



Planning Applications Sub-Committee

Date: TUESDAY, 10 FEBRUARY 2026

Time: 1.45 pm

Venue: LIVERY HALL, GUILDALL

Members:

Deputy Tom Sleigh (Chairman)	Tim McNally
Shravan Joshi MBE (Deputy Chairman)	Sophia Mooney
Tana Adkin KC	Deputy Alastair Moss
Samapti Bagchi	Aldерwoman Jennette Newman
Deputy Emily Benn	Deputy Deborah Oliver
Deputy John Edwards	Deputy Henry Pollard
Deputy Marianne Fredericks	Alderman Simon Pryke
Alderman Alison Gowman CBE	Deputy Nighat Qureishi
Alderman Prem Goyal CBE	Gaby Robertshaw
Deputy Madush Gupta	Hugh Selka
Josephine Hayes	Naresh Hari Sonpar
Stephen Hodgson	William Upton KC
Amy Horscroft	Matthew Waters
Aldерwoman Elizabeth Anne King, BEM JP	Jacqui Webster
Charles Edward Lord, OBE JP	David Williams
Antony Manchester	Deputy Dawn Wright

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

NB: Certain matters for information have been marked * and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting. These information items have been collated in a supplementary agenda pack and circulated separately.

Membership

To note that Stephen Hodgson has been appointed to membership of the Committee with effect from 2 February 2026 in the room of Deputy Jaspreet Hodgson.

1. APOLOGIES

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

3. MINUTES

To agree the minutes of the meeting held on 28 October 2025.

For Decision
(Pages 5 - 12)

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.

For Decision
(Pages 13 - 576)

5. *VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT

Report of the Chief Planning Officer and Development Director.

For Information

6. *DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR

Report of the Chief Planning Officer and Development Director.

For Information

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**
8. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

PLANNING APPLICATIONS SUB-COMMITTEE

Tuesday, 28 October 2025

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 28 October 2025 at 10.30 am

Present

Members:

Deputy Tom Sleigh (Chairman)
Shravan Joshi MBE (Deputy Chairman)
Samapti Bagchi
Deputy John Edwards
Alderman Alison Gowman CBE
Alderman Prem Goyal CBE
Josephine Hayes
Deputy Jaspreet Hodgson
Philip Kelvin
Alderwoman Elizabeth Anne King, BEM JP
Charles Edward Lord, OBE JP
Antony Manchester
Tim McNally
Sophia Mooney
Deputy Deborah Oliver
Deputy Henry Pollard
Gaby Robertshaw
Hugh Selka
Naresh Hari Sonpar
Jacqui Webster

Officers:

Phillip Carroll	- Environment Department
John Grierson	- Environment Department
David Horkan	- Environment Department
Rob McNicol	- Environment Department
Patricio Taluana	- Environment Department
Gwyn Richards	- Planning and Development Director, Environment Department
Alex Thwaites	- Environment Department
Peter Wilson	- Environment Department
Baljit Bhandal	- Comptroller and City Solicitor's Department
Judith Dignum	- Town Clerk's Department
Callum Southern	- Town Clerk's Department

1. **APOLOGIES**

Apologies for absence were received from Tana Adkin KC, Deputy Marianne Fredericks, Deputy Madush Gupta, Alderman Simon Pryke, Deputy Nighat Qureishi and Matthew Waters. Tana Adkin observed the meeting online.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations.

3. **MINUTES**

The public minutes of the Planning Applications Sub-Committee on 30 September 2025 were approved as an accurate record, subject to the addition of Deputy Nighat Qureishi as an online observer in the list of attendees.

4. **BALTIC STREET WEST, LONDON, EC1Y 0ST (25/00905/PIP)**

The Sub-Committee considered a report presenting a planning application which sought permission in principle for the erection of a single storey detached dwelling with a single storey detached garage and gardens.

Referring to the 'in principle' nature of the application, which was a relatively unusual one, the Chair stated that an explanation would be given as part of the Officer presentation.

The Chair confirmed that no objectors or supporters had registered to speak at the meeting. The applicant, Mr Meek, had submitted a request to speak but this had unfortunately been received after the deadline. Mr Meek had however provided written submissions which had been circulated to Members the day before the meeting.

The Chair invited the officer to make a presentation to the Sub-Committee.

The officer confirmed that the presentation would cover the permission and in principle application for the erection of a self-built single storey dwelling with detached single storey garage and gardens at Baltic St West. It was noted that seeking permission via in principle consent was an alternative way of obtaining planning permission for housing-led development, separating matters of principle from the technical detail of a proposed development permission. In principle consent had two stages, the first of which established whether a site was suitable for the proposed development in principle. The second stage was concerned with the technical details of the application, when the detailed development proposals was assessed.

The application currently before the Sub-Committee related to the first stage of the permission in principle process, the scope of which was limited to location, land use and amount of development. The application submission consisted solely of the site location plan, which was all that was required to validate a permission in principal application.

The site comprised a triangular strip of land bounded by Baltic St West to the north, Hatfield House and the Golden Lane estate to the south and the City of London Primary Academy, Islington and Golden Lane underground car park access road to the east. Immediately to the north of the site was the boundary with the London Borough of Islington. There were two mature trees on the site, and four Sheffield cycle stands.

The application sought permission in principle for a single Storey detached dwelling garage and gardens on the site. The site had been constructed as part of the Golden Lane Estate and was an area of publicly accessible land owned and maintained by the Corporation. It had been designated as a City of London public footway and a permissive path, and was considered by Officers to be open space, as defined by the 2015 Local Plan.

The proposed change of the land from an area of publicly accessible open space to a private dwelling was considered unacceptable in principle in land use terms.

Members viewed a visual of the site location produced by the City's offices, which showed that the site was immediately adjacent to, but not within, the Barbican and Golden Lane Estate Conservation Area. The Grade 2 listed Hatfield House and the grade two star listed Crescent House were to the west of the site and the Hat and Feathers and Saint Luke's Conservation Areas in Islington were to the north of the site (but not pictured). Members were informed that the Grade 2 listed Golden Lane Estate, Historic Park and Garden occupied the same footprint as the conservation area on the plan.

A full assessment of the impact of the proposed development on the identified heritage assets had been undertaken (as set out in the officer report), and had concluded that it would likely cause a low level of less than substantial harm to the significance of Hatfield House and slight levels of less than substantial harm to the Golden Lane Estate Registered Park and Garden and the Barbican and Golden Lane Estate Conservation Area. This harm had also been considered as part of paragraph 215 NPPF balancing exercise set out in the officer report, which had determined that the only tangible public benefit to the proposal would be the economic benefit arising from the addition of a single self-built dwelling to the city's housing stock. This would not be sufficient to outweigh the heritage harm identified.

The harm caused to the heritage assets would be through the impact on their setting. The site was surrounded by a mixture of four to six storey buildings with well-established clear, geometrically solid building lines on all three sides of the triangle. The provision of a single storey dwelling and garage in this location would likely be visually incongruous, intruding into the geometrically arranged buildings and open space that defined the Golden Lane estate and the setting of Hatfield House. In addition, it would likely appear cramped on its limited plot and would intrude into the sense of space currently present. It was therefore considered that the proposed development would be likely to have an unacceptable impact on the character and appearance of the area by failing to

respect the urban grain layout scale and building lines of the existing street scene.

The Sub-Committee viewed an image of the south-east of the site, showing the two mature London plane trees, which the application form stated were to be retained. The applicants had also stated, in their representation made on 3rd August, that the use of screwjack foundations would prevent any harm to the trees. This was not standard construction for a dwelling house. Regardless, officers considered that the construction of a dwelling in this location would have an unacceptable impact upon the health and longevity of the two mature trees which occupy the site.

A view looking west towards the site was shown, with Hatfield House on the left. Although no details of the design were available at this stage of the permission in principle process, it was a matter of fact that the visual intrusion created through the erection of a single storey dwelling and detached garage with garden on the site would be considerably greater than the existing area of open space.

Referencing comments submitted by Historic England, officers highlighted that the original designers of the Golden Lane Estate, Chamberlain, Powell and Bon, had produced a shadow diagram as part of their plan to avoid overshadowing between blocks. This had shown the proposed development site to be largely covered in shadow, which was reflective of the existing situation. It was therefore evident that the site (including trees) would be overlooked by the substantially taller building (Hatfield House). The trees would be overlooked by the immediate proximity of the residential balconies, which would result in poor levels of amenity to the proposed dwelling house on the application site and to the existing dwellings on the lower floors of Hatfield House.

Also visible in the image was the mouth of the access road junction with Baltic St West. The site's location abutting the car park access ramp and junction, made it very likely that the development of a single Storey dwelling garage and gardens on the site would have an unacceptable impact regarding road dangers and the pedestrian environment. This was because the development of this piece of land, currently open space and a designated permissive path and footway, would likely have an adverse impact on sight lines and visibility for vehicles entering the car park access ramp and for pedestrians crossing the vehicle access ramp to access Hatfield House. Furthermore, it was considered that the proposed garage would be contrary to car-free policy.

As mentioned at the beginning of the presentation, this application related to the first stage of the permission in principal process, the scope of which was limited to location, land use, and amount of development. Officers drew attention to the late correspondence from the applicant attached within the addendum pack, advising that in their view, none of the points raised affected the assessment they had undertaken, as detailed in the report.

Finally, the public benefits of the scheme were limited to the economic benefit of the addition of a single, self-built dwelling to the Corporation's housing stock, which was not considered sufficient to outweigh the harm identified.

It was therefore concluded by officers that the proposed development would be unacceptable in principle on the following two grounds:

- Firstly, that the proposed land use of the site is a private residential dwelling with a parking garage would be unacceptable as it would result in the loss of public open space and would fail to be car free. This is contrary to policies G4 and T6.1 of The London Plan 2021, policy CS19, DM 16.2 and 16.5 of the Local Plan 2015 and policies S14 OS1 and VT3 of the emerging City Plan 2040.
- Secondly, that the proposed location and amount of development would be unacceptable as it would likely:
 - have an unacceptable impact on the character and appearance of the area by failing to respect the urban grain, layout, scale and building lines of the existing street scene;
 - cause less than substantial harm to the Grade 2 listed Hatfield House and slight levels of less than substantial harm to the Golden Lane Estate Registered Park and Garden, and Barbican and Golden Lane Conservation Area, which cannot be outweighed by the public benefits of the proposals;
 - have an unacceptable impact upon the health and longevity of the two mature trees which occupy the site;
 - have an unacceptable impact with regard to road dangers and the pedestrian environment; and
 - result in poor residential amenity to the existing dwellings on the lower floors of Hatfield House and to the proposed dwelling. This was contrary to policies D3, G7 and HG1 of The London Plan 2021, Policies CS 10. CS12, CS19 CS21, DM 10.1, DM12.1, DM12.5, DM16.1 and DM21.1 of the Local Plan 2015 and emerging City Plan 2040 Policies S3, S8, S9, S10, S11, DE2, DE3,.HS1, OS5 and HE1.

