary terrace; creation of a public amenity terrace (sui generis) at level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.**

**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 the Environment Agency.

Based on the information submitted, we have **no objections** to the proposal, as submitted.

#### **Advice to LPA**

This development site has been the subject of past industrial activity which poses a risk of pollution to controlled waters.

We are unable to provide site-specific advice relating to land contamination as we have recently revised our priorities so that we can focus on:

- Protecting and improving the groundwater that supports existing drinking water supplies
- Groundwater within important aquifers for future supply of drinking water or other environmental use.

We recommend that you refer to our published '[Guiding Principles for Land Contamination](#)' which outlines the approach which should be adopted when managing this site's risks to the water environment.

We also advise that you consult with your Environmental Health/ Environmental Protection Department for advice on generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that the environmental protection of controlled waters is considered alongside any human health protection requirements. This approach is supported by paragraph 170 of the National Planning Policy Framework.

### **Model Procedures and good practice**

We recommend that developers should:

1. Follow the risk management framework provided in [Land contamination risk management \(LCRM\)](#), when dealing with land affected by contamination.
2. Refer to our [Guiding principles for land contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site. The local authority can advise on risk to other receptors, such as human health.
3. Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed.
4. Refer to the [contaminated land](#) pages on GOV.UK for more information.

### **Proximity to permitted sites**

The proposed development in close proximity to an activity regulated by a permit, issued by the Environment Agency under the Environmental Permitting Regulations.

New developments within 75m metres of large (e.g. >5MWth) MCP diesel standby engines especially if aggregated to a >50MWth EPR installation permit, including those on *UBS Broadgate Data Centre* (Permit: [EPR/ZP3238DK](#)), could result in impacts including the nearby community being exposed to short term peak nitrogen oxides, engine fumes/odour and noise.

The severity of these impacts will depend on the duration of outage/emergency events, prevailing meteorological conditions, engine plant emission standards and (if installed) time to engine emission abatement (SCR) on start-up.

Planning policy requirements (paragraph 193 of the National Planning Policy Framework) state that new development should integrate effectively with existing

businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

There are limits to the measures that the operator can take to prevent impacts to local receptors. Consequently, it is important that planning decisions take full account of paragraph 193 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s). UBS Broadgate Data Centre - EPR/ZP3238DK are required to manage outage events' impacts through a locally agreed Air Quality Management Plan (AQMP); this should be reviewed, and potentially augmented with an updated AQ impact model (re)assessment.

## **Advice to applicants**

### **Waste on-site**

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works are waste or have ceased to be waste. Under the Code of Practice:

- Excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
- Treated materials can be transferred between sites as part of a hub and cluster project
- Some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommends that developers should refer to:

- The [position statement](#) on the Definition of Waste: Development Industry Code of Practice
- The [waste management](#) page on GOV.UK

**Waste to be taken off-site**

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on GOV.UK for more information.

If you have any questions please contact me on 0203 025 5486 or email me at [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk), quoting the reference at the beginning of this letter.

Yours sincerely

**Mr Andy Goymer**  
**Planning Specialist**

Direct dial 0203 025 5486

Direct e-mail [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk)



From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Port of London Authority response (DC 831) Plan ref: 25/00494/FULEIA Liverpool Street Station  
Date: 24 June 2025 11:10:50

THIS IS AN EXTERNAL EMAIL

FAO: Kieran McCallum

Dear Kieran

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned application, for the proposed phased development at Liverpool Street Station. I have now had the opportunity to review the application documents and, given the location of the proposed development in proximity to the Tidal Thames, can confirm the PLA has no comments to make.

Regards

Michael

**Michael Atkins**  
Senior Planning Officer

Port of London Authority  
T: [REDACTED] | M: [REDACTED]

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23/06/25

**City of London Corporation  
PO BOX 270  
Guildhall  
London  
EC2P 2EJ**

**Address: Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street  
Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza, London, EC2M  
7PY.**

**LPA Reference: 25/00494/FULEIA**

Dear Mr McCallum,

Thank you for consulting the Georgian Group on the above application for Planning Permission. Based on the information available to date, the Group forwards its objection to the proposed scheme for the reasons set out below.

### **Summary**

The application site is located within an area designated as being inappropriate for tall buildings in the City of London Local Plan. The proposed development is therefore contrary to policy CS14(2) within the local plan, as well as policy D9(B) within the London Plan.

The location, height and massing of the proposed development would cause considerable harm to heritage assets of the highest importance. The harm to St Paul's Cathedral is evident within views from Waterloo Bridge and the Golden Jubilee/Hungerford Bridge – both protected views within the *London View Management Framework SPG*. Further harm would be caused to the relationship between St Paul's Cathedral and the City churches, ultimately having a detrimental impact on London's wider historic environment.

The impact on the 18<sup>th</sup> and 19<sup>th</sup> century buildings within the Bishopsgate Conservation area would be considerable. This is particularly concerning in relation to St Botolph's Church and views toward this important heritage asset. In addition to this, Devonshire Square and New Street would have their setting negatively impacted owing to the scale of the proposed development – compounding the harm to the Bishopsgate Conservation Area.

National and local policy is clear that harm to heritage assets and their setting should be avoided. Where harm does occur, it must be clearly and convincingly justified, and such harm should be given the greatest weight in the decision-making process.

The Georgian Group has serious concerns over this application for Planning Permission due to the harm that would be caused to heritage assets of the highest importance. The Group objects to this application and recommends your local authority refuse consent.

## Significance of Surrounding Heritage Assets

The Georgian Group's statutory remit includes buildings dating between 1700 and 1840 and it is only those buildings which the Group will highlight in our correspondence. For the impact on Liverpool Street Station itself, the Group defers to the expertise of our sister National Amenity Societies.

### a) St Paul's Cathedral

St Paul's Cathedral is Wren's masterpiece, and its dome became his lifelong obsession. As part of plans to repair and rejuvenate Old St Paul's - before its destruction in The Great Fire - Wren proposed the introduction of a new domed crossing to the medieval building. The idea of the dome persisted through all his subsequent designs for the new cathedral and was ultimately realised in the form we see today.

Since its completion, St Paul's has dominated London's skyline. It has provided the stage for great national events and has been depicted in countless works of art. Its location – deliberately positioned on a hill within the city - was intended to ensure the building remained visible from the River Thames and from long-range views across the capital.

The role and contribution of St Paul's Cathedral to the London skyline are formally recognised within the *London View Management Framework*. However, views toward the cathedral are not confined to the protected viewpoints alone. St Paul's is visible from numerous other locations and notable landmarks, particularly along the southern bank of the Thames, all of which contribute to its significance and enduring presence within London's townscape.

### b) St Botolph-without-Bishopsgate

St Botolph-without-Bishopsgate is a Grade II\* listed building, designed by James Gould and George Dance the Elder in the early 18th century. Dance later became Clerk of Works for the City of London, giving him effective control over architectural changes within the City. The body of the church and its tower are well preserved, with the eastern elevation and arched window - framed by pairs of Doric pilasters supporting a pediment - being of particular interest.

This impressive composition occupies a prominent position on Bishopsgate and is visible in longer views, enhancing both the surrounding streetscape and the wider Bishopsgate Conservation Area. Views of the tower and lantern against a clear skyline along Bishopsgate contribute significantly to the church's importance, as well as to the historic character of the conservation area, reflecting what would historically have been its most prominent building.

### c) Bishopsgate Conservation Area

The Bishopsgate Conservation Area is of particular interest, illustrating notable examples of Georgian town planning, with later Victorian and Edwardian developments woven into the historic fabric. Views within the conservation area make a strong contribution to its distinctive character and reflect the unique building stock found within its environs. *The Bishopsgate Conservation Area SPD* identifies these key views, which include notable buildings dating from the 18<sup>th</sup> and early 19<sup>th</sup> centuries, alongside historic street patterns that have survived from the period.



A group of late 18<sup>th</sup>-century warehouses on New Street and the eastern side of Devonshire Square create a distinctive character within this part of the conservation area. Originally constructed for the East India Company in the late 18<sup>th</sup> and early 19<sup>th</sup> centuries, the buildings were later used by the Port of London Authority from 1909 and subsequently converted for office use in the 1970s. Views looking east along New Street are specifically referenced in the SPD as contributing to the area's special interest. From this viewpoint, the historic scale and character of the area are particularly evident.

Similarly, when situated within or to the east of Devonshire Square, one can clearly perceive the historic scale of this part of the conservation area - an important factor contributing to its overall significance.

The wider conservation area is characterised by distinct sections of consistent scale and height, with few buildings deviating from this pattern. This consistency allows for prominent views across the area and enables the historic character and appearance to be clearly read and appreciated while moving through the surviving street layout.

### **Proposal**

The proposals for planning permission include the redevelopment of Liverpool Street Station including the demolition and creation of new entrances into the station to provide new lifts, escalators and stairs. The project includes the introduction of over-station development which will reach a height of 97.67m AOD to provide commercial, service and business uses.

### **The Proposals and Their Impact**

#### **a) St Paul's Cathedral**

The height and massing of the proposed development would cause harm to the setting and therefore significance of St Paul's Cathedral.

The *London View Management Framework* (LVMF) Supplementary Planning Guidance (SPG) outlines the importance of View 15: River Prospect - Waterloo Bridge and provides specific guidelines for development within its setting. With respect to View 15B, the SPG states that development should not dominate the peristyle, drum, dome, or western towers of St Paul's, and that the visual separation between the Cathedral and the eastern and northern clusters must be maintained.

View 15B faces downstream, with St Paul's Cathedral serving as a key landmark that draws the viewer's eye when crossing the bridge. In this view, the Cathedral is clearly separated from both the eastern and northern clusters, and its drum, peristyle, and dome are distinguishable against a clear skyline. The proposed development sits within the setting of St Paul's, positioned between the northwestern tower and the peristyle. AVR 9 from the accompanying Townscape and Visual Impact Assessment (TVIA) shows a wireline of the proposed development, partially obscured by the tree canopies on the Victoria Embankment in the foreground. Your local authority must be assured that seasonal changes would not reveal more of the development, which would introduce a visible intrusion into the setting of St Paul's - contrary to LVMF guidance.

There is also the potential for harm in kinetic views along Waterloo Bridge and in glimpse views, where the proposed development could obscure the silhouette St Paul's Cathedral.

St Paul's Cathedral is also the dominant structure in Views 17B.1 and 17B.2 (from the Golden Jubilee and Hungerford Footbridges), as recognised in the LVMF SPG. The document makes clear

that St Paul's is the single most important structure in this view and that its setting should be preserved. AVRs 3 and 4 of the TVIA demonstrate the harmful impact the proposed development would have, primarily through reducing the visual gap between St Paul's and the eastern cluster - thereby diminishing its skyline prominence.

Wren and his contemporaries deliberately designed a harmonious skyline of towers and spires across the city, with St Paul's as the architectural and symbolic centre. A historic and significant relationship exists between St Paul's Cathedral and the surrounding City churches. This relationship is clearly visible in many south-bank views of the Thames, where, for example, the spire of St Mary-le-Bow appears to the east of the Cathedral's dome. The proposed development would obscure and challenge this historic visual relationship. This impact is evident in AVRs 15, 16, 17, and 18 of the TVIA and represents a further encroachment on the Cathedral's setting.

The Group has also previously raised concerns with your authority regarding two additional applications for planning permission that would similarly harm the setting of St Paul's Cathedral:

1. 55 and 65 Old Broad Street, which would appear in views along Waterloo Bridge and harm the visibility of the peristyle - contrary to LVMF guidance.
2. 55 Bishopsgate, which would further erode the visual separation between the eastern cluster and the Cathedral, diminishing its prominence on the skyline.

Given these examples, the cumulative impact of the proposed development must be considered in your authority's decision-making.

In conclusion, the proposed development would harm the significance of St Paul's Cathedral through its negative impact on the Cathedral's setting. For the purposes of the National Planning Policy Framework (NPPF), this would constitute less than substantial harm at the middle of the spectrum.

#### b) St Botolph-without-Bishopsgate

The setting of St Botolph's Church contributes significantly to its overall significance. Positioned prominently on Bishopsgate, the church features in both short-range and long-range views, giving it a distinct landmark quality. The height and massing of the proposed development would have a harmful impact on this setting, effectively erasing the church's visual prominence in views along Bishopsgate and undermining its historic relationship with this important thoroughfare.

Views 47, 48, and 49 clearly demonstrate the harmful impact of the development on the church's setting. Currently, the tower and lantern of St Botolph's are framed against a clear skyline, enhancing the church's visibility and landmark status. The introduction of the proposed development would harm this composition, with the height and massing of the new towers effectively removing the church's prominence.

This impact would cause considerable harm to the significance of the church itself, as well as to the wider streetscape, and the character and appearance of the Bishopsgate Conservation Area. For the purposes of the National Planning Policy Framework (NPPF), the level of harm is assessed as being at the mid to higher end of less than substantial harm.

#### c) Bishopsgate Conservation Area

Specific views within the Bishopsgate Conservation Area contribute significantly to its significance and allow its special character and appearance to be fully appreciated. The

proposed development would negatively impact several of these important views, thereby causing harm to the significance of the conservation area.

As previously outlined in relation to St Botolph's Church, similar concerns apply to the Bishopsgate Conservation Area, in which the church is a key feature. The church occupies a prominent position on Bishopsgate and makes a substantial contribution to the area's character and appearance. The proposed development would compete visually with the church, and its height and massing would effectively remove the landmark quality of the church's tower and lantern. This would result in considerable harm to the significance of the conservation area by disrupting the historic and visual relationship between the church, Bishopsgate, and the wider streetscape. This impact is clearly demonstrated in Views 47, 48, and 49 of the TVIA.

New Street is another important component of the conservation area, where its late 18<sup>th</sup> and 19<sup>th</sup> century character can still be experienced. Formerly known as Hand Alley, it became New Street in 1782, and Nos. 5, 6, and 7 New Street survive from this period. These dwellings form a coherent group that contributes to the streetscape and to views along the street. No. 12, the Magpie Public House, dating to 1830, sits on the northern side and, together with adjacent buildings and later warehouses, maintains a consistent scale. The southern side is defined by the former East India Company and later Port of London Authority warehouse buildings, which help establish the street's unique character. The consistent rooflines and architectural scale reflect the phased development of the area during the late 18<sup>th</sup> and 19<sup>th</sup> centuries.

The proposed development would be sited at the western end of New Street, replacing the existing, sensitively designed late-20<sup>th</sup>-century entrance to Liverpool Street Station. The scale and height of the new scheme would introduce a visually intrusive element to views down New Street, undermining the established character of this part of the conservation area. This view is rightly identified in the Bishopsgate Conservation Area SPD as a contributing townscape view, and the harm is illustrated in Views 39 and 40 of the TVIA.

Devonshire Square, laid out between 1678 and 1708, is an early surviving example of a formal square in London. Although buildings surrounding the square have been altered over time, they continue to contribute to the sense of enclosure characteristic of such planned urban spaces. Nos. 12 and 13 are notable early 18<sup>th</sup>-century townhouses, while the former East India Company warehouses to the east represent a later industrial phase of the area's development during the 19<sup>th</sup> century. This section of the conservation area offers valuable insight into the historical evolution of both the square and the wider locality. Views play a vital role in reinforcing this contribution by allowing the historic scale and architectural character to be appreciated. Views 41, 42, and 43 of the TVIA show how the height and massing of the proposed development would dominate views from within the square, harming the setting of the former warehouses, which currently serve as the dominant features in terms of scale and historic use.

In conclusion, the proposed development would cause harm to three distinct areas within the Bishopsgate Conservation Area, each of which exemplifies aspects of 18<sup>th</sup> and 19<sup>th</sup> century development. The character and appearance of these areas contribute considerably to the overall significance of the conservation area. For the purposes of the National Planning Policy Framework (NPPF), the harm is assessed as being at the mid to higher end of the less than substantial harm spectrum.

### **Legislation, Policy and Guidance**

Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* applies to applications for planning permission that affect a listed building or its setting. It places a statutory duty on decision-makers to have special regard to the desirability of preserving the

building or its setting, or any features of special architectural or historic interest that it possesses.

Section 72(1) of the Act relates to any buildings or land within a conservation area. It requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of that conservation area.

The *National Planning Policy Framework (NPPF)* provides guidance on how the statutory duties set out in the *Planning (Listed Buildings and Conservation Areas) Act 1990* should be applied in practice.

Paragraph 212 of the NPPF states 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 the more important the asset, the greater the weight should be).”*

Paragraph 213 goes on to state that *“any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.”*

Government *Planning Practice Guidance (PPG)* further clarifies that any harm identified must be categorised as either less than substantial harm or substantial harm. Where harm is judged to be *less than substantial*, Paragraph 215 of the NPPF requires that this harm be weighed against the public benefits of the proposed scheme.

Section 38(6) of the *Planning and Compulsory Purchase Act 2004* states that “where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.”

This provision establishes the primacy of the development plan in planning decisions, requiring that applications be determined in line with the adopted plan unless other material considerations justify a different outcome.

London Plan Policy HC1 states that *“development proposals affecting heritage assets, and their settings, should conserve their significance by being sympathetic to the assets’ significance and their appreciation within their surroundings.”* It further requires that the cumulative impacts of incremental change from development on heritage assets and their settings be actively managed.

Policies HC3 and HC4 address local and strategic views, as well as the *London View Management Framework (LVMF)*. Specifically, Policy HC4 states that *“development in the foreground, middle ground, and background of a designated view should not be intrusive, unsightly, or prominent to the detriment of the view”* and makes clear that development must not harm the protected views identified within the plan.

Policy D9 (Tall Buildings) requires Development Plans to define what constitutes a tall building and for local authorities to determine appropriate locations for such development. The policy states that *“tall buildings should only be developed in locations identified as suitable in Development Plans.”* Regarding heritage assets, it requires that proposals *“take account of, and avoid harm to, the significance of London’s heritage assets and their settings.”* Proposals that would cause harm must provide clear and convincing justification, demonstrating that alternatives have been considered and that there are clear public benefits outweighing that harm. Furthermore, tall buildings should positively contribute to the character of the area.

The *Protected Views* Supplementary Planning Document (SPD), produced by the City of London, acknowledges the visual tension between tall buildings and the protected views of St Paul's Cathedral. It states that: *"In some of the views protected by St Paul's Heights, tall buildings can be seen in juxtaposition to the Cathedral, compromising its dominance of the skyline. The relationship of tall buildings to the Cathedral varies with the viewpoint. In some cases, tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints, tall buildings appear above the roof of the Cathedral or crowd close to the Cathedral on the skyline."*

The SPD specifically identifies compromised views from several key locations, including: the south bank between New Globe Walk and Gabriel's Wharf, areas adjacent to Waterloo Bridge, and from the Millennium Bridge, Blackfriars Bridge, the southern part of Waterloo Bridge, Hungerford Bridge, and Fleet Street. It goes on to state that, within these views, *"new development and the redevelopment of existing tall buildings should aim not to worsen and, where possible, to improve the backdrop to the views."*

The LVMF SPG provides management guidelines for View 15B, stating in paragraph 266 that *"consideration should be given to the space St Paul's Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect."* Furthermore, paragraph 267 states that *"Development should not dominate the peristyle, drum, dome, or western towers of St Paul's Cathedral in the background of the view. Development that visually interacts with the dome in the immediate background should not diminish the viewer's ability to recognise and appreciate the Strategically Important Landmark."*

With reference to View 17B, the LVMF SPG states that *"the setting of St Paul's Cathedral within the view, as the single most important structure, should be preserved or enhanced."*

The City of London is currently consulting on the draft City Plan 2040, which proposes changes to the policies on tall buildings and their relationship to heritage assets. Strategic Policy S12: Tall Buildings identifies five criteria to which tall building proposals must have regard. These include:

- The effect on the city skyline and the impact on the wider London skyline and historic skyline features.
- The character and amenity of their surroundings; and
- The significance of heritage assets, including both their immediate and wider settings.

In accordance with the *London Plan*, the draft City Plan also includes a policy map identifying areas considered appropriate for tall buildings.

In the adopted City of London Local Plan, several relevant Core Strategic Policies reinforce the City's commitment to protecting heritage assets and important views:

- Policy CS12 sets out the objective *"to conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors."*
- Policy CS13 aims to *"protect and enhance significant City and London views of important buildings, townscape and skylines,"* recognising the value of such views in preserving the overall heritage of the City's landmarks.
- Policy CS14 relates specifically to tall buildings and clearly states that planning permission will be refused where tall buildings are proposed in inappropriate locations, including the St Paul's Heights Area and St Paul's protected vista viewing corridors. It

also requires consideration of the potential effect on the city skyline, the character and amenity of surroundings, the relationship with existing tall buildings, and the impact on heritage assets and historic skyline features.

Further relevant guidance is provided by Historic England in their document *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3*. It emphasises that: *“All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it.”*

The guidance further highlights that the capacity of a setting to accommodate change depends on factors such as the nature of the proposed change and the location of the heritage asset. For example, assets located in elevated, open, riverbank, or prominent urban positions may have greater sensitivity, with reduced ability to absorb visual change without detriment to their significance or appreciation.

### **The Georgian Group’s Comments**

The proposed development qualifies as a tall building as defined by the draft *City Plan 2040*. Under this emerging policy, tall buildings are subject to specific criteria and are considered appropriate only in designated areas. The adopted *City of London Local Plan 2015* designates the application site as inappropriate for tall buildings, a position reaffirmed in the draft *City Plan 2040*. The application site lies outside the City Cluster Tall Buildings Area.

In line with Policy D9 of the *London Plan*, *“Tall buildings should only be developed in locations that are identified as suitable in Development Plans.”* This proposal therefore conflicts with both local and regional policy frameworks regarding the appropriate siting of tall buildings.

In the view of the Group, the harm to St Paul’s Cathedral would fall within the middle range of the less than substantial harm spectrum. This harm arises from the reduction in the clear skyline and the diminished ability to distinguish the peristyle, drum, dome, and western towers of the Cathedral from designated viewpoints. The cumulative impact of this and surrounding developments must also be considered, as it would further erode the setting and significance of this Grade I listed building and iconic London landmark.

The harm to St Botolph’s Church would be more immediate and pronounced, particularly from close-range views along Bishopsgate. The proposed development would challenge the church’s landmark status and visual prominence within the Bishopsgate Conservation Area. As such, this harm is assessed to be at the middle to higher end of the less than substantial harm spectrum.

The Bishopsgate Conservation Area is centred around the historic Bishopsgate Road, characterised by a network of historic streets and alleys. The proposed development would result in harm to the significance of the 18<sup>th</sup> and 19<sup>th</sup> century townscape that defines this area. This harm arises from the visibility of the proposed development from key locations within the conservation area and the resulting disruption to its historic character. The Group considers this harm to be at the middle to higher end of the less than substantial spectrum.

### **Recommendation**

The Georgian Group objects to this application for Planning Permission.

In determining this application, the local planning authority is reminded of its statutory duties under the relevant legislation:

- Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which requires special regard to be had to the desirability of preserving listed buildings, their setting, and any features of special architectural or historic interest they possess.
- Section 72(1) of the same Act, which requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas; and
- Section 38(6) of the *Planning and Compulsory Purchase Act 2004*, which states that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.

Your authority should take these representations into account in determining this application.

Yours sincerely,

Eddie Waller

Senior Conservation Adviser

London and South East England



New Life for  
Remarkable Buildings

Mr Kieran McCallum  
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[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

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.<sup>1</sup>

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

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<sup>1</sup> 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.





Historic England

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

Your Ref: 25/00494/FULEIA  
Our Ref: 232821

Contact: Helen Hawkins  
02079733223  
helen.hawkins@historicengland.org.uk

26 June 2025

Dear Kieran,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2024**

**Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza, London, EC2M 7PY.**

*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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and*



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*vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works*

### Recommend Archaeological Condition

Thank you for your consultation received on 06 June 2025.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

### Assessment of Significance and Impact

The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

A thorough and comprehensive archaeological ES chapter and Appendix accompanied the planning application (AECOM 2025). The reports highlight that the proposed development is located in an area of high archaeological interest. Although the site is located outside the Roman wall of the City, it is located in the known Roman burial ground located to the north of the City where Roman burials have been previously identified. The site is also located on the bank of the Walbrook Valley, where extensive archaeological remains of Roman date, particularly of palaeo-environmental interest, have been identified in the Walbrook deposits.

During the medieval period, the Priory and Hospital of St Mary Bethlem was present on the site. The hospital later became known as Bedlam. Historic mapping shows that in the post-medieval period, the western section of the site was located within the New Churchyard until the late 18th century and so there is a possibility for burials within this area of the site.

Proposed impacts on archaeology from the development are more extensive than those of the previous scheme and comprise pile caps, ground reduction and drainage in areas that the ES chapter suggests have been only moderately impacted by previous development. Therefore, a two-stage programme of archaeological work is recommended, to establish the potential survival of archaeological remains, particularly within the concourse area, in advance of the excavation of the pile caps. Other areas of proposed impact should also be evaluated to ensure any surviving archaeology can be properly excavated in advance of construction.



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## Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

## Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

Condition      No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:



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- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

**Informative** Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 218.

I envisage that the archaeological fieldwork would comprise the following:

## Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

## Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-



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excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

**Helen Hawkins**

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South-East Region



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Kieran McCallum  
City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

3rd July 2025

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Applicant:  
Kieran McCallum  
City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Application Reference: **2025/01549/OBS**

Registered on: **6th June 2025**

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## **Town and Country Planning Act 1990**

### **NO OBJECTION RAISED**

#### **Location and Description:**

**Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool Street, EC2M 7QN; And 50 Liverpool Street, EC2M 7PY**

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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.

Drawing Nos:

**Particulars of Decision:**

**This Council raises no objection to the proposed development.**

A black rectangular redaction box covering a signature.

**Joanne Woodward Chief Planning Officer of Place Department**  
Duly authorised by the Council to sign this notice.

**From:** [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)  
**To:** [PLN - Comments](#)  
**Subject:** 3rd Party Planning Application - 25/00494/FULEIA  
**Date:** 03 July 2025 13:59:30

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THIS IS AN EXTERNAL EMAIL

Corporation of London, Department of Planning & Transportation, , Guildhall, London, EC2P 2EJ

03 July 2025

**Our DTS Ref:** 74557  
**Your Ref:** 25/00494/FULEIA

Dear Sir/Madam,

Re: LIVERPOOL STREET STATION, LIVERPOOL STREET, OCTAGON ARCADE, LONDON, -, EC2M 2AB

**Waste Comments:**

Waste Comments: With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local



underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.  
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes:<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Please ensure to apply to determine if a build over agreement will be granted.

Thames Water would advise that with regard to the FOUL WATER network capacity, we would not have any objection to the above planning application, based on the information provided.

#### **Water Comments:**

Water Comments: The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.  
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please

contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk).

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](http://thameswater.co.uk/buildingwater).

**Supplementary Comments:**

Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all piling and the clearance between the face of the pile to the face of a pipe. If any basements intended to be constructed as part of the development, please clearly indicate the location and footprint. Without these drawings and cross-sectional details Thames Water will not be able to review your proposals and discharge your planning condition.

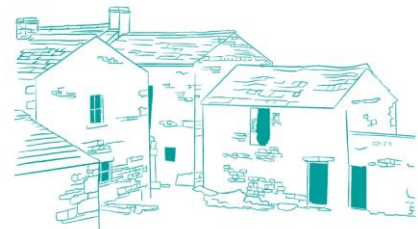
Plans of Thames Water apparatus can be obtained through our website at [www.thameswater-propertysearches.co.uk](http://www.thameswater-propertysearches.co.uk). Please use the following reference in all future correspondence: DTS 74557

Thames Water have been unable to determine the Surface Water requirements for this development, as the drainage strategy provided has no split of discharge per manhole. The strategy refers to discharge rates being reduced from 1793l/s to 1301l/s for the whole site, however, the Surface Water discharge tables 9, 10 & 11 offer differing discharge rates. The strategy also refers to Surface Water discharge being split across site, therefore we require details of this split, which should include discharge rates per manhole.

Yours faithfully,  
Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
Denham Way,  
Rickmansworth,  
WD3 9SQ,  
Email: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)



*A National Amenity Society*

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

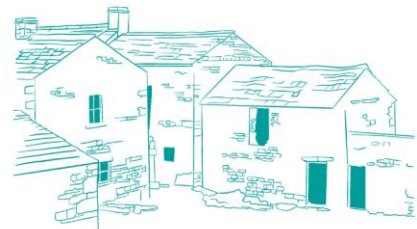
## Summary

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



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

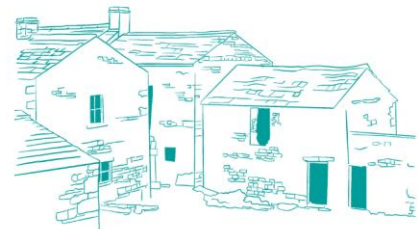
De Grey House  
St Leonard's Place  
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 [info@archaeologyuk.org](mailto:info@archaeologyuk.org)

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(287815) and Scotland (SC041971)

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Patron: HRH The Prince of Wales



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,





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.

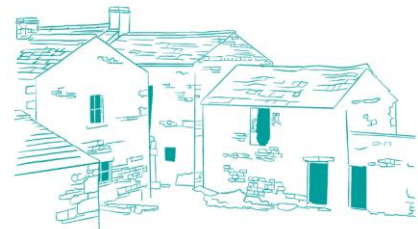
National Policy requires 'clear and convincing justification' for harm, which for a Grade II\* building should be 'wholly exceptional' (NPPF, paragraph 213). As a reduced level of intervention to the station complex would require a smaller scale of development to achieve, we do not consider that this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



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 undoubted substantial harm to the station and hotel.

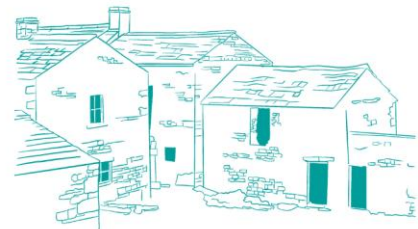
We are concerned that permitting a tall building above the listed structure would create an unwelcome precedent, allowing for further harmful development above the station in future. While the existing historic station structure has existed, with maintenance, for 150 years, the expected life span of 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





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.

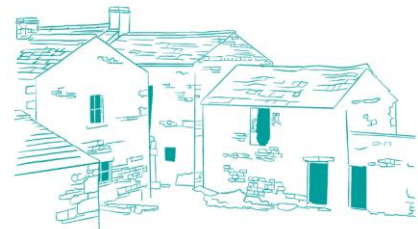
#### **4. The creation of a new upper level along the station concourse.**

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



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).

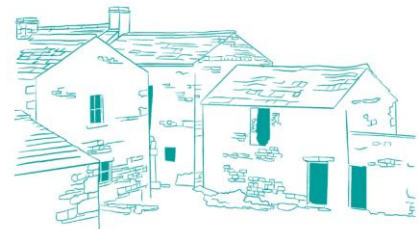
The legibility, historic character and street scene prominence of the station and hotel are noted parts of the Conservation Area, which was extended in 2007 to specifically include the hotel and Hope Square. The scale and massing of the proposed new development on and above the site would have a strong 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



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 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.'



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

De Grey House  
St Leonard's Place  
York, YO1 7HE

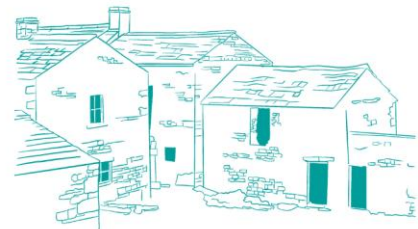
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Patron: HRH The Prince of Wales





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**.

Application ref: 2025/2419/P  
Contact: Sofie Fieldsend  
Tel: [REDACTED]  
Email: [REDACTED]  
Date: 3 July 2025

**Development Management**  
Regeneration and Planning  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9JE  
Phone: 020 7974 4444  
[planning@camden.gov.uk](mailto:planning@camden.gov.uk)  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

City of London Authority  
Kieran McCallum  
Development Division  
City of London  
PO Box 270  
Guildhall  
London

Dear Sir/Madam

## **DECISION**

Town and Country Planning Act 1990 (as amended)

### **Request for Observations to Adjoining Borough - No objection**

Address:  
**Liverpool Street Station**  
**Liverpool Street**  
**EC2M 7PY;**  
**Andaz Hotel**  
**40 Liverpool Street**  
**EC2M 7QN;**  
**and 50 Liverpool Street**  
**EC2M 7PY**

#### **Proposal:**

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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a

public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works

Drawing Nos: See City of London planning application ref. 25/00494/FULEIA

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Conditions and Reasons:

Informative(s):

1 Reasons for no objection:

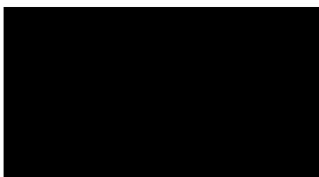
The site is situated approximately 1.6km from the nearest part of the Camden borough boundary and is in the vicinity of many existing tall buildings. Thus, the proposal will have limited visibility within the borough of Camden in addition to having no noticeable effects of the amenity or living conditions of any Camden residents or occupiers.

The site is outside the protected viewing corridors to Camden. Although, the site would likely be partially visible on the City skyline from Primrose Hill, Parliament Hill or Kenwood. The proposal would be similar to existing development in the City and it is therefore not considered to result in harm to the general views of the City skyline from these sites.

The development would have no material impacts on the significance of any protected views, on the amenity of any Camden occupiers or visitors, on transport, environmental or ecological conditions. Camden therefore raises no objections to the application.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

Yours faithfully



Daniel Pope

Chief Planning Officer



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

Development Management  
Planning and Building Control  
Housing and Regeneration Directorate  
Tower Hamlets Town Hall  
160 Whitechapel Road  
London E1 1BJ  
[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

**Application Number:** PA/25/01015  
**Your ref:** 25/00494/FULEIA

**Enquiries to:** Rikki Weir  
**Tel:**  
**Email:**

4 July, 2025

Dear Kieran McCallum,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

<b>Location</b>	Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool, Street, EC2M 7QN; and 50 Liverpool Street, EC2M 7PY
<b>Proposal</b>	Observations requested by City of London for '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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of



cycle parking and associated access ramp, servicing, refuse and ancillary.'

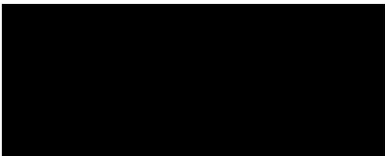
Thank you for your letter requesting the observations of the London Borough of Tower Hamlets on the above referenced application. I would be grateful if you would take the observations set out below into consideration in determining the application:-

1. The TVIA shows a number of views that would directly impact upon the setting of the Brick Lane and Fournier Street Conservation Area, as well as the Artillery Passage Conservation Area, and a number of listed buildings including the Grade I listed Christ Church, Spitalfields. The Council are concerned that these views show wirelines of the proposed building and therefore do not allow for a meaningful assessment of the impact of the proposals on Tower Hamlets heritage assets. It is clear that there would be impacts from the proposals as they remove a portion of sky space within the backdrop of Fashion Street. However, due to a lack of detail in the TVIA, a proper assessment cannot be carried out.

The Bishopsgate station access is a gateway for many visitors to Tower Hamlets and marks a transitional space from the fine grain of the Artillery Passage Conservation Area, Wentworth Street Conservation Area and Brick Lane and Fournier Street Conservation Area into the coarser grain of the City of London. In terms of scale, it is unfortunate that proposals would result in the loss of open sky space above the station, although to a lesser extent than the recent withdrawn application. It would also reduce the level of relief when leaving the station and approaching from the streets within Tower Hamlets. In terms of materiality, the proposals for the vaulted brick and stone entrance on Bishopsgate would provide a reasonable response within the existing streetscape and built environment, providing a suitable material transition between Tower Hamlets and the City of London. The Council is concerned that the glazed tower appears highly disconnected from the brick and stone entranceway and provides no design continuity or shared language between the two parts of the building. The result is a tower which awkwardly sits on top of the entrance, overpowering and undermining this transitional space on the edge of the City and Tower Hamlets, creating somewhat of a more imposing gateway.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



**Sripriya Sudhakar, Director Planning and Building Control**

Kieran McCallum  
Development Division  
Corporation of the City of London  
By e-mail only

4<sup>th</sup> July 2025

Dear Kieran,

**Letter of Response to Planning Application at Liverpool Street Station (ref: 25/00494/FULEIA)**

**Introduction**

I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral. This letter has been prepared in response to the live planning application proposals for Liverpool Street Station.

**Comment**

***Previous Consultation & Current Position***

We have undertaken a number of pre-application consultation meetings with the project team and provided letters of feedback. We thank them for their time, efforts and initial approach to consultation. Throughout discussions, we have striven to be constructive whilst expressing that Chapter is concerned about and would generally oppose heritage harm to the Cathedral.

Despite the initial constructive dialogue, the scheme has not been meaningfully revised to remove the heritage harm to the Cathedral we all, at least initially, agreed was present. This is despite a pause period in early 2025 whilst the viability of the scheme was being examined. In this period, which might have been an opportunity for further constructive engagement, no material design changes were made to respond to our concerns. Consequently, much of the content of this letter reflects that previously issued to the project team as part of pre-application discussion, as our concerns remain relevant.

***Submission Assessment***

We have concerns with the HIA and TVIA provided as part of the application:

- We do not consider that the baseline assessment of significance provided is proportionate to the exceptional, international significance of St Paul's Cathedral.

- We do not consider that the contribution of setting to significance has been adequately or proportionately assessed, in line with this exceptional significance.
- The compressed nature of the baseline images available on the portal make review and comment difficult. We have requested higher resolution material. Officers should, in our view, be mindful that the application as made public is not satisfactory for constructive engagement.
- We consider that the HIA and TVIA misconstrue, mis-represent and (deliberately or otherwise) underplay the assessment of and nature of harmful heritage impact that the proposals will have on the Cathedral. Thus, we have concerns with the outcome of the assessment which we express further below.
- We have concerns with the use of trees as screening to diminish the analysis of harm (see below)

Whilst the NPPF requires the LPA to make their own assessment in advising the decision-takers, we would like to see officers transparently enforce the expectations of NPPF 207 “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting”. (Emphasis our addition).

Over the course of pre-application discussion, we drew the attention of the project team to the mature draft of the St Paul’s Cathedral Setting Study. This references the importance of skyspace to the Cathedral’s significance, and how this significance can be appreciated. Despite assurances the Study was taken into account, we do not consider this is adequately reflected in the heritage baseline, nor the assessment of impact.

#### Overall Visual and Heritage Impacts

During initial pre-application meetings, all parties agreed that the scheme would cause harm to the significance of the Cathedral. As noted above, it is therefore disappointing that no meaningful changes have been made for the submission scheme to avoid this harm. It is also confusing as to why this harm is not acknowledged in the HIA. We submit that officers should make clear to the decision-takers that the HIA is unsatisfactory and not to be relied upon. We would like to request that the Planning and Transportation Sub-Committee are invited to formally and publicly minute that the applicant’s HIA is unsatisfactory – as this will give a clear signal, not just to this applicant but to others in future, that the committee expects the directions of the NPPF paragraph 207 to be followed, and the City will not tolerate submissions which are – in our view – obfuscating to the effective administration of planning policy.

For concision, our comments can be read with our assessment of the previous HdM/Sellar scheme to which Chapter objected. The nature of the impacts are similar. We acknowledge that the ACME scheme which is now under consideration would be less impactful than the previous HdM/Sellar proposals for the station. However, the current proposals are still of great concern to the Cathedral.

It is unclear to us whether the HdM/Sellar application remains live, or the relationship between these two proposals.

Despite the poor-quality compressed visuals provided, the text of the HIA, and our previous pre-application discussions it is evident that the proposals erode the skyspace around St Paul's, and the ability of the viewer to read and appreciate the most highly significant features and elements of the Cathedral's architecture. This impact will be to especially significant and sensitive architectural form and features -infilling areas around the West Towers and the Drum. These features make the most important contribution to the Cathedral's special interest (and the ability of the viewer to appreciate that heritage significance). This is appreciable from the riparian setting of St Paul's. Given their sensitivity, we consider that this would cause heritage harm to the Cathedral.

This change would also affect protected views. The scheme would harm strategic views (in particular LVMF view 15B.1 and 15B.2 from Waterloo Bridge) and local views identified by the City of London. We consider the proposals would harm the ability to appreciate the Cathedral as a Strategically Important Landmark through eroding the legibility of these key features. The proposals are contrary to the guidance outlined within the City's Protected Views SPD. As such, we consider the proposals would run contrary to adopted local and London-wide view management policy.

We trust that officers will a) agree with this assessment, which the applicant's documentation fails to report, and b) suitably test and appraise the consequence of this harm in the necessary planning tests. It should not be acceptable for the applicant to under-report and underplay this harm.

#### The Use of Trees as Screening

We also discussed the 'screening' provided by trees along the Embankment, used to justify the HIA's conclusion of 'no harm'.

Though we thank the team for the additional information provided on the weighting of trees in this process, we have a number of concerns with the Project team's approach in this very particular context.

We note that the trees are a present physical part of the setting of the Cathedral and will be assessed as such. We also acknowledge these trees are within conservation areas and RPGs, noting the other protections afforded to them.