For these reasons, officers recommended that permission in principle be refused.

The Chair thanked Officers for their presentation. Noting that there were no speakers, he invited Members of the Sub-Committee to ask questions of the officers in attendance.

Referring to a comment within the Applicant's written submission which described the current condition of the proposed development site as 'almost derelict', a member expressed strong disagreement. The land concerned was an open space used by the public, with a path and two beautiful trees, and in their view, it was wrong to consider such spaces as derelict and useless.

No other Members having indicated a wish to speak, the Chair moved to a vote on the officers' recommendation that the Planning and Development Director

be authorised to issue a decision notice refusing permission in principle for the application.

Voting on the recommendation was as follows:

FOR	20
AGAINST	0
ABSTAIN	0

Therefore, the recommendation was carried and permission in principle refused.

Resolved - That Members:

Authorise the Planning and Development Director to issue a decision notice refusing permission in principle for the above proposal, as set out in the schedule in Appendix B of the report, for the following reasons:

- 1) The proposed land use of the site as a private residential dwelling with a parking garage would be unacceptable in principle as it would result in the loss of public open space and would fail to be car free, contrary to Policies G4 and T6.1 of the London Plan 2021, Policies CS19, DM16.2 and DM16.5 of the Local Plan 2015 and Policies S14, OS1 and VT3 of the emerging City Plan 2040.
- 2) The proposed location and amount of development would be unacceptable in principle as it would likely: have an unacceptable impact on the character and appearance of the area by failing to respect the urban grain, layout, scale and building lines of the existing street scene; cause less than substantial harm to the Grade II Listed Hatfield House and slight levels of harm to the Golden Lane Estate Registered Park and Garden and Barbican and Golden Lane Conservation Area, which cannot be outweighed by the public benefits of the proposals; have an unacceptable impact upon the health and longevity of the two mature trees which occupy the site; have an unacceptable impact with regard to road dangers and the pedestrian environment; and result in poor residential amenity to the existing dwellings contrary to: Policies D3, G7 and HC1 of The London Plan 2021; Policies CS10, CS12, CS19, CS21, DM10.1, DM12.1; DM12.5, DM16.1 and DM21.1 of the Local Plan 2015 and emerging City Plan 2040 Policies S3, S8, S9, S10, S11, DE2, DE3, HS1, OS5 and HE1.

5. ***VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT**

The Sub-Committee received details of development applications received by the Department of the Built Environment since the report to the previous meeting on 30 September 2025.

RESOLVED - That Members:

- Note the report and its contents.

6. ***DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

The Sub-Committee received details of development and advertisement applications determined by the Chief Planning Officer and Development Director so authorised under their delegated powers since the report to the last meeting on 30 September 2025.

RESOLVED – That Members:

- Note the report and its contents.

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

Two members raised questions as follows:

Resident Engagement - Information was sought as to whether local residents or House Group representatives, including those from certain blocks located within Aldersgate Ward, were being sufficiently informed and engaged regarding the impact of ongoing building works at the City of London School for Girls.

Clarifying that that the applicant in respect of the works concerned had been the City of London Corporation, Officers advised that the planning permission included a condition requiring the applicant to submit details to mitigate any impact on residential amenity. This had not yet been actioned, a matter raised with environmental health officers prior to the meeting.

Delegated Authority – It was questioned why, given the straightforward nature of the application which the Sub-Committee had just considered, it had been referred to Members rather than being determined by officers under delegated authority.

Officers advised that the application had met the criteria for consideration by Members, as set out in the current Scheme of Delegation agreed by Comon Council. This was firstly, because it was contrary to policy, and secondly, because more than ten objections had been received.

The view was expressed that, although the criteria regarding objections was appropriate in circumstances where officers were recommending the granting of planning permission, it seemed less so where the recommendation was for refusal. Acknowledging this, the Chairman commented that the point should be fed into the ongoing review of the Scheme of Delegation being led by the Town Clerk's Department.

8. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There were no urgent items of business.

The meeting ended at 10.47 am

Chairman

Contact Officer: Judith Dignum
judith.dignum@cityoflondon.gov.uk

Committee:	Date:
Planning Applications Sub Committee	10 th February 2026
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.	Public
Ward: Bishopsgate	For Decision
Registered No: 25/00494/FULEIA, and listed building consents with reference numbers 25/00474/LBC, 25/00476/LBC, 25/00475/LBC, 25/00479/LBC, and 25/00477/LBC	Registered on: 9 th April 2025
Conservation Area: Bishopsgate	Listed Building: Yes

Summary

- i. The proposal is for the partial demolition and phased redevelopment of Liverpool Street Station to provide capacity and accessibility upgrades to the station and a new Over Station Development office building above.
- ii. The application site is singularly intensive, complex and sensitive, being a grade II listed London railway terminus and major railway interchange, handling 98 million entries and exits per year, located at the heart of an international financial centre amongst many designated heritage assets.
- iii. A significant number of objections have been received against the proposals, including circa 2,100 from members of the public, as well as objections from the heritage sector, including from the Victorian and Twentieth Century societies and others, and from other parties. Historic England have provided extensive comments but have not formally objected. The application was also subject to circa 1,100 letters of support. A fuller account of the consultation on the proposals is given in the 'Consultation' section below.
- iv. As underpinned by the submitted Financial Viability Assessment, and verified through independent third party review, the scale of the Over Station Development (OSD) is directly linked to the delivery of the amount of funding necessary to enhance the station to meet the operational needs of Network Rail and to deliver benefit to the public as daily users of the station.
- v. The nature of the site and the ambition of the proposal makes this a singular project, with singularly complex impacts. From a heritage point of view, the existing station building is grade II listed and the proposals would entail the loss of significant historic fabric, causing harm to the station's significance; there would be a range of other harms caused to other heritage assets both in the locality and on the skyline.

- vi. The proposed development would provide benefits relating to improving social and environmental sustainability through improvements of the public realm and microclimate around the station and provide a better permeability through the station and integration into its context, incorporating urban greening and climate resilience measures on the ground and at roof level on the proposed OSD. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for reuse and designing the new build for longevity, adaptability and low maintenance. The energy use intensity of the proposed OSD has been optimised and future opportunities for the station's energy performance identified, including connecting the whole development into emerging heat networks.
- vii. The capacity and accessibility upgrades to Liverpool Street Station would be transformational. The proposal would entail significant enhancements from the point of view of accessibility, highways and transportation, and would give the station significant staying power in relation to future use forecasts. These are highly significant benefits in view of the importance of the station to London and the UK.
- viii. The design approach would be equally singular. An entirely new station concourse and entrances would be delivered, in an inspired interpretation of the Victorian gothic; above this, the OSD would have a crystalline architectural identity of its own. With an innate confidence and coherence, the design approach would align with the transformational ambition of the proposal.
- ix. The application is for an EIA development and is accompanied by an Environmental Statement (ES). A reasoned conclusion on the significant effects of the proposal on the environment has been reached and the proposal would be acceptable in environmental terms.
- x. The proposal would provide other benefits through its contribution to the community infrastructure levy (CIL) which supports the improvement, replacement, operation and maintenance of infrastructure to support the development of the City. That payment of CIL is a local finance consideration. There would be, in addition to general planning obligations, site specific measures secured by condition and in the S106 agreement.

- xi. Whilst many Development Plan policies would be complied with, the range of impacts would result in numerous policy conflicts, but officers consider that there is overall compliance with the Development Plan when read as a whole. The nature of the site and the ambition of the proposal create a singularly nuanced and complex policy balance.
- xii. Ultimately, the proposal would significantly upgrade Liverpool Street Station and deliver density in a suitable and sustainable location; as such, it would advance the strategic and business objectives of the City, uniquely so in view of the transformational transport benefits flowing from the proposal. Whilst there would be numerous impacts, these have been clearly and convincingly justified, and would be of a lesser order of magnitude compared to the benefits.
- xiii. As the proposal would comply with the Development Plan when read as a whole, and as other material considerations weigh in favour of the proposal, officers recommend that planning permission and the listed building consents should be granted as set out in the recommendation and the schedules attached.

Recommendation

- (1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:
 - (a) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008); and
 - (b) The application being referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) Direction 2024 and the application not being called in under section 77 of the Town and Country Planning Act 1990;
 - (c) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section; and
 - (d) obligations having been executed.
- (2) That the Planning and Development Director be authorised to issue decision notices granting the Listed Building Consent applications in accordance with the details set out in the attached schedule, subject to:
 - (a) the necessary notifications to the Secretary of State pursuant to the Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021 and the relevant applications not being called in under Section 12 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- (3) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990.

- (4) That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

APPLICATION COVER SHEET

Liverpool Street Station – 25/00494/FULEIA and associated Listed Building Consents

1. HEIGHT	EXISTING		PROPOSED	
	33.7m		97.67m	
2. FLOORSPACE GIA (SQM)	USES	EXISTING (sqm)	PROPOSED (sqm)	
	Office (Class E)	1,677	Office (Class E)	88,013
	Retail (Class E and <i>Sui Generis</i> Food Uses)	9,134	Class E and <i>Sui Generis</i> Food Uses)	11,077
	Station (Sui Generis)	9,673	Station (Sui Generis)	10,992
	Public Access and Auditorium (Sui Generis)	0	Public Access and Auditorium	1,116
	Total:	20,484	Total:	111,198
			Uplift:	90,714
3. OFFICE PROVISION IN THE CAZ	Existing: 1,677 sqm Proposed: 88,013 sqm			

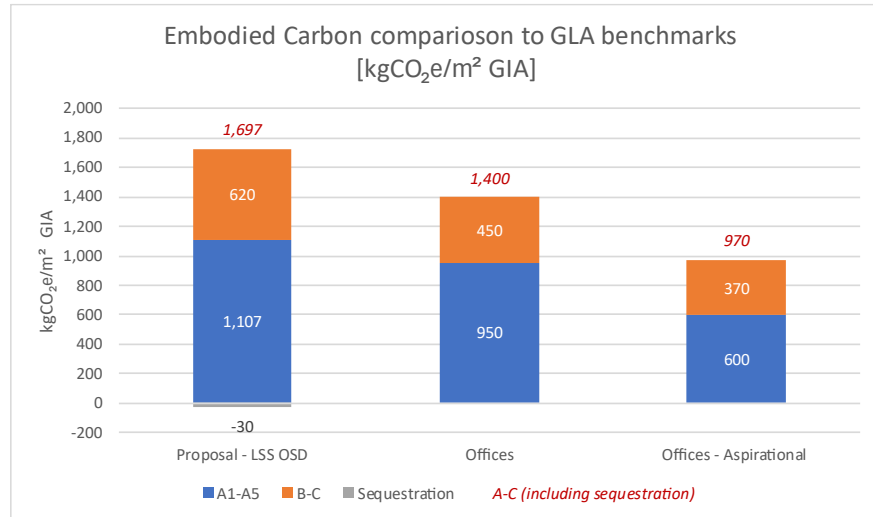
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	1,197 FTE		6,025 FTE	
5. VEHICLE/ CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	0 on-site, accessible spaces to be provided on-street. Policy requires 1 space.
	Cycle long stay	Bishopsgate: 110 at station entrance Also cycle parking available in Sun Street Passage: 102 + 12 Brompton lockers (Note: Bishopsgate and Sun Street Passage parking not limited to station users only)	Cycle long stay	Station: Up to 732 OSD: 1,253 Sun Street Passage: 102 + 12 Brompton lockers, as existing (policy compliant)
	Cycle short stay	Short stay cycle parking is provided at several locations in the vicinity of the station	Cycle short stay	Existing short stay parking is retained; an additional 48 spaces proposed in public domain split between Liverpool Street/ Bishopsgate/ Sun Street Passage. (policy compliant)