Even aside from seasonal variation, we consider that it is important to consider these trees in the longer term. Over longer time periods, even given their protections, the trees will have to undergo pollarding and other management, changing their form and appearance. The timescales for necessary management – or indeed eventual re-planting – are unknown to the applicant and officers but are also an inevitability.

The Cathedral has also long wanted to ask the relevant authorities about the need for this planting to be effectively managed as it once was in the past. The long-term lifespan of such trees needs to be considered in the context of issues which will affect longevity such as climate change. Throughout all, however, the architectural form of St Paul's will be present – unchanged – whilst the trees do change.

We therefore consider that such 'screening' should not be relied upon to minimise the appraisal of material and consequential impact in this instance, given a long-term understanding of the context of St Paul's. This appears to be acknowledged within the HIA submitted as part of the application. The HIA identifies harm to St Paul's 'were all the relevant trees in this view lowered or removed'. The harm caused by the development in the setting of the historic building (as discussed above) is understood to be 'in any case theoretical.' We do not agree that the issue is only theoretical – the trees will certainly change and will not always be there to screen the harmful development. Even so, the 'theoretical harm' that the HIA concedes is not referenced in the overall balance. We trust that officers will note the inconsistency and apparent lack of objectivity.

Even relying upon trees for screening, parts of the proposals would still be appreciable above the west front of the Cathedral – as acknowledged in the applicant's submission material. We consider this intrusion harmful and should have been identified as such in an objective manner.

We note the suggested condition related to tree management within the HIA. We request that St Paul's are included in the discharge of any such condition, should a scheme come to pass.

#### The Roof Terrace, Rooftop Incursions to the View, & Circularity of Harm and Benefits

We welcome the inclusion of a specific public benefits summary report within the application material. We consistently request such material is submitted as part of similar applications, to assist stakeholders and decision-makers.

During pre-application meetings, we discussed potential design mitigations that could be achieved to the roof terrace (non-withstanding our objection to the overall harm of the scheme). It is unclear if these have been adopted for the current proposals, though the remaining visibility of the proposals even over the tree line indicates not.

The project team point to the public benefits that would arise as a result of the roof terrace; acknowledging that these terraces also require elements (such as lift overruns) that are actively harmful to heritage. To our minds, there is a circularity to increasing the volume of a building design which - as is acknowledged - increases heritage harm, in order to generate a public benefit.

We also seek to be assured such roof terraces, and other public benefit generating aspects of the proposals, are managed through the planning system in order to ensure they are suitably implemented and maintained.

‘Office development’ forms part of the perceived public benefits underpinning the proposals. As outlined within our representations for the City Plan 2040 examination in public, we leave this to the scrutiny of those with expert judgement – however the actual demand for overall Office space is an ongoing question.

#### Viability of the Scheme, Avoiding Harm & Exploring Alternatives

Over the course of consultation, we also discussed how the applicant could act in a way to completely avoid harm to the Cathedral. Whilst we always welcome efforts to reduce impacts (as outlined within the accompanying DAS in relation to LVMF views and the design process), in this instance we would again note that the team initially came to these conversations to discuss minimising impact, rather than avoiding it completely.

A number of options are presented in the DAS and other supporting material. Options were also discussed at pre-application meetings. As previously discussed, we consider that any application should be informed by a full exposition of a true, suitably detailed, ‘no harm’ proposal, even if the applicant then argues that such an approach cannot be achieved.

For the purposes of this scheme, we feel this ‘no harm’ option should not erode the skyspace around the Cathedral at all – even with perceived screening from trees. While this is explored in broad terms in the submission material, we would hope Officers scrutinise whether the detail provided is sufficient. We also consider that such an option should also take into consideration our queries below about alternative ways the scheme could be designed / achieved and avoid impact – and thus also be subject to an objective viability evaluation.

We understand that avoiding harm to St Paul’s completely would necessitate the removal of parts of the upper floors of the proposals. The project team argue that this removal of this floor area would unacceptably impact the viability of the scheme and thus the benefits of the station upgrades.

The Cathedral acknowledge the benefits of station upgrades to the sustainable growth of London. We also understand the benefit that this may bring to the unique circumstances of the City.

We also acknowledge the complex heritage context of the site, noting that St Paul's is not the only heritage asset that has potential to be affected (noting impacts to other heritage assets in the immediate locality of the station lie beyond our main locus). There are further technical and operational constraints, beyond heritage and views, that clearly shape the scheme and are being mediated.

We thank the project team for their presentation on viability, undertaken ahead of submission – this is most communication we have ever received on this important aspect of justification. We are not experts in viability, economics, or the dynamics of infrastructure projects. Policy dictates that such aspects should be convincingly proven and clearly communicated so that we key stakeholders (the City, GLA, HE) can understand this context, holistically with the perceived justification for harm.

During our consultation on viability, we roughly calculated that the cost of reducing the building heights to remove it from the view completely would be around £70 million. The applicants have not validated this approximation as far as we can see from the papers. If we are broadly correct, we note that it is rare that officers could report to the decision-takers, in such a way, the actual cost of harm to St Paul's. We suggest that this approximation of cost/harm is verified and reported to committee.

We also note, as have others, that the Financial Viability Assessment notes that the profitability of the scheme depends on an upturn in economic conditions. In this instance, it is welcome that seemingly the minimum perceived required floorspace possible is informing the scheme. Even so, there is harm – and if the harm cannot deliver the station upgrades discussed then we again question the justification. We ask if officers can explain how these uncertainties should be appraised in the weighting tests.

We have also sought to clearly understand if the station improvements could be achieved in any other way than currently presented, as part of options appraisals. This is essential, given the scale and the nature of the current impacts, and again is linked to justification and the essential planning tests.

To illustrate our many points above, a number of queries remain from our pre-application discussions:

What other Network Rail properties more broadly (elsewhere from Liverpool Street Station) could be developed to earn income for the station development; why does the development have to be here; or why does all the development have to be on this site?

As we understand the assumptions, the passenger capacity of the station is being modelled on the combined flows of public off trains and to/from TFL assets, including the Elizabeth Line. What other ways have been modelled to explore how other entrances and flows of travelling public could relieve pressures on the core station, which in turn could limit the cost and



quantum of the changes sought – and thus reduce the upward development pressure? Some are included within the application pack, but we consider all options should be appraised.

Is there any other, less harmful, design solution that could be adopted to alleviate these issues to the station, coupled with the considerations above?

### Weighting and Decision Making

The NPPF states that heritage assets are an irreplaceable and finite resource. Their value can in-part be expressed in monetary terms (see recent Historic England research on the value of heritage to the UK economy) but evidently goes far beyond economics to other non-monetary social and communal values. This is reflected in the great weight given to the conservation of heritage assets within the NPPF. The more important the asset, the greater the weight.

Given the exceptional heritage significance of St Paul's, we therefore also seek to better understand the weighting of harms and benefits of the scheme by the project team and decision takers. Due to the level of harm we perceive, and the vastly different nature of the nature of associated harms and benefits, we feel this is of great importance in terms of methodology and approach.

Given the sensitivities and nature of the scheme, any decision may be just as important as a precedent for the balance itself, as much as it is for the precedent it sets for development in similar contexts.

### Conclusions

Unfortunately, St Paul's remains deeply concerned regarding the potential for harm that would arise from the scheme, both in the short and the long term. For such a proposal, the viability and justification for the design is also key – and all options should be meaningfully explored to eliminate this harm entirely. Many of these aspects go beyond the expertise of St Paul's and the resources available to us to respond to applications of this nature.

As such, based on our understanding of the material provided we currently object to the scheme, seeking that in its determination Officers, regulators, and other stakeholders interrogate the optioneering and justification for the proposals with the appropriate expertise and rigour. This objection also stems from the methodological issues we see with the baseline assessment, which we consider should be rigorously cross-examined and challenged. For a development project of such import we suggest that the City should expect a commensurately high standard of documentation and it should, in our view, be made very clear to the applicant that their HIA is unacceptable. As noted above, we feel that it would be of wider interest for this concern to be placed on public record in the minutes of the planning committee.

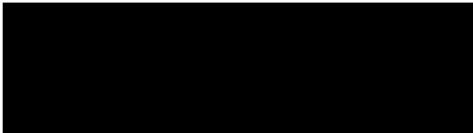
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In order for Officers to pass judgment on the acceptability of the overall argument for consent there are also a number of other matters which need to be technically described to assist the decision-takers.

If, in the overall balance, the City elects to recommend approval there are a number of conditions and matters relating to contributions relating to harm and trees that Chapter would ask to be cited within, as identified above.

We hope that this is a consultation response that furthers the shared aims of St Paul's Cathedral and the City of London.

Yours sincerely,



Oliver Caroe  
Surveyor to the Fabric  
On behalf of St Paul's Cathedral Chapter.

cc      Rebecca Thompson: Director of Property, St Paul's Cathedral  
            Tom Nancollas: Assistant Director (Design), City of London  
            Historic England

**Director:**  
Oliver Caroe RIBA AABC  
Mark Hammond RIBA SCA AABC

**Associates and Designers:**  
Touseer Ahmad  
Andrew Senior

Emailed to: [REDACTED]

04/07/2025

Dear Kieran McCallum,

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

**Ref: 25/00494/FULEIA**

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 planning 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 (25/00494/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

Registered office: 70 Cowcross Street, London EC1M 6EJ  
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:

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:

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:

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):

213. 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:

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:

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):

8. 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 stated 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 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 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 Twentieth Century 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 gateline 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, 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.

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.

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 have 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.

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 resulting from setting to the designated heritage assets that are the grade II\* Great Eastern Hotel and the Bishopsgate Conservation Area, we strongly object to this application.

Yours sincerely,

Gus Wray



**Caseworker**

The Twentieth Century Society  
70 Cowcross Street  
London, EC1M 6EJ  
Tel [REDACTED]  
[REDACTED]

**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.

# GREATER **LONDON** AUTHORITY

## Good Growth

Kieran McCallum  
City of London Corporation  
By Email

**Our ref:** 2025/0462/S1  
**Your ref:** 25/00494/FULEIA  
**Date:** 07 July 2025

Dear Kieran McCallum

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008**

**Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage**

**Local Planning Authority reference: 25/00494/FULEIA**

I refer to the copy of the above planning application, which was received from you on 28 May 2025. On 7 July 2025 Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority, considered a report on this proposal, reference 2025/0462/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 100 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, email [gavinmclaughlin@tfl.gov.uk](mailto:gavinmclaughlin@tfl.gov.uk).

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Yours sincerely

A large black rectangular redaction box covering the signature area.

**John Finlayson**  
Head of Development Management

cc    Unmesh Desai, London Assembly Constituency Member  
      James Small-Edwards Chair of London Assembly Planning Committee  
      National Planning Casework Unit, MHCLG  
      TfL  
      Jeremy Randall, Newmark (agent)

# Liverpool Street Station

Local Planning Authority: City of London Corporation

Local Planning Authority reference: 25/00494/FULEIA

## Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

## The proposal

Phased development comprising the demolition of 50 Liverpool Street, and partial demolition and alterations to the train station including the creation of new entrances and improvements to access, provision of new retail/ hot food takeaway and pub/ bar units (1,943 sq.m) at lower and upper concourse levels. Provision of an over-station development reaching a maximum height of 97.67m AOD to accommodate 88,013 sq.m. of office (Class E(g)(i)) floorspace and auditorium (1,116 sq.m.).

## The applicant

The applicant is **Network Rail Infrastructure Limited** and the agent is **Newmark**.

## Strategic matters summary

**Land use principles:** The proposals for substantial improvements in capacity, permeability and accessibility to the existing train station and London Underground lines, as well as the development of a significant new office building within the CAZ and City of London is strongly supported in principle. Capacity optioneering and viability to address significant congestion on some NR platforms in the future scenario should be considered further.

**Transport:** Detailed work is required to ensure the design and delivery of key transport improvements, supported by modelling. The impact of an extensive construction period for a scheme of this scale must be defined and secured prior to determination. Other issues include: larger lifts to serve LU lines; impact of temporary rail service thinning on LU and Elizabeth line operation; clarification of access and wayfinding to the cycle hub; removal of zebra crossing proposed at the bus station; updates to the modelling for all LU areas, including the Elizabeth line before, during and after construction; completion of Stage 5 of the TfL Model Auditing Process (MAP) for the street level LEGION assessment prior to determination; technical engineering assurance by TfL of the bus station layout; sufficient space for bus waiting areas proposed; as well as the requested s106 obligations, s278 works and conditions.

**Heritage:** The proposals would result in less than substantial harm to the significance of Liverpool Street Station at the very high end of the spectrum and less than substantial harm at the high end of the spectrum to the Bishopsgate Conservation Area and Former Great Eastern Hotel. Less than substantial harm has also been identified to the setting of other heritage assets in the vicinity. GLA officers consider that the proposed public benefits have the potential to outweigh the harm to the assets identified above. However, a final balancing exercise will be undertaken at Stage 2 once the public benefits package is secured.

Other matters on **urban design**, **environmental issues** and **sustainability** also require resolution prior to the Mayor's decision making stage.

## Recommendation

That the City of London Corporation be advised that the application does not yet fully comply with the London Plan for the reasons set out in this report and summarised at paragraph 100.

## Context

1. On 28 May 2025, the Mayor of London received documents from the City Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in issuing his response.
2. The application is referable under the following categories of the Schedule to the Order 2008:
  - 1B "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings in the City of London and with a total floorspace of more than 100,000 square metres."
  - 2C: "Development to provide a railway station or a tram station."
3. Once the Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Corporation to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planapps.london.gov.uk>

## Site description

6. The site incorporates 50 Liverpool Street, parts of the Station including the concourse, train shed, bus station, 40 Liverpool Street (Andaz, Former Great Eastern Hotel) and the entrances to Bishopsgate, Liverpool Street, and Sun Street Passage. Also included within the site are Hope Square, adjacent to the Liverpool Street entrance and the Bishopsgate entrance (known as Bishopsgate Square). The site is bounded by Sun Street Passage to the west, Liverpool Street to the south, Bishopsgate Square to the east and the northern boundary cuts across the station trainshed from Bishopsgate to Sun Street Passage.
7. The site is located within the CAZ. The area is identified as a key area of change in the emerging City Plan (Strategic Policy S25).
8. Liverpool Street Station is Grade II listed, with the exception of the entrances at Hope and Bishopsgate Squares and the associated towers, 50 Liverpool Street and retail and circulation structures within the entrances and concourse. The site also includes part of 40 Liverpool Street, the Andaz Hotel (also known as the

Former Great Eastern Hotel) which is Grade II\* listed. Other listed structures include the Great Eastern Railway War Memorial, The London Society of East Anglians War Memorial, and a Police Call Box, which are all Grade II listed. Also within the site are several non-designated heritage assets, including two memorial sculptures to the Kindertransport of the 1930s. The southern portion of the application site is located within the Bishopsgate Conservation Area.

9. The site has a PTAL level of 6b, which is excellent. Liverpool Street Station and interchange provides access to London Overground, Elizabeth, Central, Circle, Hammersmith & City and Metropolitan London Underground (LU) lines. It is also served by rail services on the Greater Anglia lines. The application site includes Liverpool Street bus station which provides passenger access to three services and serves additional routes with essential operational standing and turnaround space, especially in emergencies or when rail replacement buses are required. A taxi rank exists to the south of the Andaz hotel.

## Details of this proposal

10. The application proposes the following key elements:

- Demolition of 50 Liverpool Street, the removal of the upper concourse retail units and concourse, the demolition of the southern part of the existing station roof and some works to the Andaz Hotel to disconnect the station roof and concourse.
- Reconstruction of the station roof to support the over station development, creation of a new upper concourse with new walkways north to Exchange Square and new connection to Broadgate, new retail floorspace at lower and upper concourse levels and improvements to capacity, improved step-free access to all Network Rail (NR) and London Underground (LUL) platforms, larger TfL ticket hall and wider gate lines.
- Construction of a new office building above the station of up to 97.67m AOD with an auditorium and roof garden at roof level.

11. The proposals as listed above would provide 10,992 sq.m. of station (sui generis) floorspace; 88,013 sq.m. of office (Class E(g)(i)) floorspace; 1,116 sq.m. of public access/ auditorium (sui generis) floorspace; and 11,077 sq.m. of retail/ restaurant, bar and takeaway uses (Class E and sui generis).

12. The key station improvements proposed would involve:

- The size of the concourse will be increased from 9,189 sqm to 12,784 sq.m., (39% increase in space). The number of gatelines to NR platforms and TfL platforms from Ticket Hall B would also be increased by 15<sup>1</sup> and 9<sup>2</sup> respectively.

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<sup>1</sup> When compared with the recently completed 'do minimum' baseline.

<sup>2</sup> Comprising a net increase of 5 automatic ticket gates and 4 wide aisle gates.

- Improvements to vertical circulation through the increase in stair widths, increasing the number of escalators within the station from 4 to 8 and increasing the size and number of passenger lifts from 1 to 8.
- LUL Ticket Hall B is to be enlarged and reconfigured to improve access and capacity as well as widening the passageway between the ticket hall and circle line.
- Improved interchange between the NR upper concourse and Liverpool Street bus station through the provision of improved passenger waiting areas, step free access to bus services, real time information and the customer assistance and operational control kiosk.

13. Other proposed improvements include:

- New, fully accessible toilets, family rooms, multifaith room, step free station entrances.
- New dedicated cycle hub within the station and new access from Primrose Street to the north which would deliver a 547% increase in existing cycle parking provision.
- New pedestrian routes from the station through to Exchange Square and Broadgate and improvements to wayfinding.
- Consolidation and improvements to NR and TfL operational centres, with step free enhancements to fire evacuation, supporting facilities for the station and all public transport modes serving it.

## Strategic case history

14. The GLA hosted a pre-application meeting with the applicant team (also attended by the LPA) in October 2024 in respect of proposals to demolish parts of Liverpool Street Station and 50 Liverpool Street; new station entrances, concourse and improvements to capacity and step free access to all London Underground platforms; provision of a new office building of up to 15 storeys above the station including the provision of circa 90,000 sq.m. of office and retail floorspace. The proposed development was also presented to the Mayor of London's London Panel Review (Design Review) in December 2024.
15. The Deputy Mayor has previously considered proposals at this site for partial demolition of the station, demolition of 50 Liverpool Street and elements of the Andaz Hotel, station interchange improvements and an over station development in May 2023 (GLA ref: 2023/0726/S1 LPA ref: 23/00453/FULEIA). The application is currently pending determination.



## Strategic planning issues and relevant policies and guidance

16. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Plan 2021 and City of London Local Plan (2015).

17. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- City of London Local Plan Revised Proposed Submission Draft April 2024 and proposed changes dated December 2024; and
- Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on world city role, economic development, central activities zone, urban design, historic environment, strategic views, transport, sustainable development and environmental issues which can be found on the GLA's website [here](#).<sup>3</sup>

## Land use principles

### Station interchange

18. Liverpool Street Station is the UK's busiest station and currently experiences significant operational challenges and design issues relating to accessibility, capacity and overcrowding. The proposals are intended to remedy many of these issues and ensure that the station is fit for the purpose without the need for further significant interventions for the next 60 years.

19. Estimated station footfall (across both Network Rail and LU domains) was 118 million in 2024 and is forecast to increase to circa 158 million by 2041. Three demand profiles have been created to help understand the current and future demand for the station and therefore inform the current proposals, including the current station operation, demand in 2041 (as above) and demand in 2041+35%, by applying a uniform uplift applied to all demand figures.

20. The three demand profiles have been applied to the main Network Rail (NR) concourse, some LU lines and services at platform level and passenger areas next to the gatelines of LU Ticket Halls A, B and C. They have been used to test three different infrastructure options, 'do nothing' (based on the station as of 2024), 'do minimum' (the station incorporating NR gateline enhancements which have very recently taken place) and 'do something' (i.e. transport operations) with the proposed development. All scenarios and infrastructure and development options have been further assessed through LEGION modelling (a pedestrian simulation tool).

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<sup>3</sup> <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

21. The initial results indicate that the existing station cannot accommodate forecasted demand to 2041 and that both NR's concourse and TfL areas of the interchange would become inoperable in the 2041+35% scenario, with particularly acute levels of congestion in the AM peak.
22. The design and layout changes proposed to improve the station's current and future capacity have therefore been identified and will be further verified through additional modelling. In the 'do something' scenario, queuing in the lower concourse and NR platforms would greatly reduce and future capacity challenges in the station would be substantially addressed, which is welcomed. However, it is understood that constraints imposed by limited NR platform lengths and widths<sup>4</sup> preclude any further increase in capacity without significant further investment and disruption. The applicant should confirm whether safeguarding has been investigated and costed as part of the design and viability optioneering and considered further by the Corporation. This should also include further analysis of the impact of the proposed new servicing area between platforms 10 and 11 would have on future demand growth.

### Commercial development

23. The development of an 88,013 sq.m. office building within the CAZ and City of London, a nationally important location for globally-oriented financial and business services, is strongly supported in land use terms in accordance with Good Growth objectives GG2 and GG5 as well as Policies SD4, SD5 and E1. In accordance with Policy E2, the floorplates are designed to be flexible and adaptable to suit a variety of occupiers and can be divided on each floor to accommodate tenants seeking different sized spaces. The applicant should make appropriate provision for affordable workspace in consultation with the Corporation in line with Policy E3.
24. The proposals would also result in a net increase of 1,943 sq.m. of retail floorspace across the station site, which is also within Moorgate / Liverpool Street Principal Shopping Centre and is therefore supported in line with Policy SD4.

### Equalities

25. The applicant has produced an Equalities Impact Assessment in support of the application, which assesses the impact of the scheme on groups with protected characteristics. This is comprehensive and highlights the numerous positive impacts the scheme would have, in line with Good Growth objective GG1.

## **Transport**

### Public transport impacts – LU and bus station

26. Officers have worked closely with the applicant to define and progress capacity and accessibility improvements for the LU station, bus station and wider interchange. The proposals indicate that they would result in significant

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<sup>4</sup> Most notably NR platforms 1 and 10

improvements in accessibility to a key interchange on London's transport network, which is strongly supported in line with Good Growth objectives GG1-3, and Policies T1, T2, T3 and T4 and particularly T3 parts B, C and E.

27. The key elements of the scheme are expected to align with the proposed changes to the NR station to increase capacity sufficiently to accommodate growth to the 2041 demand levels as summarised at Paragraph 12. However, full modelling of 2041+35% demand levels is ongoing and would need to be satisfactorily concluded by TfL and NR prior to determination.
28. The proposed changes to the bus station, are supported in principle. However, options for the layout of Sun Street Passage and resultant passenger impacts, are still being reviewed by London Buses. Technical assurance by TfL Engineering must be funded by the applicant and completed prior to determination to ensure full TfL approval of the new bus station facilities and layout proposed.
29. Prior to Stage 2, the applicant must achieve TfL Pathway Stage 2 (option selection) for the final scope of agreed bus interchange and wider improvements as a minimum and show how progress towards Stage 4 (detailed design) would be achieved. This is essential for a s106 to give effect to a Development Agreement (DA) with London Buses Ltd and LU Ltd.

#### Trip generation, mode split and strategic modelling

30. The applicant has assessed trip generation for the proposed over station development (OSD) and station retail, employee and delivery and servicing trips in accordance with relevant TfL guidance. However, clarification should be provided in relation to assumptions about retail trips and duration.
31. An overall peak hour trip generation by mode has been set out. The rail and LU trips should however, be disaggregated and provided separately for the various lines and operators. The applicant should also explain and set out trip generation as a whole – OSD, retail and forecast station trips. This is necessary to understand how they are applied to both cycle and pedestrian distribution analysis.
32. The employee density for the OSD indicates that it would accommodate approximately 6,000 employees. A development proposal of this scale would typically require an assessment on the wider transport impacts using TfL's full suite of strategic models including MoTiON (Mode of Travel in London). Further discussion on this matter is required. It may also inform necessary mitigation on both the public transport and the local and strategic highway networks in the surrounding area.

#### Pedestrian and highway modelling

33. The impact of additional pedestrian trips on the surrounding public realm and highway networks including projected future crowding on key local footways and at crossings is also being assessed via LEGION modelling. Before further

comments can be provided on any impacts, and to identify any necessary mitigation, the street level LEGION modelling must pass Stage 5 of TfL's Model Audit Process (MAP) prior to determination and the s106 agreement should include a scope of s278 works to be agreed with TfL.

### ATZ and healthy streets

34. The development is supported by an Active Travel Zone (ATZ) assessment which considers key routes to and from Liverpool Street interchange. A number of the locations where ATZ improvements identified in the assessment should be secured such as at the junction of Great Eastern Street and the A10 are acknowledged and already being addressed through adjacent development.
35. The improvement of key routes through and adjacent to the development are also proposed. Proposals to create an improved pedestrian connection from Half Moon Street are welcomed, though they should be modified to discourage walking along the eastern side of the bus station which is neither safe nor attractive. Opening up this route to the proposed retail should also be considered.
36. As confirmed by TfL at pre-application stage, visualisations showing a new zebra crossing between 100 Liverpool Street and the bus station are not supported and would certainly require significant further details, consideration and traffic modelling fully audited by TfL to demonstrate its acceptability.
37. In line with Healthy Streets and the Mayor's Vision Zero initiative, s106 contributions towards highway safety improvements in the local area should be agreed and may be applied by TfL to permanent works on the A10 Bishopsgate corridor. Supporting highway works could be delivered by the applicants or a future development partner via s278 agreement, provided that all proposed TLRN highway works are designed up in further detail to enable Stage 1 Road Safety Audits (RSAs) and Designer's Responses for all affected junctions, footways and crossings prior to Stage 2.
38. Any s278 works for the TLRN would require full strategic highway modelling to TfL standards prior to implementation, audited and approved by TfL as the highway authority for the A10; and they must be designed, assessed and implemented at zero cost to TfL. Alternatively, a contribution could be made directly to TfL for them to deliver improvement works to the A10 Bishopsgate corridor, particularly at its junction with Primrose Street. There, the new cycle hub entrance proposed will significantly increase cyclist traffic, and a Stage 1 RSA has already been commenced and submitted.

### Cycle parking

39. The proposals include a new cycle hub at concourse level for circa 720 cycles. This will replace multiple existing station cycle parking facilities at Bishopsgate and Sun Street. The proposed increase broadly complies with Policy T5's standard for cycle parking at stations and is welcomed in principle, though the applicant should advise on the station cycle mode share that it could support.

Detailed design, implementation and long-term management of the hub should be secured by s106 obligation.

40. Access to the cycle facility is proposed via Primrose Street and Exchange Square to the north. As access to the cycle store would be some distance from the main station to the rear of the site, to ensure its effective use, and avoid cyclists entering/ existing via the main entrances, signposting and wayfinding to and from the cycle store must be clearly displayed throughout the station. Details of how the new proposed entrance would link large numbers of cyclists safely to A10 Bishopsgate in particular. The planning decision should address how any RSA recommendations or other necessary highway works identified and requested by TfL, including changes to the Primrose Street/A10 junction, could be funded and taken forward, as earlier mentioned.
41. Cycle parking provision for the OSD will be in line with London Plan standards which is welcomed. Full details should be secured by condition.
42. The development would also increase demand for greater cycle docking provision in the area. A contribution to provide a new TfL Cycle Hire docking station with 50 docking points is proposed which is welcome. This should be secured from the development via the s106 agreement. The final agreed location must meet TfL Cycle Hire's operational requirements, including ground level highway access from Liverpool Street to the south.
43. A proposed s106 contribution to a new TfL Cycle Hire station is welcomed. However, the proposals still do not include space within the main station buildings for storage of additional bikes to alleviate pressure during peak periods. Further discussion with the Corporation is recommended to identify a suitable location for this, and dimensions and access requirements have been shared with the applicants separately by TfL.
44. The City Corporation should consider any improvements and highway modelling necessary to ensure safe access from Liverpool Street, considering the proposed OSD cycle parking will serve a very large number of users. Cycle parking provision within the OSD will be in line with London Plan standards which is welcomed. Full internal details should be secured by condition.

#### Travel planning, delivery and servicing and construction logistics

45. The proposal for a consolidated delivery and servicing area within the station is welcomed in order to minimise servicing activity across the interchange, and to accord with Policy T7. The proposals for cargo bike storage are also welcomed. However, the permanence of this facility and retail development above assumes that additional platform capacity is not required. The applicant should verify that this decision is evidenced by demand forecasts and train operational changes, such as higher capacity services.
46. The construction period is forecast to be approximately 9 years and will have a considerable impact on the operation of all parts of this interchange. The proposals are supported by a draft construction logistics plan (CLP) and LEGION modelling to understand expected impacts on the rail station.

47. However, the impact on LU infrastructure has not been assessed, especially ticket hall B, which is proposed to be variously half-closed across two phases of development. Further demand forecasting is requested prior to Stage 2 to clarify whether exit only and other crowd control measures or even non stopping of TfL services may be necessary. In which case, full strategic modelling to clarify wider network impacts and operational compensation to LU Ltd to cover any additional expenditure they must temporarily incur may need to be funded by the applicant via the s106 agreement and relevant DA.
48. The CLP should be secured and monitored through the section 106 agreement.
49. The applicant should also clarify the proposal in the CLP for temporary 'service thinning' of rail services and potential gateline controls is expected to affect all LU services including the Elizabeth Line, and all rail services including London Overground. Strategic modelling may be necessary to understand any impacts including where trips may reroute. The impact on TfL services at either Liverpool Street or elsewhere may need to be mitigated. The applicant is urged to discuss this matter further with TfL and necessary mitigation measures (if any) must be secured prior to Stage 2.
50. The construction access arrangements currently proposed in respect of LU ticket hall B; and pit lanes on Sun Street Passage and the A10 Bishopsgate require further discussion and design development. Safe and convenient passenger access at the bus station and to local coach services should be maintained throughout.
51. In addition, the later phases of construction indicate that Liverpool Street may be closed to general traffic and pick up and drop off provision at the taxi rank should therefore be carefully considered throughout construction, as well as in the end state s278 proposals, in discussion with the Corporation.

## **Urban design**

### Scale, form and massing

52. The proposed development, which reaches a maximum height of 97.7 AOD, meets the definition of a tall building in the context of the emerging City Plan Policy S12 (tall buildings being defined as those reaching 75m AOD and above). The adopted Local Plan defines tall buildings as those that significantly exceed the height of their general surroundings but also states that planning permission should be refused for tall buildings within inappropriate areas such as conservation areas. In this regard, whilst the context includes a wide range of building heights, from 4 storeys to 40+ storeys, the buildings within the Bishopsgate Conservation Area, which includes the station buildings where the OSD is proposed, are generally of a medium to low scale.
53. Furthermore, the site is not identified in the emerging Local Plan as a site which is suitable for tall buildings. Accordingly, the proposals do not comply with the locational requirements of London Plan Policy D9 (Part B).

54. Notwithstanding this non-compliance, at this stage the proposal does not raise strategic concerns in regard to its impacts (outlined under Policy D9 (Part C)). Matters relating to heritage, strategic views, air quality and transport are all dealt with under the relevant headings below. The detailed information submitted with regard to D9(C) will also be reviewed by the Corporation and any necessary local mitigation must be suitably secured as part of any planning permission. A publicly accessible area would be provided at the top of the building, which is welcomed. This should be secured as free to enter.
55. The proposed building has reduced in height by circa 11 meters when compared with the previous proposals. GLA officers acknowledge that this reduction in height, together with refinements to the massing generally, reduces the overall impact of the scheme, particularly in longer range views. Furthermore, the element of the OSD that previously oversailed the listed former Great Eastern Hotel has now been removed which is supported.

#### Layout, permeability and legibility

56. The applicant has proposed a number of key moves at the ground floor plane to achieve the project aims of enhanced urban connections, step free access, and increased station capacity.
57. GLA officers are fully supportive of the increased station permeability. The new north-south routes into the station from Exchange Square and the creation of a more formal east-west route into Broadgate Campus are particularly positive. The replacement station entrances effectively signpost the station.

#### Public realm

58. The provision of green infrastructure on Hope Square and on Liverpool Street may not be viable and impact on pedestrian movement through this space. The applicant should provide further justification in this regard.
59. Whilst the availability of natural daylight to the main concourse would be noticeably diminished as a result of the proposed new OSD oversailing the replacement station roof, a cutaway between it and the Andaz would somewhat mitigate this. It is also acknowledged that natural light penetration would still be afforded from the transparent panels and windows to the retained original trainshed. In combination, the applicant has developed a complementary lighting strategy to optimise light levels to the station public areas throughout the day and night, which is supported. The details of which should be secured by the Corporation.
60. The provision of free drinking water stations should be incorporated into the public realm in line with Policy D8.

#### Strategic views

61. The impact of the proposed development has been assessed in a number of LVMF views. The proposals would be completely obscured behind the existing

townscape or established vegetation (views 13B.1, 9A.1, 13A.1 and 13B.1) and therefore would have no impact on these views. Other views assessed in the TVIA include 5A.2 and 16B.1. In these views the building is only just discernible and would blend entirely into the existing townscape thereby causing no harm.

62. In respect of the river prospect view 15B.1 from Waterloo Bridge to St Pauls, the development would sit just below the established treeline in the foreground. Although the trees are still partially in leaf in the submitted AVRs, the development would likely not be visible year-round given the density of tree canopy when viewed from this position. However, if the trees were pruned to a significant degree in this location, part of one lift overrun and small elements of the uppermost floors could become visible behind St Paul's, behind the peristyle and northwest tower, infilling this gap to a small degree, but staying below the bottom of the peristyle. Various viewpoints have also been assessed between 15B.1 and 15B.2 and in each of these instances, the development is either completely obscured by the established treeline or by St Paul's itself. At View 15B.2, the development is completely obscured by Unilever House and other buildings in the foreground. The impact of the development has also been assessed in these views at night-time. Again, the impact is negligible in these views. As such, it is not considered that the development would materially harm the composition of these views, or the ability to appreciate St Paul's or other key landmarks in this view.
63. In View 17B.1 from the Golden Jubilee/ Hungerford Footbridges (downstream, crossing the Westminster Bank), the development can be seen just above existing buildings in the sky gap between St Pauls and the City Cluster in this view. The small scale of the infringement, is not considered to challenge the primacy of St Paul's in this view, harm the overall composition or reduce the viewers ability to appreciate any of the other key landmarks. Particularly given the distance of the development from the view.
64. Slightly more of the proposed building is visible above the established roof line in View 17B.2 from the Golden Jubilee/ Hungerford Footbridges (downstream, close to the Westminster Bank). However, in this view the stepped massing of the proposed building is apparent, which drops down to meet the existing roof line towards St Pauls. Although the sky gap would still reduce, this stepping down serves to lessen its impact. As such it is not considered that this would materially harm the composition of this view or ability to appreciate St Paul's or other key landmarks in this view.

#### Architectural quality

65. In general, the architectural quality and materials proposed are robust and supported.

#### Fire safety

66. In line with Policy D12 the application is accompanied by two fire safety statements, one for the station concourse and the other for the OSD. These have both been prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire



safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The documents indicate that several areas of the strategy would require updating at the next design stage as well as making various recommendations. There are also several areas where the strategy is somewhat limited by the constraints of the existing building and densely developed surroundings, alternative strategies are suggested in these instances. Therefore, to ensure compliance with Policy D12, a condition should be secured requiring the submission of updated Fire Strategies including firm commitments as to the fire safety measures to be employed.

67. In respect of Policy D5, which seeks developments incorporate safe and dignified emergency evacuation for all building users it is proposed to provide evacuation lifts, however, in respect of the station, the exact number and location of some of these lifts is yet to be determined. Therefore, further details should be secured via condition. The evacuation lift strategy with respect to the OSD is reasonable and would therefore generally comply with Policy D5. The full details should be secured via condition.

#### Access and inclusive design

68. As set out above, the existing station suffers from extremely poor levels of accessibility, wayfinding and limited public facilities. There is only one 4-person capacity passenger lift in the whole station serving the upper and lower concourses, which is currently out of service much of the time.
69. An inclusive design statement has been included in the application submission which demonstrates that the proposed development would significantly enhance accessibility and inclusion across the site. All entrances to the station are proposed to be step-free, incorporating flat or gently sloping paths, step free circulation throughout the concourses. In total, 8 new passenger lifts are proposed including 4 x 25 person lifts and 4 x 12 person lifts, serving all NR and LUL lines, the number and size of which have been informed by pedestrian flow modelling. The stairs would be widened, and 4 additional escalators installed. Improvements to sightlines throughout the station, and wayfinding is also proposed. A dedicated waiting area has been provided for the bus station along with additional seating and a replacement customer assistance and operational control kiosk, which is supported.
70. The addition of lifts from the NR concourse to ticket hall C and a lift to the Central line platforms is strongly supported as it would provide step free access to them for the first time. However, the applicant should clarify whether level boarding to the trains will also be included as the continued use of manual boarding ramps would not give the station full 'Blue Badge' status. The size of the lifts should also be increased to accommodate at least 17 persons minimum and sized according to forecast demand, subject to structural/ viability constraints and further discussion with the applicant and Corporation.
71. Step free access routing must be clearly signed through the NR station concourse as part of a wider station wayfinding strategy which should include

updated and new Legible London signage for the main stations and surrounding area. This should be secured by condition or in the s106 agreement.

72. The access strategy for the station should consider how lift access to the Central line would be achieved for night tube if the NR concourse is closed to the public.
73. Currently, there is only one public toilet at basement level, accessible only via escalators. The proposals would instead provide new accessible toilets at grade on both concourse levels. Two new Changing Places toilets are also proposed, along with family rooms and assisted travel lounge. The Corporation should seek to ensure that public toilets are secured as free to use and available as long as the station is open, or 24 hours when accessed from the public realm. Additional seating is provided in logical locations throughout the station, which is supported.
74. The access and inclusion strategy for the OSD is comprehensive and would significantly enhance the accessibility and overall inclusiveness of the station in line with Policy D12, the details of which should be secured by the Corporation as necessary.

## Heritage

75. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be.
76. Liverpool Street Station is Grade II listed. The southern end of the station is in Bishopsgate Conservation Area, there are three other designated heritage assets on site including two war memorials and a Police Call Box, all Grade II listed. The site is also adjacent to the Andaz Hotel, which is Grade II\* listed. There are a number of other listed buildings in the vicinity of the site as detailed below. Based on the information submitted, GLA officers consider that the following levels of harm are caused by the proposed development.

Designated heritage asset	Category of harm	Extent of harm
Liverpool Street Station, listed Grade II	Less than substantial	Very High
Former Great Eastern Hotel, listed Grade II*	Less than substantial	High
St Paul's Cathedral, listed Grade I	Less than substantial	Low
St Mary-le-Bow Church, listed Grade I	Less than substantial	Very low
St Botolph Without Bishopsgate, listed Grade II*	Less than substantial	Low to middle

St Botolph Bishopsgate Church Hall, listed Grade II	Less than substantial	Middle
Bishopsgate Conservation Area (CoL)	Less than substantial	High
New Broad Street Conservation Area (CoL) and the listed buildings within the area	Less than substantial	Very low
St Helen's Place Conservation Area (CoL) and the listed buildings within the area	Less than substantial	Low
Finsbury Circus Conservation Area (CoL) and Finsbury Circus Gardens, Registered Park and Garden, Grade II and the listed buildings within the area	Less than substantial	Low to middle

#### Liverpool Street Station impacts

77. The development results in the demolition of almost all of the 1985 to 1992 parts of the listed roof. These elements were added to the listing in 2022. The over station development will cause harm to the setting of the station and would dominate the remaining listed station in key views. Harm would also arise as a result of the proposed service yard in a concrete box within the station by virtue of its size and its construction which necessitates the removal two 1875 columns. The scale and dominance of the proposed entrances is harmful in street views and the setting of the listed buildings. The provision of the new retail units along the length of the trainshed and the proposed raised walkway along Sun Street Passage would obscure the historic brickwork of the trainshed, resulting in further harm.

78. Overall, these impacts are considered to cause less than substantial harm at the very high end of the spectrum to the significance of Liverpool Street Station.

#### Former Great Eastern Hotel impacts

79. The minor direct works to the hotel, are not considered to cause harm. However, the scale of the proposed development would detract from the hotel's landmark status in the street, diminishing the ability to appreciate its rooftop silhouette. The historical links between the station and the hotel would also be diminished through the proposed demolition and more of the northern façade of the hotel would be obscured by the development when viewed from the north.

80. The impact of the development is considered to result in less than substantial harm at the high end of the spectrum.

#### Bishopsgate Conservation Area

81. The 50 Liverpool Street building, Bishopsgate and Hope Square entrances and the associated elements, are positive contributors to the Conservation Area's significance. Their loss, together with the nature and scale of the proposed development, would cause harm to the contribution made to the significance of

the Conservation Area by the architecturally and historically coherent Victorian railway terminus group and surrounding listed buildings.

82. The impact of the development on the conservation area is considered to result in less than substantial harm at the high end of the spectrum.

#### St Botolph's Church and Hall

83. The tower and spire would be almost entirely backdropped by the proposed development. This would result in a reduction in the ability to appreciate the silhouette of the church's tower and spire against open sky, the impact of which would cause less than substantial harm to the middle end of the spectrum.

84. As harm has been identified, the proposals do not comply with London Plan Policy HC1. However, in accordance with the provisions of the NPPF, the harm must be weighed against the public benefits. As outlined in the submission documents, there are numerous identified public benefits to the station as outlined at paragraph 12 and 13 as well as the following:

- The development of a significant new office building which would accommodate approximately 6,000 employees;
- The provision of new and improved retail floorspace;
- Construction and related jobs equivalent to 700+ FTE per year over the construction programme;
- Provision of a free to enter publicly accessible roof garden and an auditorium, which would be available for public and private events; and
- The project would deliver a significant biodiversity net gain of 2,573.30% (2.02 area habitat units).
- Heritage benefits include: The removal of 2013 ticket office and station reception building between platforms 10 and 11. The reintegration of the architectural relics of the Victorian station buildings at roof level, repainting of station to match historic colours, the relocation and alternation of the memorials. The other heritage benefits identified by the applicant would be undermined by the harmful effects of the replacement structures.

85. GLA officers consider that the proposed public benefits have the potential to outweigh the harm to the assets identified above. However, a final balancing exercise will be undertaken at Stage 2 once the public benefits package is secured.

## Environment and sustainable infrastructure

### Energy strategy

86. An energy statement has been submitted with the application. The energy strategy does not yet fully comply with the London Plan. The applicant should further refine the energy strategy and submit further information to comply with London Plan policy. Full technical details have been provided to the Corporation and applicant in an excel memo that should be responded to; however outstanding policy requirements include:

- Be Lean and managing heat risk – The glazing percentage is resulting in high curtain walling U-value, where feasible, the applicant should consider reducing the glazing ratio;
- Be Clean – The requirement to provide a single point of connection from the development to the district heating network should be secured through an obligation or condition;
- Be Green – A more detailed roof layout should be provided to demonstrate that the area identified for PV has been maximised;
- Be Seen – A 'be seen' energy monitoring obligation should be secured within the s106 agreement; and
- Energy infrastructure – The applicant should provide commentary as to why their EUI targets exceed the EUI values table 4 of the GLA guidance.

### *Carbon savings*

87. The development is estimated to achieve a 13% reduction in CO2 emissions compared to 2021 Building Regulations.

88. The development falls short of the net zero-carbon target and the minimum 35% reduction on site required by Policy SI2. The applicant should consider the above comments further in order to improve the performance further. A carbon offset payment would need to be secured. The draft legal agreement should be submitted, demonstrating the offset payment with agreement with the Corporation.

### Whole life-cycle carbon

89. The applicant has submitted a whole life-cycle carbon assessment, as required. The WLC assessment does not yet fully comply with Policy SI2. Further technical information is required on why module A-C emissions exceed the benchmarks and explore ways to reduce this. More information is also requested on material quantities and end of life scenarios. Detailed comments have been supplied to the Corporation and applicant for further consideration.

90. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions, suggested condition wording is available on the GLA [website](#)<sup>5</sup>.

#### Circular economy

91. The applicant has submitted a Circular Economy Statement. The Circular Economy Statement does not yet comply with London Plan Policy SI7. Further justification for the current proposals in terms of embodied carbon including alternate proposals tested is requested. Further detailed comments have been submitted to the applicant and Corporation for further consideration.
92. A condition should be secured requiring the applicant to submit a post-construction report, suggested condition wording are available on the GLA [website](#)<sup>6</sup>.

#### Urban greening and biodiversity

93. The applicant has calculated that the scheme would achieve an Urban Greening Factor (UGF) score of 0.19 which falls beneath the target score of 0.3 based on the entire site area. However, when excluding the undevelopable area (the station tracks), the site would achieve 0.32. The UGF strategy is considered acceptable on this basis in this instance. The Corporation should secure all greening measures to ensure the target is met.
94. The applicant considers that the scheme is exempt from the biodiversity net gain requirement as it meets the exception tests. Nevertheless, the applicant has set out that there would be a significant biodiversity net gain of 2,573.30% (2.02 area habitat units) which is fully supported.

#### Flood risk, sustainable drainage and water efficiency

95. GLA officers have reviewed the Flood Risk Assessment (FRA) in terms of pluvial (surface water), groundwater and sewer flood risk. The site is considered to be at low risk from these flood sources. The FRA provided for the proposed development generally complies with Policy SI12. The proposals would also comply with Policy SI5 relating to water efficiency and consumption.
96. The sustainable urban drainage strategy generally complies with Policy SI13, subject to a condition requiring the provision of a detailed drainage design prior to construction.

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<sup>5</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

<sup>6</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

## Air quality

97. The applicant has provided an air quality assessment and dust risk assessment which concludes that the scheme would be air quality neutral and identifies that the proposed development would not require mitigation measures other than during the construction phase of the development, which is acceptable. The Corporation should identify all appropriate mitigation and appropriately secure these as part of any future planning permission. An Air Quality Positive Assessment has been undertaken and concludes the proposed development would likely not lead to adverse impacts on local air quality and conditions for future occupiers, which is accepted. Accordingly, the development is compliant with Policy SI1.

## **Local planning authority's position**

98. City Corporation planning officers are currently assessing the application. In due course the Corporation will formally consider the application at a planning committee meeting.

## **Legal considerations**

99. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Corporation under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## **Conclusion**

100. London Plan policies on land use, transport, urban design, heritage, environmental issues and sustainable development are relevant to this application. Whilst the proposal is strongly supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land use principles:** The proposals for substantial improvements in capacity, permeability and accessibility to the existing train station and London Underground lines, as well as the development of a significant new office building within the CAZ and City of London is strongly supported in principle. Capacity optioneering and viability to address significant congestion on some NR platforms in the future scenario should be considered further.

- **Transport:** Detailed work is required to ensure the design and delivery of key transport improvements, supported by modelling. The impact of an extensive construction period for a scheme of this scale must be defined and secured prior to determination. Other issues include: larger lifts to serve LU lines; impact of temporary rail service thinning on LU and Elizabeth line operation; clarification of access and wayfinding to the cycle hub; removal of zebra crossing proposed at the bus station; updates to the modelling for all LU areas, including the Elizabeth line before, during and after construction; completion of Stage 5 of the TfL Model Auditing Process (MAP) for the street level LEGION assessment prior to determination; technical engineering assurance by TfL of the bus station layout; sufficient space for bus waiting areas proposed; as well as the requested s106 obligations, s278 works and conditions.
- **Urban design:** The proposals are generally supported in design terms and have evolved positively through the pre-application process. The height and massing of the proposed building is considered acceptable, subject to securing the necessary mitigation measures identified. The roof garden should be secured as free to access. The applicant should provide further evidence that the soft landscaping within the public realm would not adversely impact on pedestrian flows. The provision of water fountains should be considered and the conditions as requested, secured.
- **Heritage:** The proposals would result in less than substantial harm to the significance of Liverpool Street Station at the very high end of the spectrum and less than substantial harm at the high end of the spectrum to the Bishopsgate Conservation Area and Former Great Eastern Hotel. Less than substantial harm has also been identified to the setting of other heritage assets in the vicinity. GLA officers consider that the proposed public benefits have the potential to outweigh the harm to the assets identified above. However, a final balancing exercise will be undertaken at Stage 2 once the public benefits package is secured.
- **Environment and sustainable infrastructure:** The development is estimated to achieve a 13% reduction in CO2 emissions compared to 2021 Building Regulations which falls short of the zero carbon target and 35% minimum threshold and efforts therefore should be made to improve this score and the memo responded to. Carbon offset and 'be seen' obligations should be secured. Comments should be addressed regarding whole life cycle and circular economy as well as securing post construction conditions. A detailed drainage condition should be secured and mitigation measures secured in respect of air quality.



We are committed to being anti-racist, planning for a diverse and inclusive London  
and engaging all communities in shaping their city.



## HISTORIC BUILDINGS & PLACES

8 July 2025

FAO: Kieran McCallum

By Email: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

**Address: Liverpool Street Station Redevelopment**

**Application Ref: 25/00494/FULEIA**

**Statutory Remit:** Historic Buildings & Places (formerly the AMS) is a consultee for Listed Building Consent applications, as per the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.

**Comments:** Thank you for notifying HB&P of submission of the latest application for the redevelopment of Liverpool Street Station. HB&P were involved in pre-app discussions with the applicant which, unfortunately, did not result in any substantial changes to reduce the scale of development or the level of harm to the grade II listed station, grade II\* Andaz/ Great Eastern Hotel, or the Bishopsgate Conservation Area.

This is not a conservation-led scheme. It involves demolition of over half of the grade II listed station (the concourse and related part of the trainshed) and the introduction of an 18 storey/ 80+ meter glazed tower above the concourse, which grossly intrudes on the setting of the station and the grade II\* listed Andaz/ Great Eastern Hotel, and harms the character of the Bishopsgate Conservation area. The cumulative impact is considered to represent substantial harm. HB&P therefore **OBJECT** to the application on heritage grounds and recommends refusal.

### *Site and Context*

The current form of Liverpool Street Station is a result of a public inquiry into the proposed demolition of both the station and the former Great Eastern Hotel in 1976. The 1870s trainshed was listed and the hotel was omitted from the scheme, while the former Broad Street Station was sacrificed to fund the alterations to Liverpool Street Station, including the extension of the train shed and remodelling of the concourse between 1986–1991. The redevelopment won awards for its conservation led approach and celebration of the gothic and Victorian architecture that characterises the station today. The station's grade II listing very clearly includes both the original trainshed dating from the 1870s, as well as the current concourse and the trainshed extension from the late 1980s/early 1990s reorganisation of the station.

Historic England's list descriptions for both Liverpool Street Station and the former Great Eastern Hotel clearly outline the architectural, social, historic and group value of both buildings. This is reiterated in the Bishopsgate Conservation Area Appraisal, which was amended in 2007 to include Liverpool Street. It notes that the CA consists of 'predominantly Victorian and Edwardian buildings' and 'overlaid with key examples of Georgian town planning and Victorian railway infrastructure'. It is also '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'. It describes Liverpool Street Station as 'one of London's great Victorian stations, and is a dominating presence in Liverpool Street and

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

#### *Harmful Impact of the Development*

The application would demolish a substantial portion of the grade II listed station, including the almost complete loss of the concourse and southern parts of the trainshed. The later concourse is included in the grade II listing for the quality of its sympathetic design, which carefully follows the detailing, form and proportions of Wilson's original 1870s trainshed, integrating a second transept that enhances the spatial quality and cohesiveness of the remodelled and unified station concourse. HB&P therefore dispute the suggestions in the Heritage Statement that the loss of part of the trainshed, the Sun Street walls and the main concourse is less than substantial harm due to the 'limited historic value'.

Incremental development nearby has resulted in the station being encircled by midrise development, and construction of an 18-storey over-station development over the southern end of the station would destroy the heritage value and historic character of the station from all public view points, bar Exchange Square at the rear. It would also drastically block natural light to the concourse and platforms, even with the restoration of the glazing to the remaining part of the trainshed.

The tower would also irreparably damage the character and appearance of the Bishopsgate Conservation Area by the imposition of a tall, modern building of excessive width over the station. The new buildings, by virtue of their scale, materiality, and design are unacceptable in heritage terms and would destroy one of the last cohesive Victorian streetscapes in this part of the City of London, as observed in the CA appraisal.

The design itself is a confusing and conflicting piece of architecture and demonstrates that an over station development in this location is not appropriate, given the constricted site and the surrounding built, view corridor, and heritage constraints that are present.

The range of different architectural styles and the transitions between them is awkward. From the pointed arches of the heritage train shed, to the proportions of the 'Victoriana' concourse roof, that then transitions into the solid brick arches at the entry points (which introduce a rounded curve arch that jars with the pointed arched windows of the existing trainshed - particularly noticeable on the Sun Street elevations), and the hard lines between the brickwork and the fluted glass box above, introducing yet another style, material and texture. Externally, it appears as two disjointed buildings placed on top of each other. It then sits awkwardly wedged between the Grade II\* Andaz Hotel and the Bishopsgate office building and does not in any way relate to either of these buildings.

The design of the proposed development certainly does not help to 'better reveal' the significance of the conservation area.

We defer to, and echo, the extensive comments the Georgian Group have already submitted regarding view corridors and the impact the office tower would have on numerous nearby churches, listed buildings, and other conservation areas, most notably the long, cross-city views of St Paul's Cathedral.

#### *Public Benefits*

HB&P acknowledge that the station needs work to improve access and capacity, and some of these issues are currently being addressed, such as work to increase the ticket barrier gates to the main line platforms. Many of the claimed public facing 'benefits' (e.g. new 'statement' entrances are only provided to support the tower above and are not essential to the actual access and capacity requirements of the grade II listed station itself. The

additional cost of piling in this difficult location above tube and rail tunnels has also unnecessarily inflated costs for delivering the over station development. The roof top garden and lecture roof are not essential to improving access and capacity at the station and should not be considered benefits at the expense of a listed structure.

#### *Lack of Justification*

Council will be well aware of para 213 of the NPPF which advises that: *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of... ..grade II listed buildings... should be exceptional.*

The application fails to satisfy para 213 as it has not adequately explored less harmful and alternative options for the upgrade of this grade II listed station. The application only considers an over-station development. Network Rail need to go back to basics and clearly identify the needs of the station, the cost to upgrade the station, and the minimum amount of enabling development needed to fund those works in order to justify any development. For example, Network Rail has a nationwide supply of sites that could be developed to fund an upgrade of this grade II listed station. The application will also involve a substantial uplift in retail space within the new, raised walkways to Exchange Square at the rear - would this alone offset the cost of the access and capacity requirements of the grade II listed station? All these less harmful options must be explored.

It is also a concern that the station needs such a substantial upgrade only 30 years after the last major rebuild. The over-station development fails to safeguard the ability to provide further major upgrades to meet changing needs in the future.

In summary, given this involves the demolition of a substantial proportion of a listed structure, all alternatives must be explored to ensure the least harmful development and one that secures and sustains the heritage value of the station.

If your Authority is minded to grant permission for this application, despite the level of harm to significance, the extent of contradiction in the submitted planning documents and the lack of justification provided, we request that this be referred to the Secretary of State for determination.

Ross Anthony

HB&P Casework



Mr Kieran McCallum  
City of London Corporation  
Development Division

Direct Dial: 0207 973 3777

Our ref: P01593424  
14 July 2025

Dear Mr McCallum

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

**LIVERPOOL STREET STATION, LIVERPOOL STREET, EC2M 7PY; ANDAZ  
HOTEL, 40 LIVERPOOL STREET, EC2M 7QN; AND 50 LIVERPOOL STREET,  
EC2M 7PY  
Application No. 25/00494/FULEIA**

Thank you for consulting Historic England on the 5th June 2025 on the development proposals for Liverpool Street Station. We have had extensive and positive pre-application discussions on this scheme.

We have not received consultation documents for the associated Listed Building Consent applications, so this letter relates only to the above planning application.

**Summary**

Liverpool Street Station is a key historic gateway into the City of London and marries some of the best Victorian station architecture with an exceptional historicist remodelling of the late-20th century, itself an important architectural work of its period. It is a major building that contributes positively to a highly characterful area that evokes the great age of steam, with the former station hotel a handsome landmark that gives the station a prominent and confident street frontage.

Network Rail's proposals to remodel and improve the station are a significant improvement on the other live application (ref: 23/00453/FULEIA) and represent a further step forward since the public consultation on an earlier version of this application scheme in 2024. However, they would still cause a high level of harm to the building's significance, while also seriously harming that of the Great Eastern Hotel and the Bishopsgate conservation area. The station's significance would be harmed by both the extensive works of demolition and by the effect of the over site development; and it is the presence of the latter that would harm the Great Eastern Hotel and the conservation area.



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Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



Historic England recommends that your authority should seek further changes to the scheme to further reduce the harm, and only grant planning permission if persuaded that the harm has been minimised and would be outweighed by public benefits.

## Historic England Advice

### Significance

#### a) Liverpool Street Station

Liverpool Street Station, built in 1872-75, was designed by the engineer Edward Wilson for the Great Eastern Railway, providing connections between London and East Anglia. The station was set about 5m below ground level, behind imposing L-shaped neo-Gothic buildings that surrounded a ramp down from the area of the present Hope Square. These buildings contained the main booking hall at concourse level and railway offices above, with two mainline platforms running along the east side of the long north-south range and under the former Great Eastern Hotel as far as Liverpool Street. Shorter suburban platforms were set behind the ramp and shorter east-west range.

Due to the L-shaped frontage, the two main north-south naves of the train shed were of unequal length, crossed by a single transept. Taller than Brunel's train shed at Paddington, the faceted and decorated columns and spandrels support a largely glazed roof that recalls the fineness of ornamentation and qualities of daylight at platform level enjoyed at that station. Wilson closed the west side with a screen wall to Sun Street Passage, using Suffolk stock brick and Bath stone, with triplet lancet windows edged in red brick to each gabled bay and a taller transept gable with five high arched windows. On its east the station abutted the rear of buildings fronting onto Bishopsgate.

The station was expanded to the east in 1894-5 by W.N. Ashbee, who had worked under Wilson, to provide more capacity for cheap suburban commuter services. The station thus acquired the largest number of platforms of any London terminus, but these were split into two groups of different lengths separated by the long mainline tracks and a perforated brick wall between the train sheds. This led to the accumulation of a spectacular but difficult series of bridges and high-level walkways.

Ashbee created varied Flemish-style frontages to Bishopsgate, which recalled the links between East Anglia and the low countries. These included Harwich House, which contained a booking hall and parcel depot; a striking screen wall with arched windows and cartouches; and further north a row of shops with offices over, called Hamilton House.



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By the 1970s British Rail was pursuing plans to consolidate Liverpool Street with the neighbouring Broad Street station, with Fitzroy Robinson exhibiting plans in 1975 for a new station retaining only part of the Great Eastern Hotel. In the same year, Liverpool Street Station was listed at grade II, a listing which covered the 'Gothic style offices flanking the ramp, and the 2 western bays of the train sheds'. The Liverpool Street Station Campaign (led by The Victorian Society and chaired by Sir John Betjeman) opposed the plans, and the application was subject to a public inquiry which saw the proposals rejected.

The resulting revised scheme was implemented in 1985-1992 and produced the present station, which retained most of the original western train shed and its screen wall alongside the hotel. The 1890s parts of the station and the 1870s office range (save for fragments) were demolished at some cost to the station's significance. One portion of Wilson's original office range, the southern pavilion, was rebuilt with upper facades in near facsimile and is now 50 Liverpool Street.

British Rail architect Nick Derbyshire devised, in the words of the 2022 revised list description, 'a major historicist infrastructure project' for extension of the 1870s train shed, which successfully 'enhances the spatial quality and cohesiveness' of a rationalised concourse. The two glazed and wrought-iron naves of the western train shed were extended in a scholarly copy in steel of the original structure, up to a second southern transept running behind the Great Eastern Hotel and over the concourse beneath, creating a light airy volume over the main concourse. Acanthus scroll details were reinstated to the columns of the original train shed, and stone reliefs salvaged from Ashbee's Bishopsgate frontages were mounted on the largely blocked rear façade of the Hotel.

Derbyshire extended the Sun Street Passage screen wall in facsimile to enclose the new concourse structure and formed new entrances onto Liverpool Street and Bishopsgate. Both entrances are defined by pairs of brick towers. On Liverpool Street, these towers sit alongside glazed screen walls and a projecting canopy in an historicist style. On Bishopsgate, a high-tech projecting entrance structure sits forward of a brick screen wall that reflects the original station architecture. Both station entrances incorporate other features salvaged from the earlier station buildings including pairs of cartouches and door casements.

The entrances are set back to create piazza spaces that are partly accessed via steps and enclosed with replica stone gate piers. The piazza to Liverpool Street is known as Hope Square.

Both new entrances gave access either to a unified lower-level concourse under the new transept, or to new high-level walkways that wrapped around the inside of the screen walls and across the main gate lines to provide access to a new deck containing retail units. While these walkways recall something of the character of the



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old station, the shops block views of the train shed.

When the station was re-listed in 2022, the walkways, decks and retail units were excluded from the listing.

The TfL Ticket Hall B within Liverpool Street Station was constructed as part of the 1985-91 Derbyshire scheme and lies beneath Hope Square and 50 Liverpool Street. It is attached to the grade II station and the grade II\* former Great Eastern Hotel and integrated to enable passenger movement. This area of both buildings is of low heritage significance.

Alongside the redevelopment of the station, the local area was transformed through the development of the Broadgate Estate. This included the creation of the new public piazza of Exchange Square, which was developed over the railway tracks to the north of the station. This opened up new views that allow the architecture of the train shed, both internally and externally, to be viewed and appreciated.

Within the station are two separately listed grade II listed war memorials: the Great Eastern Railway War Memorial and the London Society of East Anglians War Memorial. Both have previously been moved as part of the 1990 works and the Great Eastern War Memorial currently has a lift entrance inserted into its lower portion, partly undermining its architectural integrity.

Liverpool Street Station today is a vast and impressive building that reflects the character of the 1870s train shed and expresses Victorian engineering confidence in what is one of the great London railway termini. The borrowing and use of careful detailing, form and proportions of the 1870s station to create the enlarged train shed of 1985-91 with its second transept and enclosing walls is a thoughtful response which achieves a complementary character and quality that contributes equal weight to the station's special interest and grade II listing.

#### b) The former Great Eastern Hotel

The former Great Eastern Hotel is one of the most significant examples of late Victorian hotel architecture in London. It was built in 1883-4 to designs by Charles Barry Jr and Charles Edward Barry and extended to the north in a complementary manner by Robert William Edis in 1898-1901. The hotel is an evocative reminder of the arrival of the railways in the 19th century, forming a prominent frontispiece to the station, and marking the transformation of this part of the City of London.

The hotel has impressive elevations that face Bishopsgate, Liverpool Street and the main train shed at Liverpool Street Station. These elevations are intricately detailed in high quality brick, terracotta and stone and confidently designed in the Flemish Renaissance style, reflecting the use of this architecture for the neighbouring station



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buildings that formerly fronted onto Bishopsgate.

The hotel was extensively altered in 1999-2000 by Michael Manser. A three-storey roof extension was added, in a curved, steep mansard form clad with copper tiles. Despite this extension, the original roofline of the hotel with its intricate gables, dormers and pinnacles remains prominent and largely intact. These features can still be clearly seen against the modern roofs, or clear sky, in views from surrounding streets and open spaces.

The high-quality architecture of the exterior of the hotel is matched by a series of fine interior spaces that combine to give the building high architectural interest. Its connection to three highly regarded Victorian architects, as well as its role in the development of the railway in the City and as the last historic hotel in the City, also give it high historical interest. These levels of interest and its integrity after the late 1990s works, alongside its group value with the station, explain its grade II\* listing.

#### c) Bishopsgate Conservation Area and other heritage assets

The site is partially within the Bishopsgate Conservation Area, which was originally designated by the City in 1981 as Middlesex Street Conservation Area, containing the streets and narrow lanes east of Bishopsgate, with their varied architecture but generally tight urban grain and older street plan.

The conservation area boundary was extended to the west in 2007 to take in the area between Bishopsgate and Broad Street. This area contains a complementary group of 19th century buildings that were constructed in response to the development of the Victorian transport infrastructure and include Liverpool Street Station, the former Great Eastern Hotel, the replica building at 50 Liverpool Street, the Railway Tavern (1877, not listed) and the Metropolitan Arcade (1911, not listed).

A Character Summary document was completed in 2014 and describes its character following extension.

The former Great Eastern Hotel is the most prominent building in the conservation area extension because of its imposing presence on Liverpool Street and Bishopsgate. The 1991 concourse, entrances and screen walls to the Liverpool Street Station are also included, though the 19th century train shed to the north is not. The 1991 additions have an imposing presence in this townscape and contribute importantly to the Victorian railway-hub character of this part of the conservation area.

Other features of interest in the street scene include the Kindertransport sculptures (unlisted) in Hope Square and the 1935 police call box (grade II listed), which is a rare survival of its type.



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To the south of the Victorian infrastructure, traces of pre-Georgian townscape are represented by Alderman's Walk and White Hart Court. The church of St. Botolph-Without-Bishopsgate recalls the historic importance of the suburb that lay outside the walls of the City along Bishopsgate. It was designed by James Gould in 1728 and has a prominent tower and spire which compliments the diverse collection of Wren spires in the City that slightly pre-date it.

The church creates an imposing presence on Bishopsgate, where it can be appreciated alongside the hotel, and its tower can be seen against clear sky in views looking north. Local and more distant modern tall buildings, notably those on Bishopsgate, have reduced its landmark qualities by virtue of their size. However, when seen against clear sky, the church tower remains salient. The significance of the church is recognised by its grade II\* listing and it benefits from the immediate conservation area setting and townscape gap afforded by its surrounding churchyard.

St Botolph's churchyard occupies a space originally hard up against the outside of the City wall and gate. It was converted into a garden in 1863. It retains a good Victorian character, being decorated with a pair of drinking fountains and three overthrows and lanterns that are listed at grade II and with the special ornament of the former Turkish Baths (8 Bishopsgate Churchyard, 1894-5, grade II) at its west end.

Set behind the church is its complementary church hall, built in 1863 in red brick with stucco details to a neo-Classical symmetrical composition with central arched entrance opening and pediment over, which is listed at grade II. The churchyard provides the best close views of the whole church, and particularly the church hall. In these views, the church hall and the former Great Eastern Hotel with its gabled and pinnacle roofscape seen against the sky and provides a sympathetic historic backdrop to these buildings.

The Bishopsgate Conservation Area is abutted and surrounded by other conservation areas on all sides, including in Tower Hamlets to the east and Hackney to the north-west.

#### d) St Paul's Cathedral

St Paul's Cathedral was built between 1676 and 1711 to designs of Sir Christopher Wren. It was erected as a symbol of the resurgence of London following the Great Fire and marks the transition in English cathedral building from the Gothic of the Middle Ages to the Classical of the post Reformation age of the Renaissance. Through its life the cathedral has played, and continues to play, a central role in the lives of both the nation and the capital. In recognition of its exceptional heritage significance, the cathedral is grade I listed.

The cathedral has a setting that takes in large stretches of Greater London thanks to



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the monumental and central presence of its dome in city panoramas and strategic metropolitan views. This is described in detail in the recent Setting Study produced for Historic England and the Dean and Chapter of the cathedral.

St Paul's skyline presence contributes greatly to its exceptional significance in ways that have long been codified. This includes as part of the London Views Management Framework (LVMF), which identifies it as one of London's three 'Strategically Important Landmarks'.

### The proposals

The applicant, Network Rail, proposes a major scheme to upgrade Liverpool Street Station. This is intended to address issues that they have identified with the operation and usage of the existing station, including:

- Lack of street presence in the local area to help wayfinding to the station;
- Overcrowding in the ticket halls, concourses and near the gate lines;
- Poor circulation between the various modes of transport and levels within the station;
- Lack of intervisibility between the station concourse areas and the historic train shed;
- Lack of cycle parking and other amenities, including retail offer;
- The dated appearance of the buildings and the need for general works of repair;
- The need to upgrade staff and back of house servicing facilities;
- Poor setting of the grade II listed war memorials and lack of adjacent space to hold annual services of commemoration.

The proposals also seek to provide additional capacity to meet projected increases in passenger numbers.

The majority of the funding to address these points would come from retail accommodation within the station and the construction of a new commercial office building, known as the Over Site Development (OSD). The proposed OSD would be located above the area currently occupied by the 1990s concourse roof. This new building would also extend over the footprint of the existing station entrances and piazzas onto Liverpool Street and Bishopsgate, and would replace the existing building



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at 50 Liverpool Street.

The OSD is proposed to be accessed via a new entrance on Liverpool Street that would form part of the new entrance to the station. It would rise above the station to a maximum height of 97.37m AOD and would be clad in glazing punctuated with curved glass and vertical aluminium fins to provide solar shading. At the top of the building a roof terrace would be provided; this would be accessed via lift/stair pavilions and would be partly open to the public. The terrace would be planted and would integrate architectural features reclaimed from the Victorian station buildings that were demolished for the 1990s scheme, as well as the replica gate piers.

a) Proposed works of demolition to the station

The works include the demolition of a large part of the 1990s phase of development at the station.

The demolition includes a significant section of the 1990s roof structure, the existing station entrances, towers and gate piers fronting onto Bishopsgate and Liverpool Street, part of the Sun Street Passage screen wall, 50 Liverpool Street, the current ground level concourse walkways, associated retail units, lift, staircases and escalators.

A complex rationale has been presented by the applicants to seek to justify the proposed works of demolition. This justification relates partly to the proposed improvements to the Network Rail station, access to the TfL station and provision of the OSD, as set out below.

The applicants state that the proposed works of demolition to the 1990s roof structure are necessary in order to provide the OSD above. It may be technically possible to retain this roof structure while constructing a substantial OSD above, but information provided with the application suggests the OSD would require large columns to be placed within the concourse area. Those columns would not align with the existing roof structure due to the underground constraints and would significantly impede pedestrian movement at concourse level. The proposal is instead to create a new roof structure that integrates the structural support for the OSD, with the number of columns within the station minimised and integrated into the proposed floorplan of the concourse.

The demolition of the entrance structures and screen walls onto Bishopsgate, Liverpool Street and Sun Street is proposed in order to provide new station entrances that will draw more attention to the station, increase accessibility into the station and provide the opportunity to extend the OSD at the upper levels into this part of the site, thereby maximising the potential funding that can be generated from the OSD.



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The demolition of 50 Liverpool Street would allow for removal of associated basement level structure that would provide increased space to the TfL entrance and concourse area.

The demolition of the current ground level concourse structures is proposed to facilitate the general improvements to station facilities.

#### b) Proposed new works to the station

The proposals include the creation of new entrances onto Liverpool Street and Bishopsgate that would project beyond the existing building line of the station. The former piazza spaces below would be incorporated into the station volume and resurfaced to provide level access. The existing Kindertransport sculptures would be reinstated within the Liverpool Street entrance.

The proposed entrance structures have been designed as bold, dramatic features intended to give the station a greater presence at street level and to provide views into the station concourses beyond. The entrances would be equivalent to four storeys high and would be faced in reclaimed yellow brick from 50 Liverpool Street and amber tinted glass bricks. They would take the form of large vaulted and ribbed arches and part arches that cantilever towards the street. The salvaged cartouches from the original station would be attached to the brickwork of these structures.

The proposed Liverpool Street entrance also incorporates an escalator leading to the new office accommodation above, as well as a lift that would take the public to the proposed roof garden.

The aesthetic of the proposed main entrances is carried around to the new section of the Sun Street Passage façade, which transitions between the new entrance onto Liverpool Street and the retained west façade of the station, while incorporating additional entrances.

The most significant changes are focused on the southern section of the station, where the vaulted brick aesthetic of the new entrance structures flows into the concourse spaces and a new steel vaulted roof structure is created over the concourse areas. The proposed new roof would incorporate the necessary structure for the OSD and would reflect the volume and elements of the aesthetic of the 19th century train shed roof. The design would also evoke the spirit of the 1990s works, albeit to a new structural grid and much weightier in form. This new roof incorporates the pilasters that form part of the north elevation of the Great Eastern Hotel, which would appear to support the new vaulted roof structure in the same manner and shape as the existing roof structure. A lightwell at the rear of the hotel provides some natural light at the south end of the concourse.



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A new enlarged concourse would be provided at ground floor level that would incorporate large openings allowing visibility to the lower concourse level. This concourse would flow around the east and west sides of the main train shed, providing access to new retail units at this level and to the north via Exchange Square, providing new views into the train shed. The western concourse extension would take the form of a deck, while the eastern concourse extension would be provided over a large concrete box housing the service accommodation for the station.

The listed war memorials would be relocated within the station, adjacent to the eastern walkway at the upper concourse level and would be mounted on the proposed new brick elevations.

The main concourse area at lower ground floor would be made more accessible through the introduction of numerous escalators and lifts, while being increased in size through the incorporation of existing accommodation currently associated with the basement level of the former Great Eastern Hotel. Increased access and circulation space would also be provided to the TfL station.

Further views into the train shed would be opened up by removing the upper-level retail units and repositioning the station gate line and train time boards. It is envisaged that the removal of these retail units will also increase potential for borrowed light into the concourse areas from the main train shed roof.

New public facilities, including passenger lounges and WCs, would be created in accessible locations at both upper and lower concourse levels and in areas currently occupied by retail accommodation and back of house accommodation. New cycle parking would be located in the area of the existing lower-level walkway that provides access to Exchange Square and a new service hub and staff facilities would be created on the east side of the train shed.

#### Impact of proposals on significance

The proposals would cause a great deal of harm to the Victorian station due to the extent of demolition and scale of new entrances, albeit that in some, limited, ways the works would enable some aspects of the station to be better appreciated. The OSD would harm the former Great Eastern Hotel, the Bishopsgate Conservation Area and various designated heritage assets within it due to its size and design.

#### a) Liverpool Street Station

The proposed demolition of the much of the 1990s fabric, would cause a high degree of harm to the significance of the station.

The proposed new development would fundamentally alter the relationship between



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the station and its surrounding context. While referencing the gothic railway architecture, the new entrance structures on Liverpool Street and Bishopsgate present an entirely new scale and aesthetic that would contrast with and dominate the surrounding street scenes. They bear little relationship with the architecture or composition of the OSD above, which further draws attention to that part of the development and its significant bulk and scale. The impact of the new entrances and the OSD would cause a high level of harm to the significance of the station.

The OSD would also be visible beyond the train shed in views looking south from Exchange Square and its bulk and scale would be clearly evident. We do not consider this impact to be harmful, though.

The proposed works to the interior of the station provide a less dramatic interpretation of the railway gothic compared to the proposed entrances. Although heavier in its detailing than the existing station interior, the designs have taken cues from the existing architecture of the 19th century train shed roof and 1990s roof structures, and are appropriately lofty; they have the potential to be a creative addition. They may appear more comfortably alongside the retained historic fabric of the station interior and the former Great Eastern Hotel than previous schemes.

As the OSD would be a solid structure above the station concourse, the quality of the latter would be compromised as less natural light would reach it, causing some harm.

The proposed service box on the eastern side of the 19th century train shed would necessitate the removal of the lower section of 2 original iron columns and the imposition of a large new structure into the volume. The proposed retail units and concourse extensions on the east and west sides of the train shed also create a large new presence within the volume of these impressive arched spaces and block views through to the 19th century brick elevations on the east and west sides. These proposals impact on the significance of the fabric and architectural composition of the 19th century train shed and thereby cause some harm to its significance

The works to the remaining fabric and volumes of the station would largely be positive. They would allow people to appreciate some aspects of the station's significance more clearly, notably views of the Victorian train shed would be enhanced and the war memorials would be more sensitively presented. However, these benefits are modest by comparison with the high level of harm that would be caused overall.

#### b) Former Great Eastern Hotel

The proposed new development would markedly harm the significance of the Former Great Eastern hotel.

The aspiration to signal the presence of the entrances to the station on Liverpool



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Street and Bishopsgate through the introduction of large, bold and dramatic entrance structures particularly harms the ability to appreciate the contribution that setting makes to the significance of the hotel.

To the Liverpool Street frontage, the proposed entrance structure and OSD above would project significantly beyond the building line of the hotel and would be of a much greater height. The development would be highly prominent in views looking along Liverpool Street. It would partially obscure views looking east towards the hotel and would challenge the prominent role of the hotel as the frontispiece to the station by reason of its contrasting scale, materials and architectural composition.

To the Bishopsgate frontage, the proposed entrance structure and OSD would similarly challenge the architecture and its prominent role of the hotel in the street scene. In addition, the proposed building would obscure large parts of the northern elevation from view and may impact on the quality of the interior spaces within the hotel.

In wider views from the surrounding streets and open spaces, the proposed OSD would be seen to rise significantly above the roofline of the hotel. While the applicant suggests that the simple glazed façade of the new office building would avoid visual competition with brick and terracotta façade of the hotel, we note that it would replace much of the clear sky that currently allows the intricate roofline of the hotel to be seen unhindered.

Due to its height, bulk and design, the proposed OSD would seriously erode the ability to appreciate the prominence and architecture of the hotel in its immediate surroundings and on the skyline. These major interventions would cause a high level of harm to the significance of the grade II\* listed hotel.

As referred to above, the proposals include the removal of a small portion of historic fabric at the basement level of the hotel in order to expand the lower-level concourse of the station and TfL facilities. This would have a negligible impact on the significance of the hotel.

#### c) Bishopsgate Conservation Area and other heritage assets

The demolition of the historicist entrances, gates and railings, public open areas including Hope Square, and 50 Liverpool Street would result in a loss of traditional (if not historic) architecture that currently supports the historic local character. This, and the introduction of such a large-scale modern office development into this historically characterful gateway into the City, remarkable for its Victorian railway architecture, would harm the Bishopsgate Conservation Area.

The scale and design of the new building would be radically different from the special



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historic character of the area and its nearby listed and unlisted buildings, including the Metropolitan Arcade on Liverpool Street. The OSD would be a large and dominant new feature, visible from numerous characterful locations within the conservation area and would particularly affect the setting of the former Great Eastern Hotel, as discussed above.

The proposed building would appear as a large and dominant new feature in views looking north along Bishopsgate in the context of the grade II\* listed Church of St Botolph without Bishopsgate, where it would be seen beside or behind the church tower. The proposed OSD would remove much of the clear sky space behind the tower and would therefore reduce the ability to appreciate the scale, architectural quality and clarity of the tower. The proposals would similarly impact on the church hall.

The aspiration to signal the presence of the entrances to the station on Liverpool Street and Bishopsgate would result in dramatic new presence on the street scene that would dominate local views and draw attention away from existing historic buildings that make a positive contribution to the character and appearance of the conservation area, including the Metropolitan Arcade.

Given that the proposals are radically at odds with the character of the conservation area, they would cause a high degree of harm to its significance.

We note that the grade II listed 1930s police call box is proposed to be removed from site during the duration of the proposed construction works and reinstated in a similar location following completion of the works. The proposals are unlikely to cause any harm to the significance of the box, subject to the proposed methods of work, safe storage and reinstatement.

#### d) St Paul's Cathedral

In the LVMF view 15B.1 from Waterloo Bridge looking east, the OSD could theoretically appear in the skyline between the pediment and north-western tower if it were not for the thick tree cover. While trees are living organisms and thus the screening will change as parts of it grow and die, this screening limits the potential for harm that would otherwise be likely given the importance of seeing the pediment and its associated statuary, and the precisely articulated north-western tower, against clear sky.

#### Historic England's position

Historic England considers that the proposals for Liverpool Street Station would be harmful to an important element of London's highly valued heritage. We recommend that your authority should seek amendments to the scheme to minimise this harm, and



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only grant planning permission if persuaded that the harm cannot be avoided and would be outweighed by public benefits.

Legislation and national planning policy provides strong support for the protection of heritage assets including listed buildings and conservation areas. Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 make it a statutory duty for Local Planning Authorities to have special regard to the desirability of preserving listed buildings and their settings. Section 72 of the Act also requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

As the National Planning Policy Framework (NPPF) explains, heritage assets are an irreplaceable resource that 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 (NPPF, 202). Accordingly, when considering the impacts of this scheme on the significance of Liverpool Street Station, the former Great Eastern Hotel, Bishopsgate Conservation Area, St Paul's Cathedral and other assets identified above, great weight should be given to their conservation. The more important the assets, the greater the weight should be, irrespective of the level of harm (NPPF, 212).

The protections in law and national policy are replicated at local plan level, where adopted and draft policies (including DM12.3 (2015) and HE1 (2024) include a presumption against heritage harm, unless clearly outweighed by public benefits.

#### a) Liverpool Street Station

In this policy context, the high level of harm to Liverpool Street Station caused by the loss of most of the 1990s work is a weighty consideration. While not the oldest fabric in the station, Derbyshire's scheme transformed Liverpool Street in such a way that it remained a high-quality and coherent work of architecture.

The proposed replacement work would introduce new architectural languages that would exacerbate the loss of architectural unity to the exterior of the station. The new concourse roof has the potential to be a creative response to the Victorian shed, but it would diminish the quality of the light on the concourse. The volume of the 19th century train shed would be reduced at basement level by introducing a service box on its eastern side.

This loss of fabric, and the associated loss of the sense of unity within the station would cause a high level of harm to the station (at the upper end of the scale of less



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than substantial harm in the terms of the NPPF).

The scale of the new station entrances, and the way in which they would transform the relationship between the station and its context, contribute to our conclusions on the high level of harm.

While the overall impact of the proposals would be to harm the significance of the station, we note that the removal of the shops from above the ticket gates, coupled with the repair of the train shed roof (currently underway as part of a separate scheme of work), would enhance users' appreciation of the quality of the historic train shed. We welcome the efforts that have been made to refine the design in response to the Victorian train shed and the proposals to improve the presentation of the separately listed War Memorials. These benefits, although welcome, are modest by comparison with the high level of harm that would be caused to the station overall.

#### b) Former Great Eastern Hotel

The legal and policy presumptions in relation to heritage assets extend to the contribution made to their significance by their settings. Development plan policies on tall buildings seek to avoid harm to heritage assets unless clear public benefits outweigh that harm (D9 London Plan 2021), and require decision makers to have regard to the significance of heritage assets and their settings (City Plan CS14 (2015) and S12 (2024)).

These considerations are particularly pertinent when considering the impact of the OSD on the setting of the listed former Great Eastern Hotel. Due to the size, location and design, the new entrances and OSD would greatly reduce the ability to appreciate the hotel's landmark qualities causing considerable harm (in the middle of the range of less than substantial harm in terms of the NPPF).