	Lockers	Station: 0	Lockers	Station: 0 Office: 840
	Showers	Station: 0	Showers	Station: 0 Office: 130
	Changing facilities	Station: 0	Changing facilities	Station: 2 Office: 130
6. HIGHWAY LOSS / GAIN	No change.			
7. PUBLIC REALM	Public Open Space Existing: Hope Square: 550 sqm Bishopsgate: 603 sqm Sun Street Passage: 966 sqm Proposed: Hope Square: 1221 sqm Bishopsgate: 1500 sqm Sun Street Passage: 996 sqm Roof Garden: 1910 sqm			
8. STREET TREES	EXISTING		PROPOSED	
	Sun Street Passage: 2		Hope Square: 12 Bishopsgate: 15 Sun Street Passage: 37 Sun Street Passage: 2 retained	

	EXISTING	PROPOSED
9. SERVICING VEHICLE TRIPS	Primrose Street servicing yard: 19 vehicles/day There are additional service areas off Appold Street (serving Boots) and on Pindar Street.	Primrose Street servicing yard: 136 vehicles/day No change proposed to Boots and Pindar Street service areas
10. SERVICING HOURS	No servicing proposed between the hours of 06:00-10:00; 12:00-14:00; and 16:00-19:00	
11. RETAINED FABRIC	Approx. 85% of the substructure and 90% of the superstructure (by mass)	
12. OPERATIONAL CARBON EMISSION SAVINGS	Improvements compared to Part L compliant building: OSD:13.8% Station Enhancements: 9.6% Whole development: 13.2% GLA policy target: 35%	
13. OPERATIONAL CARBON EMISSIONS	Proposed development (energy & water) B6&B7: 86,067 tonnes CO₂e over 60 years 774 kg CO₂e/m² GIA over 60 years	

14. EMBODIED CARBON EMISSIONS

PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS



Upfront carbon (A1-A5) excl. sequestration = 1,107
kgCO₂e/m² GIA

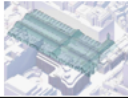
Embodied carbon (A1-C4, excl. B6&B7) incl. sequestration =
1,697 kgCO₂e/m² GIA

15. WHOLE LIFE-CYCLE CARBON EMISSIONS

Total WLC (Embodied + operational) including sequestration:
2,471 kgCO₂e/m² GIA
274,756 tonnes CO₂e

16. CARBON OPTIONS ASSESSMENT

CARBON OPTIONS ASSESSMENT RESULTS

				
	Option B	Option C	Option E	Option G
Gross Internal area (GIA) m ²	20,484	18,984	112,698	111,198
Increase in NIA (over existing)	0	-1,320	55,816	55,816
Substructure % retained (by mass)	100%	~85%	~98%	~85%
Superstructure % retained (by mass) (frame, upper floors, roof, stairs, ramps)	100%	~90%	~98%	~90%
Superstructure % retained (by area) (external walls, windows, external doors)	100%	~98%	~25%	~25%
Upfront Embodied Carbon (A1-A5) (kgCO ₂ e/m ² GIA) exc. sequestration	828	926	1,201	1,106
In-use & End of Life Embodied Carbon (B-C) (kgCO ₂ e/m ² GIA) excl. B6 & B7	587	628	610	620
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO ₂ e/m ² GIA)	1,415	1,554	1,811	1,726
Fuel source	Electricity	Electricity	Electricity	Electricity
Whole Building Operational Energy Use (kWh/m ² GIA per year)	318	318	115	115
Whole Building Operational Carbon for building lifetime (B6) (kgCO ₂ e/m ² GIA)	405.7	405.7	146.1	146.1
Total WLC Intensity (incl. B6 & pre-demolition) (kgCO ₂ e/m ² GIA) B7 not considered	1,820.7	1,965.1	1,961.1	1,876.6
Upfront Embodied carbon (A1-A5) (tCO ₂ e)	16,961	17,579	135,350	122,985
In-use embodied carbon (B-C) (tCO ₂ e)	12,024	11,922	68,746	68,943
Operational carbon for building lifetime (B6) (tCO ₂ e)	8,310	7,702	16,463	16,243
Total absolute WLC (incl. B6 and pre-demolition) (tCO ₂ e) Module B7 not considered	37,295	37,305	221,015	208,679

17. BREEAM RATING

OSD “Excellent” (target “outstanding”)
Retail and F&B within the station: targeting “excellent”
(policy compliant)

18. URBAN GREENING FACTOR

0.19 (all area within red line boundary)
0.32 (policy compliant across developer area – e.g. excluding rail tracks)

19. BNG

208.29% net gain (policy compliant)

20. AIR QUALITY

The Proposed Development will be Air Quality Positive.

Main Report

1. Environmental Statement

- 1.1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
- 1.2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 1.3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - To examine the environmental information
 - To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
 - To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
- 1.4. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix C and the content of this report set out the conclusions reached on the matters identified in regulation 26.

- 1.5. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.
- 1.6. Representations made by any body required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.
- 1.7. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
- 1.8. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.

2. Site and Surroundings

- 2.1. The application site comprises Liverpool Street Station and parts of its environs, as shown in the site location plans appended as above within this report. As indicated by these site location plans, there are differing red line boundaries at ground, lower ground and basement levels of the site. The site is bounded by Liverpool Street to the south, Bishopsgate (A10) to the east and Sun Street Passage to the west. Immediately to the north of the site lies Exchange Square, with Primrose Street lying perpendicular and to the north of the square. The site also includes Hope Square, at its south-western corner, 50 Liverpool Street (occupied by a McDonald's restaurant) adjacent to Hope Square, and partially includes 40 Liverpool Street (also known as the Andaz Hotel, formerly the Great Eastern Hotel). The site in total comprises c. 5.6 hectares of land.

2.2. The surrounding area is high density, and commercial office use is dominant. Alongside the primary office use, the area features residential properties, retail uses, and religious buildings. The site is surrounded by medium to large scale developments including established buildings of between seven to eleven storeys, and newer development such as the eight storey 100 Liverpool Street building to the west. Taller buildings can be found to the south, such as 55 Old Broad Street, and to the east including 110 Bishopsgate (Salesforce Tower, formerly Heron Tower) and the Pan Pacific Hotel at 80 Houndsditch, which indicate the proximity and extent of the City Cluster.

2.3. Residential uses are located to the south of Liverpool Street and the wider area thereof, and further residential uses are found on the eastern side of Bishopsgate. Turning to retail uses, there are retail uses within the Station itself, as well as along Bishopsgate, and within and towards Broadgate Circle and Broadgate Central to the west. Part of the site falls within the retail arcade to the south of the site, which is identified as a Principal Shopping Centre in the adopted City of London Local Plan (2015). Religious buildings in the immediate vicinity of the site include St. Botolph-without-Bishopsgate alongside its Church Hall, All Hallows-on-the-Wall further to the south. In the wider area these include St Mary Moorfields, the Church of St Helen and the Guild Church of St Ethelburga the Virgin.

2.4. The site itself is Grade II Listed, noting some portions of the Station are identified as not of special interest, dealt with in detail within the design and heritage sections of this report below. The site features a Grade II Listed Police Box, along the southern boundary of the site, as well as two Grade II Listed memorials – memorials to the First World War – within the site. Additionally, 40 Liverpool Street is Grade II* Listed (as the Former Great Eastern Hotel). In the wider area, listed structures include:

- St Paul's Cathedral (Grade I)
 - Church of St Mary-Le-Bow (Grade I)
 - Church of St Botolph-without-Bishopsgate (Grade II*)
 - St Boltoph's Church Hall (Grade II)
 - 76-80 Old Broad Street (Grade II)
 - Finsbury House, 22-23 Bomfield Street (Grade II)
 - London Wall Buildings (Grade II)
 - Park House and Garden House, Finsbury Circus (Grade II)

- Lutyens House, 1-6 Finsbury Circus and 94-100 Moorgate (Grade II*)
- Roman Catholic Church of St Mary's Moorfields, Eldon Street (Grade II)
- 1 Finsbury Avenue (Grade II)
- 10 and 14 Brushfield Street (Grade II)
- Bishopsgate Institute and Library, 6 Brushfield Street (Grade II*)
- Port of London Authority's Warehouses and Boundary Walls to Middlesex and New Streets (Grade II)
- House to East of Entrance to Port of London Authority's Warehouses, Cutler Street (Grade II)
- Pair of Houses to North of Entrance of Port of London Authority Warehouses (Grade II)
- Shield House, 16 News Street (Grade II)
- 12-13 Devonshire Square (Grade II)
- 162-164 Bishopsgate (Grade II)
- Guild Church of St Ethelburga's the Virgin Bishopsgate (Grade I)
- 52-68 Bishopsgate (Grade II)
- 1,3 and 5 Stone House Court (Grade II)

2.5. Where relevant, these are referred to in further detail within the design and heritage sections of this report. Additionally, the site and proposals make relevant various designations identified within the London View Management Framework, which are similarly drawn out in detail within the relevant sections of this report. These designations make St Pauls Cathedral, Grade I statutorily Listed, relevant to this application. Non-designated heritage assets relevant to the site include the Liverpool Street Metropolitan Arcade, the Kindertransport Statue within Hope Square and 50 Liverpool Street which fall within the site boundary. Non-designated heritage assets which fall outside the site boundary but have the potential to be affected via impacts to their setting include St Botolph without Bishopsgate Churchyard, 117 and 119-121 Bishopsgate and 152-154 Bishopsgate.