Efforts to refine the design of the station entrances and entrance to the OSD, as well as the step back of the building line on Liverpool Street in response to the hotel, have moderated the harm, but the design approach would still be very harmful. This is because the station entrances would be so dominant that they would distract from the hotel as the landmark. It is also because of the size of the OSD, located in close proximity to the hotel, would preclude the ability to appreciate the hotel's prominence and fine architecture against clear skies from the surrounding streets.

#### c) Bishopsgate Conservation Area and associated heritage assets

The loss of prominent traditional architectural features that respond positively to the historic character, as well as the introduction of visually dominant station entrances with a large modern office development above into this characterful gateway to the City, would harm the Bishopsgate Conservation Area.



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Both the new station entrances and the OSD would be radically different from the special character of the area. This would be visible from numerous locations within the conservation area where the historic character can be easily appreciated. We consider this would cause serious harm (high in the range of less than substantial harm in terms of the NPPF).

The proposals would also harm other heritage assets in the conservation area, notably St Botolph's without Bishopsgate and its associated church hall when seen from its churchyard garden. The harm in each case would be modest.

#### d) St Paul's Cathedral

While the proposals have the potential to harm St Paul's Cathedral, with the current levels of tree screening we consider there would be no harm. That situation would change in the unlikely event of all the relevant trees on the Embankment dying or being substantially lopped.

#### e) Suggested design changes

We note from the financial appraisal provided with the application that this scheme would not be viable. The proposed roof gardens have both a significant cost associated with them and add bulk to the scheme, especially in terms of roof build-ups, planting and lift overruns. Given that our main concern is with the bulk of the OSD (including height and its extent of projection over the entrances), rather than with an absence of public benefits, we advise that these gardens be omitted and the OSD reduced accordingly.

Additional to a significant reduction in bulk, harm could also be reduced - although not eliminated - by the following design changes:

The new entrances could be further refined to respond more sensitively to the scale of the former Great Eastern Hotel

The palette of materials for the new brick vaults could be simplified to better respond to the conservation area and Victorian train shed

The junction between the brick entrance vaults and the glazed OSD could be refined to help the building read as a coherent architectural response rather than two different approaches

The design of the interior further refined including:

- changing the proposed concrete finish beside the platform to brick



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- greater finesse with new metalwork vaults to respond to the Victorian trainshed detailing
- Refinement of the retail units to enhance the intended cathedral-like volume of the trainshed and further reveal 19th-century architectural features such as lancet windows and the articulation of the Sun Street Passage screen wall.
- Reduction in the width of the west upper concourse walkway to allow the 19th-century trainshed columns to stand independently, free of this structure. This would help mitigate the visual impact on the intended linear, nave-like views and sightlines throughout the trainshed.

The proposal also provides an opportunity to reinstate important lost features, including the square Gothic clock that once hung over the main transept of the station-a key element in the overall design of Liverpool Street Station, drawing upon and unifying the station's Gothic design, similar in this sense to the clock at St Pancras Station.

## Recommendation

Historic England recommends that your authority should only grant planning permission if persuaded that the harm has been minimised and would be outweighed by public benefits.

The NPPF requires that clear and convincing justification is required for any harm such as that identified above (NPPF, 213): in this case, we think the harm is capable of being reduced further, and we there advise that you seek further opportunities to improve the scheme before weighing the harm it would cause against the public benefits of the scheme (NPPF, 215). In carrying out this exercise, you will need to give great weight to the conservation of all designated heritage assets, and especially great weight to the grade II\* listed former Great Eastern Hotel.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater->



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Historic England

[london-archaeology-advisory-service/our-advice/](https://www.historicengland.org.uk/london-archaeology-advisory-service/our-advice/)

Yours sincerely

**Claire Brady**

Team Leader, Development Advice

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**Planning and Place**

Kensington Town Hall, Hornton Street, LONDON, W8 7NX

**Director of Planning and Place**

Amanda Reid



THE ROYAL BOROUGH OF  
**KENSINGTON  
AND CHELSEA**

Kieran McCallum  
City of London  
Environment Department  
PO Box 270 Guildhall  
LONDON EC2P 2EJ

**Date:** 17/07/2025  
**My Ref:** OB/25/03396

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990**

**Liverpool Street Station, Liverpool Street and 50 Liverpool Street, and Andaz Hotel,  
40 Liverpool Street, LONDON, EC2M**

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

**SCHEDULE**

**Development:**

This Council is asked for its observations on an application (25/00494/FULEIA) submitted to the City of London for: 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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.

**Site Address:** Liverpool Street Station, Liverpool Street and 50  
Liverpool Street, and Andaz Hotel, 40 Liverpool Street,  
LONDON, EC2M

**RBKC Drawing Nos:** OB/25/03396

**Applicant's Drawing Nos:**

**Application Dated:** 05/06/2025

**Application Completed:** 05/06/2025

**FULL CONDITION(S), REASON(S) FOR THEIR IMPOSITION AND INFORMATIVE(S)  
ATTACHED OVERLEAF**



## **CONDITION(S) AND REASON(S) FOR THEIR IMPOSITION**

### **INFORMATIVE(S)**

- . You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980. The Council can prosecute developers and their contractors if work is not managed properly. For advice on how to manage construction works in the Royal Borough please see [Advice for Builders](#) on the Council's website; from this page you will also find guidance on what to include in Construction Traffic Management Plans (where these are required) which are very valuable instruments in limiting the impact of large scale building work. (I.40)

The full report is available for public inspection on the Council's website at <https://www.rbkc.gov.uk/planningsearch/cases/OB/25/03396>. If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours sincerely,

Amanda Reid  
**Director of Planning and Place**

# City of London Conservation Area Advisory Committee

Department of the Built Environment,  
Corporation of London,  
P.O. Box 270,  
Guildhall,  
London EC2P 2EJ

5<sup>th</sup> August 2025

Dear Sir/Madam,

At its meeting on 24<sup>th</sup> July 2025 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

**Case C.25/00494/FULEIA - Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza London EC2M 7PY**

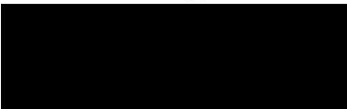
**Bishopsgate Conservation Area/Bishopsgate Ward. No Ward Club Rep.**

The Committee received a presentation from the applicants on the revised proposals for development at Liverpool Street Station. The Committee considered that the new proposals were more sympathetic to the heritage assets affected than those in application 23/00453 to which the Committee had objected.

The Committee was unable to support the proposals in their present form, considering them still to be overdevelopment of the site. Members were pleased that the new proposals made fewer alterations to the Grade II\* listed Andaz (Great Eastern) hotel, but believed that the proposals would adversely affect the building's setting and its important role in the Bishopsgate Conservation Area. They considered that the proposed changes to the internal circulation in the station were beneficial to the public realm within the station but believed that their external expression was damaging to the character and appearance of the Conservation Area. The Committee was especially concerned about the effect of the southern projection of the western arm of the proposed development and its intrusion into the views along Liverpool Street. Members were also concerned about the proposed arched entrances, both in materials and design, and their relation to the new building which they believed sat uncomfortably on them. Therefore the Committee must register an objection to the application as presented to them.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox  
Secretary



Our Ref: CITY-23-52

local Ref: 23/00453/FULEIA

**GLA Ref: 2023/0726/S1**

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Sent by email  
6 August 2025

Dear City Corporation,

Liverpool Street planning application – TfL consultation comments

Thank you for consulting us on the proposed redevelopment of Liverpool Street. These comments follow initial consideration of the proposals by the Mayor at Stage 1 of London's referable planning process on the 7 July 2025.

**They are underpinned by various regulations, legal and guidance documents listed at Appendix A (p. 24). These will be essential to our consideration of the proposals throughout, having been previously mentioned in our pre-application meetings and formal advice to Network Rail (NR) under the Planning Performance Agreement (PPA) between the applicants, GLA and TfL. A summary of key strategic planning policy is also provided at Appendix C (p. 32).**

## Summary

As highlighted in the Mayoral stage 1 report, the proposals are supported in strategic transport terms, subject to a range of further detailed work required to ensure the design and delivery of key transport improvements, supported by modelling.

The impact of an extensive construction period for a scheme of this scale must be very carefully defined and secured prior to determination. The applicant team should therefore continue to engage closely with TfL, and the above documents and standards will need to be followed throughout.

## Required prior to determination

For the City Corporation to be able to give the necessary weight to the proposed package of transport improvements and mitigation, we urge the following matters to be resolved prior to determination of the planning application by your committee.

- **TfL Pathway Stage 2 (option selection) must be achieved** for the final scope of agreed step free, bus and wider interchange improvements, along with evidence of significant progress towards Stage 4 (detailed design). This is essential for a section 106 (s106) to give effect to a Development Agreement (DA) with London Buses Ltd and London Underground Ltd to deliver those works to the transport interchange . **Whilst the TfL Pathway project team have provided comments to NR separately** as part of their own collaboration and consultation processes, **for the avoidance of doubt**, many of their comments also need to be resolved as part of this Planning Application or agreed formally by NR to be resolved later as part of the future design. **Please see Appendix B (p. 25) for these Detailed Comments**, and others from across TfL.
- **Fire Strategy for all LU areas accepted in principle by TfL and London Fire Brigade**, also essential for later negotiation of the DA.
- Proposed **lifts from NR areas to LU services should be increased to accommodate at least 17 persons minimum**, subject to structural/ viability constraints to be further discussed with TfL.
- **Clarification of how level boarding can be achieved to all LU and LO trains serving the interchange**; continued use of manual boarding ramps may not make TfL services at Liverpool Street fully Step Free Accessible (SFA).
- **Confirmation access to all buses and coach services in the local area will be maintained throughout construction**. Vehicular tracking analysis should be provided to show buses (including our new 12m electric buses) could continue accessing the bus station and all stops on A10 Bishopsgate even with proposed pit lanes and hoarding lines in place (see detailed Bus comments at Appendix B).

- Agreement secured within the s106 of **high-level governance and funding for multi-stage s278 works** and all necessary supporting modelling, legal agreements and other required consents, RSAs and technical assurance, and provision for mitigation of future impacts identified on buses, coaches, taxis, Pedestrian Comfort Levels (PCLs), and safe cycling infrastructure including on-street parking.
- **Completion of TfL's Model Audit Process (MAP) Stage 5 for the submitted street-level LEGION pedestrian modelling.** Additional model runs will also be required to test and mitigate temporary highway impacts such as pit lanes, pedestrian and cycle diversions and footway closures. Future delivery of these should be in the s106 agreement.
- **Further discussion on full strategic modelling of the proposed OSD including MoTiON (Mode of Travel in London)** to clarify expected impacts on the London-wide public transport network including multi-modal stations, lines and services across London, rather than those serving Liverpool Street only.
- **Technical engineering assurance** by TfL of the proposed **bus station layout** particularly to demonstrate sufficient space is proposed along Sun Street and in all new bus waiting areas. This should also assess the proposed pit lane arrangements, to clarify operational bus impacts.
- **Clarification of access and wayfinding** to the new **cycle hub**, including signage and routing.
- **Highway works proposed and agreed in principle with applicant funding for the A10/Primrose Street/Spital Square junction** essential for cycle hub access, as recommended by the submitted Road Safety Audit (RSA).
- **Removal** (or significant further design, modelling and separate RSA) of **proposed zebra crossing** between 100 Liverpool St and bus station, which is not currently supported.
- **Disaggregation and validation of trip generation data** by all modes and public transport lines/operators and clarification of the assumptions used for future retail trips.
- Commitment to further **detailed assessment of expected LU infrastructure and capacity impacts** during all phases of construction, especially on **Ticket Hall B**. This requires use of TfL's Railplan model to assess wider network impacts; costing any **financial mitigation** for **additional operating expenditure** that will be due to TfL.

- **Clarification of temporary rail service thinning** proposals including formal consultation requirements and timescales, and their expected impacts on LO, LU and Elizabeth Line services.
- **Design development of construction access arrangements throughout**, including Sun Street Passage and A10 Bishopsgate pit lanes proposed. Meetings and arrangements be agreed upon for ongoing engagement with the City Corporation; TfL and relevant day-to-day Bus and Coach managers and operators.
- **Discussions on maximising use of rail, electric vehicles and cargo bikes for the transport of construction materials including waste;** the current CLP (p. 47) assumes no freight will be transported by rail.
- **Long term demand and viability analysis** from optioneering for the NR platform capacity enhancements to be shared, considering the proposed replacement of space between Platforms 10 and 11 with servicing and retail, which is supported in principle, subject to further assessment of verification materials.

## Conditions & section 106 (s106) Heads of Terms (HoTs)

Required	Impacts addressed	Relevant Policy	Mitigation to secure
Sufficient detail for the final scope of all SFA, bus and wider interchange improvements to be agreed at determination	Currently incomplete i.e. only partially modelled i.e. concept designed 'in principle'	T3, T4, D5	Achievement of TfL Pathway Stage 4 (detailed design) to enable negotiation of a DA secured in s106
Development Agreement (DA) with London Buses Ltd. and London	Delivery of improvements then long term access and IP for LU assets and the bus station before,	T1, T3, T4, D5 and the Transport LPG	s106 secures future DA and covers IP via DA in addition to standard IP conditions

Underground (LU) Ltd.	during and after construction		
Delivery and Servicing; Construction Logistics and Travel Plans (DSP, CLP, TP)	Consolidation for all uses to new access and area within station at north end. Reduce overall movements and switch to lower carbon modes	T3, T7	Conditions discharged in consultation with TfL. Monitoring and future highway works budget secured in s106
Safe construction access, works co-ordination, reinstatement and general management of both the interchange and surrounding public highway	Considerable impact on transport and highway operations expected across 7-9 year build programme	T1, T3, T4, T7 and the Transport LPG	s106 scopes, secures and resources ongoing engagement with the public transport operators and affected highway authorities to facilitate and ensure safe construction
Further street-level LEGION modelling to TfL in MAP process	Pit lanes; pedestrian diversions; on-street cycle parking re-provision and access; potential Bus station and Coach bay closures	T2, T4	Secure model scope & MAP Stage 5 completion prior to commencement via condition or in s106; model outputs feed into temporary s278 highway works and other construction consents secured via s106
Technical assurance of bus station layout by TfL	Bus station redesign	T3, T4	Fund TfL engineering review pre-determination

Bus station to maintain current essential operational standing and turnaround space during construction and in end-state	Safeguards existing use by 3 regular services plus ad hoc emergencies, and by rail replacement buses	T3, T4	Principle confirmed in s106 obligations on Pathway project and multi-stage s278; planning decision allows for further design development if requested by TfL via the future DA
New bus station waiting areas; real-time passenger information and replacement customer assistance and operational control kiosk	All proposed designs must meet relevant TfL guidance and standards (see Appendix A, including for safe, step free access by all	T3, T4	Secure and monitor Wayfinding Strategy via s106, with TfL input / sign-off
Short and long-term pick up and drop off strategy for Coaches	Pit lane proposed close to existing coach bays	T1, T3, T4, T7 and the Transport LPG	Signage during construction and end-state re-provision of existing bays on A10 secured in multi-stage s278.
Highway works	Significant permanent and temporary impacts on buses, coaches, taxis, Pedestrian Comfort Levels (PCLs), and safe cycling infrastructure	T1, T2, T5, T7	Multi-stage s278 works secured in s106 with governance and funding for monitoring, all necessary supporting modelling, model auditing, and other required consents



	including on-street parking		
Short-term pick up and drop off strategy for Taxis	Proposed closure of Liverpool Street highway in later construction phases	T1, T2, T5, T7	Works via multi-stage s278 for temporary taxi provision. Long-term provision subject to City Corporation as relevant highway authority
Cycle hub access shown via Primrose St entrance only	Wayfinding from A10 and Cycleway 1 still unclear	T5	Secure detailed design inc. signage via s106 (see below)
Multi-type future-proofed cycle parking across the interchange	Should also provide for micromobility, dockless Cycle Hire, Cargo bikes	T5, T7	Single 'Cycle Hub' Design, Access and Operations Strategy secured in s106; DSP obligations and monitoring address cargo bikes.
Safe cycle access on surrounding local streets throughout construction	Proposals and temporary provision needed for public cycle parking / lanes, signage etc. HGV collision risk high	T2; T4; T5; T7	Successive diversionary and parking layouts, RSAs, monitoring and site walkarounds via CLP condition(s), s106 and multi-stage s278
New internal and external public realm created should be accessible wherever	Compliance with Mayor's 'Public London Charter'	D8; T4; T2	Access Strategy for the interchange as a whole should be secured by pre-occupation condition

possible for 24-hour public use			
Co-ordinated wayfinding needed despite NR and TfL managing different areas, especially at new main entrances	Wayfinding Strategy should follow relevant TfL LU and Bus customer information guidance	D8; T4; T2	Pre-occupation condition; funding for Legible London signage secured in s106 agreement
Remove zebra crossing at bus station	Safety & traffic flow	T2, Vision Zero	Not a matter for section 106 or condition. Remove from plans; model alternatives
Trip Generation analysis needs Strategic modelling using MoTiON	Wider network impact	T1, T4	Pre-commencement Condition securing full MoTiON modelling of commercial development's trip generation impact
Fully assess and mitigate LU infrastructure and service impacts during construction	Ticket Hall B closure primarily but more impacts to be identified	T4, T7	TfL strategic model Railplan used to clarify forecast of temporary disruption and demand; financial mitigation secured s106
Clarify temporary service thinning during construction	CLP mentions thinning (p. 28, 30) but March 2024 timetable for Nat Rail services has been used for initial LEGION modelling of temporary	T4, T7, the Transport LPG	Model impacts via TfL-approved LEGION updates; potential operational compensation

	interchange layouts during construction		
TfL Cycle Hire	New 50-point docking station proposed should also be supported by additional bikes storage area	T5	Secure contribution and location via s106
Secure s278 works for A10 Bishopsgate & local highway	Cycle hub access risk at new entrance proposed on Primrose St	T5, Vision Zero	Fund/implement junction upgrades

## Site description

The site benefits from an excellent PTAL rating of 6b, reflecting its location at Liverpool Street Station, a major multimodal interchange served by:

- London Underground: Central, Circle, Hammersmith & City, Metropolitan lines
- Elizabeth line: Fully integrated east–west services since 2023
- Weaver line: Frequent services to Chingford, Enfield Town, and Cheshunt
- National Rail: Greater Anglia services

It is also within walking distance of Moorgate (600m), Bank (700m), and Aldgate East (820m) stations. Bank has recently been upgraded for enhanced capacity and accessibility.

Liverpool Street bus station, directly west of the site, provides access to six routes, with 18 more in the wider interchange zone. The A10 Bishopsgate (TLRN) corridor is now bus and cycle only from 7am to 7pm on weekdays (since July 2023), which has improved bus speeds and cycle safety.

Cycle network access includes:

- Cycleway 1 (700m NW)
- TfL Cycle Hire docking stations at Wormwood Street (125m) and Devonshire Square (250m)

Servicing access is via Primrose Street, now restricted to pre-booked accessible taxis only. A 14-space taxi rank remains on Liverpool Street.

TfL has defined through strategic pre-application advice a Liverpool Street Interchange Zone extending up to 375m from the station, and encompassing key entrances, kerbside areas, crossings, and public realm features.

## Development principles

The proposed development is a mixed-use scheme which includes the following:

- Demolition of 50 Liverpool Street, the removal of the upper concourse retail units and concourse, the demolition of the southern part of the existing station roof and some works of to the Andaz Hotel to disconnect the station roof and concourse.
- Reconstruction of the station roof to support the over station development, creation of a new upper concourse with new walkways north to Exchange Square and new connection to Broadgate, new retail floorspace at lower and upper concourse levels and improvements to capacity, improved step-free access to all Network Rail and London Underground (LUL) platforms, larger TfL ticket hall and wider gate lines.
- Construction of a new office building above the station of up to 97.67m AOD with an auditorium and roof garden at roof level.

The proposals as above would provide 10,992 sq.m. of station (sui generis) floorspace; 88,013 sq.m. of office (Class E(g)(i)) floorspace; 1,116 sq.m. of public access/ auditorium (sui generis) floorspace; and 11,077 sq.m. of retail/ restaurant, bar and takeaway uses (Class E and sui generis).

## Key transport information and elements

### Station interchange

Liverpool Street Station is the UK's busiest station and transport gateway to the City of London the effective operation of which is key to the UK's economy and support the City's economic growth. The station currently experiences significant operational challenges and design issues caused by a lack of significant investment since the last major redevelopment in 1991. These mainly relate to capacity and overcrowding within the station in respect of current and forecasted demand growth as well as poor levels of general accessibility, tired infrastructure and other operational issues. The proposals are intended to remedy many of these issues and ensure that the station is fit for the purpose without the need for further significant interventions for the next 60 years.

Passenger numbers using Liverpool Street Station post Covid-19 have recovered significantly, buoyed by the recent opening of Elizabeth line station. Estimated station footfall (across both Network Rail and LU domains) was 118 million in 2024 and is forecast to increase to circa 158 million by 2041. Three

demand profiles have been created to help understand the current and future demand for the station and therefore inform the current proposals, including the current station operation, demand in 2041 (as above) and demand in 2041+35%, by applying a uniform uplift applied to all demand figures.

The three demand profiles have been applied to the main Network Rail (NR) concourse, some LU lines and services at platform level; and passenger areas next to the gate lines of LU Ticket Halls A, B and C. They have been used to test three different infrastructure options, 'do nothing' (based on the station as of 2024), 'do minimum' (the station incorporating NR gate line enhancements which have very recently taken place) and 'do something' (i.e. transport operations with the proposed development. All scenarios and infrastructure and development options have been further assessed through LEGION modelling, a pedestrian simulation tool for levels of expected future crowding throughout the station in the peak AM and PM hours, during the busiest expected 15-minute periods and in absolute worst-case scenarios for perturbation and fire evacuation purposes.

The initial results indicate that the 'do minimum' station would struggle to accommodate forecasted demand to 2041 without station controls and that both NR's concourse and TfL areas of the interchange would become inoperable in the 2041+35% scenario, with particularly acute levels of congestion in the AM peak (see Figures 1-4 below).

The design and layout changes proposed to improve the station's current and future capacity have therefore been identified and will be further verified through additional modelling. In the 'do something' scenario, queuing in the lower concourse and NR platforms would greatly reduce (Figure 2), and future capacity challenges in the station would be substantially addressed, which is supported.

Constraints imposed by limited NR platform lengths and widths must be considered in the proposed designs to ensure ongoing accommodation of 10-car trains. Additionally, Liverpool Street has only 17 existing National Rail platforms, with significant space between platforms 10 and 11, which is proposed to be converted to servicing and retail use.

Whilst consolidating delivery and servicing at this location is acknowledged to be a strong benefit in line with Policy T7, to demonstrate full compliance with Policy T3 and supporting Table 10.1, further analysis is also requested to verify the loss of this space given anticipated future demand growth and its potential future use as additional platforms. The applicant (NR) should confirm whether this safeguarding has been investigated and costed as part of design and viability optioneering, validated by the Corporation as part of their viability review.

**Figure 1:** NR Platform and concourse LEGION modelling undertaken based on the existing baseline ‘Do Minimum’, against the forecasted 2041+35% demand profile<sup>2</sup>



**Figure 1 (continued):**



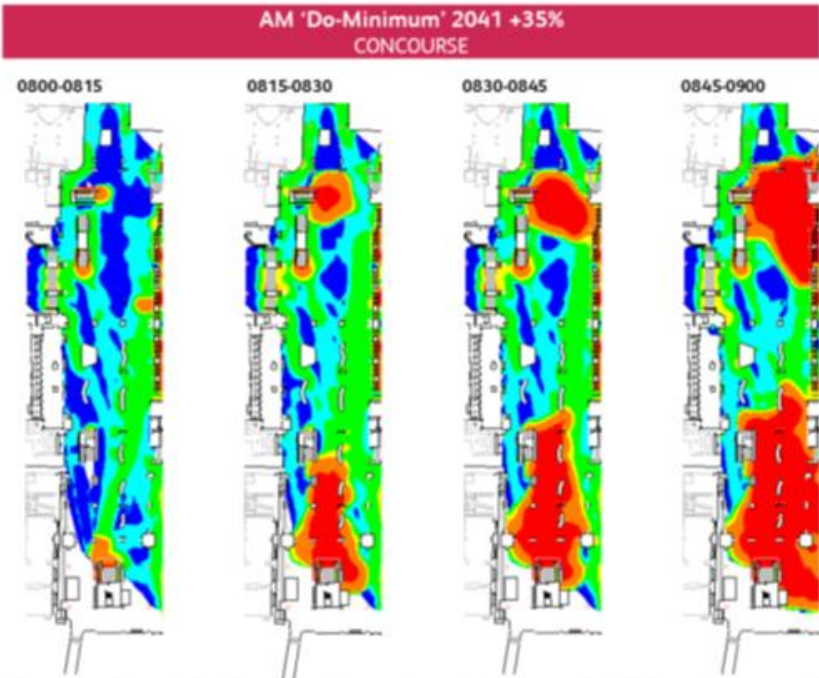


Figure 5-10: Cumulative Mean Densities (Walkway) Concourse – Do Minimum AM 2041+35%

**Figure 2:** LEGION modelling undertaken based on the ‘Do Something’ scenario (i.e. the proposals), against the forecasted 2041+35% demand profile

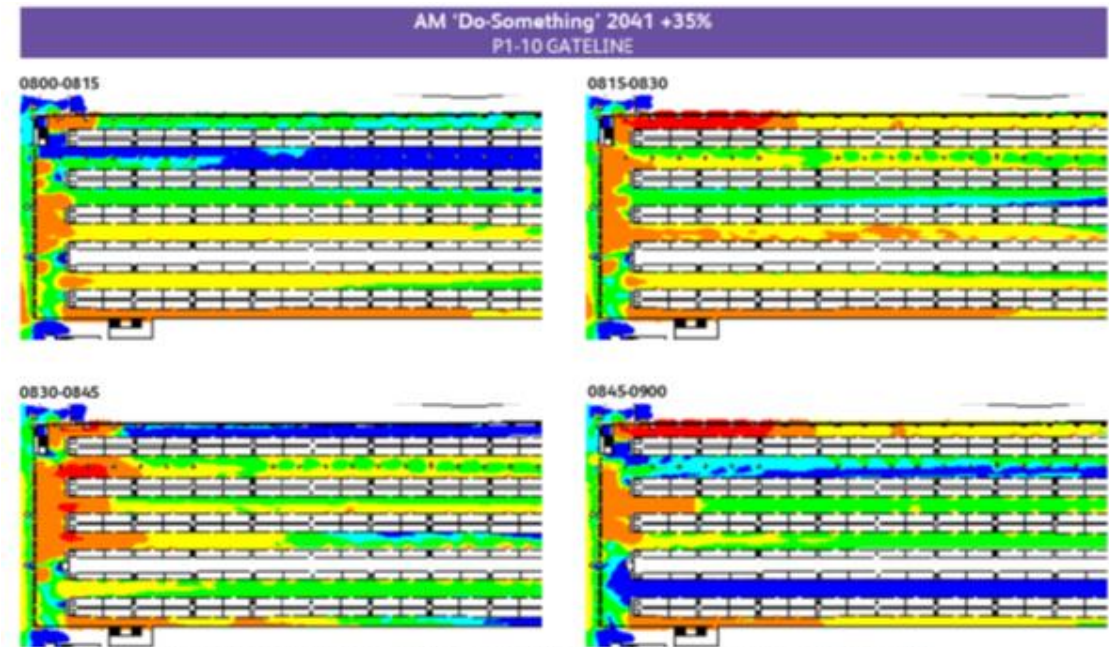


Figure 5-3: Cumulative Mean Densities (Walkway) P1-10 Gateline – Do Something AM 2041+35%

Figure 2 (continued):

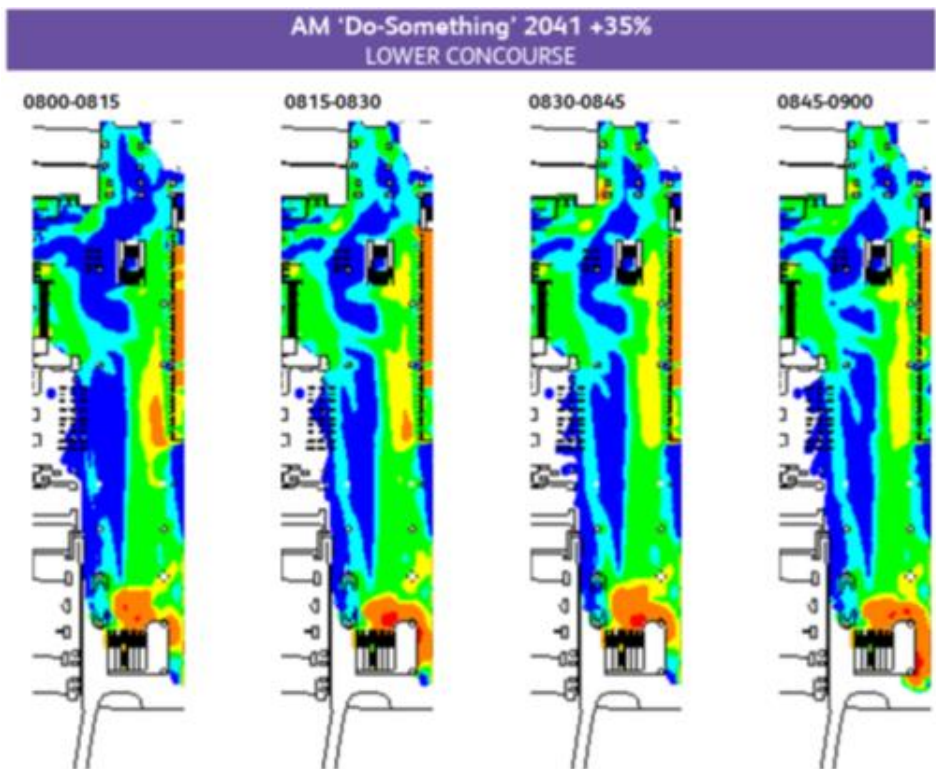
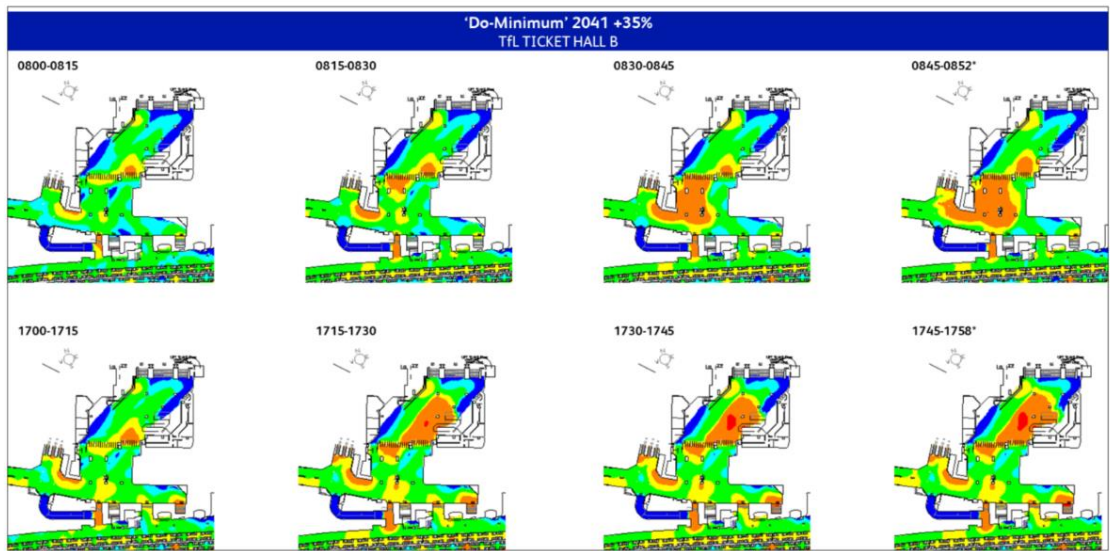


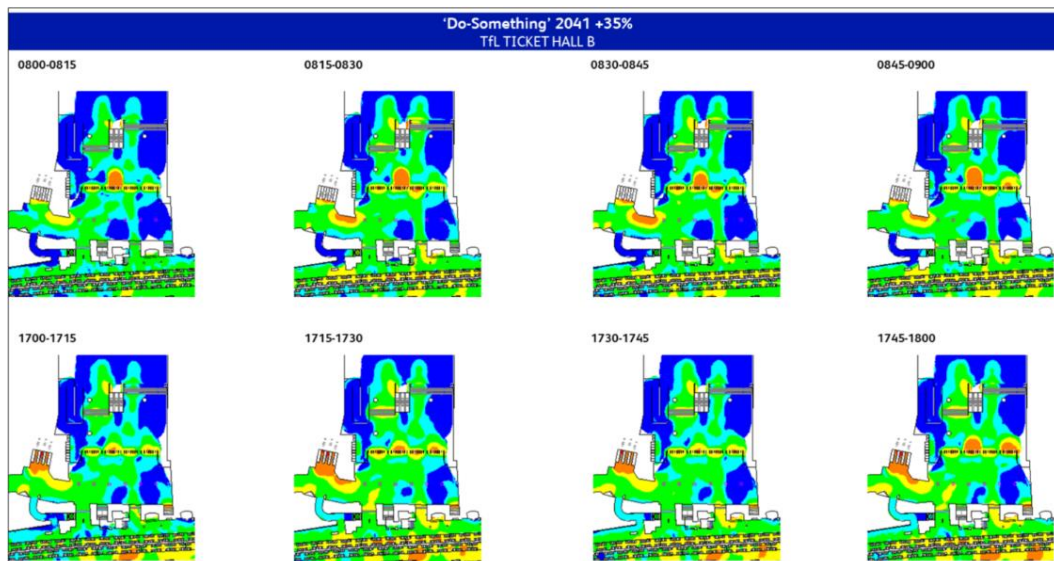
Figure 5-11: Cumulative Mean Densities (Walkway) Concourse – Do Something AM 2041+35%

**Figure 3:** LU Ticket Hall B *LEGION* modelling undertaken based on the 'Do Minimum' scenario against the forecasted 2041+35% demand profile



**Figure 4:** LU Ticket Hall B *LEGION* modelling undertaken based on the 'Do Something' scenario (i.e. the proposals) against the forecasted 2041+35% demand profile





The key station improvements proposed would involve:

- The size of the concourse will be increased from 9,189 sqm to 12,784 sq.m., (39% increase in space). The number of gatelines to NR platforms and TfL platforms from Ticket Hall B would also be increased by 15<sup>4</sup> and 9<sup>5</sup> respectively.
- Improvements to vertical circulation through the increase in stair widths, increasing the number of escalators within the station from 4 to 8 and increasing the size and number of passenger lifts from 1 to 8.
- LUL Ticket Hall B is to be enlarged and reconfigured to improve access and capacity as well as widening the passageway between the ticket hall and Circle line.
- Improved interchange between the NR upper concourse and Liverpool Street bus station through the provision of improved passenger waiting areas, step free access to bus services, real time information and the customer assistance and operational control kiosk.
- New, fully accessible toilets, family rooms, multifaith room, step free station entrances.
- New dedicated cycle hub within the station and new access from Primrose Street to the north which would deliver a 547% increase in existing cycle parking provision.
- New routes pedestrian routes from the station through to Exchange Square and Broadgate and improvements to wayfinding.
- Consolidation and improvements to NR and TfL operational centres, with step free enhancements to fire evacuation strategy and supporting facilities for the station and all public transport modes serving it.

### Public transport impacts – LU and bus station

In partnership with the GLA, we have worked closely with the applicant to define and progress capacity and accessibility improvements for the LU station, bus station and wider interchange. The emerging proposals indicate that they would result in significant improvements in accessibility to a key interchange on London's transport network, which is strongly supported in line with Good Growth objectives GG1-3, and Policies T1, T2, T3 and T4 and particularly T3 parts B, C and E.

The key elements of the scheme are expected to align with the proposed changes to the NR station to increase capacity sufficiently to accommodate growth to the 2041 demand levels as summarised earlier. However, full modelling of 2041+35% demand levels is ongoing and still needs to be satisfactorily concluded by TfL and NR prior to determination.

The proposed changes to the bus station are broadly supported. However options for the layout of Sun Street Passage, and resultant passenger impacts, are still being reviewed in detail by London Buses.

Technical assurance by TfL Engineering must be funded by the applicant and completed prior to determination to ensure full TfL approval of the new bus station facilities and layout proposed.

Prior to Stage 2, the applicant must achieve TfL Pathway Stage 2 (option selection) for the final scope of agreed bus interchange and wider improvements as a minimum and show how progress towards Stage 4 (detailed design) will be achieved. This is essential for a s106 to give effect to a Development Agreement (DA) with London Buses Ltd and London Underground Ltd.

### Trip generation, mode split and strategic modelling

The applicant has assessed trip generation for the proposed over station development (OSD) and station retail, employee and delivery and servicing trips in accordance with relevant TfL guidance. However, clarification should be provided in relation to assumptions about retail trips and duration.

An overall peak hour trip generation by mode has been set out. However, the rail and LU trips, including Elizabeth line services, should be disaggregated and provided separately for all the various lines and operators. The applicant should also explain and set out trip generation as a whole – OSD, retail, and forecast station trips. This is necessary to understand how they are applied to both cycle and pedestrian distribution analysis.

The employee density for the OSD indicates that it would accommodate approximately 6,000 employees. A development proposal of such considerable scale would typically require an assessment on the wider transport impacts using TfL's full suite of strategic models including MoTiON (Mode of Travel in

London). Further discussion on this matter is required. It may also inform necessary mitigation on both the public transport and the local and strategic highway networks in the surrounding area.

#### Pedestrian and highway modelling

The impact of additional pedestrian trips on the surrounding public realm and highway networks, including projected future crowding on key local footways and at crossings, is also being assessed via LEGION modelling. Before further comments can be provided on any impacts, and to identify any necessary mitigation, the street-level LEGION modelling must pass Stage 4 of TfL's Model Audit Process (MAP) prior to determination, and the Section 106 (s106) agreement should include a scope of Section 278 (s278) works to be agreed with TfL. The applicant is therefore urged to continue dialogue and collaborative work with TfL to progress this work. Further detail will be provided in TfL's detailed response to the Corporation.

#### ATZ and healthy streets

The development is supported by an Active Travel Zone (ATZ) assessment, which considers key routes to and from Liverpool Street interchange. A number of the locations where ATZ improvements are identified in the assessment should be secured, such as at the junction of Great Eastern Street and the A10. These are acknowledged and are already being addressed through adjacent development.

The improvement of key routes through and adjacent to the development are also proposed. Proposals to create an improved pedestrian connection from Half Moon Street are welcomed, though they should be modified to discourage walking along the eastern side of the bus station which is neither safe nor attractive. Opening up this route to the proposed retail should also be considered.

Visualisations of a new zebra crossing between 100 Liverpool Street and the bus station are not supported by TfL at this stage. Any such proposal would require significant further negotiation and traffic modelling. TfL would need to fully audit the modelling to assess its acceptability. Therefore, the zebra crossing visualisations should be completely removed from all submission and public consultation materials for now.

In line with Healthy Streets and the Mayor's Vision Zero initiative, s106 contributions towards highway safety improvements in the local area should be agreed and may be applied by TfL to permanent works on the A10 Bishopsgate corridor. Supporting highway works could be delivered by the applicants or a future development partner via s278 agreement, provided that all proposed TLRN highway works are designed up in further detail to enable Stage 1 Road

Safety Audits (RSAs) and Designer's Responses for all affected junctions, footways and crossings prior to Stage 2.

Any s278 works for the TLRN would require full strategic highway modelling to TfL standards prior to implementation, audited and approved by TfL as the highway authority for the A10; and they must be designed, assessed and implemented at zero cost to TfL. Alternatively, a contribution could be made directly to TfL for them to deliver improvement works to the A10 Bishopsgate corridor, particularly at its junction with Primrose Street. There, the new cycle hub entrance proposed will significantly increase cyclist traffic, and a Stage 1 RSA has already been commenced and submitted. TfL will provide further detailed comments on this matter directly to the Corporation and NR.

### Cycle parking

The proposals include a new cycle hub at concourse level for circa 720 cycles. This will replace multiple existing station cycle parking facilities at Bishopsgate and Sun Street. The proposed increase broadly complies with Policy T5's standard for cycle parking at stations and is welcomed in principle, though the applicant should advise on the station cycle mode share that it could support. Detailed design, implementation and long-term management of the hub should be secured by s106 obligation.

Access to the cycle facility is proposed via Primrose Street and Exchange Square to the north. As access to the cycle store would be some distance from the main station to the rear of the site, to ensure its effective use, and avoid cyclists entering/ existing via the main entrances, signposting and wayfinding to and from the cycle store must be clearly displayed throughout the station. Details of how the new proposed entrance would link large numbers of cyclists safely to A10 Bishopsgate in particular. The planning decision should address how any RSA recommendations or other necessary highway works identified and requested by TfL, including changes to the Primrose Street/A10 junction, could be funded and taken forward, as earlier mentioned.

In design terms, all secure cycle parking is proposed to be consolidated into a single area at B1 level with access from Primrose Street and an improved ramp. While the proposed separation of cycle and pedestrian movements is welcome, the legibility of this connection needs further development, given its combination of two-way cycle tracks and a one-way with contraflow section. Greater consistency of provision would be preferred.

Access to this cycle parking from Bishopsgate and the south may also need to be improved, both in terms of cycle infrastructure and wayfinding (noting that the Cycle Travel Survey Data clearly shows the highest flows in the area on A10 Bishopsgate and London Wall). It is unclear from the current information provided whether cycle users are invited to wheel through the station to access the long-stay cycle parking from the southern end, within the main concourse.

Cycle parking proposed on and around the axis between Broadgate and the new station entrance on the western side may confuse users and visitors, as cycling is not permitted through Broadgate Circus or the bus station area. Please see also further detailed comments on the proposed cycle parking at Appendix B.

The development would also increase demand for greater cycle docking provision in the area. A contribution to a new TfL Cycle Hire docking station with 50 docking points is proposed which is welcome. This should be secured from the development via the s106 agreement. The final agreed location must meet TfL Cycle Hire's operational requirements, including ground level highway access from Liverpool Street to the south.

A proposed s106 contribution to a new TfL Cycle Hire station is welcomed. However, the proposals still do not include space within the main station buildings for storage of additional bikes to alleviate pressure during peak periods. Further discussion with the City Corporation is recommended to identify a suitable location for this, and dimensions and access requirements have been shared with the applicants separately by TfL.

The City Corporation should consider any improvements and highway modelling necessary to ensure safe access from Liverpool Street, considering the proposed OSD cycle parking will serve a very large number of users. Cycle parking provision within the OSD will be in line with London Plan standards which is welcomed. Full internal details should be secured by condition.

#### Travel planning, delivery and servicing and construction logistics

The proposal for a consolidated delivery and servicing area within the station is welcomed in order to minimise servicing activity across the interchange, and to accord with Policy T7. The proposals for cargo bike storage is also welcomed. However, the permanence of this facility and retail development above assumes that additional platform capacity is not required. The applicant should verify that this decision is evidenced by demand forecasts and train operational changes, such as higher capacity services.

The construction period is forecast to be around 9 years and will have a considerable impact on the operation of all parts of this interchange. -The proposals are supported by a draft construction logistics plan (CLP) and LEGION modelling to understand expected impacts on the rail station.

However, the impact on LU infrastructure has not been fully assessed—particularly Ticket Hall B, which is proposed to be partially closed across two phases of development. Further demand forecasting is requested prior to Stage 2 to clarify whether this can be managed through exit-only arrangements and other crowd control measures, or whether more significant interventions—such as non-stopping of TfL services—may be necessary. If so, full strategic modelling will be required to assess wider network impacts. Operational

compensation to LU Ltd for any additional temporary expenditure may also need to be secured via the Section 106 agreement and relevant Development Agreement.

The Construction Logistics Plan (CLP) should be secured and monitored through the Section 106 agreement. The applicant should clarify the proposals in the CLP for temporary 'service thinning' of rail services and potential gate line controls, including how these are expected to affect all LU services, the Elizabeth Line, and London Overground. Strategic modelling may be necessary to understand the impacts, including potential trip rerouting. Any adverse impacts on TfL services at Liverpool Street or elsewhere may require mitigation. The applicant is strongly encouraged to discuss this further with TfL.

The impacts and mitigation measures related to construction access arrangements—particularly those affecting the design and operation of LU Ticket Hall B, and the proposed pit lanes on Sun Street Passage and A10 Bishopsgate—require further discussion and resolution. Safe and convenient passenger access to all bus and coach services in the local area must be maintained throughout the construction period.

In addition, the later phases of construction indicate that Liverpool Street may be closed to general traffic and pick up and drop off provision at the taxi rank should therefore be carefully considered throughout construction, as well as in the end state s278 proposals, in discussion with the City Corporation.

### Fire safety

In line with Policy D12 the application is accompanied by two fire safety statements, one for the station concourse and the other for the OSD. These have both been prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The documents indicate that several areas of the strategy would require updating at the next design stage as well as making various recommendations. There are also several areas where the strategy is somewhat limited by the constraints of the existing building and densely developed surroundings, alternative strategies are suggested in these instances.

Therefore, to ensure compliance with Policy D12, a condition should be secured requiring the submission of Fire Strategies including firm commitments as to the fire safety measures to be employed. The Fire Strategy for all LU areas must meet the relevant TfL and London Fire Brigade standards for stations and this needs further work prior to determination.

In respect of Policy D5, which seeks developments incorporate safe and dignified emergency evacuation for all building users it is proposed to provide



evacuation lifts, however, in respect of the station, the exact number and location of some of these lifts is yet to be determined. Therefore, further details should be secured via condition. The evacuation lift strategy with respect to the OSD is reasonable and would therefore generally comply with Policy D5. The full details should be secured via condition.

#### Access and inclusivity

As set out above, the existing station suffers from extremely poor levels of accessibility, wayfinding and limited public facilities. There is only one 4 person capacity passenger lift in the whole station serving the upper and lower concourses, which is currently out of service much of the time.

An inclusive design statement has been included in the application submission which demonstrates that the proposed development would significantly enhance accessibility and inclusion across the site. All entrances to the station are proposed to be step-free, incorporating flat or gently sloping paths, step free circulation throughout the concourses.

In total, 8 new passenger lifts are proposed including 4 x 25 person lifts and 4 x 12 person lifts, serving all NR and LUL lines, the number and size of which have been informed by pedestrian flow modelling. The stairs would be widened and 4 additional escalators installed. Improvements to sightlines throughout the station, and wayfinding is also proposed. A dedicated waiting area has been provided for the bus station along with additional seating and a replacement customer assistance and operational control kiosk, which is supported.

The addition of lifts from the NR concourse to ticket hall C and a lift to the Central line platforms is strongly supported as it would provide step free access to them for the first time. However, the applicant should clarify whether level boarding to the trains will also be included as the continued use of manual boarding ramps would not give the station 'Blue Badge' status. The size of the lifts should also be increased to accommodate at least 17 persons minimum and sized according to forecast demand, subject to structural/viability constraints and further discussion with the applicant and Corporation.

Step free access routing must be clearly signed through the NR station concourse as part of a wider station wayfinding strategy which should include updated and new Legible London signage for the main stations and surrounding area. This should be secured by condition or in the s106 agreement. The access strategy for the station should consider how lift access to the Central line would be achieved for night tube if the NR concourse is closed to the public.

#### Interchange design

Improvement and definition of Hope Square so it would become a coherent public space is welcome, as are the proposals for new green infrastructure.

Before the City Corporation consider whether the proposals for tree planting and greening are realistic, the applicant should clarify the ability of any given species of tree to survive under or very close to the overhang of a large office building. Even if sufficient light is available, these trees will need to be irrigated as they will be in a rain shadow. They should also indicate the impact on widths and pedestrian comfort levels of proposals to include trees in planters along the kerbside of Liverpool Street. These will also have management implications, both from the perspective of maintenance and public safety. Tree planting in the footway is preferable - while utilities may be present, often it is possible to relocate them. This may be necessary to achieve the overall greening objectives sought, especially if planting space is limited in the Hope Square area.

The implications on the safety of pedestrian crossing movements across Old Broad Street carriageway, key for access to and from the bus station, need to be better understood, as the Hope Square landscape plan shows continuous paving proposed across a currently block-paved emergency vehicle access area. There are also no proposals to change the asphalt carriageway treatment of this section, or to add formal crossing facilities, which may be necessary in future, depending on likely pedestrian flows and bus movements.

It is not clear whether the proposed improvements to Half Moon Street as a connection from the north are intended to invite more people to walk along the narrow footway and waiting space on the eastern side of the bus station. This is essential to clarify, as in such limited footway space, high pedestrian flows in addition to bus passengers should not be strongly encouraged. The existing barrier may still be needed to divert pedestrians either to the upper-level walkway inside the station or Broadgate Circus.

Despite this we acknowledge Half Moon Street is proposed to become a much-improved pedestrian route, leading directly into the bus station and linking to the proposed western entrance to the station. Widening of this space as proposed is therefore welcome, to make it more usable and allow for green infrastructure. The proposed widened Half Moon Street could be enhanced if there were door or window openings into the proposed retail units on the eastern side, to help animate the street with more active frontages.

Finally, the upper-level pedestrian walkway proposed on the western side of the station will need careful design to ensure it reads clearly as a permeable through-route, with sufficient width to deal with high expected future pedestrian flows, coming and going for both travel and retail trip purposes. In principle creation of this new, direct pedestrian route between Exchange Square and Old Broad Street is strongly supported, subject to further design refinement such as on wayfinding, prior to determination and implementation.

Yours sincerely,

**Gavin McLaughlin**

[gavinmclaughlin@tfl.gov.uk](mailto:gavinmclaughlin@tfl.gov.uk)

**Principal Planner, TfL Spatial Planning**





Scan me or click  
[here](#) to view the  
application  
documents

Case Officer:

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Phone:

Website:

[www.westminster.gov.uk/planning](http://www.westminster.gov.uk/planning)

Kieran McCallum  
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Guildhall  
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EC2P 2EJ

**Town Planning & Building Control**

Westminster City Council

PO Box 732

Redhill, RH1 9FL

6 August 2025

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990**

The City Council has now considered the proposals described below and has decided to RAISE NO OBJECTION.

SCHEDULE			
Application No:	25/03803/OBS		
Date Received:	05.06.2025	Date Amended:	05.06.2025
Plan Nos:	Plans and drawings on City of London planning website, including Environmental Statement Volume II: Townscape and Visual Impact Assessment.		
Address:	Site Bounded By 40 Liverpool Street, 50 Liverpool Street, Open Space From, Liverpool Street (Hope Square) And Bishopsgate (Bishopsgate Square), And Sun Street, Passage/Liverpool Street Bus Station At The Western Boundary, London		
Proposal:	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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.		

Yours faithfully,



Tracy Darke  
Director of Town Planning & Building Control

### Tell us about your experience

Help us improve the planning process. We are committed to making our planning service easier to use, faster, and more transparent. To achieve this, we need your feedback. Please take a few minutes to complete this [short survey](#) about your experience of making an application. Your response will be anonymous and will help us shape future improvements.



### Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



Condition(s):

**Note:**

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
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- The terms 'us' and 'we' refer to the Council as local planning authority.





New Life for  
Remarkable Buildings

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

By email to: [kieran.mccallum@cityoflondon.gov.uk](mailto:kieran.mccallum@cityoflondon.gov.uk) &  
[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

Our reference: 250445

29.08.25

Dear Mr McCallum,

**25/00494/FULEIA | Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza, London, EC2M 7PY**

Further to our detailed letter of objection to the above application dated 25<sup>th</sup> June 2025, we wish to submit the attached Embodied Carbon Assessment report by leading sustainability and carbon expert Simon Sturgis, commissioned by LISSCA (The Liverpool Street Station Campaign).

This detailed report, published on 28th August, examines the carbon emission impacts of the proposed over-station development and the substantial resulting demolition.

The report finds that the application fails to meet a significant number of national and local carbon emission related environmental policies and should be rejected on sustainability grounds.

Yours sincerely,

A black rectangular redaction box covering the signature of Lydia Franklin.

Lydia Franklin,  
**Conservation Officer**

# Liverpool Street Station

Planning Submission Ref: 25/00494/FULEIA

## Embodied Carbon Assessment

*on behalf of*

## The LISSCA Campaign: Save Liverpool Street Station

23 August 2025

**Contents:**

1. Executive Summary
2. Author Credentials
3. Flawed Carbon Assessment Methodology
4. Comparisons against Benchmarks
5. Optioneering: Structure and Facade
6. Circular Economy
7. Demolition
8. Policy Failures

# 1. Executive Summary

- 1.1. The objective of this report is to examine and comment on the carbon emission impacts of the planning submission: 25/00494/FULEIA, and in particular the Over Station Development (OSD) and the substantial resulting demolition.
- 1.2. The submission fails to meet a significant number of UK, GLA and City of London carbon emission related environmental policies for new office development and **should be rejected** on this basis. (See 8.1, 8.2, 8.3, and 8.4 etc below).
- 1.3. The assessment methodology used to produce the assessment is **flawed** as it is based on the now redundant 1<sup>st</sup> Edition (2017) with only partial use of its replacement the 2<sup>nd</sup> Edition (2023). (see para 3 below)
- 1.4. This flawed assessment therefore gives potentially **misleading conclusions** which are likely to be lower than if the 2<sup>nd</sup> edition was exclusively used. (See paras 3, and 4.4 below).
- 1.5. The submission schemes OSD has an **inefficient layout** with a sub-optimum wall to floor ratio (see paras 5.5 and 8.3 paras; '4' and '7')
- 1.6. The OSD facade design has only a 30 year life which is **inefficient in terms of embodied carbon, life cycle and resources**. (see 8.3; para '3')
- 1.7. The submission **fails to meet current sustainability and energy efficiency standards**, let alone those likely to be in place on completion in 2036. (see 8.3 para; '4' etc)
- 1.8. The submission for the OSD therefore **fails to meet office development of the highest quality** requirements as defined in Strategic Policy S4 (see p18/19 below)
- 1.9. The OSD performs poorly against UK (2050) and City of London (2040) Net Zero targets and will therefore **potentially be obsolete on completion**. (see 4.2; p7, 5.6, 8.1, 8.2, 8.4 para; '1.4' below)
- 1.10. The submission **demolishes useable fabric** without examining retrofitting options for 50 Liverpool Street in any detail. (8.4 para '1.4', Policy OF1 p19 below, Strategic Policy S8 para '1', p20 etc. below)

- 1.11. As these failures do not meet the City's stated requirements for 'exemplary' design (City Plan 2040 – para 1.4, p10, Strategic Policy S4 p18/19 below), the submission **should be rejected** on these bases.

## 2. Author Credentials:

This report is by Targeting Zero llp. The report author, Simon Sturgis AADip RIBA, has the following credentials with respect to carbon assessment in relation to this project:

- Lead Author of the RICS Professional Standard 1<sup>st</sup> Edition – 2017
- Lead Author of the RICS Professional Standard 2nd Edition – 2023
- Co-Author of GLA London Plan Whole Life Carbon Policy SI2 – 2022
- Special Advisor to Environmental Audit Select Committee 2021/2022 on whole life carbon.
- Advisor on EU Carbon Emissions in Construction Standard EN15978
- Advisor to MHCLG and other Govt Departments
- Practical experience on many live projects re Carbon Reduction.
- Advisor to UKGBC, LETI, RIBA, RICS on Carbon reduction.

## 3. Flawed Carbon Assessment Methodology

The Submission Document '*GLA Stage 2-3 Whole Life Carbon Assessment*', states in relation to the use of the RICS Whole Life Carbon Assessment Methodology, the following:

- Para 3.2.5: RICS Professional Statement (PS) (1<sup>st</sup> and 2<sup>nd</sup> Editions): *"This study was primarily undertaken in accordance with the **1st edition** of RICS PS to ensure robustness and consistency with comparisons to the GLA benchmarks"*
- Para 3.7.10: *"Material end of life scenarios are applied in accordance with the RICS PS **2nd Edition** business-as-usual approach".*
- **Comment:** The RICSPS 2<sup>nd</sup> Edition has been available since September 2023 and therefore should be used in its entirety as it replaces the 1<sup>st</sup> Edition which is now out of date. This 'pick and mix' approach to these Standards would appear to be designed to produce the lowest carbon emissions figures for this proposal.



- **Comment:** The RICSPS 2<sup>nd</sup> Edition has a more thorough approach to capturing all building related carbon emissions, and for that reason assessments using the 2<sup>nd</sup> Edition tend to be circa 10% higher than assessments using the 1<sup>st</sup> Edition. Correct use of the 2<sup>nd</sup> Edition would therefore have increased the assessment figures by approximately this percentage.
- **Comment:** The RICSPS 2<sup>nd</sup> Edition requires assessments to include a contingency percentage to take account of the inadequacies of material and quantities data at RIBA Stages 2-3, in the expectation that reported figures will increase between Stages 2-3 and Practical Completion. Although some contingency appears to have been added to primary structure, this is a somewhat random % and is not based fully on the current RICSPS approach. This lack of contingency therefore in effect reduces the reported figures giving a potentially optimistic impression for this project stage. The total contingency applied to a project varies depending on project stage and quality of data but could be in the region of 15% for this project. There can be some overlap between this figure and the +/-10% mentioned above, but it is not possible to judge this without a detailed review of the assessment data. Therefore, it is not unreasonable to assume that in total the underestimate could be in the region of 15%-25%.
- **Comment:** The justification that a 1<sup>st</sup> Edition approach was used to “*to ensure robustness and consistency with comparisons to the GLA benchmarks*” is not a solid justification for avoiding using the latest methodology. The GLA figures are ‘benchmarks’, not targets or limits, and are therefore for guidance only. A possible conclusion is that adherence to the 1<sup>st</sup> Edition was to avoid the uplifts described in the above comments.
- **Conclusion:** Therefore, the figures produced in the assessment are likely to appear artificially low as they do not align with current standards or best practice. **All carbon assessment figures should therefore be considered invalid, and the submission should be rejected on this basis.**

## 4. Comparisons against Benchmarks

- 4.1. The submission documents include comparisons with GLA benchmarks. However, there is no mention or comparison with the latest UK Standard, The Net Zero Carbon Building Standard (NZCBS), published in pilot version in September 2024,

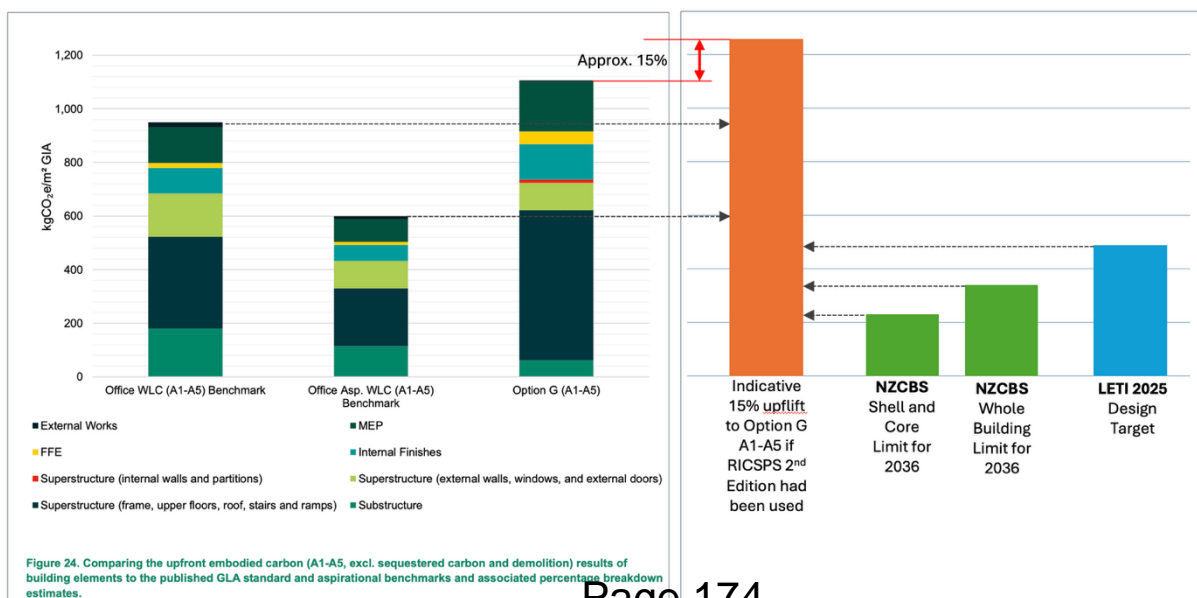
nor, for example, the LETI benchmarks, also an industry benchmark. The submission states that a post completion WLC assessment will be done (Sustainability Statement para 7.6.27, p19) so an NZCBS assessment could be undertaken and will very likely be standard practice by 2036, at practical completion. This submission for the OSD would **FAIL** against NZCBS Limits. This Report includes this comparison See 4.3 below.

4.2. This Report shows the diagrams used in the submission, but with three additions:

- An indication of what the submission figures would look if they were adjusted as per Para 3 above.
- A comparison with LETI benchmarks.
- A comparison with NZCBS, for offices completed in 2036.

4.3. Comparison with GLA, NZCBS and LETI, benchmarks and targets/limits.

- The diagram below shows the Submission Diagram comparing the Option G, adopted scheme Upfront Carbon A1-A5 carbon assessment against the Standard GLA Office Benchmark, and also the Aspirational Benchmark.
- The **Orange** column shows 'Option G' with an indicative (and possibly conservative) corrected 15% uplift reflecting what the assessment is likely to look like had RICSPS 2<sup>nd</sup> Edition been correctly used for the assessment.
- The two **Green** columns show respectively the NZCBS 'shell and core limit' and the 'whole building limit' for offices completed in 2036. (It is the shell and core limit that will apply).
- The **Blue** column shows the LETI 2025 Design Target.
- The **black arrows** show the shortfall between the orange column, and the respective benchmarks, limits and targets.

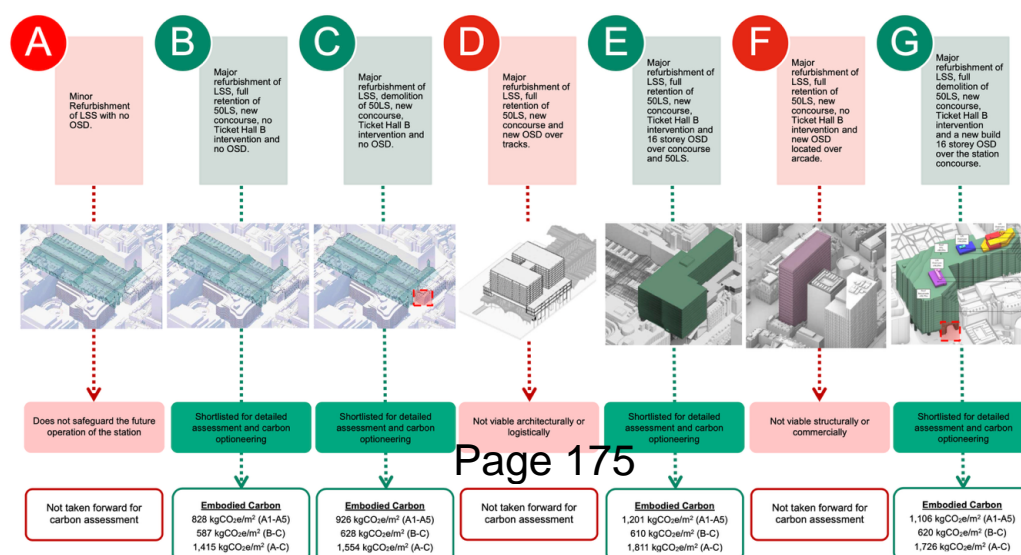


- **Conclusion:** This combined diagram shows the likely uplift from using RICSPS 2<sup>nd</sup> Edition rather than the now redundant 1<sup>st</sup> Edition. It shows how much this building will miss the GLA 'Office WLC (A1-A5) Benchmark' (by approx. 33%), and the 'Office Asp. WLC (A1-A5) Benchmark' (over double).
- **Conclusion:** This combined diagram also shows that the orange, corrected, Option G column is nowhere near meeting industry best practice limits/targets illustrated by the green and blue columns. It is important to note that the NZCBS (Green) limits are designed to meet the government's required trajectory to net zero.
- **Conclusion:** In essence this proposal shows minimal ambition or intention to meet current best practice in terms of low carbon construction, or the UK's trajectory to Net Zero. Due for completion in 2036, only 14 years short of 2050, this building is has the potential to be commercially redundant on completion. Occupier and investor awareness of ESG issues is increasing, and therefore buildings such as this which have not evolved meaningfully past 20<sup>th</sup> Century Office design are highly likely to be downgraded in value. (See also paras 5.4 and 5.5 below).

## 5. Optioneering: Structure and Facade:

5.1. Strategic options were considered as described in 5.2 below. However, only a single, high carbon, structural option was considered (see 5.3, last paragraph below) and only a single, short life, cladding option was considered (see 5.4 and 5.5). Therefore the 'Optioneering' process did not look at options for these significant elements of construction.

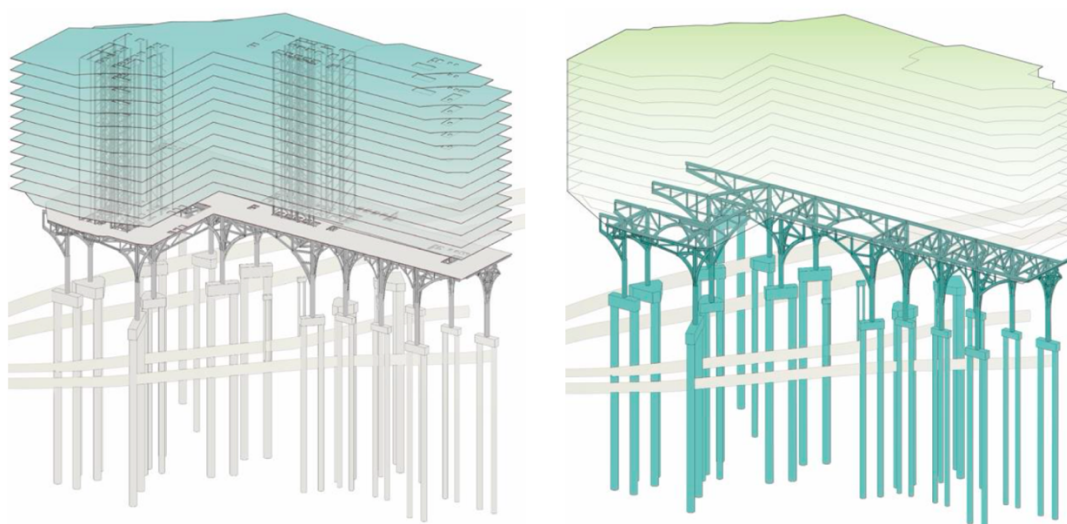
5.2. The 'Carbon Optioneering Report P02' shows that initially 7 Options A-G were considered. See diagram below from 'Carbon Optioneering Part 1 p6:



This rejects Options A, D, F in favour of a more detailed examination of Options B, C, E, G. Based on the applicant's assumptions on viability, and the need to pay for the station improvements, this in effect leaves only options E and G in contention. Options B and C appear to be retained really only to give a degree of validity to the optioneering as the clear requirement was to build a new office building in the location shown. This is a very restricted range of options, excluding other structural possibilities, see 5.3 below.

### 5.3. Structural Efficiency:

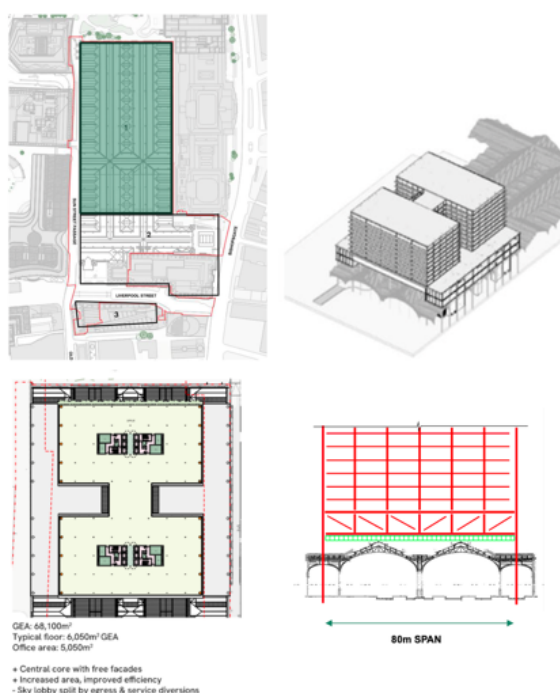
- In the Submission Document 'GLA Stage 2-3 Whole Life Carbon Assessment' para 1.6.3. there is the statement *"The upfront (A1-A5) carbon emissions of the transfer structure alone accounts for around 25% of 1,110 kgCO<sub>2</sub>e/m<sup>2</sup>. Without the transfer structure, the OSD may perform more favourably with the GLA's A1-A5 benchmark"*. This observation raises the question as to why a more imaginative solution wasn't examined that does not require a large transfer structure, which would have removed the need for this type of high carbon design approach, and potentially help reduce construction costs. The 'Carbon Optioneering Report P02' Option G p13 Figures 18 and 19, show the massive high carbon transfer structure that is required below.



Figures 18 and 19. 3D model showing proposed transfer and stability structure over station concourse and OSD cores.

- The structural solutions for both Options and E and G are essentially the same and involve a significant transfer structure over the station concourse to be achieved. It has already been stated in the submission that this design approach was exceptionally high carbon adding some '25%' to the assessment figures (see

above para). The obvious solution to this problem is already evidenced on site with Exchange House which spans the tracks of Liverpool Street Station with a parabolic (tension) structure. This is potentially a much lower carbon approach which would very likely have avoided the '25%' additional carbon cost necessitated by the transfer structure. This would have brought the rejected Option D, described in the above diagram (5.2 above) as '*Not viable architecturally or logistically*' back into contention, as Exchange House has historically managed to solve both the architectural and logistical issues from building over the railway tracks at this station.



Figures 30, 31 and 32. Extract from acme options development report (refer to Appendix D)

Figure 33. AECOM mark up of indicative superstructure scheme principle for heritage train shed track bridging.

Rejected Option D, "Carbon Optioneering Part 1 P02", p27, showing high carbon transfer structure.

- Cross Laminated Timber (CLT) as a low carbon structural solution: CLT structural floors would seem to be a potential solution for this project solving two major issues, structural mass and carbon emissions. A basic structural problem with the submission is the weight bearing down on the transfer structure which would have been mitigated using CLT. In addition, CLT structural slabs would have not only have had a reduced carbon emissions impact from construction but could also have had a significant sequestration benefit. The reason given for this omission is '*Insurance*' concerns. However, Landsec's Timber Square Building in

SE1, and Bywater Properties' Paradise Building in Vauxhall are two examples of London office buildings that use significant amounts of primary structural timber, i.e. CLT, and this therefore suggests that this lighter, more carbon efficient approach is possible with the right advice.

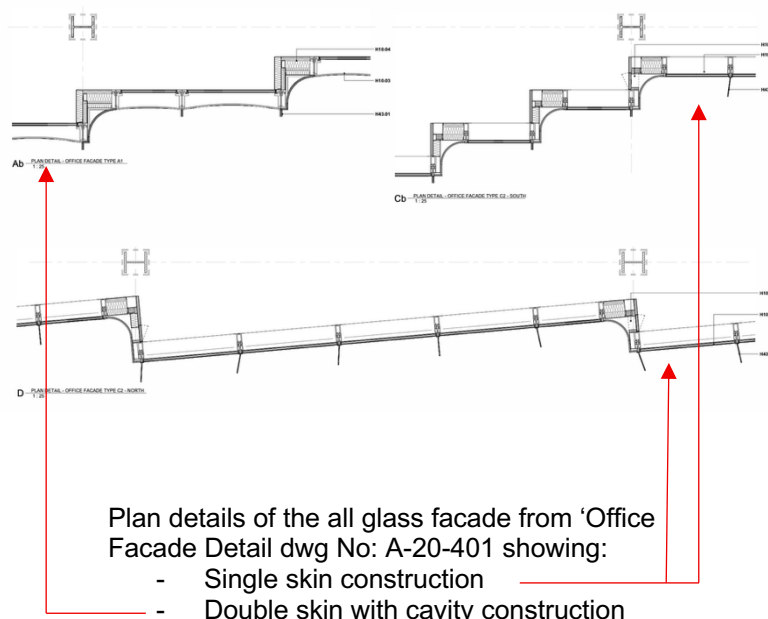
#### 5.4. Facade Design and Material Efficiency:

- The cladding for this building is a fully glazed unitised cladding system, no other design approach was considered in the Carbon Optioneering Report P02.

Plate 4-15: OSD Façade Articulation Detail



Illustration of the fully glazed facade from the 'Environmental Statement' para 4.8.6. p4-14.



- This fully glazed facade has, according to the 'GLA WLC Template' included with the submission, a life expectancy of '30 years'. This means that as designed, it will need continual replacement roughly every 30 years with the resulting ongoing embodied carbon costs (greater in the double skin areas). 40 Liverpool Street was completed in 1884 and has had the same facade over the 140 years since then (plus maintenance, repair etc). Over a similar 140 year period the proposed scheme would therefore have to have its facade replaced a total of nearly 5 times (5<sup>th</sup> time at 150 years), with the associated resource use, carbon emissions, waste and local disruption.

**5.5. Facade and Energy Efficiency:** The submitted 'Energy Statement' examines the facade in some detail, and makes the following statement:



- “The Proposed Development achieves carbon savings of 12.5% from the “Be Lean” stage of the energy hierarchy and overall carbon savings of 13.2%. Although this falls below the targets of 15% and 35% for “Be Lean” and overall on-site savings respectively the proposed energy strategy has been optimised to maximise the reduction in operational regulated energy consumption and associated carbon emissions in line with the GLA energy hierarchy.”
- This statement, astonishingly, shows that the submission for the OSD fully accepts that this building is substandard. The extract below from the ‘Energy Statement’, para 11.8.4, illustrates not only this failure but also the suggestion of an offset payment of £1,060,782 in mitigation. This offset payment was, it is assumed, considered a cheaper route to achieving a ‘zero carbon’ solution than designing a building that actually performs in accordance with best practice and current policies and targets (e.g. GLA ‘Be Lean’). This shows that this is not an ‘exemplary’ building (see 8.4 below).

11.8.4. The predicted shortfall in savings relative to the ‘zero carbon’ 100% regulated emission saving target is 372.2tCO<sub>2</sub>/year, which is a cumulative total over 30 years of 11,166 tCO<sub>2</sub> that is expected to be addressed through offsetting. This results in an estimated carbon offset payment of approximately £1,060,782 subject to agreement with CoL. This is summarised in Figure 22 and Table 57.

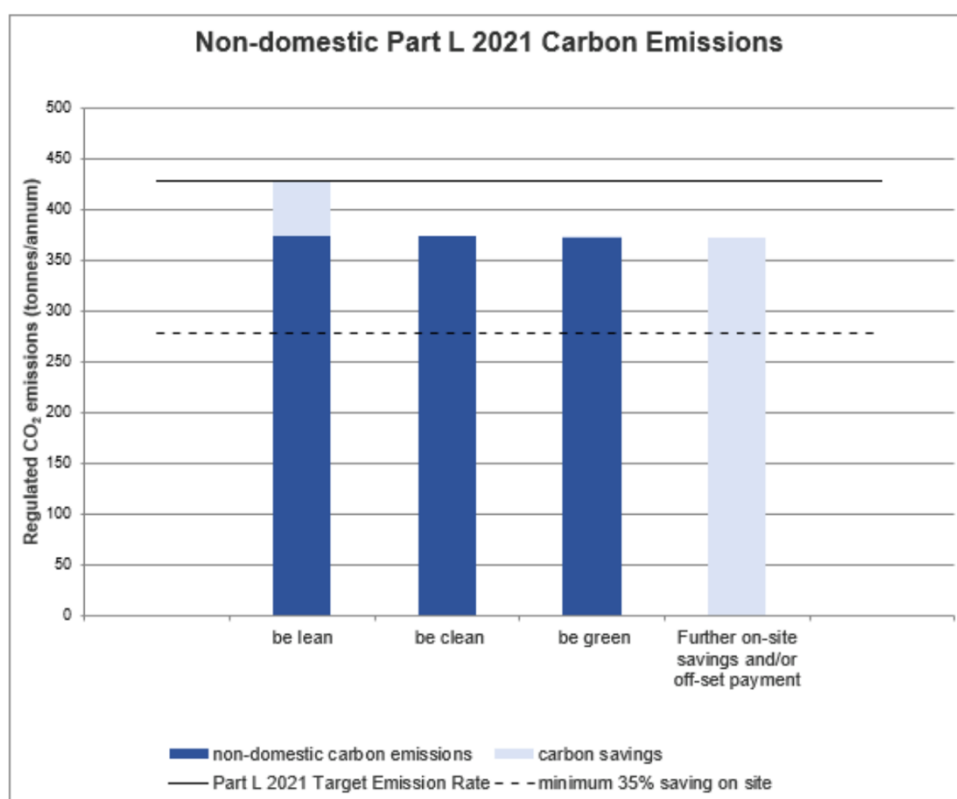


Figure 22: Proposed energy strategy: Energy Hierarchy CO<sub>2</sub> baseline, emissions and savings – non-domestic buildings

- The typical floor plan shown below (Submission ‘Energy Statement – Section 5: Energy Demand Reduction, para 5.1.3’) shows that the fully glazed facade is also inefficient in terms of wall to floor ratio. Apart from the inherently sub-optimum shape, the continual stepping of the facade adds to the overall surface area of the building, increasing material, i.e. embodied carbon costs, and is also consequently unhelpful to heat loss/gain. A more efficiently designed facade from both material and shape perspectives would contribute to greater facade longevity and improved operational performance. This floor plan cannot therefore be said to be ‘exemplary’ (see para 8.4 below, ref City Plan 2040 para 1.4)

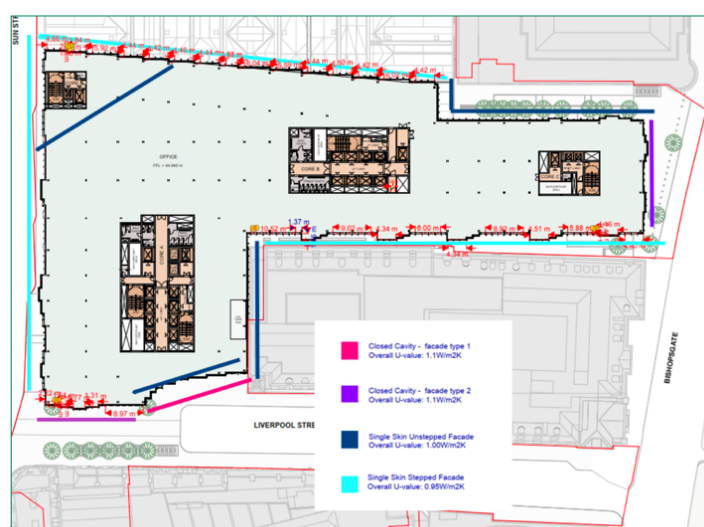


Figure 12: Plan view of 7th floor showing facade types

Key issues:

- Inefficient floorplate
- Poor wall to floor ratio
- Inefficient stepped facade
- Short life, fully glazed facade

Typical floor plan: from 'Energy Statement – Section 5: Energy Demand Reduction, para 5.1.3'

5.6. **Comment:** This facade solution is not “An optimised facade responding to the external environment, with external shading” (LSSt Sustainability Statement March 2025 para 1.3.2.2) as claimed, and is as explained above, not a sustainable design approach in both embodied carbon and energy use terms. This is particularly concerning in the face of a climate crisis and the government’s legally binding target of achieving Net Zero by 2050, and improved energy efficiency. The City’s stated objective is to achieve Net Zero by 2040. The first facade replacement would be in about 2066, i.e. 16 years after 2050, and 26 years after 2040. It is very likely that given the current direction of continually tightening environmental legislation, and parallel ESG concerns by occupiers, that double glazed, all glass facades will no longer be possible for regulatory or commercial reasons. Will the structural solution be able to support a different, possibly heavier, long life facade solution when the building is vacated and refurbished in 2066, 2096 etc? **This building is therefore likely to be obsolete on completion.**



## 6. Circular Economy:

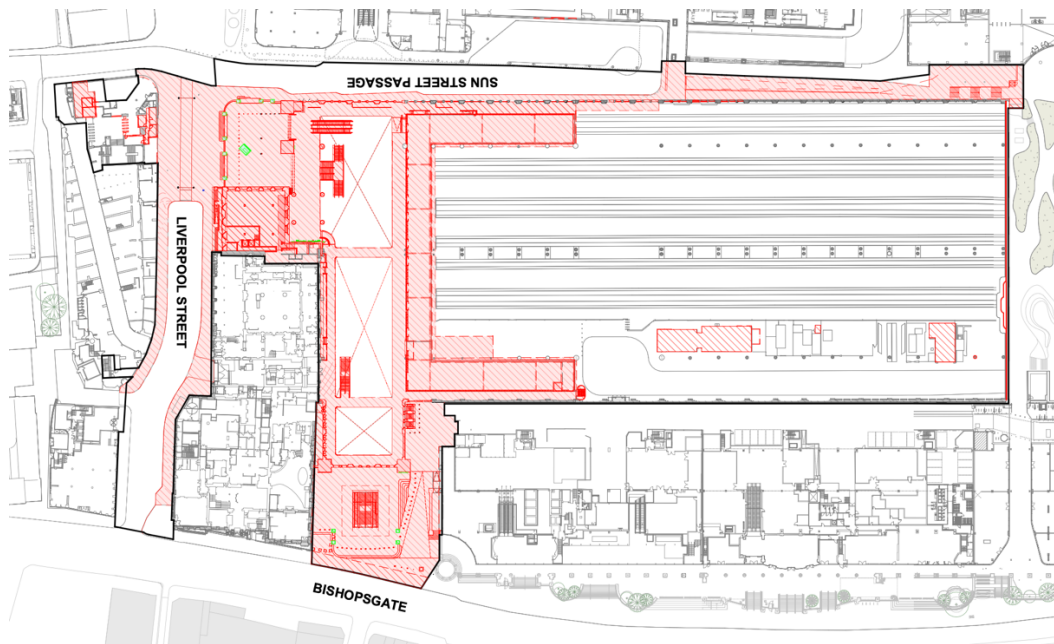
The key commitments of the Applicant with respect to demolition of existing fabric are:

- *“To target diversion of a minimum of **95%** of non-hazardous demolition waste from landfill for reuse, recycling, or recovery (excluding energy recovery in line with the London Plan definitions);*
- *To target diversion of a minimum of **95%** of inert excavation waste generated from the Proposed Development from landfill for beneficial use;*
- *To target diversion of a minimum of **95%** of construction waste generated by the Proposed Development from landfill for reuse, recycling, or recovery (excluding energy recovery in line with the London Plan definitions).”*
- These are all standard industry commitments that are offered by most contractors and do not represent any additionally sustainable approach. The inclusion of ‘recycling’ means that the waste can be used at the lowest level, e.g. as ballast under new roads, and not at a higher level as in ‘reuse’ where the component has a new life matching its original use. It would have been helpful for example to have had the ‘95%’ broken down into more specific commitments.