- 2.6. The site lies partially within the Bishopsgate Conservation Area, towards its southern boundary with Hope Square falling within the Conservation Area itself. Other Conservation Areas in the wider vicinity include New Broad Street Conservation Area (City of London), Finsbury Circus Conservation Area (City of London), Bunhill Fields and Finsbury Square Conservation Area (Islington), Sun Street Conservation Area (Hackney), South Shoreditch Conservation Area (Hackney), Elder Street Conservation Area (Tower Hamlets), Fournier Street Conservation Area (Tower Hamlets), Artillery Passage Conservation Area (Tower Hamlets), Wentworth Street Conservation Area (Tower Hamlets), Creechurch Conservation Area (City of London), St Helen's Place Conservation Area (City of London) and Bank Conservation Area (City of London).
- 2.7. As noted above the site is adjacent to the Exchange Square area of open space to the north, as well as Broadgate Circle to the west. Finsbury Circus Gardens also lie to the west, and other open spaces in the wider area include Bishops Square to the north east, Devonshire Square to the east, and the grounds of St Botolph's Church and Church Hall to the south. It should also be noted that Hope Square is identified as a Primary Civic Space within the City of London's Open Space Strategy (2015), as is Exchange Square.
- 2.8. Turning to policy designations, the site falls within the following designations within the Development Plan (excluding those referenced above):
- Key City Places – North of the City
 - Central Activities Zone (CAZ)
 - Principal Shopping Centre
 - London Views Management Framework – Linear View from King Henry's Mound (9A.1)
 - Key Area of Change
 - Airport Safeguarding Area
 - Crossrail Safeguarding Area
- 2.9. Further, in the emerging City Plan 2040 the site is identified by Strategic Policy 25: Liverpool Street.

- 2.10. In terms of public transport, the site is eminently well located and is identified as having a Public Transport Accessibility Level (PTAL) of 6b across the site's entirety, the highest rating available. In addition to the station providing ready access by National Rail services, now including the Elizabeth Line serving the station, the site is also directly connected to the TfL network through its concourse and entrances within the station's environs, as well as the wider area in which stations are present at Moorgate, Bank, Aldgate and Shoreditch High Street.

3. Relevant Planning History and Background to the Proposal

- 3.1. Relevant recent planning history primarily comprises an application for planning permission submitted in 2023 and with reference number 23/00453/FULEIA, accompanied by applications for listed building consent for works associated with this planning application. The description of development for this application is as follows:

- 3.2. *Liverpool Street Station: Partial demolition of Station including concourse, train sheds and entrances to Bishopsgate, Liverpool Street and Sun Street Passage. Demolition of 50 Liverpool Street. Construction and remodelling of station at basement, lower and upper concourses, new station roof, new entrances to Bishopsgate, Liverpool Street and Sun Street Passage, new lifts and escalators. Provision of units at basement, lower and upper concourse flrs for retail, café/restaurant, pub/bar. Remodelling of existing bus station and provision of a cycle hub on upper concourse.*

Andaz/Great Eastern Hotel: Alteration of existing building at basement, ground and upper flrs including insertion of new structure, creation of new west wall and removal and replacement of mansard roof. Change of use from hotel to office at part ground flr and across flrs 1-4; access to servicing area from vehicle lifts at flr 3; provision of units at basement and ground for retail, café/restaurant, and pub/bar; spaces for leisure and community uses; retail and café/restaurant at part of flr 5.

Over Station Development: Erection of a new building above Liverpool Street Station and 40 Liverpool Street with maximum height of 108.6 metres AOD in height (excluding rooftop plant) comprising office use at flrs 5-13, and partly at flrs 14-15, with ancillary lobby and functions at flrs 3-4. New hotel at flrs 17-20 and partly within flrs 14-16, ancillary restaurant/bar at flr 15 and ancillary leisure facility at flr 16. New public amenity space at podium level comprising café/restaurant, retail, leisure; and partially at flr 16 comprising outdoor pool, leisure court and café/restaurant, alongside a publicly accessible roof garden. Provision of lifts, cycle parking, servicing, refuse, and plant.

Public Realm: Refurbishment and extension of Hope Square and Bishopsgate Plaza. New pedestrian routes, including the pedestrianisation of Liverpool Street and new pedestrian footway to Exchange Square.

- 3.3. This application is under consideration and required further information, and potentially amendments, prior to being progressed to a decision. As set out in the application material submitted with the proposals subject to this report and recommendation, the applicant for that application has chosen not to pursue this.
- 3.4. A range of smaller applications comprising works to the station have been submitted and approved in recent years, including those related to repairs to the station roof and minor improvements to the station gateline.

4. Proposal - 25/00494/FULEIA

- 4.1. Full planning permission is sought for the following development:
- 4.2. *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.*

- 4.3. Further to the description of development copied above, these works are summarised in further detail below.

Demolition

- 4.4. The extent of demolition comprises demolition to station concourse areas, truss/columns within the concourse, demolition of the Bishopsgate and Hope Square entrances, Entrances, and a portion of the modern 1990's era station roof which sits above the main concourse area, alongside demolition and alteration to other areas of the site including the entrance to Sun Street Passage and areas at basement, lower ground floor and ground floor levels, including around the interface and connection of the existing station roof with 40 Liverpool Street. The proposals include the demolition of those retail units sitting at upper concourse level and perpendicular to the trainshed roof. The proposals also include the demolition of 50 Liverpool Street and demolition within TfL ticket halls.

Station Improvement Works

- 4.5. The proposals deliver a substantial and extensive series of improvements to the station. This includes:
- Creation of fully accessible routes through the station from the upper concourse level
 - Enhanced gatelines and circulation spaces, allowing for concourse capacity to be streamlined and increased
 - Introduction of a Network Rail control centre, integrated within the station for improved operation
 - Extension and upgrade to the Bishopsgate and Hope Square entrances responding to desire lines and passenger flow to improve movement and therefore capacity within the Station

- 4.6. Overall, the proposals for the station will improve capacity, accommodating an increase in capacity within what has been identified as Britain's busiest train station in 2024 and again in 2025, as well an increase in capacity to accommodate projected passenger and station user numbers up to 2040 and including a 35% additional increase to ensure the station functions beyond those projected capacity figures. Accommodating these numbers of people has been achieved through the proposal by increasing visibility, signage, desire lines, and concourse space available for passengers.
- 4.7. In addition to dealing with existing and future issues surrounding capacity, the proposals include significant improvements to the accessibility of the station and its provision of step-free access. All primary entrances to the Station would be upgraded to be step-free, including step-free access through TfL Ticket Hall B, a fully accessible route would be achieved from the lower concourse and upper concourse level to the platforms servicing the Central Line via TfL Ticket Hall C, four new passenger lifts within the Station, sized to accommodate wheelchair users and users with buggies/prams, two new passenger lifts at TfL Ticket Hall A providing step-free access to the Metropolitan, Hammersmith & City and Circle lines, one new passenger lift within Ticket Hall C at lower concourse level and one associated new passenger lift at basement level to provide step-free access to the Central line.
- 4.8. Proposals also include a range of supporting facilities improved from the Station's current offer. These include: two family rooms which include changing areas; two changing places toilets, one at each level; sanitary facilities for male, female and gender neutral users including wheelchair accessible cubicles in each; an accessible assisted travel lounge; a calm room; multifaith rooms; seating at lower concourse and upper concourse levels; and the provision of additional accessible gates within the Station gateline.
- 4.9. Further station improvement works include the rationalisation and improvement of the retail space at the upper and lower concourse levels. At the upper concourse level, the existing arrangement, which sees unattractive retail units running east to west and retail units north to south positioned so that they face onto the main walls of the Station and block views of the railway lines would be removed. Replacement retail units would be provided against the main north to south walls of the Station at this level, with users then able to enjoy views across the Station, and their extent would be increased so that they would run from the main concourse north and through to Exchange Square. This would also include the introduction of an access from Exchange Square to the station itself.

Over Station Development

- 4.10. The proposals include the erection of an office development above the concourse and above the Hope Square and Bishopsgate entrances to the Station. This Over Station Development (OSD) would have its primary entrance facing onto Liverpool Street in the location previously occupied by 50 Liverpool Street, with additional cores for servicing and emergency access/evacuation at its north eastern corner, adjacent to the south western corner of 135 Bishopsgate and at the Bishopsgate entrance.
- 4.11. The OSD would be elevated above the Station, excepting where it is brought to ground on columns within the Station concourse and via the entrances at Hope Square and Bishopsgate. At the Bishopsgate entrance the OSD would sit 19.2m above ground floor level when measured to the base of the office building, and at the Hope Square entrance would sit 20.2m above ground floor level when measured to the base of the office building. The drawings submitted with this planning application draw this building across eighteen levels, with four levels across the Station entrances, measuring c. 74m in height from ground floor level to the parapet of the building's façade. The height of the building varies given the array of balustrades provided to support the use of the roof space, the auditorium proposed at rooftop level, and the associated plant and machinery above the proposed cores. The highest height when measured using AOD would be 97.67m, at the lift top above the cores of the building.
- 4.12. A replacement Station roof above the existing concourse is also proposed, replacing an element of the Station roof built in the 1990's. This part of the proposal would feature the columns supporting the OSD, they have been proposed to reflect the components of classical Victorian columns, the base, torus, shaft and capital. Decorative steel plate reliefs are proposed at their base, and the steel capital accommodates the arches which terminate or spring from each column, with decorative steel stiffening plates proposed within the juncture of each arch with a column. The roof itself would then be characterised by lateral arches which serve the purpose of providing continuous structure to the OSD in the absence of a traditional structural core. The profile of the proposed arches matches that of the historic roof, beginning at each column before forming a pitched profile. A series of trusses then spans between each lateral arch.

- 4.13. The OSD would be designed for flexibility of use so that it can be subdivided across its floorplates, with configurations possible given the clear floorplates of the OSD as enabled for subdivision through the position of the proposed cores. With its front entrance onto Liverpool Street itself, landing where the existing 50 Liverpool Building sits, office users would then travel to a generous reception area at the base of the OSD (i.e. level 04). At this same level, amenity spaces would be provided including a restaurant area and a café, alongside the plant area for the building which is located here so that the rooftop can be freed for other uses. This level, and levels 05 and 06, includes cycle parking and end of trip facilities alongside conference spaces, a Business Centre Space, a gym, and office space. The levels above these then provide the mainstay of the typical office floorspace proposed.
- 4.14. The proposals follow an L-shaped form, stretching from the Bishopsgate entrance to the Hope Square entrance, with a primarily glazed façade featuring articulation which provides differentiation and expressing depth and variety through light and shade. This is achieved through vertical fins across sections of the façade, as well as through the carving of the mass so that it features reliefs at certain identified corners. These carved corners also allow for the introduction of external terraces for each office floorplate, further enabling the proposal to be subdivided as tenants require, and for the introduction of urban greening at such terraces. These are principally at the south eastern corner closest to Bishopsgate, the south eastern corner above 50 Liverpool Street, and more substantially at the north western corner adjacent to Sun Street Passage.
- 4.15. Alongside the terraces provided at a range of floors within the OSD, the proposals also include an elevated public space (or roof garden) and auditorium. The roof garden would be publicly accessible, with its entrance at the upper concourse level within the Station and to the rear of the proposed entrance to the OSD. A flexible use is proposed, where it could be interchangeably used exclusively for public or private use. The landscaped area includes extensive urban greening, and a proposed relic garden featuring historic relics and artifacts from within the existing Station and from the wider Network Rail estate. When split between public and private use, the public area of the roof garden would enjoy views to the north, west and south, with the area being split diagonally across a north east to south west line, maintaining public access to sanitary facilities which also include wheelchair accessible facilities. The private area would then be accessible through the OSD office cores and would include part of the roof garden space, as well as a rooftop auditorium.