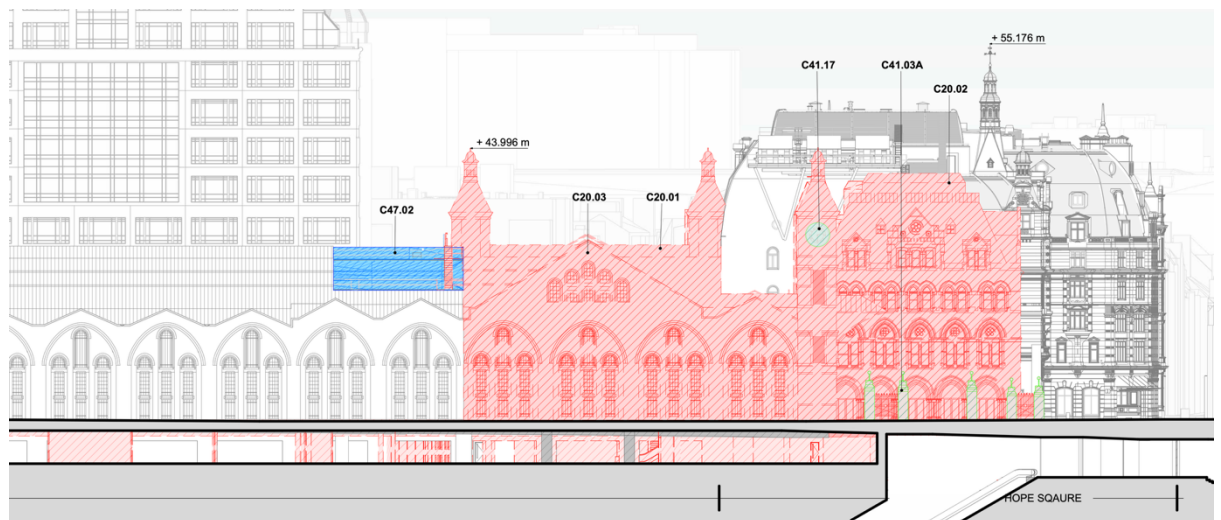
## 7. Demolition:

7.1. This report is not concerned with the heritage issues around the extensive demolitions proposed but is concerned about the demolition and disposal of usable fabric from the perspective of a waste of resources.

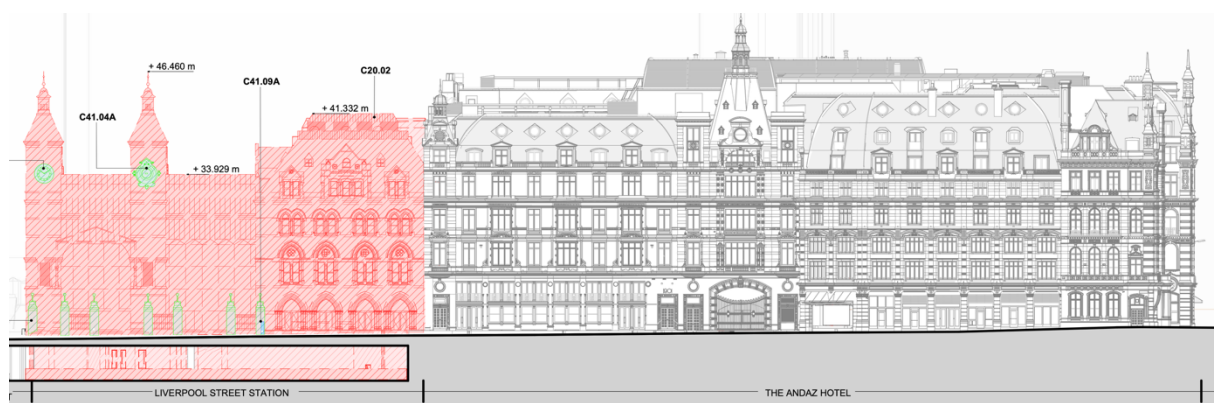
7.2. The proposed demolitions are extensive and predominantly involves fabric that has not reached the end of its useful life. Fabric and buildings subject to demolition are therefore entirely capable of retention and reuse. The concerns with respect to demolition are specifically associated with the buildings that face onto Liverpool Street and Bishopsgate.



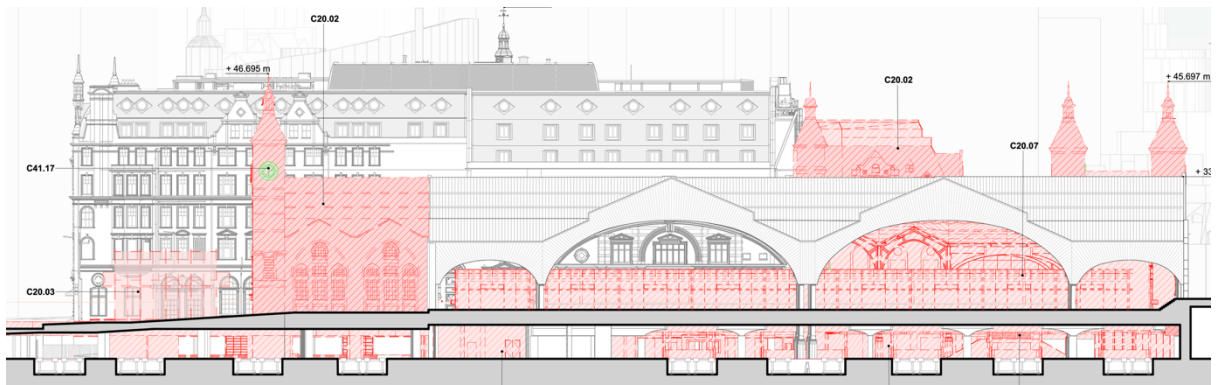
Demolition Site Plan – Extract from Dwg: A-04-200



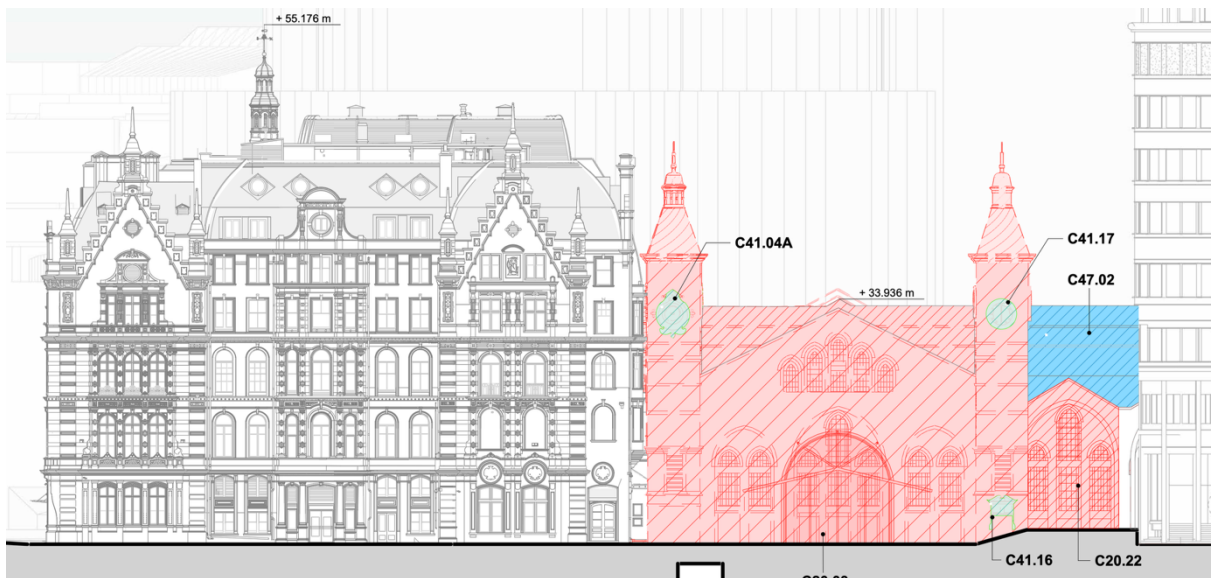
Demolition West Elevation – Extract from Dwg: A-06-403



Demolition South Elevation – Extract from Dwg: A-06-402



Demolition North Elevation – Extract from Dwg: A-06-400



Demolition East Elevation – Extract from Dwg: A-06-401

- The above are extracts from the submission documents and illustrate the significant amount of demolition of entirely useable structure and fabric to achieve this submission. The proposed scale of demolition represents a huge and unnecessary waste of resources. The issue of concern from a carbon and resources perspective is not the reorganisation of the station concourse areas, (assuming optimum resource and carbon efficiency is undertaken) but the demolition of useable assets that have not reached their end of their useful life and once retrofitted are capable of continued beneficial use.

## 8. Policy Failures:

There are many relevant National and Local Environmental and Sustainability Policies that are relevant to this submission. The following are a list of those policies that this submission fails to meet.

**8.1. UK Trajectory to Net Zero:** At a UK National level the government has legislated for the economy to achieve net zero by 2050. The City of London has brought this forward to 2040. There is detailed policy at all levels to ensure that these commitments should be met. To achieve this means that office design today is not 'business as usual', and indeed that significant changes are required to office design in 2025 to meet these commitments and policies. This submission (OSD) is not noticeably different to buildings designed in the last decades of the 20<sup>th</sup> Century, showing no significant evidence of meeting current policies as is illustrated below. The overall whole life carbon figure for the submission is 2,200kgCO<sub>2</sub>e/m<sup>2</sup> GIA, this is approximately what you would expect of an equivalent office building built in circa 1990. **The submission should therefore be rejected.**

### 8.2. National Planning Policy Framework (NPPF):

- Para 161: ***"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure"***
  - This submission does not meet the requirements of those areas highlighted in bold above. (See paras 4.3, 5.4, 5.5, 5.6 above)
- Para 164: ***"b) help to reduce greenhouse gas emissions,....."***. And Para 8 c) ***"an environmental objective.....including moving to a low carbon economy"***
  - This submission does not meet these requirements, as it fails to meet GLA, LETI and NZCBS benchmarks and limits for greenhouse gas emissions, it cannot therefore be said to be 'moving to a low carbon economy'. (See 4.3 above)

8.3. **GLA London Plan Policy SI2 Minimising greenhouse gas emissions.** The submission **FAILS** to meet a number of GLA whole life carbon principles:

- **Table 2.1 WLC Principles:**

- **“1. Reuse and Retrofit:** *Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option”.*
  - Existing reusable fabric (e.g. 50 Liverpool Street) is demolished rather than retrofitted. (see paras 5.2, 7.2 last paragraph above)
- **“3. Material selection:** *Appropriate low-carbon material choices are key to carbon reduction. Ensuring that materials are selected with consideration of the planned life expectancy of the building reduces waste, the need for replacements, and the in-use costs”.*
  - The material choices are standard for office construction for several decades and are not specifically low carbon. CLT was rejected (see para 5.3; last paragraph, above)
- **“4. Minimise operational energy use:** *A ‘fabric first’ approach should be prioritised to minimise the heating and cooling requirement of a building and the associated systems.”*
  - The submission performs poorly and fails to meet appropriate standards. The submission **FAILS** to achieve the 15% carbon savings from the ‘Be Lean’ stage of the energy hierarchy (achieving just 12.5%) and **FAILS** to achieve the 35% for overall onsite savings (achieving just 13.2%) (Sustainability Statement para 5.3.11). (See para 5.5)
- **“6. Disassembly and reuse:** *Designing for future disassembly ensures that products do not become future waste, and that they maintain their environmental and economic value”.*
  - There is no significant evidence that this has been given priority.
- **“7. Building shape and form:** *Compact efficient shapes help minimise both operational and embodied carbon emissions from repair and replacement for a given floor area. This leads to a more efficient building overall, resulting in lower construction and in-use costs”.*



- The submission starts with a high wall to floor ratio due to its basic shape and then adds to the problem by introducing a highly stepped facade. (see 5.5 last paragraph)
- **“16. Circular economy:** *The circular economy principle focuses on a more efficient use of materials which in turn leads to financial efficiency. Optimising recycled content, reuse and retrofit of existing buildings; and designing new buildings for easy disassembly, reuse and retrofit, and recycling as equivalent components for future reuse are essential”.*
- There is very little evidence that this submission has been designed for future circularity.

#### 8.4. City of London’s ‘City Plan 2040’ – Draft April 2024.

- **Strategic Priorities:**
  - **Para 1.2: Economic objective:** *“Ensuring new and refurbished office space meets the environmental, social and governance (ESG) priorities of occupiers and their workforces”*
  - **Para 1.4: Environmental Objective:** *“Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a ‘retrofit first’ approach to development”*
  - **Para 1.4: Environmental Objective:** *“Ensuring exemplary design of development”*
  - This submission **fails** to meet any of these Strategic Priorities, as it:
    - **Fails** to meet current environmental standards and best practice. (See paras 4, 5 and 6 above)
    - **Fails** to meet the UK trajectory to net zero by 2050, and therefore also the City’s trajectory to net zero by 2040. (See para 5.6 above)
    - **Fails** to exhibit “*exemplary design*” as it does not meet the above criteria and could well be commercially redundant by 2036. (See paras 4, 5 and 6 above)

- **Strategic Policy S4: Offices**, states:
  - Para 5.1.0. *“The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy”*
    - i.e. There is a higher than average standard expectation for office space in the City of London.
  - Para 5.1.3 states: *“Recent years have also seen strong demand for ‘best in class’ or Grade A+ floorspace. Many businesses are placing greater value on high quality sustainable and well-being credentials,”*.
    - i.e. Sustainability and commercial value are directly linked.
  - *“The City Corporation will facilitate significant growth in **office development of the highest quality** to meet projected economic and employment growth”*
    - This submission is not an example of office space ‘of the highest quality’ as it exhibits poor floor configuration, poor environmental performance and **fails** to meet basic sustainability standards” (See 4, 5 and 6 above).
  - *“Ensuring that **new floorspace is designed to be flexible to allow the transformation and adaptation of space to support new uses, different layouts and configurations.....**”*
    - Circular Economy Statement P01, para 4.3.1 Table 2 p16, under ‘Adaptability’ states: *“It is not anticipated that either the station or office development will undergo any significant change in use during their lifetime”*. This is therefore in direct conflict with Strategic Policy S4 and Sustainable Design Policy DE1, 7b.
    - It is also worth noting that the configuration and core arrangement of proposed floorplans do not lend themselves easily or efficiently to future hotel or residential use.
  - **This submission therefore fails to meet the requirements of Strategic Policy S4 and should be rejected.**

- **Policy OF1: Office Development**, states:
  - *“Office Development should*
    - *a. Prioritise the retrofitting of existing buildings*
    - *b. Be of an outstanding design and an exemplar of sustainability”*
  - The submission:
    - **Fails** to meet the first of these policies as the submission proposal demolishes 50 Liverpool Street, which could be retrofitted.
    - **Fails** to meet the second of these as the submission is not well above average in terms of sustainability, as it does not meet the basic policy requirements.
- **Strategic Policy S8: Design**, states:
  - *“Sustainable design*
    - *“1. Takes a ‘retrofit first’ approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options;”*
    - *“2. Seeks opportunities to refurbish existing buildings, improving their environmental performance;”*
    - *“3. Minimises whole life-cycle carbon and contributes towards a net zero carbon City”;*
    - *“4. Delivers world class sustainable buildings that are adaptable and informed by circular economy principles and that treat materials as a resource;”*
  - The submission:
    - **Fails** to meet items 1 and 2 as there is no detailed ‘optioneering’ for retrofitting 50 Liverpool Street.
    - **Fails** to meet item 3 as the whole life-cycle carbon emissions are above existing benchmarks (see 4.3 above)



- **Fails** to meet item 4 as the submission states: *“It is not anticipated that either the station or office development will undergo any significant change in use during their lifetime”.*
- **This submission therefore fails to meet the requirements of Strategic Policy S8 and should be rejected.**
- **Policy DE1: Sustainable Office Design**, states:
  - *“1. Development proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options”.*
  - *“3. Development proposals should minimise whole life-cycle carbon emissions”.*
  - *“4. Where new buildings are the most sustainable and suitable approach, they should deliver exemplar low carbon development and the highest environmental sustainability quality, driving forward best practice beyond standard approaches and contributing to wider sustainability improvements in the area”.*
  - *“5. Innovative design, materials, construction, and technologies should be used to deliver highest standards of environmental sustainability.”*
- The submission:
  - **Fails** to meet policy item 1 above as detailed options for retrofitting 50 Liverpool Street have not been submitted.
  - **Fails** to meet policy item 3 above as whole life carbon emissions have not been minimised. (See 4, 5 and 6 above)
  - **Fails** to meet policy item 4 above as the submission is not *“exemplar”*, is not *“best practice”* and is not *“beyond standard approaches”*. (see 4.3, 5.4, 5.5)

- **Fails** to meet policy item 5 above as the materials proposed have been standard usage in commercial office design since the 1980's, i.e. are not *"innovative"*, and do not *"deliver highest standards of environmental sustainability"*, as the submission, by its own admission, fails to meet both operational and embodied performance standards. (see 4.3, 5.4, 5.5)
- **This submission therefore fails to meet the requirements of Policy DE1 and should be rejected.**
- **NABERS rating:** Policy DE1 requires in item 8. that:
  - *"Proposals for major development, b. Commit to achieving a minimum NABERS UK rating of 5 stars."* The submission intentionally does not make this required commitment and states in the LLS Sustainability Statement March 2025:
    - Para 1.3.2.2, p1: *"**aspires** to achieve a NABERS rating of 5 star"*.
    - Para 5.1.2, p13: *"The OSD **aims** to achieve NABERS 5\*"*
    - **There is therefore no commitment to meet Policy DE1 with respect to NABERS.**
  - This contrasts with a firm commitment to achieve BREEAM 'Outstanding' for the OSD (LLS Sustainability Statement March 2025, para 13.2.1). Why a firm commitment for BREEAM and not for NABERS?

8.5. **As shown above, the submission for the OSD fails in a significant number of policy areas and should therefore be rejected.** (See Executive Summary, Item 1 page 3 for a summary of the key issues.)

LPA Ref: 25/00494/FULEIA

London City Airport Ref: 2025/LCY/324

Date: 08/12/2025

Dear Kieran McCallum,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found not to conflict with London City Airport's safeguarding criteria.

<p><b>Reference</b></p> <p><b>Proposal</b></p>	<p>25/00494/FULEIA</p> <p>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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and</p>
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<b>Location</b>	ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.
	Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool Street, EC2M 7QN; and 50 Liverpool Street, EC2M 7PY
<b>Borough</b>	Kieran McCallum
<b>Case Officer</b>	City of London

We would however, like to make you aware of the following:

### **CAA Crane Notification**

where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)

<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

Kind regards,

**Madison Atkinson**

**On behalf of London City Airport**

**From:** [REDACTED]  
**To:** [Liverpool Street Station](#)  
**Subject:** RE: 25/00494/FULEIA - Re-Consultation Letter  
**Date:** 08 December 2025 15:22:54  
**Attachments:** [image001.png](#)

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

Official

Good afternoon

This address is not in the Wandsworth borough.

Best Regards

**Planning Technical Support**  
Planning Department

**Chief Executive Directorate**  
Serving Richmond and Wandsworth Councils  
[www.wandsworth.gov.uk](http://www.wandsworth.gov.uk)



Please note the views expressed in this email are informal advice only. It does not bind the Council in any way.

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**From:** Liverpool Street Station <[LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)>  
**Sent:** 08 December 2025 14:41  
**Cc:** Liverpool Street Station <[LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)>  
**Subject:** 25/00494/FULEIA - Re-Consultation Letter

You don't often get email from [liverpoolstreetstation@cityoflondon.gov.uk](mailto:liverpoolstreetstation@cityoflondon.gov.uk). [Learn why this is important](#)

Dear Sir or Madam,

Please find attached a re-consultation letter pertaining to Liverpool Street Station (25/00494/FULEIA).

Reply with your comments to [LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)

Kind Regards

Planning Administration

On behalf of

Kieran McCallum

Environment Department

City of London

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**From:** [Active Travel England Planning](#)  
**To:** [PLN - Comments](#)  
**Subject:** LPA Reference: 25/00494/FULEIA Standing Advice Response  
**Date:** 09 December 2025 15:54:04

---

THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 25/00494/FULEIA

**ATE Reference:** ATE/25/00793/FULL

**Site Address:** ANDAZ HOTEL, 40 LIVERPOOL STREET, LONDON, EC2M 7QN

**Proposal:** 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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed

comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,



**Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ ref:a0zTw000004Js5dIAC;f902db78c90532e27c20b2de9a7fd28d:ref ]



**From:** [REDACTED]  
**To:** [Liverpool Street Station](#)  
**Subject:** Re: 25/00494/FULEIA - Re-Consultation Letter  
**Date:** 09 December 2025 08:34:28  
**Attachments:** [image.png](#)

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Classification: Internal

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, if a crane is needed for installation purposes? We would like to draw your attention to the following:

**CAA Crane Notification**

where a crane is 100m or higher, crane operators are advised to notify the CAA ([arops@caa.co.uk](mailto:arops@caa.co.uk)) and Defence Geographic Centre ([dvof@mod.gov.uk](mailto:dvof@mod.gov.uk)) via Crane notification | Civil Aviation Authority ([caa.co.uk](http://caa.co.uk))

<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

**Simon Vince** | Airport Planning Manager

On behalf of Heathrow Airport Ltd.



Airport Safeguarding Limited | Admin Building (EDC), Teesside International Airport, Darlington, DL2 1LU  
United Kingdom

[WEBSITE](#) [REDACTED]

Visit our website: [Home - Airport Safeguarding Limited](#) or connect on LinkedIn - Airport Safeguarding Limited.



**From:** Liverpool Street Station <[LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)>

**Sent:** 08 December 2025 14:41

**Cc:** Liverpool Street Station <[LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)>

**Subject:** 25/00494/FULEIA - Re-Consultation Letter

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Dear Sir or Madam,

Please find attached a re-consultation letter pertaining to Liverpool Street Station (25/00494/FULEIA).

Reply with your comments to [LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)

Kind Regards

Planning Administration

On behalf of  
Kieran McCallum  
Environment Department  
City of London

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**From:** [REDACTED]  
**To:** [Liverpool Street Station](#)  
**Subject:** RE: 25/00494/FULEIA - Re-Consultation Letter (Our ref 25-1077)  
**Date:** 09 December 2025 15:47:53  
**Attachments:** [image001.png](#)

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Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number in all future correspondence.

Kind regards

**Lisa Gaskill | Operational Support | Planning Gateway One**  
Health and Safety Executive | Building Safety Division

[REDACTED]

 **PROTECTING PEOPLE  
AND PLACES**

**From:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>

**Sent:** 08 December 2025 14:41

**Cc:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>

**Subject:** 25/00494/FULEIA - Re-Consultation Letter

Dear Sir or Madam,

Please find attached a re-consultation letter pertaining to Liverpool Street Station (25/00494/FULEIA).

Reply with your comments to [LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)

Kind Regards

Planning Administration

On behalf of

Kieran McCallum

Environment Department

City of London

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Os nad chi yw'r derbynnydd bwriadedig, mae unrhyw ddatgeliad, copïo, dosbarthu neu unrhyw gamau eraill a gymerir gan ddefnyddio'r wybodaeth sydd yn yr e-bost hwn wedi'u gwahardd yn llym. Rhwch wybod i'r anfonwr am y gwall fel y gellir dilyn gweithdrefnau mewnol, a dileu'r cyfathrebiad o'ch system ar unwaith wedi hynny.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: 25/00494/FULEIA - Re-Consultation Letter [SG36348]  
**Date:** 09 December 2025 15:22:54  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Our Ref: SG36348

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

**NATS**

NATS Safeguarding

[REDACTED]

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)



NATS Internal

---

**From:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>  
**Sent:** 08 December 2025 14:41  
**Cc:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>  
**Subject:** [EXTERNAL] 25/00494/FULEIA - Re-Consultation Letter

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Reply with your comments to [LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)

Kind Regards

Planning Administration

On behalf of  
Kieran McCallum  
Environment Department  
City of London

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---



**From:** [REDACTED]  
**To:** [Liverpool Street Station](#)  
**Subject:** RE: 25/00494/FULEIA - Re-Consultation Letter  
**Date:** 09 December 2025 10:01:09  
**Attachments:** [image001.png](#)

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Good Morning,

Thank you for your e-mail.

Having reviewed the planning details and documents uploaded on the planning portal I can't see that there have been any changes to the SQM figures.

If there have been no changes to the figures, our comments remain the same. The conditions still stand.

Kind Regards,

**Saira Irshad**

Development Planner  
Asset Management & Engineering



Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ



It's everyone's water

---

**From:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>  
**Sent:** 08 December 2025 14:41  
**Cc:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>  
**Subject:** 25/00494/FULEIA - Re-Consultation Letter

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Dear Sir or Madam,

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Reply with your comments to [LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)

Kind Regards

Planning Administration

On behalf of

Kieran McCallum

Environment Department

City of London

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---

**From:** Gus Wray [REDACTED]  
**Sent:** 09 December 2025 11:41  
**To:** McCallum, Kieran <[REDACTED]>  
**Subject:** Liverpool Street Station - 25/00494/FULEIA

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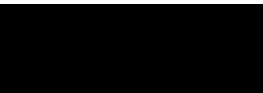
Dear Kieran,

Thank you for reconsulting us on the proposed works to Liverpool Street Station, application 25/00494/FULEIA.

We would like to reiterate our previous objection, as set out in our earlier letter. We have no new information to add.

Best wishes,  
Gus

**Gus Wray - Caseworker**  
(he/him)  
Twentieth Century Society  
70 Cowcross Street, London, EC1M 6EJ



[www.c20society.org.uk](http://www.c20society.org.uk)

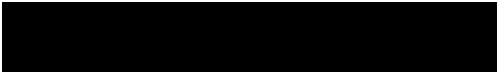
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Reg. charity no: 1110244





Application ref: 2025/5583/P  
Contact: Josh Lawlor



Date: 17 December 2025

**Development Management**  
Regeneration and Planning  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9JE



[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

City of London  
Kieran McCallum  
Environment Department  
City of London  
PO Box 270  
Guildhall  
London

Dear Sir/Madam

## **DECISION**

Town and Country Planning Act 1990 (as amended)

### **Request for Observations to Adjoining Borough - No objection**

Address:

**Liverpool Street Station**  
**Liverpool Street**  
**EC2M 7PY;**  
**Andaz Hotel**  
**40 Liverpool Street**  
**EC2M 7QN; and**  
**50 Liverpool Street**  
**EC2M 7PY**

Proposal: RE-CONSULTATION due to the submission of additional information.  
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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp,

servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.

Drawing Nos:

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Conditions and Reasons:

Informative(s):

1 Reasons for no objection:

The site is situated approximately 1.6km from the nearest part of the Camden borough boundary and is in the vicinity of many existing tall buildings. Thus, the proposal will have limited visibility within the borough of Camden in addition to having no noticeable effects of the amenity or living conditions of any Camden residents or occupiers.

The site is outside the protected viewing corridors to Camden. Although, the site would likely be partially visible on the City skyline from Primrose Hill, Parliament Hill or Kenwood. The proposal would be similar to existing development in the City and it is therefore not considered to result in harm to the general views of the City skyline from these sites.

The revised development would have no material impacts on the significance of any protected views, on the amenity of any Camden occupiers or visitors, on transport, environmental or ecological conditions. Camden therefore raises no objections to the application.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

Yours faithfully

Bethany Cullen  
Chief Planning Officer

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:**  
**Subject:** Port of London Authority response (DC 831) Plan ref: 25/00494/FULEIA Liverpool Street Station  
**Date:** 12 December 2025 10:34:25

---

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THIS IS AN EXTERNAL EMAIL

FAO: Kieran McCallum

Dear Kieran

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned re-consultation, for the proposed phased development at Liverpool Street Station. I have now had the opportunity to review the application documents and, given the location of the proposed development in proximity to the Tidal Thames, can confirm the PLA has no comments to make.

Regards

Michael

**Michael Atkins**

Senior Planning Officer

*Port of London Authority*

[REDACTED]

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**From:** [REDACTED]  
**To:** [PLN - Comments](#)  
**Subject:** Liverpool Street Station, Liverpool Street, London, EC2M 7QH 25/00494/FULEIA  
**Date:** 15 December 2025 15:27:05

THIS IS AN EXTERNAL EMAIL

F.A.O Kieran McCallum

Our ref 213183

Your ref [25/00494/FULEIA](#)

**Liverpool Street Station, Liverpool Street, London, EC2M 7QH**

**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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.**

Dear Kieran

Thank you for notifying the SPAB of the above revised application. As the amendments do not address our previous concerns, we are unable to withdraw our objection. For ease of reference, we have reproduced our earlier comments below.

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

Gill

**Gill Pedler**  
Casework Officer

Phone number: [REDACTED]

Part-time hours: Monday to Wednesday

Please send all notifications of listed building consent applications, faculty applications or requests for pre-application advice to [casework@jcnas.org.uk](mailto:casework@jcnas.org.uk)

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [Liverpool Street Station](#)  
**Subject:** FW: 25/00494/FULEIA - Re-Consultation Letter  
**Date:** 17 December 2025 14:52:17  
**Attachments:** [25-00494-FULEIA - Re-consultation Letter.docx](#)  
[Liverpool Street Station rec cond\\_232821.pdf](#)

THIS IS AN EXTERNAL EMAIL

Dear Kieran

Thank you for consulting me on this application. The additional documents submitted for this reconsultation do not affect my previous advice, which I have attached for information.

Kind regards

Helen



Ensuring our heritage lives on and is loved for longer.

[historicengland.org.uk](https://historicengland.org.uk)

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**From:** Liverpool Street Station <[LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)>

**Sent:** 08 December 2025 14:41

**Cc:** Liverpool Street Station <[LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)>

**Subject:** 25/00494/FULEIA - Re-Consultation Letter

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir or Madam,

Please find attached a re-consultation letter pertaining to Liverpool Street Station (25/00494/FULEIA).

Reply with your comments to [LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)

Kind Regards

Planning Administration

On behalf of

Kieran McCallum

Environment Department

City of London

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

By email to: [REDACTED]

Our reference: 250445

16.12.25

Dear Mr McCallum,

25/00494/FULEIA | 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 reconsulting SAVE Britain's Heritage on the above planning application following the submission of additional information. Following careful assessment of the new documentation, we maintain our strong objection to this application and wish to reiterate the heritage and sustainability grounds set out in our detailed letter of objection of 25 June 2025.

The revisions submitted by the applicant are minor in the context of the overall scheme and do not alter the fundamental nature of the application, which still proposes the demolition of the grade-II listed, 20th century concourse roof and the construction of a building up to 97.67m AOD within the Bishopsgate Conservation Area

We further wish to submit on behalf LISSCA (The Liverpool Street Station Campaign) the attached **Embodied Carbon Assessment: Responses to AECOM's Sustainability Addendum PO2 Nov 2025** by leading sustainability and carbon expert Simon Sturgis dated 12 December 2025. This should be read alongside the previously submitted Embodied Carbon Assessment report dated 23 August 2025, attached for ease of reference.

#### Conclusion

For these reasons, and those set out in our original letter of objection (25 June 2025), we maintain our strong objection to this application and recommend that the Local Planning Authority refuse planning and listed building consent.

Yours sincerely,

A black rectangular redaction box covering the signature of Lydia Franklin.

Lydia Franklin  
Conservation Officer

# Liverpool Street Station

Planning Submission Ref: 25/00494/FULEIA

## Embodied Carbon Assessment

Responses to AECOM's:  
**Sustainability Addendum PO2**  
Nov 2025

*on behalf of*

**The LISSCA Campaign:  
Save Liverpool Street Station**

12 December 2025

**Contents:**

1. Executive Summary
2. Comments on AECOM's '*Sustainability Addendum PO2*' dated November 2025

## 1. Executive Summary

- 1.1. This Report (referred to as 'TZ Report 2') is in response to AECOM's '*Sustainability Addendum PO2*' dated November 2025 and should be read with it. TZ Report 2 is also an addendum to Targeting Zero Report '*Embodied Carbon Assessment*' dated 23 August 2023 (referred to as 'TZ Report 1') and should also be read with it. TZ Report 1 examined and commented in detail on the carbon emissions impacts of the planning submission: 25/00494/FULEIA, and in particular the Over Station Development (OSD) and the resulting demolition.
- 1.2. In TZ Report 1, the 'Executive Summary', a number of fundamental objections on climate grounds of the proposals were set out. These have not, as explained in this report, been negated or superseded by the AECOM Addendum. If anything, the AECOM addendum has helped underline the deficiencies of the planning submission scheme.
- 1.3. In summary, the essential problem with the design of the OSD is that it is not designed from the outset to meet the City of London's sustainable office design policy requirements as set out in the **City of London's 'City Plan 2040'** (see TZ Report 1, para 8.4 and Para 2.2 below). The OSD is essentially a standard commercial office design of the type you might expect in the latter decades of the 20<sup>th</sup> Century, but with various added gestures towards sustainability and low carbon design. The facade, examined in sections 2.13 and 2.15 below, is a particularly clear example of this failure, as is the structural approach, as examined in 2.4 below, and TZ Report 1 para 5.3.
- 1.4. **For these reasons the OSD fails to meet the City of London's requirements and policies for 'exemplary' or 'best in class sustainable office buildings', and the application should therefore be rejected.**

## 2. Comments on AECOM's '*Sustainability Addendum PO2*' dated November 2025.

*(NB all bracketed reference numbers are paragraphs in the AECOM addendum):*

- 2.1. **(3.2: Overarching aim)** It is not disputed that changes to Liverpool Street Station, such as accessibility upgrades, are necessary for the future of the station. What is disputed, is the way this particular scheme delivers on this intention with a

development proposal (the OSD) that does not meet existing UK, GLA and City of London carbon emission related environmental policies for new office development.

2.2. **(3.7: Delivering new sustainable office spaces)** It is claimed that: *‘The proposed OSD will meet the particular and acknowledged shortage of ‘best in class’ office floorspace, that is floorspace which exceeds the standards previously classified as Grade A’.*

- As has been identified in para 5.5 of TZ Report 1, the proposal for the OSD acknowledges that it significantly **fails** to meet ‘Be Lean’ targets, and in mitigation suggests an offset of £1,060,782. The OSD cannot therefore be described as ‘best in class’ and exceeding ‘the standards previously classified as Grade A’.
- As shown in detail in Para 8.3 of TZ Report 1, the proposed OSD **fails** to meet **GLA London Plan Policy SI2 ‘Minimising greenhouse gas emissions’**.
- As shown in detail in Para 8.4 of TZ Report 1, the proposal for the OSD **fails** to meet any of the following policies relating to the provision of new sustainable office buildings in the City of London:
  - **City of London’s ‘City Plan 2040’ – Draft April 2024.**
    - **Strategic Priorities: Para’s 1.2, 1.4.**
    - **Strategic Policy S4: Offices**
    - **Policy OF1: Office Development**
    - **Strategic Policy S8: Design**
    - **Policy DE1: Sustainable Office Design**
    - **Nabers Rating – aspirational only.**
- **Conclusion: As the OSD fails to meet all of these CoL policies, it cannot therefore be described as ‘best in class’ and exceeding ‘the standards previously classified as Grade A’. It therefore should be rejected.**

2.3. **(4.2: Assessment methodology and RICS approach)**

As has been stated in Para 3 of TZ Report 1, the whole life carbon assessment by AECOM is fundamentally flawed.

- This is because the assessment for the OSD is based on ‘pick and mix’ use of a combination of the RICS Professional Standard 1<sup>st</sup> Edition 2017, and the RICS

Professional Standard 2<sup>nd</sup> Edition 2023. Only the 2<sup>nd</sup> Edition, which supersedes the 1<sup>st</sup> Edition, should have been used, and in its entirety for accuracy and consistency. This would have produced a higher overall assessment figure. This is because the 2<sup>nd</sup> edition more accurately captures the scope of materials and activities etc leading to increases compared to the 1<sup>st</sup> Edition, and further the 2<sup>nd</sup> Edition also requires additional contingency.

- In mitigation of using this ‘pick and mix’ approach it is stated (*in para 4.2 Assessment methodology and RICS approach*) that ‘the assessment also incorporates a 12.5% quantity contingency on the primary structure to address data uncertainties’. However as is also noted (*in 4.4 Results and GLA Benchmark Comparison*) the primary structure only accounts for 21.25% of the embodied carbon. Using this logic, the 12.5% quantities contingency should also be applied to the remaining 78.75% of the OSD’s embodied carbon A1-A5 (cladding, services, fitout etc). This would produce a significant uplift.
- For A1-A5 using the 12.5% uplift across all elements of construction (i.e. not just primary structure) would increase the reported figure of ‘1107 kgCO<sub>2</sub>e/m<sup>2</sup> GIA’ to approx. **1250kgCO<sub>2</sub>e/m<sup>2</sup>**. This is significantly more than is currently reported, and exceeds GLA Benchmarks.
- However, if the assessment had been done correctly, then the contingencies as per the RICS Professional Standard 2<sup>nd</sup> Edition 2023 would have been used. This would have produced an uplift as per TZ Report 1 para 4.3.
- **The Whole Life Carbon assessment for the OSD is therefore fundamentally flawed and the submission should be rejected on these grounds.**

#### 2.4. (4.4 Results and GLA Benchmark Comparison, 4.4.1 Structural Transfer Contribution)

In this paragraph an attempt is made to ‘lower’ the carbon cost of the OSD from ‘1,110’ to ‘874’ by omitting the construction of the transfer structure. This is presumably to get it to meet the GLA Benchmark figure of ‘<950’. This is incorrect, you cannot omit elements of construction from these assessment figures. The total carbon cost of any project reflects the location (e.g. building over a station) as much as the design. The ‘874’ figure should be disregarded as completely irrelevant’.



- **As noted in TZ Report 1, para 5.3 the OSD structural design approach is fundamentally inefficient which leads directly to the OSD as a whole, failing to meet GLA Targets.**

## 2.5. **(4.4.2: Alternative Benchmarks for comparison)**

TZ Report 1 identifies industry standard benchmarks (LETI, NZCBS) which in addition to the GLA Benchmarks represent the industry standard approaches to rating the carbon performance of office buildings. It is accepted that these benchmarks (LETI, NZCBS) are still evolving, nevertheless they give an order of magnitude against which the OSD performs particularly poorly. Therefore, other non-industry standard comparisons have been introduced by comparing the OSD against other Network Rail buildings over rail tracks. This is irrelevant, because a new office building should be assessed in its entirety without special allowances being made for its location, and should be compared to other standard office buildings carbon performance.

- Therefore para **(4.4.2)** and **(Appendix D)** should be ignored as they are irrelevant.

## 2.6. **(4.5.1. Substructure Design and Piling Strategy).**

*This states ‘that the embodied carbon calculations presented in the planning application documentation therefore do not take the ground assessment and any resultant additional structural material that may be required into account except for the allowances advised by the Tier 1 contractor’.*

- This is clear evidence that the assessment figures of **‘1,110’** and **‘874’** discussed in paras 2.4 and particularly 2.5 above are unreliable and probably too low as the scope of the assessment is not comprehensive.
- **This is further evidence that the Whole Life Carbon assessment for the OSD is fundamentally flawed, and the submission should be rejected on these grounds.**

2.7. **(4.5.2.2 Fire Safety Considerations).**

This is obviously a serious issue. It should be noted that there are many recent UK office buildings that use CLT structurally, and that fire safety and insurance issues have been overcome to achieve the desired low carbon outcomes.

2.8. **(4.5.5 Facade Optioneering, see also 6.2.1, Facade Design, performance and optimisation below).**

There are several concerns associated with this section:

- It is not clear whether the aluminium sections etc that make up the facade are finished as anodized aluminium sections or PPC (polyester powder coated). This can make a difference to the carbon cost, the recyclability and the life expectancy of the aluminium sections used. There are single references to both anodizing and PPC in the text and facade detail; dwg: A-20-401 P00, also avoids mentioning the finish to the aluminium sections mentioning only 'vertical metal fins' etc. It would appear that this choice has been intentionally withheld with respect to the planning submission documents.
- There is no commitment to actually use the low carbon options put forward, for example:
  - 'Aluminium: The curtain wall extrusion **could** be manufactured using Hydro CIRCAL 100R which is made 100% recycled .....'
  - 'Glass: The glazing **could** incorporate ORAE glass by Saint-Gobain which contains up to 64% recycled.....'
  - Both of these statements are clearly weakened by the use of '**could**' which means that they can be abandoned at the first opportunity due to 'cost' or 'programme' issues. 'Could' needs to be substituted for '**will**'.
  - In conservation areas it is normal for bricks to be specified in terms of type and colour as part of the planning consent to achieve the conservation requirements. It is therefore not unreasonable to expect that in order to deliver the CoL's Low Carbon policies, that aluminium and glass performance should be specified as part of the planning consent, including aluminium

finish. This could be actual products, or specific low carbon performance criteria.

- This paragraph further states that *'the aluminium framing system is designed for long term durability and can remain in place for up to 60 years'*. Where has this come from, what evidence? By comparison, the GLA WLC template provided refers to *'30 years'* life expectancy. No evidence has been provided to justify the 60 year claim. Usually with an aluminium framed cladding system, when gaskets etc fail the entire system is replaced, this is what the *'30 years'* would be based on.
- The GLA WLC template includes the following statements:
  - *'Aluminium frame window, double glazed, non-operable, 0% recycled aluminium'* and *'Aluminium framed stick curtain wall system with laminated glass insulating'*. With a replacement cycle given as 30 years in both cases. It can be assumed, in the absence of other evidence, that the *'aluminium framed stick curtain wall system'* would also be 0% recycled, as it is very likely they would both be procured from the same sub-contractor.
  - **This contradicts the claims made in this section (4.5.5) and shows the default design preference of 0% recycled content, and a life expectancy of 30, ie not the 60 years now claimed.**
- **(4.5.5)** also states *'As the building is scheduled for construction several years from now, it is expected that further advancements in low-carbon materials and facade technologies will become available. These will be reviewed and incorporated where appropriate to enhance sustainability outcomes.'* This is considered meaningless and irrelevant as it makes no actual commitment. The submission should not be judged by these claims but by what is in the actual planning submission, as in: *'0% recycled aluminium'* and a replacement cycle given as 30 years.

## 2.9. (4.6 Carbon Reduction strategies for MEP equipment and refrigerant selection)

In this section it states: *'The applicant notes City of London normally require a post completion RIBA Stage 6 WLC Assessment by condition. However, it is*

acknowledged that that CoL also wish to apply a condition to update the WLC A.....'. The questions that arise from this are:

- The building is due for completion many years hence. How will the current assessment using a unique mixture of RICS 1<sup>st</sup> and 2<sup>nd</sup> edition methodologies and partial contingencies compare with the future assessments that will inevitably be solely RICS 2<sup>nd</sup> edition based?
- **This is completely unclear and sets up a situation where carbon performance post completion cannot be compared to the submission assessment (or to other buildings). Why therefore is the applicant not now required to provide a corrected WLC assessment based solely on RICS 2<sup>nd</sup> edition?**

2.10. (5.3 – Reuse of deconstructed elements from 50 Liverpool Street)

- This section purports to offer a range of circular economic possibilities for the works at Liverpool Street Station. However as with item 2.8 above, none of these are firm commitments or guaranteed, for example:
  - *The steel frame construction of the OSD offers the opportunity to source donor steel from existing buildings in the Network Rail portfolio....'*
  - *'At present there is intent for the existing yellow London stock bricks to be reclaimed and reused .....where feasible.*
  - *'The Outline Construction Logistics Plan (AECOM March 2025) further specifies that facade demolition arisings may be used to back fill the existing basement level gym and toilets located in this zone if suitable.*
- These statements are not commitments per se and provide no guarantees. It is very likely that under the pressure of 'cost' and 'programme' that most if not all of the proposals in (5.3) will be abandoned. What is needed is a firm commitment in terms of percentages or quantities that will be guaranteed to be recycled.
- The last of the above statements '....may be used to back fill the existing basement level gym....' is not what would generally be considered an

example of circularity as this is a clear example of downcycling. There is the suggestion that a feasibility will be undertaken on closed loop recycling, however, again this does not commit the applicant to anything other than a study.

2.11. **(5.4 – Integration into design and construction)**

- It is important to note that many of the existing elements used in 50 Liverpool Street derive their value from their location within the existing building fabric as much as from their carbon value. Just committing to reuse is not necessarily sufficient.
- This section provides a range of actions that appear to support circularity, however, again, these statements include sufficient ‘wobble room’ to enable the commitments to be abandoned when they are deemed to be inadequate for some reason by the design team.
- If the applicant was serious about these suggestions, work on site would have been done to verify these commitments and for them to be included within the application.

2.12. **(5.5 Reused and recycled content targets)**

This section states: *‘Various heritage elements from the existing station are proposed to be reused within the new station development. This includes architectural relics proposed to be returned to the site from storage, metalwork and decorative ironwork including elements of the existing trainshed roof, and where feasible repurposing of steelwork within the interiors of the station and OSD or rooftop garden’.*

- This statement misses the point that such ‘heritage elements’ derive their value from the heritage context in which they sit. It may be technically possible to relocate elements within the ‘rooftop garden’ but this destroys their heritage value to the extent that they become decorative props.
- It is stated that: *‘Network Rail has identified schemes within its real estate development portfolio that **may** act as material donors, including structures and*

station fit-out materials such as carpet tiles, suspended ceilings, and sanitaryware'.

- 'May act as material donors' This again, is not a commitment.
- It is further highly unlikely that second hand materials such as 'carpet tiles, suspended ceilings, and sanitaryware' would be properly considered for reuse in a new building of this type.
- The carbon value of the items listed are effectively cosmetic in relation to the massive carbon impacts resulting from the overall design of this building.

#### 2.13. (5.6 - Facade Design)

This facade is designed as a fully glazed system. The following is stated:

- 'Coatings and treatments will be applied to achieve necessary levels of thermal and solar performance. Solar control glazing is proposed for single skin facades to mitigate solar gains'.
  - The next sentence states the following: 'The Circular Economy Statement acknowledges potential constraints to recycling of coated or treated glass.'
  - These two statements are in direct conflict and undermine claims of 'circularity'. Future engagement with suppliers is mentioned in the hope that somehow this problem will be mitigated.
- This in a nutshell summarizes the essential problem with the design of the OSD. The OSD is not designed from the outset to meet CoL low carbon, sustainable policies. It is a standard commercial office design of the type you might expect in the latter decades of the 20<sup>th</sup> Century, but with various gestures towards sustainability and low carbon design.

#### 2.14. (5.8 – End of life strategy for steelwork)

This section lists a range of measures that are intended to show that the design of the steelwork will facilitate recycling. These are all generally standard measures, and do not provide any additional or special measures.

2.15. **(6.2.1 Facade design, performance and optimisation).** This is a justification for an all glass facade, using various different configurations behind the external skin.

- The all glass solution chosen has a life expectancy of 30 years as stated in the GLA WLC analysis included in the submission.
- The design team acknowledge that *'Alternative façade materials with lower embodied carbon, such as modern terracotta or stone cladding, were considered during the design process. However, these were deemed less appropriate in their context'*. It is clearly acknowledged here that the facade is not a low carbon design.
- It has already been acknowledged by the designers (see 2.13 above) that *'The Circular Economy Statement acknowledges potential constraints to recycling of coated or treated glass.'* i.e. the glass proposed for this facade. The designers have therefore selected a facade design solution that:
  - Is short life, as stated in the submission as being '30 years'.
  - Acknowledges avoidable problems with future recyclability.
  - Is accepted by the design team as not being the lowest carbon option.
- **The OSD facade cannot therefore be described as 'best in class', or 'exemplary' or exceeding 'the standards previously classified as Grade A'. It does not therefore comply with City of London Policies as identified in City of London's 'City Plan 2040' – Draft April 2024, and should be rejected.**

2.16. **(6.2.4 – Low and zero carbon technologies)** This section states: *'Innovative façade integrated PV panels were considered, but their inclusion would have impacted the aesthetic integrity of the design. Additionally, the energy generated by a small area of façade-integrated PV would be limited due to restricted solar exposure and it would not significantly contribute to the overall carbon savings'.*

- This is a self-defeating statement, as the solar PV area shown in Figure 11 in the addendum would appear to be significantly less than a facade integrated system, therefore contributing even less to the overall carbon savings.

2.17. **(6.2.5 – Minimising energy costs to tenants)** This section states that: 'The design team will undertake a NABERS assessment to predict the operational energy use. This can be used to inform the tenants about likely running costs.'

- The obvious question is: Why has this not been done for inclusion within the submission?



# **Liverpool Street Station**

Planning Submission Ref: 25/00494/FULEIA

## **Embodied Carbon Assessment**

*on behalf of*

### **The LISSCA Campaign: Save Liverpool Street Station**

**23 August 2025**

**Contents:**

1. Executive Summary
2. Author Credentials
3. Flawed Carbon Assessment Methodology
4. Comparisons against Benchmarks
5. Optioneering: Structure and Facade
6. Circular Economy
7. Demolition
8. Policy Failures

# 1. Executive Summary

- 1.1. The objective of this report is to examine and comment on the carbon emission impacts of the planning submission: 25/00494/FULEIA, and in particular the Over Station Development (OSD) and the substantial resulting demolition.
- 1.2. The submission fails to meet a significant number of UK, GLA and City of London carbon emission related environmental policies for new office development and **should be rejected** on this basis. (See 8.1, 8.2, 8.3, and 8.4 etc below).
- 1.3. The assessment methodology used to produce the assessment is **flawed** as it is based on the now redundant 1<sup>st</sup> Edition (2017) with only partial use of its replacement the 2<sup>nd</sup> Edition (2023). (see para 3 below)
- 1.4. This flawed assessment therefore gives potentially **misleading conclusions** which are likely to be lower than if the 2<sup>nd</sup> edition was exclusively used. (See paras 3, and 4.4 below).
- 1.5. The submission schemes OSD has an **inefficient layout** with a sub-optimum wall to floor ratio (see paras 5.5 and 8.3 paras; '4' and '7')
- 1.6. The OSD facade design has only a 30 year life which is **inefficient in terms of embodied carbon, life cycle and resources**. (see 8.3; para '3')
- 1.7. The submission **fails to meet current sustainability and energy efficiency standards**, let alone those likely to be in place on completion in 2036. (see 8.3 para; '4' etc)
- 1.8. The submission for the OSD therefore **fails to meet office development of the highest quality** requirements as defined in Strategic Policy S4 (see p18/19 below)
- 1.9. The OSD performs poorly against UK (2050) and City of London (2040) Net Zero targets and will therefore **potentially be obsolete on completion**. (see 4.2; p7, 5.6, 8.1, 8.2, 8.4 para; '1.4' below)
- 1.10. The submission **demolishes useable fabric** without examining retrofitting options for 50 Liverpool Street in any detail. (8.4 para '1.4', Policy OF1 p19 below, Strategic Policy S8 para '1', p20 etc. below)

- 1.11. As these failures do not meet the City's stated requirements for 'exemplary' design (City Plan 2040 – para 1.4, p10, Strategic Policy S4 p18/19 below), the submission **should be rejected** on these bases.

## 2. Author Credentials:

This report is by Targeting Zero llp. The report author, Simon Sturgis AADip RIBA, has the following credentials with respect to carbon assessment in relation to this project:

- Lead Author of the RICS Professional Standard 1<sup>st</sup> Edition – 2017
- Lead Author of the RICS Professional Standard 2nd Edition – 2023
- Co-Author of GLA London Plan Whole Life Carbon Policy SI2 – 2022
- Special Advisor to Environmental Audit Select Committee 2021/2022 on whole life carbon.
- Advisor on EU Carbon Emissions in Construction Standard EN15978
- Advisor to MHCLG and other Govt Departments
- Practical experience on many live projects re Carbon Reduction.
- Advisor to UKGBC, LETI, RIBA, RICS on Carbon reduction.

## 3. Flawed Carbon Assessment Methodology

The Submission Document '*GLA Stage 2-3 Whole Life Carbon Assessment*', states in relation to the use of the RICS Whole Life Carbon Assessment Methodology, the following:

- Para 3.2.5: RICS Professional Statement (PS) (1<sup>st</sup> and 2<sup>nd</sup> Editions): *"This study was primarily undertaken in accordance with the **1st edition** of RICS PS to ensure robustness and consistency with comparisons to the GLA benchmarks"*
- Para 3.7.10: *"Material end of life scenarios are applied in accordance with the RICS PS **2nd Edition** business-as-usual approach".*
- **Comment:** The RICSPS 2<sup>nd</sup> Edition has been available since September 2023 and therefore should be used in its entirety as it replaces the 1<sup>st</sup> Edition which is now out of date. This 'pick and mix' approach to these Standards would appear to be designed to produce the lowest carbon emissions figures for this proposal.

- **Comment:** The RICSPS 2<sup>nd</sup> Edition has a more thorough approach to capturing all building related carbon emissions, and for that reason assessments using the 2<sup>nd</sup> Edition tend to be circa 10% higher than assessments using the 1<sup>st</sup> Edition. Correct use of the 2<sup>nd</sup> Edition would therefore have increased the assessment figures by approximately this percentage.
- **Comment:** The RICSPS 2<sup>nd</sup> Edition requires assessments to include a contingency percentage to take account of the inadequacies of material and quantities data at RIBA Stages 2-3, in the expectation that reported figures will increase between Stages 2-3 and Practical Completion. Although some contingency appears to have been added to primary structure, this is a somewhat random % and is not based fully on the current RICSPS approach. This lack of contingency therefore in effect reduces the reported figures giving a potentially optimistic impression for this project stage. The total contingency applied to a project varies depending on project stage and quality of data but could be in the region of 15% for this project. There can be some overlap between this figure and the +/-10% mentioned above, but it is not possible to judge this without a detailed review of the assessment data. Therefore, it is not unreasonable to assume that in total the underestimate could be in the region of 15%-25%.
- **Comment:** The justification that a 1<sup>st</sup> Edition approach was used to “*to ensure robustness and consistency with comparisons to the GLA benchmarks*” is not a solid justification for avoiding using the latest methodology. The GLA figures are ‘benchmarks’, not targets or limits, and are therefore for guidance only. A possible conclusion is that adherence to the 1<sup>st</sup> Edition was to avoid the uplifts described in the above comments.
- **Conclusion:** Therefore, the figures produced in the assessment are likely to appear artificially low as they do not align with current standards or best practice. **All carbon assessment figures should therefore be considered invalid, and the submission should be rejected on this basis.**

## 4. Comparisons against Benchmarks

- 4.1. The submission documents include comparisons with GLA benchmarks. However, there is no mention or comparison with the latest UK Standard, The Net Zero Carbon Building Standard (NZCBS), published in pilot version in September 2024,

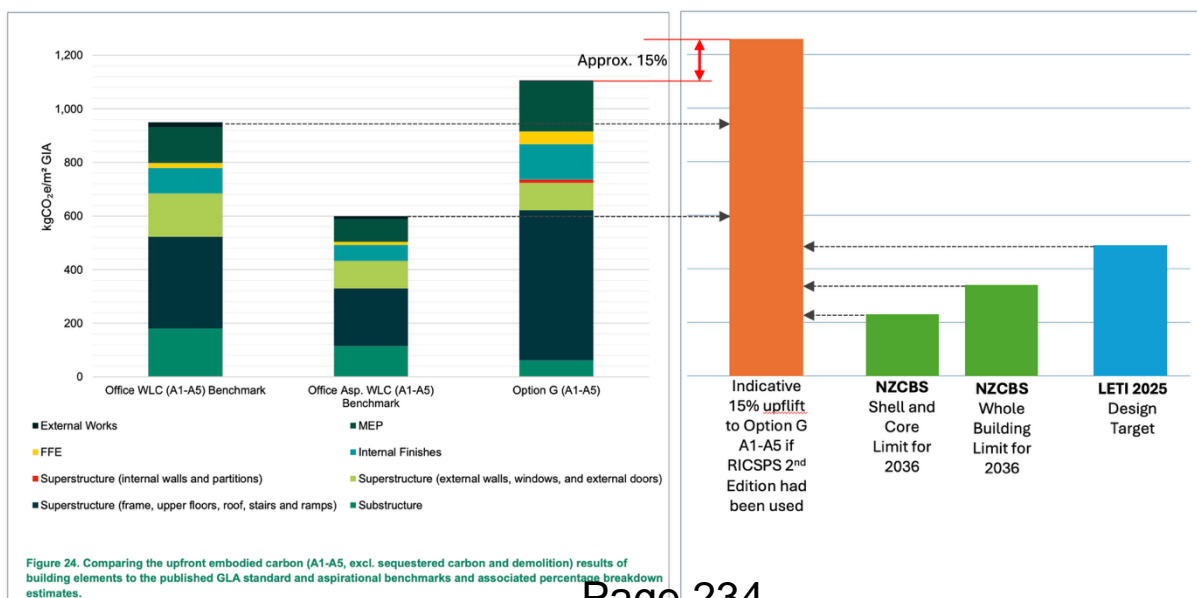
nor, for example, the LETI benchmarks, also an industry benchmark. The submission states that a post completion WLC assessment will be done (Sustainability Statement para 7.6.27, p19) so an NZCBS assessment could be undertaken and will very likely be standard practice by 2036, at practical completion. This submission for the OSD would **FAIL** against NZCBS Limits. This Report includes this comparison See 4.3 below.

4.2. This Report shows the diagrams used in the submission, but with three additions:

- An indication of what the submission figures would look like if they were adjusted as per Para 3 above.
- A comparison with LETI benchmarks.
- A comparison with NZCBS, for offices completed in 2036.

4.3. Comparison with GLA, NZCBS and LETI, benchmarks and targets/limits.

- The diagram below shows the Submission Diagram comparing the Option G, adopted scheme Upfront Carbon A1-A5 carbon assessment against the Standard GLA Office Benchmark, and also the Aspirational Benchmark.
- The **Orange** column shows 'Option G' with an indicative (and possibly conservative) corrected 15% uplift reflecting what the assessment is likely to look like had RICSPS 2<sup>nd</sup> Edition been correctly used for the assessment.
- The two **Green** columns show respectively the NZCBS 'shell and core limit' and the 'whole building limit' for offices completed in 2036. (It is the shell and core limit that will apply).
- The **Blue** column shows the LETI 2025 Design Target.
- The **black arrows** show the shortfall between the orange column, and the respective benchmarks, limits and targets.

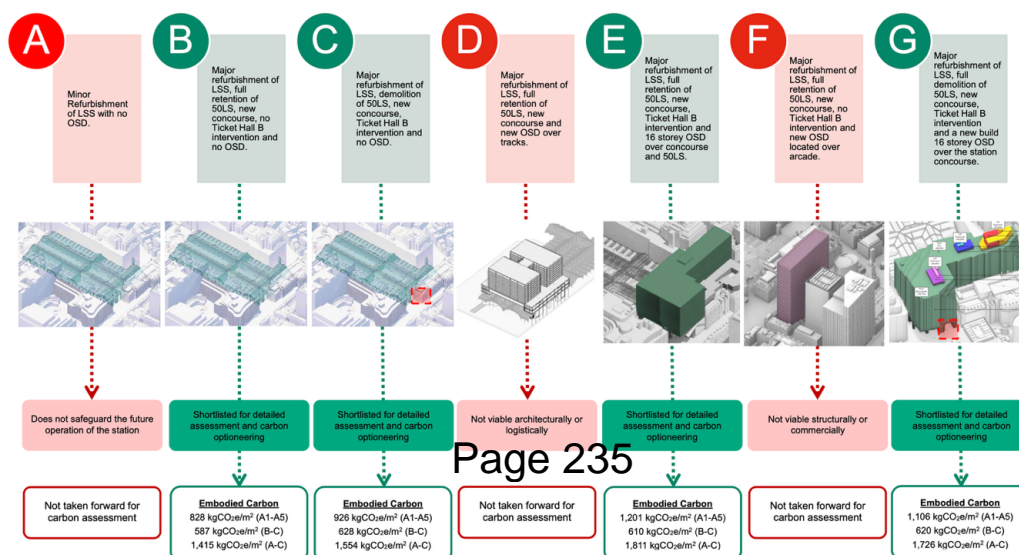


- **Conclusion:** This combined diagram shows the likely uplift from using RICSPS 2<sup>nd</sup> Edition rather than the now redundant 1<sup>st</sup> Edition. It shows how much this building will miss the GLA 'Office WLC (A1-A5) Benchmark' (by approx. 33%), and the 'Office Asp. WLC (A1-A5) Benchmark' (over double).
- **Conclusion:** This combined diagram also shows that the orange, corrected, Option G column is nowhere near meeting industry best practice limits/targets illustrated by the green and blue columns. It is important to note that the NZCBS (Green) limits are designed to meet the government's required trajectory to net zero.
- **Conclusion:** In essence this proposal shows minimal ambition or intention to meet current best practice in terms of low carbon construction, or the UK's trajectory to Net Zero. Due for completion in 2036, only 14 years short of 2050, this building is has the potential to be commercially redundant on completion. Occupier and investor awareness of ESG issues is increasing, and therefore buildings such as this which have not evolved meaningfully past 20<sup>th</sup> Century Office design are highly likely to be downgraded in value. (See also paras 5.4 and 5.5 below).

## 5. Optioneering: Structure and Facade:

5.1. Strategic options were considered as described in 5.2 below. However, only a single, high carbon, structural option was considered (see 5.3, last paragraph below) and only a single, short life, cladding option was considered (see 5.4 and 5.5). Therefore the 'Optioneering' process did not look at options for these significant elements of construction.

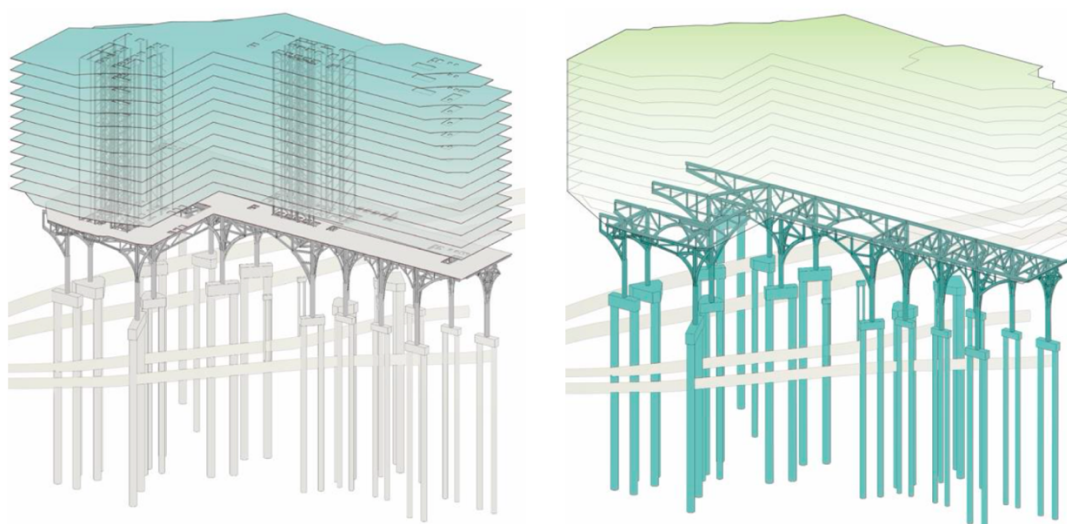
5.2. The 'Carbon Optioneering Report P02' shows that initially 7 Options A-G were considered. See diagram below from 'Carbon Optioneering Part 1 p6:



This rejects Options A, D, F in favour of a more detailed examination of Options B, C, E, G. Based on the applicant's assumptions on viability, and the need to pay for the station improvements, this in effect leaves only options E and G in contention. Options B and C appear to be retained really only to give a degree of validity to the optioneering as the clear requirement was to build a new office building in the location shown. This is a very restricted range of options, excluding other structural possibilities, see 5.3 below.

### 5.3. Structural Efficiency:

- In the Submission Document 'GLA Stage 2-3 Whole Life Carbon Assessment' para 1.6.3. there is the statement *"The upfront (A1-A5) carbon emissions of the transfer structure alone accounts for around 25% of 1,110 kgCO<sub>2</sub>e/m<sup>2</sup>. Without the transfer structure, the OSD may perform more favourably with the GLA's A1-A5 benchmark"*. This observation raises the question as to why a more imaginative solution wasn't examined that does not require a large transfer structure, which would have removed the need for this type of high carbon design approach, and potentially help reduce construction costs. The 'Carbon Optioneering Report P02' Option G p13 Figures 18 and 19, show the massive high carbon transfer structure that is required below.

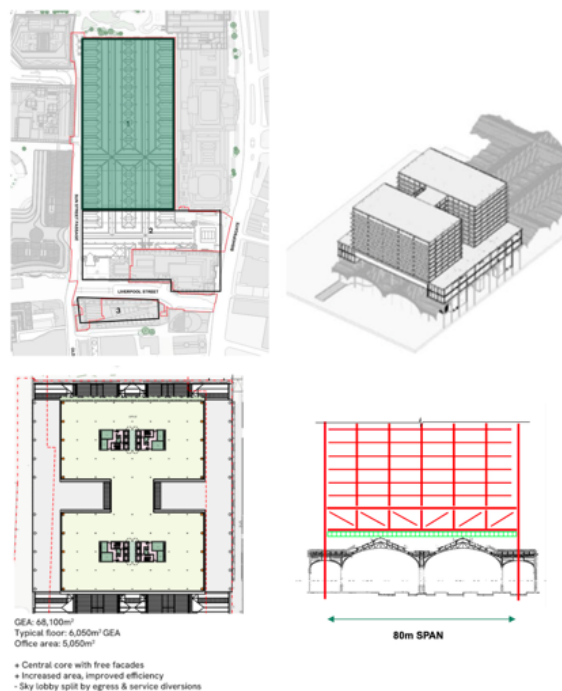


Figures 18 and 19. 3D model showing proposed transfer and stability structure over station concourse and OSD cores.

- The structural solutions for both Options and E and G are essentially the same and involve a significant transfer structure over the station concourse to be achieved. It has already been stated in the submission that this design approach was exceptionally high carbon adding some '25%' to the assessment figures (see



above para). The obvious solution to this problem is already evidenced on site with Exchange House which spans the tracks of Liverpool Street Station with a parabolic (tension) structure. This is potentially a much lower carbon approach which would very likely have avoided the '25%' additional carbon cost necessitated by the transfer structure. This would have brought the rejected Option D, described in the above diagram (5.2 above) as '*Not viable architecturally or logistically*' back into contention, as Exchange House has historically managed to solve both the architectural and logistical issues from building over the railway tracks at this station.



Figures 30, 31 and 32. Extract from acme options development report (refer to Appendix D)

Figure 33. AECOM mark up of indicative superstructure scheme principle for heritage train shed track bridging.

Rejected Option D, "Carbon Optioneering Part 1 P02", p27, showing high carbon transfer structure.

- Cross Laminated Timber (CLT) as a low carbon structural solution: CLT structural floors would seem to be a potential solution for this project solving two major issues, structural mass and carbon emissions. A basic structural problem with the submission is the weight bearing down on the transfer structure which would have been mitigated using CLT. In addition, CLT structural slabs would have not only have had a reduced carbon emissions impact from construction but could also have had a significant sequestration benefit. The reason given for this omission is '*Insurance*' concerns. However, Landsec's Timber Square Building in

SE1, and Bywater Properties' Paradise Building in Vauxhall are two examples of London office buildings that use significant amounts of primary structural timber, i.e. CLT, and this therefore suggests that this lighter, more carbon efficient approach is possible with the right advice.

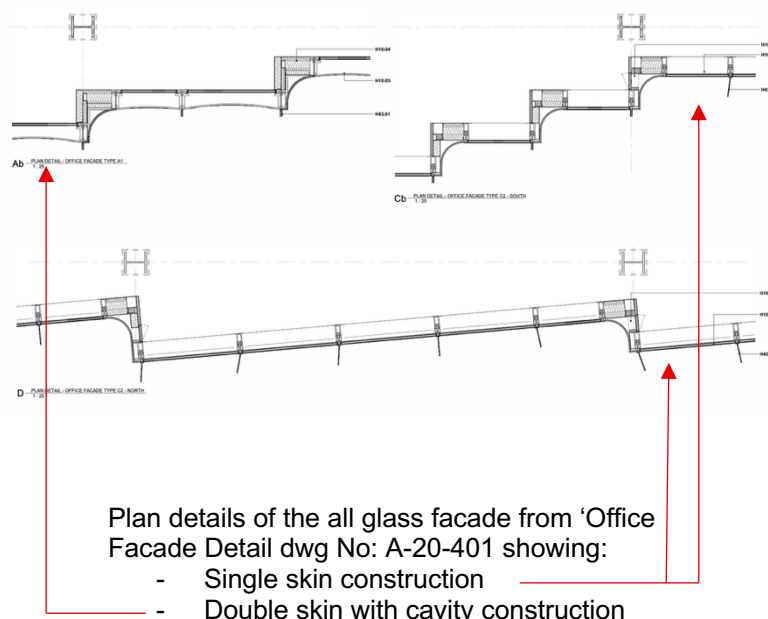
#### 5.4. Facade Design and Material Efficiency:

- The cladding for this building is a fully glazed unitised cladding system, no other design approach was considered in the Carbon Optioneering Report P02.

Plate 4-15: OSD Façade Articulation Detail



Illustration of the fully glazed facade from the 'Environmental Statement' para 4.8.6. p4-14.

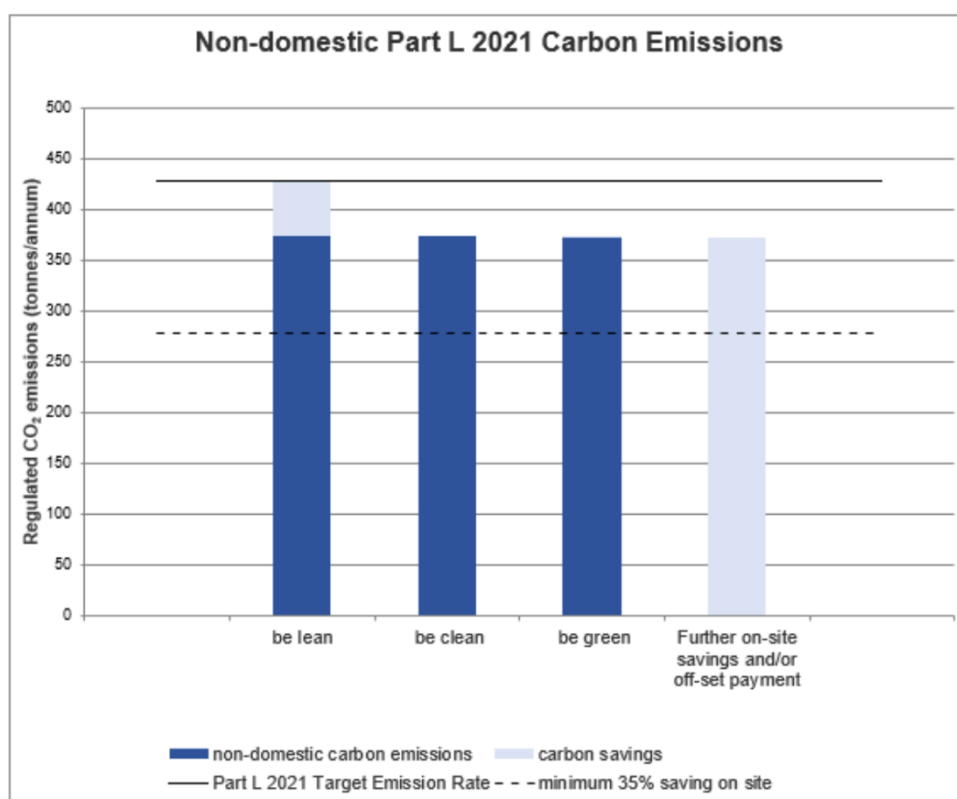


- This fully glazed facade has, according to the 'GLA WLC Template' included with the submission, a life expectancy of '30 years'. This means that as designed, it will need continual replacement roughly every 30 years with the resulting ongoing embodied carbon costs (greater in the double skin areas). 40 Liverpool Street was completed in 1884 and has had the same facade over the 140 years since then (plus maintenance, repair etc). Over a similar 140 year period the proposed scheme would therefore have to have its facade replaced a total of nearly 5 times (5<sup>th</sup> time at 150 years), with the associated resource use, carbon emissions, waste and local disruption.

**5.5. Facade and Energy Efficiency:** The submitted 'Energy Statement' examines the facade in some detail, and makes the following statement:

- “The Proposed Development achieves carbon savings of 12.5% from the “Be Lean” stage of the energy hierarchy and overall carbon savings of 13.2%. Although this falls below the targets of 15% and 35% for “Be Lean” and overall on-site savings respectively the proposed energy strategy has been optimised to maximise the reduction in operational regulated energy consumption and associated carbon emissions in line with the GLA energy hierarchy.”*
- This statement, astonishingly, shows that the submission for the OSD fully accepts that this building is substandard. The extract below from the ‘Energy Statement’, para 11.8.4, illustrates not only this failure but also the suggestion of an offset payment of £1,060,782 in mitigation. This offset payment was, it is assumed, considered a cheaper route to achieving a ‘zero carbon’ solution than designing a building that actually performs in accordance with best practice and current policies and targets (e.g. GLA ‘Be Lean’). This shows that this is not an ‘exemplary’ building (see 8.4 below).

11.8.4. The predicted shortfall in savings relative to the ‘zero carbon’ 100% regulated emission saving target is 372.2tCO<sub>2</sub>/year, which is a cumulative total over 30 years of 11,166 tCO<sub>2</sub> that is expected to be addressed through offsetting. This results in an estimated carbon offset payment of approximately £1,060,782 subject to agreement with CoL. This is summarised in Figure 22 and Table 57.



**Figure 22: Proposed energy strategy: Energy Hierarchy CO<sub>2</sub> baseline, emissions and savings – non-domestic buildings**

- The typical floor plan shown below (Submission ‘Energy Statement – Section 5: Energy Demand Reduction, para 5.1.3’) shows that the fully glazed facade is also inefficient in terms of wall to floor ratio. Apart from the inherently sub-optimum shape, the continual stepping of the facade adds to the overall surface area of the building, increasing material, i.e. embodied carbon costs, and is also consequently unhelpful to heat loss/gain. A more efficiently designed facade from both material and shape perspectives would contribute to greater facade longevity and improved operational performance. This floor plan cannot therefore be said to be ‘exemplary’ (see para 8.4 below, ref City Plan 2040 para 1.4)

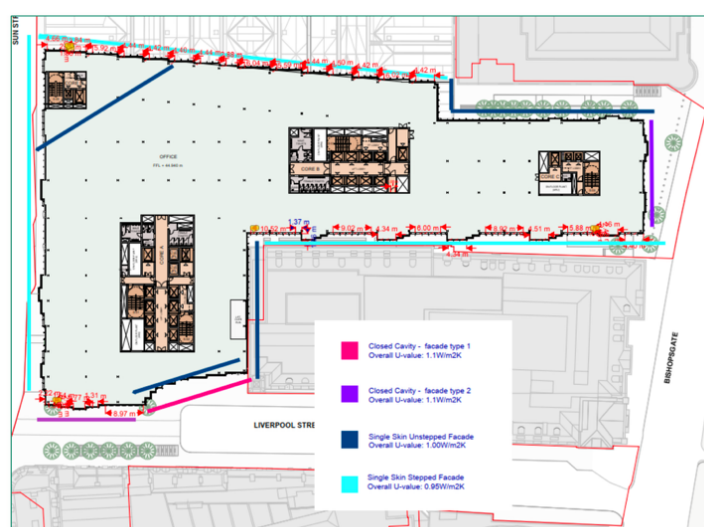


Figure 12: Plan view of 7th floor showing facade types

Key issues:

- Inefficient floorplate
- Poor wall to floor ratio
- Inefficient stepped facade
- Short life, fully glazed facade

Typical floor plan: from 'Energy Statement – Section 5: Energy Demand Reduction, para 5.1.3'

5.6. **Comment:** This facade solution is not “An optimised facade responding to the external environment, with external shading” (LSSt Sustainability Statement March 2025 para 1.3.2.2) as claimed, and is as explained above, not a sustainable design approach in both embodied carbon and energy use terms. This is particularly concerning in the face of a climate crisis and the government’s legally binding target of achieving Net Zero by 2050, and improved energy efficiency. The City’s stated objective is to achieve Net Zero by 2040. The first facade replacement would be in about 2066, i.e. 16 years after 2050, and 26 years after 2040. It is very likely that given the current direction of continually tightening environmental legislation, and parallel ESG concerns by occupiers, that double glazed, all glass facades will no longer be possible for regulatory or commercial reasons. Will the structural solution be able to support a different, possibly heavier, long life facade solution when the building is vacated and refurbished in 2066, 2096 etc? **This building is therefore likely to be obsolete on completion.**

## 6. Circular Economy:

The key commitments of the Applicant with respect to demolition of existing fabric are:

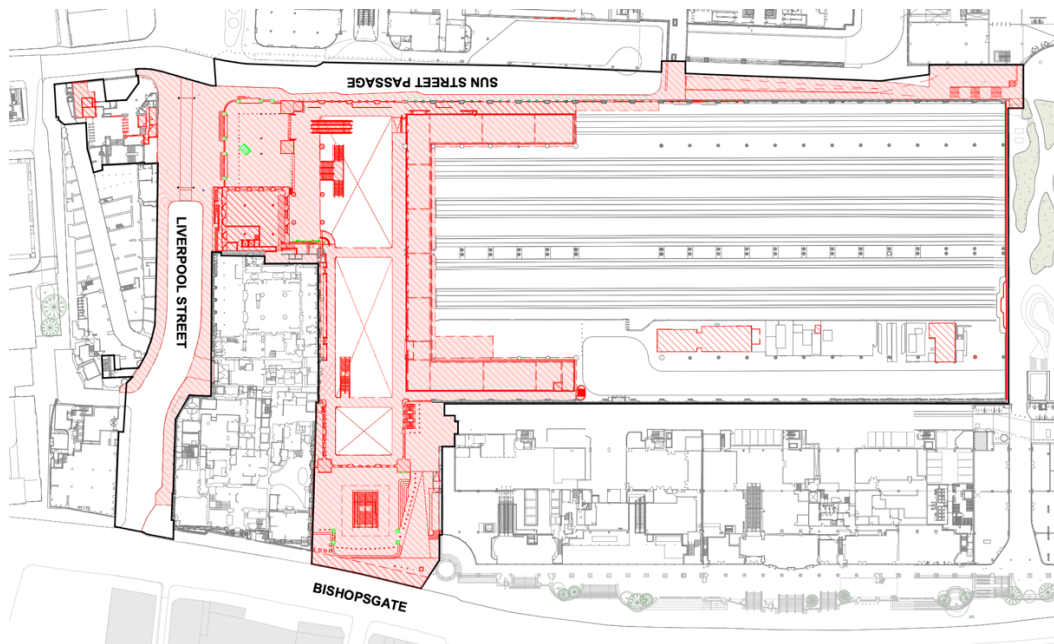
- *“To target diversion of a minimum of **95%** of non-hazardous demolition waste from landfill for reuse, recycling, or recovery (excluding energy recovery in line with the London Plan definitions);*
- *To target diversion of a minimum of **95%** of inert excavation waste generated from the Proposed Development from landfill for beneficial use;*
- *To target diversion of a minimum of **95%** of construction waste generated by the Proposed Development from landfill for reuse, recycling, or recovery (excluding energy recovery in line with the London Plan definitions).”*
- These are all standard industry commitments that are offered by most contractors and do not represent any additionally sustainable approach. The inclusion of ‘recycling’ means that the waste can be used at the lowest level, e.g. as ballast under new roads, and not at a higher level as in ‘reuse’ where the component has a new life matching its original use. It would have been helpful for example to have had the ‘95%’ broken down into more specific commitments.