- 4.16. The rooftop auditorium has been designed to provide “town hall” event space for the future office occupiers, which is considered a premium and unique offer for the office building. It has been proposed alongside kitchen facilities and a small café area, and is integrated well with the adjacent area of the roof garden. The auditorium would also be flexibly used, being given over to public use at times when the roof garden is exclusively public.

Public Realm

- 4.17. At the Bishopsgate entrance, the proposals include the removal of the existing glass enclosure and the opening up of this entrance beneath the proposed vaulted entrances. Its width and dimensions would be increased, with an increased number of escalators being accompanied by nearby lifts. Landscaping is also proposed, with the introduction of trees at the boundary with the existing street. At Hope Square, the entrance would be improved similarly, with step-free access provided in a wide area which also accommodates new staircases and escalators, using its width and breadth to provide a series of vaulted spaces, with the introduction of street trees amongst its seating and hard landscaping.
- 4.18. An improved entrance to Sun Street Passage is also proposed at the western end of the existing concourse, responding directly to the new access to the 100 Liverpool Street development. New bus waiting areas and a bus information centre are proposed adjacent to this entrance. Sun Street Passage would then be enhanced with segregated routes for pedestrians and cyclists, as well as ramped access to the new cycle parking facilities at lower concourse level.
- 4.19. Along the new pedestrian path running alongside the historic trainshed walls, a cycle parking route would see cyclists use a ramp on Sun Street Passage to access the proposed Cycle Hub facilities. The Cycle Hub would provide 732 long stay cycle parking spaces, comprising 650 cycle spaces in two tier racks, 66 Sheffield stands, and 16 spaces for larger cycles. Short stay spaces are then provided in Hope Square, as existing, at the Bishopsgate entrance, and on Sun Street Passage, all proposed as Sheffield stands.
- 4.20. No changes are proposed to the taxi rank and taxi areas on Liverpool Street, and a blue badge parking space serving the OSD would be accommodated through the conversion of an existing space on Liverpool Street.

Associated Works

- 4.21. It is also proposed to enhance the bus facilities currently at the southern end of Sun Street Passage. As noted above this includes an area identified as a bus information centre as well as a new waiting area, but also through the improvements to the public realm at Sun Street Passage which include new signage and wayfinding.
- 4.22. The proposal also includes a new servicing strategy for the site, utilising and improved the existing service yard at lower concourse level and accessible from Primrose Street to the north. This area would be extensively increased to allow for the servicing required by Network Rail, the proposed retail uses, and the proposed OSD.

Summary

- 4.23. The proposal comprises station improvement works, the introduction of an Over Station Development, the rationalisation and extension of the retail offer within the Station, and public realm works comprising the Bishopsgate, Hope Square and Sun Street Passage entrances, as well as the introduction of new routes from Exchange Square into the Station.
- 4.24. The proposal would deliver the following:
- 1,319m² of new Station use (sui generis)
 - 86,336m² of new office floorspace (Class E)
 - 1,116m² of auditorium space (sui generis)
 - 1,968m² of public roof garden (sui generis)
 - 1,155m² of public realm at the three primary entrances (sui generis)
 - 1,934m² of new mixed retail and food and beverage use (Class E and sui generis)

5. Proposals – Listed Building Consent

- 5.1. In facilitation of the above works submitted for full planning permission, a number of listed building consent applications have also been submitted. Their descriptions of development are copied in full below:

5.2. **25/00474/LBC** – Phased development comprising partial demolition of Liverpool Street Station, including (in part) including station concourse, trainsheds, and truss/columns, demolition of 50 Liverpool Street, demolition of Bishopsgate Square entrance and Hope Square entrance; Works of reconstruction and remodelling of station basement, lower and upper concourse levels, new station columns/truss and roof (in part); introduction of new lifts, escalators and stairs and service spine at basement; increased operational space; insertion of new ticket gates; creation of new station entrances from Hope Square and Bishopsgate Square; creation of new units at lower and upper concourse levels for Class E (shops, cafe, restaurants), hot food takeaway (Sui Generis) and pub/bar (Sui Generis); creation of new upper concourses and associated new public access from Exchange Square including new walkways; works associated with the construction of a new Over-station development (OSD) reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business), including new station roof, truss and columns (in part), creation of a public amenity terrace (Sui Generis) at Level 18 with access from Hope Square entrance; new station and office entrances to Liverpool Street and Bishopsgate; and all other associated listed building works.

5.3. **25/00476/LBC** – Dismantling and relocation of the Great Eastern Railway (GER) War Memorial, within Liverpool Street Station.

5.4. **25/00475/LBC** – (i) Works to 40 Liverpool Street (Andaz, Great Eastern Hotel) including works to rear, north elevation to disconnect station roof and concourse, 50 Liverpool Street, and elements of the 1980s station; (ii) refurbishment works within the basement demise leased to Network Rail; (iii) works to disconnect two WW1 War Memorials; and all associated listed building works.

5.5. **25/00479/LBC**- Dismantling and relocation of London Society of East Anglians (LSEA) War Memorial, within Liverpool Street Station.

5.6. **25/00477/LBC** - Temporary Dismantling of Police Call Box and reconstruction in same location in Hope Square, Liverpool Street.

6. Consultation

Statement of Community Involvement

- 6.1. The applicant has submitted a Statement of Community Involvement, prepared by Shared Voice. This statement details consultation, taking place from June 2023 to March 2025, which included public engagement, targeted engagement with stakeholders, and pre-application consultation with the City of London corporation, the Greater London Authority, and Historic England.
- 6.2. Consultation included the following:
- An opinion survey (June 2023)
 - Passenger Focus groups (three held, June 2024 to October 2024)
 - Live consultation and social media outreach (November 2024 to December 2024)
 - Accessibility workshops (six held, November 2024 to March 2025)
 - Stakeholder engagement meetings (forty-eight held, June 2024 to March 2025)
 - Stakeholder email outreach (five listed, November 2024)
 - A public consultation webinar (November 2024)
 - Meet the team sessions (two held, November 2024)
 - Station 'Pop-Up' events (four held, November 2024)
 - A project consultation website (maintained throughout)
- 6.3. Annex 1 of the submitted SCI details the list of stakeholders identified as relevant to consultation and engagement, a list of c. 130 different stakeholders or categories of stakeholders (e.g. Members of Parliament). The document also states that the consultation undertaken resulted in receipt of 1,860 individual responses.
- 6.4. Summarising the key themes of stakeholder engagement feedback, the SCI states that stakeholders highlighted the “critical needs for the Liverpool Street Station redevelopment, emphasising accessibility improvements like step-free access, more lifts and escalators, and better signage” alongside concerns raised regarding platform congestion and the need for more space. This summary also noted that statutory bodies focused on the design and massing of the Over Station Development, echoed within the feedback provided by amenity groups. In summarising general feedback received the document listed the following:

Theme	Example Comment
Station facilities	Outdated and needing improvement; limited seating, making long waits uncomfortable; toilets often out of order
Platform congestion	Overcrowded during peak hours, creating safety hazards; difficulty boarding or alighting from trains; better system needed for managing passenger flow on platforms; platforms not wide enough
Accessibility	Station not wheelchair accessible; elderly passengers struggle with stairs due to lack of elevators; accessibility for disabled passengers need to be prioritised; no ramps make it impossible for mobility-impaired passengers to navigate; More inclusive features should be added to make the station
Transformation plans	Transformation plans seem to prioritise commercial interests over passenger needs; building more office space doesn't address the station's real problems/ proposals lack a clear vision for improving commuter experience; construction work during transformation likely to cause massive disruptions; designs don't seem to align with the historical importance of the station
Passenger experience	Overall passenger experience is poor due to lack of amenities; waiting areas are uncomfortable and insufficient for the number of passengers; people feel rushed and stressed because of poor station design; the station could do more to improve the comfort of passengers; passenger flow needs to be

	better managed to create a pleasant experience
Transport connectivity	Connections between buses and trains are poorly managed and cause delays; the station needs better transport links to surrounding areas; improving connectivity should be a priority
Improvement requests	Better waiting areas and more seating options; fix broken ticket machines and improve overall infrastructure; lack of proper maintenance is evident throughout the station.
Customer service	Information desk is hard to location, no proper signage; better training for customer service staff would improve experiences
Heritage preservation	Station's historical architecture should be preserved; transformation plans seem to disregard the heritage value of this site; please protect iconic features of this station; unique architectural design is a treasure that must not be destroyed.
Environmental impacts	Transformation should include eco-friendly features; noise pollution from the station affects nearby residents; more green spaces around the station would make it more inviting; the station should adopt sustainable practices to reduce its carbon footprint; reducing waste and improving recycling efforts should be a focus.

6.5. In its remaining sections, the SCI then details the summary responses within the proposed design to this feedback.

Statutory Consultation

6.6. Following receipt of the applications by the Local Planning Authority in April of 2025 it has been advertised on site via erection of site notices, subject of a published notice in the press and consultation letters dispatched to neighbouring residents as follows:

- On validation of the application for a period of thirty days
- Under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information, for a period of no less than forty days across December and January and expiring 21st January 2026.

6.7. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the consultation responses received is set out in the table below.

Consultee	Summary of Response
GLA	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. 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. 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. Officer response: Noted. The Matters raised are addressed by officers within the relevant sections of the report.
TfL	TfL supports the proposals in strategic transport terms. However, a number of matters remain outstanding and should be addressed through the framework of controls including planning obligations and conditions, as set out below. Where full resolution before committee is potentially unachievable, we have set out mechanisms (s106 Heads of Terms, Grampian-style triggers and conditions) by which they should be secured. We hope and plan to provide you with an addendum note on strategic transport after a TfL scheme Pathway Gate 2 meeting with Network Rail and the applicant team which is currently scheduled for 5 February 2026. It is also critical that the City's Committee Report summary of expected section 106 (s106) Heads of Terms confirms TfL via its affected subsidiary companies must be a signed party to the s106 agreement, and includes explicit requirements for Asset Protection, Development and both Temporary and Permanent section 278 (s278) Agreements to be entered into with TfL prior to any demolition or commencement of works. The rest of this response re-states our previous comments on pre-determination requirements and requested obligations and conditions and provides updates on each. Where new or altered conditions or obligations are now requested, any additionality or difference is made clear. Officer response: Noted, the matters raised are addressed in the relevant sections below.