## 7. Demolition:

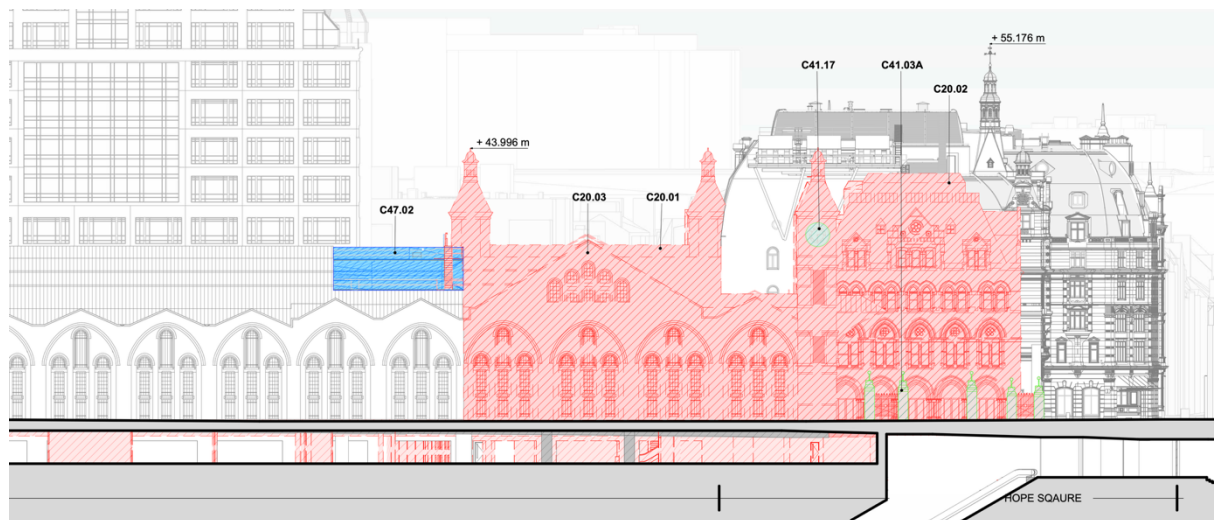
7.1. This report is not concerned with the heritage issues around the extensive demolitions proposed but is concerned about the demolition and disposal of usable fabric from the perspective of a waste of resources.

7.2. The proposed demolitions are extensive and predominantly involves fabric that has not reached the end of its useful life. Fabric and buildings subject to demolition are therefore entirely capable of retention and reuse. The concerns with respect to demolition are specifically associated with the buildings that face onto Liverpool Street and Bishopsgate.

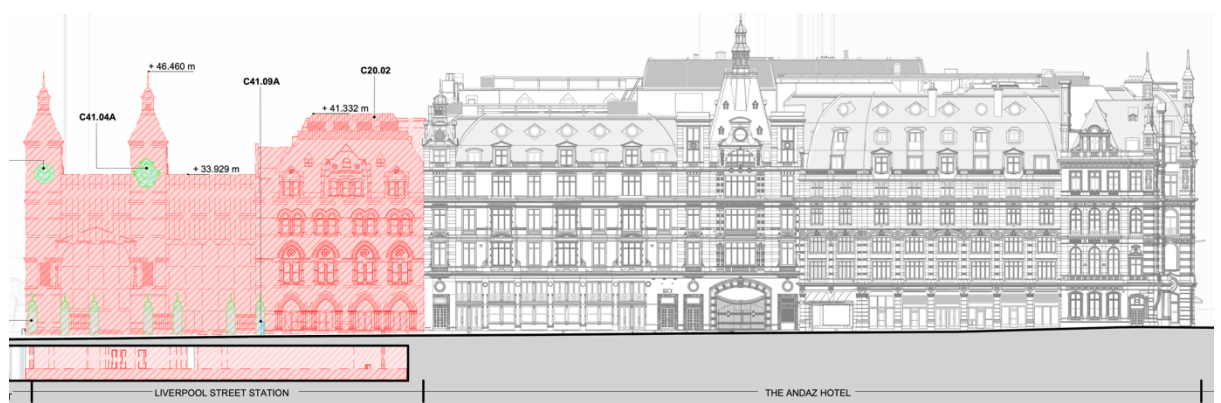




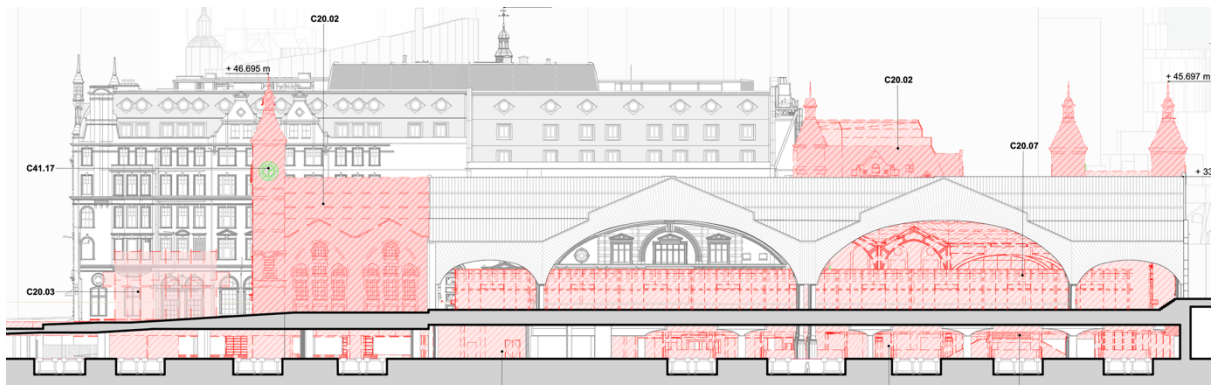
Demolition Site Plan – Extract from Dwg: A-04-200



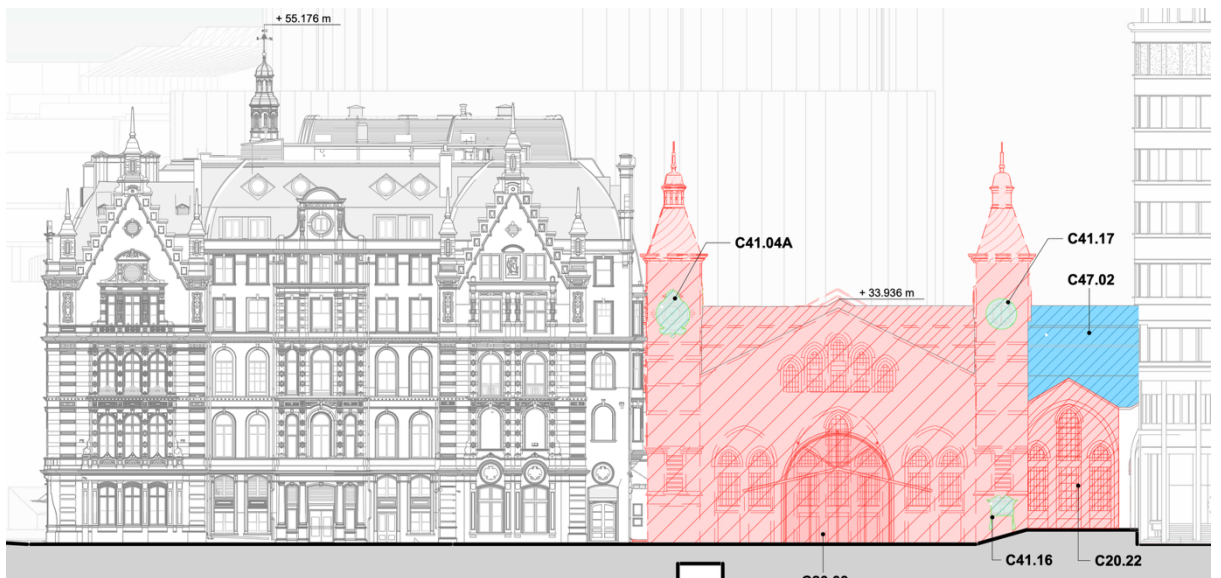
Demolition West Elevation – Extract from Dwg: A-06-403



Demolition South Elevation – Extract from Dwg: A-06-402



Demolition North Elevation – Extract from Dwg: A-06-400



Demolition East Elevation – Extract from Dwg: A-06-401

- The above are extracts from the submission documents and illustrate the significant amount of demolition of entirely useable structure and fabric to achieve this submission. The proposed scale of demolition represents a huge and unnecessary waste of resources. The issue of concern from a carbon and resources perspective is not the reorganisation of the station concourse areas, (assuming optimum resource and carbon efficiency is undertaken) but the demolition of useable assets that have not reached their end of their useful life and once retrofitted are capable of continued beneficial use.

## 8. Policy Failures:

There are many relevant National and Local Environmental and Sustainability Policies that are relevant to this submission. The following are a list of those policies that this submission fails to meet.

**8.1. UK Trajectory to Net Zero:** At a UK National level the government has legislated for the economy to achieve net zero by 2050. The City of London has brought this forward to 2040. There is detailed policy at all levels to ensure that these commitments should be met. To achieve this means that office design today is not 'business as usual', and indeed that significant changes are required to office design in 2025 to meet these commitments and policies. This submission (OSD) is not noticeably different to buildings designed in the last decades of the 20<sup>th</sup> Century, showing no significant evidence of meeting current policies as is illustrated below. The overall whole life carbon figure for the submission is 2,200kgCO<sub>2</sub>e/m<sup>2</sup> GIA, this is approximately what you would expect of an equivalent office building built in circa 1990. **The submission should therefore be rejected.**

### 8.2. National Planning Policy Framework (NPPF):

- Para 161: ***"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure"***
  - This submission does not meet the requirements of those areas highlighted in bold above. (See paras 4.3, 5.4, 5.5, 5.6 above)
- Para 164: ***"b) help to reduce greenhouse gas emissions,....."***. And Para 8 c) ***"an environmental objective.....including moving to a low carbon economy"***
  - This submission does not meet these requirements, as it fails to meet GLA, LETI and NZCBS benchmarks and limits for greenhouse gas emissions, it cannot therefore be said to be 'moving to a low carbon economy'. (See 4.3 above)



8.3. **GLA London Plan Policy SI2 Minimising greenhouse gas emissions.** The submission **FAILS** to meet a number of GLA whole life carbon principles:

- **Table 2.1 WLC Principles:**

- **“1. Reuse and Retrofit:** *Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option”.*
  - Existing reusable fabric (e.g. 50 Liverpool Street) is demolished rather than retrofitted. (see paras 5.2, 7.2 last paragraph above)
- **“3. Material selection:** *Appropriate low-carbon material choices are key to carbon reduction. Ensuring that materials are selected with consideration of the planned life expectancy of the building reduces waste, the need for replacements, and the in-use costs”.*
  - The material choices are standard for office construction for several decades and are not specifically low carbon. CLT was rejected (see para 5.3; last paragraph, above)
- **“4. Minimise operational energy use:** *A ‘fabric first’ approach should be prioritised to minimise the heating and cooling requirement of a building and the associated systems.”*
  - The submission performs poorly and fails to meet appropriate standards. The submission **FAILS** to achieve the 15% carbon savings from the ‘Be Lean’ stage of the energy hierarchy (achieving just 12.5%) and **FAILS** to achieve the 35% for overall onsite savings (achieving just 13.2%) (Sustainability Statement para 5.3.11). (See para 5.5)
- **“6. Disassembly and reuse:** *Designing for future disassembly ensures that products do not become future waste, and that they maintain their environmental and economic value”.*
  - There is no significant evidence that this has been given priority.
- **“7. Building shape and form:** *Compact efficient shapes help minimise both operational and embodied carbon emissions from repair and replacement for a given floor area. This leads to a more efficient building overall, resulting in lower construction and in-use costs”.*

- The submission starts with a high wall to floor ratio due to its basic shape and then adds to the problem by introducing a highly stepped facade. (see 5.5 last paragraph)
- **“16. Circular economy:** *The circular economy principle focuses on a more efficient use of materials which in turn leads to financial efficiency. Optimising recycled content, reuse and retrofit of existing buildings; and designing new buildings for easy disassembly, reuse and retrofit, and recycling as equivalent components for future reuse are essential”.*
- There is very little evidence that this submission has been designed for future circularity.

#### 8.4. City of London’s ‘City Plan 2040’ – Draft April 2024.

- **Strategic Priorities:**
  - **Para 1.2: Economic objective:** *“Ensuring new and refurbished office space meets the environmental, social and governance (ESG) priorities of occupiers and their workforces”*
  - **Para 1.4: Environmental Objective:** *“Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a ‘retrofit first’ approach to development”*
  - **Para 1.4: Environmental Objective:** *“Ensuring exemplary design of development”*
  - This submission **fails** to meet any of these Strategic Priorities, as it:
    - **Fails** to meet current environmental standards and best practice. (See paras 4, 5 and 6 above)
    - **Fails** to meet the UK trajectory to net zero by 2050, and therefore also the City’s trajectory to net zero by 2040. (See para 5.6 above)
    - **Fails** to exhibit “*exemplary design*” as it does not meet the above criteria and could well be commercially redundant by 2036. (See paras 4, 5 and 6 above)

- **Strategic Policy S4: Offices**, states:
  - Para 5.1.0. *“The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy”*
    - i.e. There is a higher than average standard expectation for office space in the City of London.
  - Para 5.1.3 states: *“Recent years have also seen strong demand for ‘best in class’ or Grade A+ floorspace. Many businesses are placing greater value on high quality sustainable and well-being credentials,”*.
    - i.e. Sustainability and commercial value are directly linked.
  - *“The City Corporation will facilitate significant growth in **office development of the highest quality** to meet projected economic and employment growth”*
    - This submission is not an example of office space ‘of the highest quality’ as it exhibits poor floor configuration, poor environmental performance and **fails** to meet basic sustainability standards” (See 4, 5 and 6 above).
  - *“Ensuring that **new floorspace is designed to be flexible to allow the transformation and adaptation of space to support new uses, different layouts and configurations.....**”*
    - Circular Economy Statement P01, para 4.3.1 Table 2 p16, under ‘Adaptability’ states: *“It is not anticipated that either the station or office development will undergo any significant change in use during their lifetime”*. This is therefore in direct conflict with Strategic Policy S4 and Sustainable Design Policy DE1, 7b.
    - It is also worth noting that the configuration and core arrangement of proposed floorplans do not lend themselves easily or efficiently to future hotel or residential use.
  - **This submission therefore fails to meet the requirements of Strategic Policy S4 and should be rejected.**

- **Policy OF1: Office Development**, states:
  - *“Office Development should*
    - *a. Prioritise the retrofitting of existing buildings*
    - *b. Be of an outstanding design and an exemplar of sustainability”*
  - The submission:
    - **Fails** to meet the first of these policies as the submission proposal demolishes 50 Liverpool Street, which could be retrofitted.
    - **Fails** to meet the second of these as the submission is not well above average in terms of sustainability, as it does not meet the basic policy requirements.
- **Strategic Policy S8: Design**, states:
  - *“Sustainable design*
    - *“1. Takes a ‘retrofit first’ approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options;”*
    - *“2. Seeks opportunities to refurbish existing buildings, improving their environmental performance;”*
    - *“3. Minimises whole life-cycle carbon and contributes towards a net zero carbon City”;*
    - *“4. Delivers world class sustainable buildings that are adaptable and informed by circular economy principles and that treat materials as a resource;”*
  - The submission:
    - **Fails** to meet items 1 and 2 as there is no detailed ‘optioneering’ for retrofitting 50 Liverpool Street.
    - **Fails** to meet item 3 as the whole life-cycle carbon emissions are above existing benchmarks (see 4.3 above)

- **Fails** to meet item 4 as the submission states: *“It is not anticipated that either the station or office development will undergo any significant change in use during their lifetime”.*
- **This submission therefore fails to meet the requirements of Strategic Policy S8 and should be rejected.**
- **Policy DE1: Sustainable Office Design**, states:
  - *“1. Development proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options”.*
  - *“3. Development proposals should minimise whole life-cycle carbon emissions”.*
  - *“4. Where new buildings are the most sustainable and suitable approach, they should deliver exemplar low carbon development and the highest environmental sustainability quality, driving forward best practice beyond standard approaches and contributing to wider sustainability improvements in the area”.*
  - *“5. Innovative design, materials, construction, and technologies should be used to deliver highest standards of environmental sustainability.”*
- The submission:
  - **Fails** to meet policy item 1 above as detailed options for retrofitting 50 Liverpool Street have not been submitted.
  - **Fails** to meet policy item 3 above as whole life carbon emissions have not been minimised. (See 4, 5 and 6 above)
  - **Fails** to meet policy item 4 above as the submission is not *“exemplar”*, is not *“best practice”* and is not *“beyond standard approaches”*. (see 4.3, 5.4, 5.5)

- **Fails** to meet policy item 5 above as the materials proposed have been standard usage in commercial office design since the 1980's, i.e. are not *"innovative"*, and do not *"deliver highest standards of environmental sustainability"*, as the submission, by its own admission, fails to meet both operational and embodied performance standards. (see 4.3, 5.4, 5.5)
- **This submission therefore fails to meet the requirements of Policy DE1 and should be rejected.**
- **NABERS rating:** Policy DE1 requires in item 8. that:
  - *"Proposals for major development, b. Commit to achieving a minimum NABERS UK rating of 5 stars."* The submission intentionally does not make this required commitment and states in the LLS Sustainability Statement March 2025:
    - Para 1.3.2.2, p1: *"**aspires** to achieve a NABERS rating of 5 star"*.
    - Para 5.1.2, p13: *"The OSD **aims** to achieve NABERS 5\*"*
    - **There is therefore no commitment to meet Policy DE1 with respect to NABERS.**
  - This contrasts with a firm commitment to achieve BREEAM 'Outstanding' for the OSD (LLS Sustainability Statement March 2025, para 13.2.1). Why a firm commitment for BREEAM and not for NABERS?

8.5. **As shown above, the submission for the OSD fails in a significant number of policy areas and should therefore be rejected.** (See Executive Summary, Item 1 page 3 for a summary of the key issues.)

Ref.: TC

18 December 2025

Kieran McCallum  
Development Division  
City of London

By e-mail: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

**Application:** 25/00494/FULEIA

**Site:** Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza London EC2M 7PY

**Proposal:** 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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.

**Theatres Trust**

22 Charing Cross Road, London WC2H 0QL

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**Chair** Dave Moutrey OBE

**CEO** Joshua McTaggart

**Trustees** Vicky Browning OBE, Anna Collins, James Dacre, Liam Evans-Ford, Stephanie Hall, Annie Hampson OBE, Tracy Ann Oberman, Lucy Osborne, Saratha Rajeswaran, Truda Spruyt, Michèle Taylor MBE, [info@theatrestrust.org.uk](mailto:info@theatrestrust.org.uk)

## **Remit:**

Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'.

## **Comment:**

Thank you for re-consulting Theatres Trust following the submission of additional plans and documents.

In our previous comments of June 2025 we noted the 'auditorium' at level 18 was undefined at this stage with limited detail on design and function. That largely remains the case, and so our previous observations stand in that if it is to be more of a theatre/performance space we would encourage further engagement with Theatres Trust to help ensure a viable and sustainable proposition.

We otherwise continue to make no comment on the wider aspects of this scheme, including its scale, design or mix of uses.

Please contact us if we may be of further assistance or should you wish to discuss these comments in further detail.



Tom Clarke MRTPI

National Planning Manager

## **Theatres Trust**

22 Charing Cross Road, London WC2H 0QL

**Telephone** 020 7836 8591 **Email** [info@theatrestrust.org.uk](mailto:info@theatrestrust.org.uk) **Website** [theatrestrust.org.uk](http://theatrestrust.org.uk)

**X** @TheatresTrust **Facebook** @theatres.trust **Instagram** @TheatresTrust

**Chair** Dave Moutrey OBE

**CEO** Joshua McTaggart

**Trustees** Vicky Browning OBE, Anna Collins, James Dacre, Liam Evans-Ford, Stephanie Hall, Annie Hampson OBE, Tracy Ann Oberman, Lucy Osborne, Saratha Rajeswaran, Truda Spruyt, Michèle Taylor MBE, Pauline Wren



**From:** [REDACTED]  
**To:** [Liverpool Street Station](#)  
**Subject:** RE: 25/00494/FULEIA - Re-Consultation Letter  
**Date:** 19 December 2025 15:05:53  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[RE 2500494FULEIA - Planning Application - Consultation.msg](#)

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

FAO Kieran McCallum,,

**Application No:** 25/00494/FULEIA

**Site address:** Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool Street, EC2M 7QN; and 50 Liverpool Street, EC2M 7PY

**Proposal:** 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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.

Thank you for your re-consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no additional comments to make on this planning application (re-consultation) as submitted. However, our attached comments submitted in respect of the original planning application are still valid and should be taken into consideration.

**Reason:** To ensure that the development does not impact on existing London Underground/DLR transport infrastructure, in accordance with the London Plan 2021 Policy T3 and Sustainable Transport Walking and Cycling London Plan Guidance 2022.

*This response is made as a Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line*

*with their own statutory responsibilities.*

Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



---

**From:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>

**Sent:** 08 December 2025 14:41

**Cc:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>

**Subject:** 25/00494/FULEIA - Re-Consultation Letter

Dear Sir or Madam,

Please find attached a re-consultation letter pertaining to Liverpool Street Station (25/00494/FULEIA).

Reply with your comments to [LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)

Kind Regards

Planning Administration

On behalf of

Kieran McCallum

Environment Department

City of London

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This message has been scanned for malware by Forcepoint. [www.forcepoint.com](http://www.forcepoint.com)

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

Development Management  
Planning and Building Control  
Housing and Regeneration Directorate  
Tower Hamlets Town Hall  
160 Whitechapel Road  
London E1 1BJ  
[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

**Application Number:** PA/25/02135  
**Your ref:** 25/00494/FULEIA

**Enquiries to:** Rikki Weir

**Tel:**

**Email:**

24 December, 2025

Dear Kieran McCallum,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

<b>Location</b>	Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool Street, EC2M 7QN; and 50 Liverpool Street, EC2M 7PY
<b>Proposal</b>	Observation requested by City of London for: 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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated



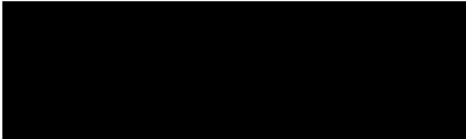
access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works (RE-CONSULTATION due to the submission of additional information)

Thank you for your letter requesting the observations of the London Borough of Tower Hamlets on the above referenced application. I would be grateful if you would take the observations set out below into consideration in determining the application:-

1. Objections raised from the letter dated 4 July 2025 still remain.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,

A large black rectangular box redacting the signature of the Director.

**Sripriya Sudhakar, Director Planning and Building Control**

# CoLAT

The City of London  
Archaeological Trust

Kieran McCullum  
Environment Department  
Corporation of London

7 January 2026

by email only

Dear Mr McCullum

**Re-consultation on proposed development of Liverpool Street station,  
25/00494/FULEIA**

Thank you for consulting CoLAT for its opinion in your letter of 8 December 2025. Our response is below and replaces a response we made some time ago.

CoLAT wishes to **object** to the proposals by Network Rail. Objections to the damaging changes to the existing buildings (in particular the Grade II listed Great Eastern Hotel and Liverpool Street Station, the Grade II\* listed concourse roof) and their surroundings (the Bishopsgate Conservation Area) have been made by many organisations and individuals, and we draw your attention to the detailed criticisms in the letters you have received from the Surveyor to St Paul's (4 July 2025), the Council for British Archaeology (4 July 2025), Historic England (14 July 2025) and the London & Middlesex Archaeological Society (LAMAS, 16 September 2025; on the page for 25/00474).

This proposal is grossly inappropriate. It has little architectural merit, and will seriously damage the existing buildings and their settings. Further, as noted in the comment from LAMAS, '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.' We also note, with approval, that the Council for British Archaeology in its response of 4 July states '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.'

CoLAT therefore urges you **to reject this application**.

yours sincerely



John Schofield  
Secretary, CoLAT

The City of London Archaeological Trust (CoLAT) was founded by the City of London and the Museum of London in 1974, to promote and assist all kinds of archaeological work in the City of London and its environs.



[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

09 January 2026  
Crossrail Ref: CRL-IP-3463 (Re-consultation)

**Transport for London**  
Crossrail Safeguarding  
5 Endeavour Square  
LONDON  
E20 1JN

Dear Kieran McCallum,

**25/00494/FULEIA : Liverpool Street Station, Liverpool Street, EC2M 7PY; Andaz Hotel, 40 Liverpool Street, EC2M 7QN; and 50 Liverpool Street, EC2M 7P**

*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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.*

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 08 December 2025, requesting the views of TfL on the above application. I confirm that this application relates to land within the limits of land subject to consultation by the Crossrail Safeguarding Direction.

**I have no comment on the application.**

If you require any further information, please contact:

[CRL\\_Safeguarding@tfl.gov.uk](mailto:CRL_Safeguarding@tfl.gov.uk)

Yours sincerely,

**Safeguarding Officer (Elizabeth line)**

TfL Infrastructure Protection Team

Floor 7 Red Zone: 5 Endeavour Square : London : E20 1JN

.....  
Note: please send, by email, all planning application consultations that are captured by the SoS Safeguarding Direction to [CRL\\_Safeguarding@tfl.gov.uk](mailto:CRL_Safeguarding@tfl.gov.uk)  
.....

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).





Historic England

Mr Kieran McCallum

Direct Dial: 0207 973 3777

City of London

PO Box 270

Our ref: P01593424

Guildhall

London

EC2P 2EJ

13 January 2026

Dear Mr McCallum

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

**LIVERPOOL STREET STATION, LIVERPOOL STREET, EC2M 7PY; ANDAZ  
HOTEL, 40 LIVERPOOL STREET, EC2M 7QN; AND 50 LIVERPOOL STREET,  
EC2M 7PY**

**Application No. 25/00494/FULEIA**

Thank you for your letter of 8 December 2025 regarding amendments on the above application for planning permission. We do not have any concerns with these amendments and our previous comments of 14 July 2025 therefore still stand.

Yours sincerely

**Claire Brady**

Team Leader, Development Advice

E-mail: [claire.brady@HistoricEngland.org.uk](mailto:claire.brady@HistoricEngland.org.uk)



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

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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



Kieran McCallum  
Corporation Of London

**Our ref:** NE/2025/138249/01-L01  
**Your ref:** 25/00494/FULEIA

[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

**Date:** 24 June 2025

Dear Kieran,

**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; 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; provision of over-station development reaching a maximum height of 97.67m aod to accommodate Class E use (commercial, service and business); and creation of an auditorium (sui generis) at level 18 with ancillary terrace; creation of a public amenity terrace (sui generis) at level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.**

**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 the Environment Agency.

Based on the information submitted, we have **no objections** to the proposal, as submitted.

#### **Advice to LPA**

This development site has been the subject of past industrial activity which poses a risk of pollution to controlled waters.

We are unable to provide site-specific advice relating to land contamination as we have recently revised our priorities so that we can focus on:

- Protecting and improving the groundwater that supports existing drinking water supplies
- Groundwater within important aquifers for future supply of drinking water or other environmental use.

We recommend that you refer to our published '[Guiding Principles for Land Contamination](#)' which outlines the approach which should be adopted when managing this site's risks to the water environment.

We also advise that you consult with your Environmental Health/ Environmental Protection Department for advice on generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that the environmental protection of controlled waters is considered alongside any human health protection requirements. This approach is supported by paragraph 170 of the National Planning Policy Framework.

### **Model Procedures and good practice**

We recommend that developers should:

1. Follow the risk management framework provided in [Land contamination risk management \(LCRM\)](#), when dealing with land affected by contamination.
2. Refer to our [Guiding principles for land contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site. The local authority can advise on risk to other receptors, such as human health.
3. Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed.
4. Refer to the [contaminated land](#) pages on GOV.UK for more information.

### **Proximity to permitted sites**

The proposed development in close proximity to an activity regulated by a permit, issued by the Environment Agency under the Environmental Permitting Regulations.

New developments within 75m metres of large (e.g. >5MWth) MCP diesel standby engines especially if aggregated to a >50MWth EPR installation permit, including those on *UBS Broadgate Data Centre* (Permit: [EPR/ZP3238DK](#)), could result in impacts including the nearby community being exposed to short term peak nitrogen oxides, engine fumes/odour and noise.

The severity of these impacts will depend on the duration of outage/emergency events, prevailing meteorological conditions, engine plant emission standards and (if installed) time to engine emission abatement (SCR) on start-up.

Planning policy requirements (paragraph 193 of the National Planning Policy Framework) state that new development should integrate effectively with existing

businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

There are limits to the measures that the operator can take to prevent impacts to local receptors. Consequently, it is important that planning decisions take full account of paragraph 193 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s). UBS Broadgate Data Centre - EPR/ZP3238DK are required to manage outage events' impacts through a locally agreed Air Quality Management Plan (AQMP); this should be reviewed, and potentially augmented with an updated AQ impact model (re)assessment.

## **Advice to applicants**

### **Waste on-site**

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works are waste or have ceased to be waste. Under the Code of Practice:

- Excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
- Treated materials can be transferred between sites as part of a hub and cluster project
- Some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommends that developers should refer to:

- The [position statement](#) on the Definition of Waste: Development Industry Code of Practice
- The [waste management](#) page on GOV.UK

**Waste to be taken off-site**

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on GOV.UK for more information.

If you have any questions please contact me on 0203 025 5486 or email me at [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk), quoting the reference at the beginning of this letter.

Yours sincerely

**Mr Andy Goymer**  
**Planning Specialist**

Direct dial 0203 025 5486

Direct e-mail [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk)



Surveyor to the  
Fabric  
The Chapter House  
St Paul's Cathedral  
St Paul's Churchyard  
London EC4M 8AD

Tel:   
Web: [www.caroe.com](http://www.caroe.com)

Kieran McCallum  
Corporation of the City of London  
*Sent via email only*

21 January 2026

Dear Kieran,

**Re-consultation - Liverpool Street Station (ref: 25/00494/FULEIA)**

I write on behalf of the Dean and Chapter of St Paul's Cathedral regarding the updated proposals for Liverpool Street Station. This response should be read alongside our previous letter of objection (dated 4 July 2025).

The majority of the changes within the updated proposals concern areas of the proposals outwith the scope of comment by the Cathedral or provide additional information that does affect the conclusions of our previous letter of response. Our objection to the scheme therefore still stands.

We do, however, have further comments regarding the management of the proposed roof terrace which has direct consequences for St Paul's. This has been prompted by review of the updated proposals, and discussion with Officers. We thank Officers for their time and efforts in assisting us in understanding the scheme.

We therefore would urge the City officers either to seek to approve a suitable roofspace and terraces management plan prior to any approval, or to attach a condition to any approval (if so minded by the decision-takers) that restricts the height of planting, furniture, and activity to the roof terrace. This is important to avoid worsening the adverse visual impact and heritage harm that to St Paul's that will be caused by the proposals. We do not consider that this would avoid or mitigate the harm entirely but would ensure it is not exacerbated, should the scheme be consented.

We have also discussed tree management with Officers – which is an important and salient matter related to any approval of this scheme, and has been explored in pre-application discussions. We had understood in our previous message that there was to be a condition in relation to tree management. We understand that this is not a matter that the applicant could deliver and therefore would not be a feasible condition. However, in conversation with Officers, we did formulate a suggestion that a public benefit which might arise to this project (if approved) would be a

Surveyor to the Fabric

contribution to a fund which would be designated for the purposes of tree management. This could be secured through obligations in any S106. We agreed that this would not be the right time to specify the management strategy. However, if the City did have a dedicated fund then, in partnership with Westminster, there could be a scheme of careful works based on a management plan.

St Paul's would welcome the opportunity to be involved in partnership with City, Westminster and other stakeholders on designing the specific management plan accompanied by expert visualization analysis to optimize the respective heritage and natural environment interests between trees and views.

We hope that Officers would agree that such an approach could be a public benefit and would start to attend to an issue which has long been known, but there has not been a specific impetus to address in recent years.

As noted above, notwithstanding the above observations, our objection to the proposals still stands for the reasons outlined in our letter of 4<sup>th</sup> July 2025, to wit the proposals would cause harm to the heritage significance and protected views of St Paul's Cathedral, and present a further incremental erosion of the ability to appreciate the Cathedral, contrary to policy which clearly seeks to limit and prevent these ever-encroaching harms.

Nevertheless, we hope this is a consultation response that furthers the shared aims of the City of London and St Paul's Cathedral.

Yours sincerely,



*Oliver Caroe; RIBA AABC  
Surveyor to the Fabric of St Paul's Cathedral*

*For and on behalf of Caroe Architecture Ltd*

cc: *Tom Nancollas, Deputy Director (Design), City of London  
Rebecca Thompson, Director of Property, St Paul's Cathedral*

**Directors:**

Oliver Caroe RIBA AABC  
Mark Hammond RIAS RIBA AABC

**Associates:**

Touseer Ahmad AABC CEPH  
Helen Bradbury IHBC  
Matthew Cox RIBA CA MAPM  
Gethin Harvey ARB  
Alice Milligan RIAS RIBA AABC  
Andrew Senior ARB

Surveyor to the Fabric



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<b>APPLICATION COMMENT FORM</b>	
<b>From:</b> Ben Bishop, Environmental Resilience Officer <b>Application No:</b> 25/00494/FULEIA <b>Development Management Case Officer:</b> Kieran McCallum	
<b>Site Address:</b> Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza London EC2M 7PY  <b>Proposal:</b> 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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.	
<b>Application Received:</b> 9 April 2025 <b>Request for Comment Received:</b> 6 June 2025 <b>Response issued:</b> 20 June 2025	
<b>Comment:</b> Application submission documents relating to climate change resilience and adaptation have been reviewed, including the Sustainability Statement, the Design and Access Statement, Flood Risk and Drainage Strategy and the Preliminary Ecological Appraisal.  <b>Overheating</b> <ul style="list-style-type: none"> <li>- Optimised façade with solar-controlled glazing, shading fins, and interstitial blinds.</li> <li>- Exposed soffits for thermal mass and energy-efficient lighting.</li> <li>- Mechanical ventilation and cooling systems designed to reduce reliance on air conditioning.</li> <li>- Landscaping and green roofs to mitigate urban heat island effects.</li> <li>- Systematic risk assessment conducted (Appendix B) following BREEAM Wst 05 methodology.</li> <li>- Cooling demand reduced below notional baseline; design follows GLA Cooling Hierarchy.</li> <li>- Material review for albedo of exposed surfaces in external areas.</li> </ul> <b>Further notes:</b> <b>Flooding</b> <ul style="list-style-type: none"> <li>- Site is in Flood Zone 1 (low risk).</li> </ul>	Date & Initials

## APPLICATION COMMENT FORM

- Drainage strategy reduces surface water discharge to Thames Water sewers by at least 50%.
- Incorporates blue roof systems for stormwater attenuation.
- Design accounts for climate change allowances (30-year +35%, 100-year +40%).

### Further notes

#### Water stress

- 50% reduction in potable water use targeted via low-flow fixtures.
- Rainwater harvesting and irrigation via water butts.
- Leak detection and flow control systems integrated with BMS.
- Drought-resistant planting and moisture-sensor irrigation systems.
- BREEAM Wat01–Wat04 credits targeted.
- Water fountain installation identified in risk management approaches in risk assessment.

### Further notes

#### Biodiversity

- Biodiversity Net Gain of +2,573.30%
- Urban Greening Factor of 0.32.
- Green roofs, brown roofs, pollinator-friendly planting, and tree canopy expansion.
- Publicly accessible rooftop garden and cascading tenant terraces with planting.
- Specifies climate resilient planting to be selected.
- **Further notes**
- Some tree species identified in the DAS are considered to be susceptible to future climate impacts including drought stress.
- All aspects regarding trees **should** consult the City Gardens team.
- BNG percentage uplift only totals 2.02 habitat units. This does not meet the emerging policy approach.
- The development is approx. 3.22ha therefore would be expected to achieve 9.66bu/h.

#### Pests and Diseases

- Planting strategy includes pest-resistant species.
- Secure waste storage and daily collection to prevent vermin.
- Bird management strategy in place for the station.
- Drainage design considers non-return valves to prevent pest ingress.

#### Further notes

- Planting design should take into account native species future resilience and potential emerging plant pathogens.

#### Food, trade and infrastructure

- Fully electric energy strategy with air source heat pumps and solar PV.
- Emergency diesel generators reserved strictly for life safety, not business continuity.

APPLICATION COMMENT FORM	
<ul style="list-style-type: none"> <li>- Structural design considers future climate impacts and robustness.</li> <li>- Station enhancements improve accessibility, capacity, and operational resilience.</li> </ul> <p><b>Further notes</b></p> <p><b>Recommendation:</b></p> <p>The proposed development <b>is</b> compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.</p>	<p><b>BB</b></p> <p><b>20/06/25</b></p>

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: 25/00494/FULEIA - Planning Application - Consultation  
**Date:** 13 July 2025 13:21:27

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Hi Team,

No objections to this application.

Thanks

Vimal

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**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Sent:** 05 June 2025 09:38  
**Cc:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Subject:** 25/00494/FULEIA - Planning Application - Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to consultation for planning application 25/00494/FULEIA.

Kind regards,

Planning Administration Team

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** 25/00494/FULEIA Liverpool Street Station (Re-consultation) CCRSS Comments  
**Date:** 19 December 2025 12:58:09  
**Attachments:** [Outlook-isv2qi30.png](#)

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Hi Kieran,

I have reviewed the submitted information in relation to the above re-consultation and have updated our [comment form](#).

The proposed changes do not impact our previous recommendations made for the original application in June 2025 which found the proposed development to be compliant with our climate resilience policies.

Kind regards,

Ella



**Ella Brown MCIWEM** (she/her)

**Environmental Resilience Officer**

City of London | Environment Department | Planning & Development Division  
Guildhall | London | EC2V 7HH



Katie Stewart - Executive Director Environment

**From:**  
**To:**  
**Cc:**  
**Subject:** RE: 25/00494/FULEIA - Liverpool Street Station  
**Date:** 22 December 2025 04:02:24

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Hi Jane,

The waste storage and collection facilities outlined in the Operational Waste Mgt Plan, comply with our requirements. This Division will, therefore, raise no objections to this application.

Thanks

Vimal

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**From:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>  
**Sent:** 08 December 2025 14:41  
**Cc:** Liverpool Street Station <LiverpoolStreetStation@cityoflondon.gov.uk>  
**Subject:** 25/00494/FULEIA - Re-Consultation Letter

Dear Sir or Madam,

Please find attached a re-consultation letter pertaining to Liverpool Street Station (25/00494/FULEIA).

Reply with your comments to [LiverpoolStreetStation@cityoflondon.gov.uk](mailto:LiverpoolStreetStation@cityoflondon.gov.uk)

Kind Regards

Planning Administration

On behalf of  
Kieran McCallum  
Environment Department  
City of London

# Memo

To Assistant Director (Development Management)  
Environment Department

Email [plncomments@cityoflondon.gov.uk](mailto:plncomments@cityoflondon.gov.uk)



From Paul Bentley  
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 16/01/2026

Your Ref: 25/00494/FULEIA

**Subject:** Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza, London, EC2M 7PY.

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; 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; provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); and creation of an auditorium (Sui Generis) at Level 18 with ancillary terrace; creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; provision of private office terraces; provision of cycle parking and associated access ramp, servicing, refuse and ancillary plant; alterations to pedestrian and vehicular access including provision of new ramp; public realm works to Hope Square and Bishopsgate Square; and associated works.

An ES has been submitted as part of the EIA, with an Air Quality Chapter included. Due to being an EIA, in addition to an Air Quality Neutral Assessment an Air Quality Positive Statement has also been submitted as part of the application.

The proposed development is for the redevelopment of Liverpool Street Station, including the provision of a new over-station-development (OSD). The development will be 'car free' with the inclusion of one blue-badge parking space. Heating and cooling provision will be through electric sources, air source heat pumps, and there is a single life-safety diesel generator proposed.

Air quality modelling has been undertaken to assess the impacts from both construction vehicles and operational vehicles, and from a single diesel generator. Using best practice guidance from Environmental Protection UK and the Institute of Air Quality Management the impact has been deemed to be negligible for all assessed scenarios for the modelled pollutants, both short-term and long-term.

The development is 'Air Quality Neutral', as per GLA guidance. It should be noted that emissions from the proposed emergency life-safety generator and service and delivery vehicles are exempt from Air Quality Neutral.

Full details on the proposed generator are not provided so it cannot be compared against the requirements of the current Air Quality SPD. Testing is stated as being 8.33 hours per year so this will be conditioned to ensure it is not exceeded. In the it is stated that alternatives to a diesel generator will be further explored during development, therefore the emergency power condition is to be applied.

An Air Quality Positive Statement has been submitted with the application. Several mitigation measures have been included within the statement, and conditions have been applied to the application to ensure these are implemented.

Should the development be approved please attach the following conditions:

**Condition M28C amended / Emergency Power Supply**

Prior to the commencement of development, excluding demolition, details of the emergency power supply shall be submitted to and approved in writing by the LPA. Details shall include an assessment of feasible non-combustion alternatives and confirmation of the proposed technology for the development. The selected supply shall follow the emergency supply hierarchy detailed in the Planning for Sustainability SPD, 2025. Where it is not possible to deploy alternatives in the hierarchy, proper justification shall be submitted to and approved by the LPA prior to commencement of development. Where diesel generators are justified, they must comply with the Air Quality SPD 2017 and details of the appliance/plant must be submitted to and agreed by the LPA before installation. Any generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the 8.5 hours per annum testing necessary to meet that purpose, and shall not be used at any other time. The development shall be implemented in accordance with the approved details and be retained as such for the lifetime of the development.

**Reason**

To demonstrate that local air quality is maintained and operational carbon emissions have been minimised in accordance with Local Plan policies CS15, DM15.1, DM15.2, DM15.6, London Plan policies SI 1, SI 2, SD 4, and emerging City Plan 2040 policies S1, HL2, S8, DE1.

**Condition M29**

Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

**Reason**

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.



**Condition M32 NRMM**

Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

**Reason**

To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

**Informatives****Roof gardens**

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.

In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

**Generators and combustion plant**

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: [Medium combustion plant and specified generators: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-and-specified-generators-environmental-permits)

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