TfL – Crossrail Safeguarding	No comments to make on the application. Officer response: Noted.
TfL – Infrastructure Protection	No objection in principle, subject to conditions related to protection of infrastructure throughout construction and in operation. An informative is also requested concerning advised contact with TfL Infrastructure Protection in advance of the final design and method statements requested via condition. Officer response: Noted, with the relevant conditions forming a part of the recommendation.
Historic England	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 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. Comments: Overall impact on the Station identified as a high level of harm at the upper end of Less than Substantial Harm, with the demolition of the 1990's concourse roof fabric causing a high degree of harm through the loss of architectural unity, the new entrances to the Over Station Development causing a high level of harm through the new scale and the aesthetics

	of the entrance contrasting with and dominating the street, a contrast which draws attention, and which transforms the relationship between the Station and its context. Harm also results from the loss of natural light, the loss of columns, and the new retail units and concourse extension which block views of brick elevations of the train shed. Some benefits are derived from improvements such as the removal of the existing retail units at the concourse which opens up views, improvement of internal light levels, the enhancing setting of the war memorials, and improvements to views within the trainshed. Due to the size, location and design, the new entrances and OSD would greatly reduce the ability to appreciate the Former Great Eastern 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. 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. 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. 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. Historic England's response also includes some suggested changes to the proposed design, including changes to the interiors, the palettes of materials proposed, the new entrances, the junction between the entrances the OSD, refinement of the proposed retail units, and opportunities to reinstate important lost features. Officer response: The matters raised by Historic England are addressed in the Architecture, Urban Design and Public Realm, Heritage and Strategic Views sections of this report.
Historic England GLAAS	A two-stage archaeological condition is requested, which could provide an acceptable safeguard against any potential harm to archaeological remains. This would comprise evaluation to clarify the nature and extent of surviving remains, followed if necessary by a full investigation. Officer response: Noted, with the relevant conditions forming a part of this recommendation.
Council for British Archaeology	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. 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. 2. The creation of a new building above the station. 3. Alterations to the existing station entrances. 4. The creation of a new upper level along the station concourse. 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. Officer response: The matters in the CBA objections are addressed in the Architecture, Urban Design, Heritage and Strategic Views sections of this report.
Twentieth Century Society	Century	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 <i>"the Proposed Development is not technically viable, as a surplus is not generated once the costs of the Station</i>

	<i>Improvement Works are taken into consideration</i>" (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. The proposals would amount to <i>substantial harm</i> to the Grade II Liverpool Street Station and Bishopsgate Conservation Area. 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 <i>substantial harm</i>. 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 <i>substantial harm</i> 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 <i>substantial harm</i> to the Grade II listed station. 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. 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. It is our view that 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 City of London Local Plan 2040 (Revised Proposed Submission Draft April 2024) states at paragraph 11.5.4 that <i>outside the identified tall building areas</i> [the City Cluster and Fleet Valley areas], <i>tall buildings would be likely to very significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.</i> This is the case for the proposed Liverpool Street development, contrary to Strategic Policy S12(8.c) of the plan, which states that <i>tall buildings must have regard for... the significance of heritage assets.</i> Given the potential <i>significant harm</i> posed by the OSD, it runs contrary to the Local Plan. Given the <i>significant harm</i> 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. Officer response: The matters in the Twentieth Century Society objections are addressed in the Architecture, Urban Design and Heritage and Strategic Views and 'Principle of Development and Economic Considerations' sections of this report.
Society For the Protection of Ancient Buildings	Having considered the proposals and associated documentation, we now write with the Society's response. The SPAB supports and concurs with the views expressed by other National Amenity Societies, SAVE Britain's Heritage, and Historic England, all of whom have raised significant concerns about the impact of the proposals on designated heritage assets , and the wider historic environment. While we recognise that the scheme currently proposed has been revised from the previous application

	25/00494/FULEIA , the proposals continue to result in the extensive demolition of elements of the Grade II listed station, in our view these losses have not been sufficiently justified. Additionally, the over-site development which although reduced in mass, remains an over-bearing presence on the Grade II* listed former Great Eastern Hotel. The negative impact on the Bishopsgate Conservation Area and St Botolph's Church has also not been mitigated by the revisions. In our view, the fabric, design integrity, setting, roofscapes, skyline, and context of the historic environment will be irreversibly harmed by the scheme. Despite the revised scheme, the Society remains extremely concerned by the proposals and does not consider that they are supported by the requisite clear and convincing justification, or that the nd 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. Officer response: The are addressed in the Architecture, Urban Design and Heritage, Strategic Views sections of this report.
Victorian Society	The Society acknowledges the need for operational upgrades and enhancements to the functionality and accessibility of Liverpool Street Station. However, it is essential that any improvements to the Station's facilities are

	respectful of the significance and setting of both the Station and neighbouring heritage assets. Despite the advice offered by the Victorian Society on the previous application, and in pre-app consultation with the applicant in advance of the submission of this latest scheme, this application still proposes sweeping demolition of the Grade II-listed 1990s concourse and substantial over-station development, causing a high impact on the significance and setting of the Station and the grade II* listed Andaz hotel, and impacting immediate, mid-range and long-range views of these heritage assets. In this proposal, the harm to the significance of the Grade II-listed station is significantly compounded by the extensive retail development proposed within the Victorian train shed, part of the site that was previously spared from intervention. This level of harm is also insufficiently understood in the applicant's Heritage Impact Assessment, a document that contains a high level of contradiction throughout. Whilst we welcome Donald Insall's historical analysis, which is thorough and well-researched, we question whether the analysis provided in section 5.0 of the Assessment aligns itself with the judicious research that underpins earlier parts of the document. Conflict in the document particularly arises when sections 4.0 and 5.0 are considered side-by-side. Whilst various levels of harm are understood, the justification in 5.0 contradicts the harm acknowledged earlier in the report. A selection of these contradictions is highlighted in this letter. There is also concern that Donald Insall Associates has either not understood or at least not communicated the impact of cumulative harm, whereby the sheer volume of high level of less than substantial harm results in a much greater impact on the Listed fabric and its setting than is being stated. As a result, the report is unconvincing and potentially misleading in its assessment of harm.

	Furthermore, the Financial Viability Assessment lays bare the gamble the scheme represents, relying on unsecured funds and the precarious hope of improved market conditions. This poses a significant risk to one of the most important stations in the UK. The level of harm caused by the proposed development, deemed necessary to fund works to enhance the Station, is also insufficiently justified in the Heritage Impact Assessment, which contains considerable inconsistencies in its assessment of significance. Ultimately, neither report instils confidence that the applicant understands the significance of the heritage assets or the impact of the proposals. We ask your Authority to seriously consider whether the Heritage Impact Assessment can be relied upon to inform your determination of the application. We previously expressed the view that an options feasibility study is essential to assess how the Station could be enhanced while preserving the significance of the heritage asset. Except for the Design Development report, which only briefly considers three over-station development options, no serious alternative options to enhance the Station or fund these works appear to have been explored. Consequently, it has not been demonstrated that such a large-scale and harmful development is the only option, which, by the applicant's admission itself, remains financially unviable. The proposed scheme presents a plan for partial demolition, redevelopment, and refurbishment of the Grade II-listed heritage asset, which would result in substantial harm to its significance and setting, as well as a high level of harm to the Bishopsgate Conservation Area and numerous nearby heritage assets. Network Rail and its partners are required to provide '<i>clear and convincing justification</i>' for this substantial level of harm, which the provided documentation does not. 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. Policies 203 d, f & g of the NPPF state that: <i>'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; (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.'</i> C (d) of the London Local Plan also outlines that: <i>'proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.'</i> This application does not satisfy these policies. The Society has consistently highlighted the unacceptability of over-station development as a way of enabling improvements to the Station. This approach would cause substantial harm to the significance of the Station, in addition to a high level of harm to the significance and setting of numerous surrounding heritage assets. Neither the approach nor the harm that it would cause have been justified, and the approach is, in any case, asserted by the applicant to be financially unviable. 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. Officer response: The matters in the Victorian Society objections are addressed in the Architecture, Urban Design and Heritage,

	Strategic Views, and 'Principle of Development and Economic Considerations' sections of this report.
The Georgian Group	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 <i>London View Management Framework SPG</i>. 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 18th and 19th 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.

	The Georgian Group objects to this application for Planning Permission. Officer response: The matters raised by the Georgian Group are addressed in the Architecture, Urban Design and Heritage and Strategic Views sections of this report.
SAVE Britain's Heritage	Object to the application "in the strongest terms on heritage grounds", with the proposed scheme judged to "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. Sections of the response then detail objection to: substantial harm to Liverpool Street Station; substantial harm to the Bishopsgate Conservation Area; substantial harm to the setting of the Grade II* Listed Great Eastern Hotel; public benefits and justification (including criticism that the proposed scheme is not currently viable); inadequate consideration of alternative options, including a baseline scheme described as a costed, minimum harm scheme; inadequate consideration of alternative options, referring to

	alternative sites; acceptability of a tall building in this location; disruption to travel and timescales for delivery; views to St. Pauls Cathedral. The proposed development qualifies as a tall building as defined by the draft <i>City Plan 2040</i>. Under this emerging policy, tall buildings are subject to specific criteria and are considered appropriate only in designated areas. The adopted <i>City of London Local Plan 2015</i> designates the application site as inappropriate for tall buildings, a position reaffirmed in the draft <i>City Plan 2040</i>. The application site lies outside the City Cluster Tall Buildings Area. In line with Policy D9 of the <i>London Plan</i>, “<i>Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</i>” 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 18th and 19th 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. Note: SAVE Britain's Heritage also submitted a report entitled "Embodied Carbon Assessment" as authored by Simon Sturgis, and commissioned by LISSCA (the Liverpool Street Station Campaign). The report summarised that: 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. The assessment methodology used to produce the assessment is flawed as it is based on the now redundant 1st Edition (2017) with only partial use of its replacement the 2nd Edition (2023). This flawed assessment therefore gives potentially misleading conclusions which are likely to be lower than if the 2nd edition was exclusively used. The submission schemes OSD has an inefficient layout with a sub-optimum wall to floor ratio. The OSD facade design has only a 30-year life which is inefficient in terms of embodied carbon, life cycle and resources. The submission fails to meet current sustainability and energy efficiency standards, let alone those likely to be in place on completion in 2036. The submission for the OSD therefore fails to meet office development of the highest quality requirements as defined in Strategic Policy S4.

	The OSD performs poorly against UK (2050) and City of London (2040) Net Zero targets and will therefore potentially be obsolete on completion. The submission demolishes useable fabric without examining retrofitting options for 50 Liverpool Street in any detail. As these failures do not meet the City's stated requirements for 'exemplary' design (City Plan 2040 –Strategic Policy S4), the submission should be rejected on these bases. Officer response: The matters in SAVE Britains Heritage objection are addressed in the Architecture, Urban Design and Heritage, Strategic Views and Sustainability sections of this report.
Surveyor to the Fabric of St Paul's Cathedral	Concerns regarding the Heritage Impact Assessment and Townscape Visual Impact Assessment in that: we do not consider the baseline assessment of significance is proportionate to the exceptional international significant of St Paul's Cathedral; 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, and officers should be mindful that the application as made public is not satisfactory for constructive engagement; we consider that the HIA and TVIA misconstrue, misrepresent and underplay the assessment of and nature of harmful heritage impact that the proposals will have on the Cathedral; we have concerns with the use of trees as screening to diminish the analysis of harm. 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 <i>"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution</i>

	<i>made by their setting</i>” (emphasis added). Request that the Planning and Transportation Committee formally and publicly minute that the applicant’s HIA is unsatisfactory. We drew the attention of the project team to the mature draft of the <i>St Paul’s Cathedral Setting Study</i>. 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. During initial pre-application meetings, all parties agreed that the scheme would cause harm to the significance of the Cathedral. 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. 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. We consider the proposals would harm the ability to appreciate the Cathedral as a Strategically Important Landmark through eroding the legibility of strategic views. The proposals are contrary to the guidance outlined within the City's <i>Protected Views SPD</i>. As such, we consider the proposals would run contrary to adopted local and London-wide view management policy. Objections also raised to the concept of trees as screening to impacts, noting their seasonal variation, the lifespan of these trees, and the longevity of the trees when compared to the longevity, permanence and unchanging St Paul's Cathedral. 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. 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 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 <i>City Plan 2040</i> 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. 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. 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 <i>any</i> 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?

	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. 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. Officer response: The matters raised by the Surveyor of the Fabric of St Pauls are addressed in the Architecture, Urban Design and Heritage, Strategic Views and the 'Principle of Development and Economic Considerations', sections of this report.
Historic Buildings and Places ("HB&P")	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. Officer response: The matters raised by the Historic Buildings and Places are addressed in the Architecture, Urban Design and Heritage, Strategic Views sections of this report.
War Memorials Trust	The Trust does not consider the proposed plans for the station's redevelopment to adversely affect the station's war memorials. The Trust welcome the proposed removal of the passenger lift from the base of the Great Eastern Railway war memorial (WMO/111827), an intervention which represents an element of heritage gain. Accepting the inherent risk to fabric where dismantling is concerned, given the previous relocation of the listed war memorials in the 1990s remodelling of the station, the Trust does not feel there is any significant impact in the proposed relocation of these memorials again. They are not presently in their original setting. Officer response:

	Noted.
LAMAS – London and Middlesex Archaeological Society	LAMAS is a member of the Liverpool Street Station Campaign (LISSCA) and we object to this planning application primarily on the following grounds: The substantial harm that would be caused to (a) the setting of the Grade II* listed former Great Eastern Hotel and Liverpool Street Station by the new 97m, twenty storey building being erected over the station, and to (b) the setting of the Bishopsgate Conservation Area as a whole, which is generally an area of low-rise buildings. The destruction of the Grade II listed roof of the concourse. Its destruction is reported as necessary as it would be unable to bear the weight of the new tower above it. We remain unconvinced that such a large building is required to fund the necessary upgrades to Liverpool Street station. The extension of the high-level walkways along the east and west sides of the trainshed to house a large number of additional retail units, which will have a harmful impact on the special interest and significance of the Grade II listed trainshed. The Heritage Statement prepared by Donald Insall Associates concludes (p9) that '<i>In summary, the proposals comply in part with the development plan comprised of the heritage policies in the City of London Local Plan, the draft City of London Plan, and the London Plan, although some harm will be caused to heritage assets which prevents full compliance with certain policies</i>'. We believe strongly that the harm caused will be material, and that the proposals represent an unacceptable contravention of these planning policies. We therefore strongly recommend that this planning application be refused. Officer response:

	The matters in the LAMAS objection are addressed in the Architecture, Urban Design and Heritage, Strategic Views sections of this report.
Conservation Advisory Committee (CAAC)	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. Officer response: The matters raised by CAAC are addressed in the Architecture, Urban Design and Heritage, Strategic Views sections of this report.
London Borough of Islington	Acknowledgement received. Officer response: Noted.
Westminster City Council	Raise no objection. Officer response: Noted.
Harlow Council	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 recognised, however, that London Liverpool Street station is in the Bishopsgate Conservation Area and the 19th century building itself is Grade II listed, with structures of historic interest such as 19th 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 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. Officer response: Noted.
Royal Borough of Kensington and Chelsea	No objection to the proposals. Officer response: Noted.
London Borough of Hammersmith and Fulham	No objection to the proposals. Officer response: Noted.
London Borough of Tower Hamlets	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. Officer response: The matters raised by LBTH are addressed in the Architecture, Urban Design and Heritage, Strategic Views sections of this report.
London Borough of Camden	No objection Officer response: Noted.
Health and Safety Executive	On review of the planning application material, the proposed development does not include a relevant building and does not fall under the remit of Planning Gateway One. Officer response: Noted.
London City Airport	The proposals do not conflict with London City Airport's safeguarding criteria. Would request an informative concerning the requirement to notify the CAA and Defence Geographic Centre of use of a crane 100m or higher via Crane Notification. Officer response:

	Noted.
Port of London Authority	Confirmation that no comments to be made. Officer response: Noted.
Environment Agency	No objections to the proposal. Officer response: Noted.
Natural England	No objection to the proposals, with Annex A to the response comprising Natural England's Generic Advice. Officer response: Noted.
Thames Water	No objection subject to conditions concerning surface water capacity, surface water drainage, piling method statements, construction adjacent to strategic water mains, water network infrastructure capacity, and informatives concerning sewage flooding and requirements for Build Over Agreements where relevant, and minimum pressure provision. Officer response: Noted, with the relevant conditions and informatives forming a part of this recommendation.
Theatres Trust	Encourage engagement with the Theatres Trust should use of the proposed roof-level auditorium be proposed for any theatre or performance space use. Officer response: Noted.

Letters of Representation

- 6.8. Three thousand five hundred and seventy eight (3,578) representations have been made to the application by members of the public, and various organisations at the time of writing this report.

- 6.9. Of those raised in objection, representing two thousand three hundred and eighty eight (2,388) representations, summaries of the themes raised in these representations are found within the table below.

Representor	Summary
Hyatt International, in relation to the Andaz London Liverpool Street (the former Great Eastern Hotel)	Hyatt have been the key steward of this important City of London hotel for almost 20 years. Previous discussions with MTR, Sellar and Network Rail had proposed to include the Andaz within a wider scheme, providing assurance that the hotel's position as a key 5* hotel was accommodated, and that compensatory provision was made for key hotel facilities as part of the wider station redevelopment. In turn, Hyatt were looking at providing greater integration of the hotel within the Liverpool Street station development: giving up and allowing areas of the Andaz to be used to enhance the overall station redevelopment, including relinquishing the hotel's loading bay, providing enhanced permeability and pedestrian flow, and allowing public access to some of the historic rooms as concourse accessible public spaces. However the latest proposals now exclude the Andaz, with the red line abutting the hotel on three sides, but excluding it from the proposals. Any redevelopment of Liverpool Street Station is technically and architecturally challenging due to the proximity to the Andaz, meaning it is very difficult to create a proposal which suitably accommodates Hyatt's needs without integrating the hotel into the wider proposals. Hyatt were therefore both surprised and disappointed by this move and have been left with limited engagement and communication with Network Rail on this matter. The scheme represents 'the worst of all possible worlds' in terms of impact and disruption, with no added benefit to the Andaz which we believe will be threatened by the proposals. Hyatt remain willing to be engaged in the process. Impact on the Andaz

	Key parts of the proposals for Ref:25/00494/FULEIA include: • significant alterations to station concourse, train sheds, and truss/columns, • demolition of 50 Liverpool Street, as well as the Bishopsgate Square entrance and Hope Square entrance; • creation of new upper concourses and associated new public access from Exchange Square, including new walkways; • new entrances onto Liverpool Street and Bishopsgate; • provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); including an auditorium (Sui Generis) at Level 18 with terrace; as well as provision of private office terraces; The proposals will immediately abut the Andaz both to the north and west. To the East, the proposed new entrance, which extends to the roof level (5th/6th Floors of the Andaz), appears to create a crypt-like vaulted ceiling which encloses all rear rooms. CGI's show this will be positioned such that it almost abuts the hotel, with a scale and character wholly incongruous to the fine grain of the hotel. Rear rooms will look onto this 'cave like' structure, which will be artificially lit, creating unnatural lighting to that part of the building (Fig.2 below) and likely to create significant 'echo' impact and noise to residents, particularly through station announcements and footfall into / out of the station entrance both late at night and in the early morning. To the West, the demolition of 50 Liverpool Street (a not unattractive building), which presently abuts the Andaz, is proposed for wholesale demolition, to allow for a proposed combined new entrance and plinth leading to the large scale commercial building which will encase the hotel to the rear.

	The significant commercial building proposed to the rear will enclose the Andaz in a sarcophagus manner, with the rear rooms being potentially rendered unusable. This will have a significant operational and business impact on the Hotel. Supporting documents for Ref:25/00494/FULEIA assess the impact on the Andaz as giving rise to a '<i>low-level of less than substantial harm</i>'. We strongly and firmly dispute this. The supporting documents attempt to mitigate the negative impacts of the proposals by including a landscaping scheme, and revealing the full extent of the building's original northern elevation, as part of the proposals. However, this fails to consider and appreciate the new entrance 'structures' from Liverpool Street and Broad Street, both of which create an unedifying relationship with the hotel. This is particularly the case for the rear of the Andaz, with the proposals enclosing the building in a 'cave' / underground crypt arrangement. Those rooms at the rear of the hotel would have a "walled" outlook, with increasing severity towards the upper floors, creating an almost "subterranean" or "part subterranean" experience for residents staying in those rooms. These rooms would most likely be subject to artificial light on a 24/7 basis (see further comment below re light pollution) and significant noise echo (see below comments re noise). This impact, which we consider to be significantly greater than (a low level of) 'less than substantial harm' does not appear to have been considered in any real detail in the heritage statement and creates a greater level of harm to the Andaz building than that set out / predicted. We further believe that the benefits from the removal of 50 Liverpool Street is overstated and its replacement with a 3-5 storey entrance / plinth leading to the tall building creates a worse, not better, position for the hotel. We therefore also dispute this has an 'added benefit' to the hotel as a Listed Building which per se offsets harm elsewhere. We agree that

	the proposed office building will involve change to the asset's setting, however we dispute that the impact creates no more than a <i>'moderate level of less than substantial harm'</i> to the hotel itself because its architecture, which is its primary locus of heritage significance, is preserved intact. The building is also Listed Grade II* as a consequence of its Social and Group strength, both of which will be significantly impacted. The setting of the Andaz will be significantly and demonstrably impacted, as described above, and we see no mitigating 'enhancements' from the development to offset this. In fact, the harm to the Andaz, as one of the few 5* hotels in the City and as an important Architectural and Historic Grade II* Listed Building, is potentially very significant. For this reason alone, the Planning application in its present form can and should be refused. The Daylight/Sunlight Assessment submitted alongside Ref:25/00494/FULEIA notes that daylight and sunlight impacts have been assessed in relation to 23 surrounding properties. With regards to daylight, it is acknowledged that daylight alterations experienced by the Andaz would, for some affected spaces facing the proposed development, fall in the 'major adverse' category. The report seeks to justify this as 'expected', given the close proximity of this property to the proposed development. However, this does not serve as appropriate mitigation for the proposals being acceptable. Further justification is made that the sleeping spaces, such as hotel rooms, are less important than primary living spaces, in relation to daylight, simply because: <i>'The building, as a hotel, is not residential and will be occupied by a transient population who will primarily be using the rooms for sleeping.'</i>

	This argument is completely unfounded. The Andaz is a 24/7 business providing a 5* full service offering to its guests. Guests are paying a premium for a high standard of service, luxury and amenities on a 24/7 basis. Its rooms are used by guests as a home away from home for the duration of their stay, whether they are staying at the hotel for business or leisure. Certain rooms at the Andaz are also used for dining, conferences and/or meetings during daytime. The above justification also misses the point of the role and function of the Andaz as one of the few 5* City hotels, and one of the few surviving great railway hotels; not only in London, but in the UK. This goes to the heart of the Grade II* listing and is neither adequately explained in the heritage statement, nor assessed in a qualitative distinct manner within the daylight/sunlight assessment, which simply concludes any harm <i>'acceptable overall'</i>. Supporting documents for Ref:25/00494/FULEIA only consider lighting in the briefest of manner. It is however recognised that the negative effects of light trespass have been considered and it is concluded that the Andaz Hotel would experience the greatest significant impact of all properties assessed in terms of light trespass. Little is suggested by way of mitigation, save for the aforementioned argument that the residents of the hotel provide only 'transient use' which may be considered less important in relation to light trespass issues, <i>'particularly as the primary use of this building is for sleeping'</i>. This again wholly misses the point that the Andaz is a 5* luxury hotel, with guests paying a premium for a high standard of service, luxury and amenities on a 24/7 basis. Its rooms and suites are used by guests as a home away from home, for both business and leisure, with dining, function, meeting room and conference facilities. It certainly isn't only a place to sleep.

	The aforementioned argument alone is therefore factually incorrect, and also understates the role and expectations from residents of a full-service 5* hotel, as well as the role the Andaz has within the City of London, not only to its residents, but also to the wider social function it provides within the Square Mile. The assessment concludes: <i>'Occupants of the hotel would be likely to close curtains or blinds at night which would reduce the potential for light trespass.'</i> Flippancies aside, this underscores a misunderstanding of the true impact of the proposals, notably to those rooms to the rear of the building, in terms of these being enclosed within what is likely to amount in architectural terms to a 'crypt like' structure, which, from CGI's looks to be floodlit and which may very well create 24/7 light pollution to those rooms and therefore negatively impact guest experience. Noise appears to be considered as part of the construction process, with a suggested plan to consider noise and vibration during construction, but there appears to be no significant modelling of the post completion impact of the proposals on the Andaz. In particular, the proposed vaulted entrance could present a significant 'echo' impact on the rear of the Andaz. The structure in plans / CGI's suggest a vaulted roof, which extends outwards and upwards from pillars towards the rear of the hotel. Based on similar structures and the height of the 'ceiling', the structure is likely to create a significant echo to residents and other hotel operations located to the rear of the property. This may render those spaces unusable for residents. This will be exacerbated, notably at night and during early mornings, by footfall entering / leaving the station and by tannoy announcements as part of station operations, which on some days run beyond 01.00 am and recommence just after 03.00am.

	We understand that the development at the present time is not viable and therefore we question whether the planning application Ref:25/00494/FULEIA is ‘the tip of the iceberg’ and that ultimately a larger scheme may be required to be viably delivered. Similarly, a potential equal risk is that any approval will sit unimplemented in lieu of better market environments catching up, representing a ‘Sword of Damocles’ to future business planning and viability at the Andaz. The planning application Ref:25/00494/FULEIA fully recognises, during the demolition and construction stage, that vibration effects are predicted at the Andaz Hotel and neighbouring offices. This notes a vibration risk assessment and monitoring strategy would be prepared, which identifies any additional mitigation required. It is suggested that a risk assessment and monitoring strategy would be agreed with the hotel and secured through condition. We do not consider this is an appropriate response to the hotel or to seeking any mitigation. Given the status of the Listed Building and the Andaz’s position as a 5* full service hotel, we suggest this work is undertaken ahead of any decision being made on the application: it is not appropriate to leave this to condition. Significant and excessive disruption through construction, dust, noise and vibration may render the hotel unable to operate. This is particularly the case for vibration associated with works subterraneous to the hotel and/or for works being undertaken to the rear of the Andaz. This needs to include: • Impact through demolition (noise, vibration, dust) • Impact through Construction (noise vibration, dust) • Impact on essential services (water, gas, electricity) • Impact on deliveries and servicing of the property

	• Confirmed times scales (in weeks) for each of the above Disruption to the Andaz may result in reduced services to visitors at a time when the City of London is seeking to build the City as a key destination for visitors under its 'Destination City' initiative. At worst, it may be necessary to close the hotel for a period. This would impact not only operations, but also cultural and neighbourhood events which the Andaz engages in within the wider community. It is vitally important that any programme is acceptable to the operations of the Andaz, and that Hyatt is given precise details of timing and process for any construction in the event that planning permission goes ahead: this cannot be left to a condition. The previous proposals, which included the Andaz, allowed for greater permeability into / out of the station through the opening up of the ground floor of the hotel. This was only achieved through compensatory improvement for the hotel within the wider scheme, in order to maintain its 5-star status and provide for a better resident experience. The revised proposals remove the Andaz from the scheme, and therefore the benefit of increased permeability into and around the station and the opportunity to dissipate pedestrian flows. The proposals, as they stand, do not achieve any of this and provide no greater concourse space to that which exists today. This missed opportunity, in combination with the removal of the upper concourse will have the effect of concentrating pedestrian flow within key stress points in and around Liverpool Street station. The proposals therefore do nothing to assist in the dissipation of commuters nor help in the increased flows and stress points since the opening of the Elizabeth Line.

	Key entrances on Liverpool Street and Bishopsgate will therefore remain congested, especially at peak times, and the stresses experienced on the concourse / entrances to the Tube will not be mitigated. In fact, in all likelihood, the position will be materially worse given the increased column and support requirements for the development necessitating large structural support columns to be positioned across the concourse and within the Tube hall. The net effect, notably with the removal of the upper concourse in its entirety, is that pedestrian movement will be further concentrated around the entrances and the Andaz, and will not mitigate and may further exacerbate those stress points presently experienced, notably at rush hour. Liverpool Street Station and the capacity of its concourse has experienced growth in pedestrian movement, notably since the opening of the Elizabeth Line in 2022. This has resulted in a greater number of pedestrians both within the concourse and at key 'stress points' around the concourse, notably the lower concourse, where most of the existing congestion lies, including in particular (i) areas around the London Underground main entrances / exits off the concourse; and (ii) areas across the entrances to platforms 1-10. Initial proposals which included the Andaz/Great Eastern achieved greater pedestrian permeability through the opening up of the ground floor, with compensatory replacement and enhancement of floorspace for the hotel elsewhere within the development, however the latest plans by Network Rail now exclude the hotel and this previously presented opportunity. There will therefore be no enhanced permeability from the south east corner of the development. A review of the plans and supporting documents for the proposals indicate that the capacity / space for increased capacity (and therefore safe pedestrian movement - see

	below) within this concourse does not increase at all, with the ACME scheme neither presenting a materially greater concourse to that already existing, nor increasing the scale of the upper concourse, which largely remains in the format of the existing arrangement, with further upper elements removed in their entirety. In fact, with those upper concourse areas being removed completely, the capacity of the concourse will be reduced significantly, rather than increased. This will have a potentially significant detrimental impact on the operation of not only the railway station, but also the Tube station (including linked key tube platforms) and the recently completed Elizabeth line. It is also likely to lead to increased congestion at key entrances and exits of the station. The proposed installation of temporary platform lifts during Phase 1 construction is also likely to impact pedestrian flows in an already busy area of the concourse. As part of the proposals for the Hope Square reconstruction, Ticket Hall B will be partially closed and large columns will also be sunk at the entrances to platforms 1 and 2 which will cause significant disruption for train arrivals and departures. There appears to be no assessment of the usability of these areas post construction and the effect this will have on further concentrating pedestrian movement. Critically, the proposals fail to increase the size of Ticket Hall B despite the Elizabeth line now discharging directly onto the existing concourse. The overbuild lift cores further reduce Ticket Hall B's concourse size, exacerbating, not improving any resulting development. Given that there would be no increase in concourse capacity, the net effect of these proposals is likely to be materially worse for commuters and other pedestrians using the station.

	Liverpool Street Station and the capacity of its concourse has experienced growth in pedestrian movement, notably since the opening of the Elizabeth Line in 2022. This has resulted in a greater number of pedestrians both within the concourse and at key 'stress points' around the concourse, notably the lower concourse, where most of the existing congestion lies, including in particular (i) areas around the London Underground main entrances / exits off the concourse; and (ii) areas across the entrances to platforms 1-10. Initial proposals which included the Andaz/Great Eastern achieved greater pedestrian permeability through the opening up of the ground floor, with compensatory replacement and enhancement of floorspace for the hotel elsewhere within the development, however the latest plans by Network Rail now exclude the hotel and this previously presented opportunity. There will therefore be no enhanced permeability from the south east corner of the development. The sheer extent of the construction programme, which is at risk of prolongation and / or significant amendment, is material to the harm the Andaz will suffer both as a business and a Listed Building. The development, including demolition, is predicted to take approximately 8 years, with a very real prospect for additional delays. As part of this, it is estimated that station works would take over 4 years, with Underground works taking just under 4 years. During this period, approximately 50% of the main concourse will be closed during construction (four years). We consider this will result in a material health and safety concern for both passengers and visitors to the Andaz. This is simply unmanageable. Throughout this process, the Andaz will need access to the rear of the property for emergency exit and servicing. Such access does not appear to be possible during the construction period, especially during the phase 1 works. If

	this is the case, this would likely create a health and safety issue for the Andaz. The Demolition and Construction response in the Environmental Statement notes the programme as being both indicative and subject to a number of assumptions. There will need to be further detail on the likely phasing of demolition and construction works, the need for additional assessment of technical detail, and the need for further discussions with key stakeholders, including TfL in its capacity as operator of both the Tube and bus stations (given the impact on both assets). Appendices within the outline CEMP set out the level of closure during this period, and the extent to which the concourse and Tube will be impacted. They show that over 60% of the station concourse (including Platforms 16 and 17) would be closed for a minimum of 2 years, following which the remaining 40% (including Platforms 1 and 2) would be closed for the next 2 years. This means that over the aforementioned 4 year period, there will always be 2 platforms out of service, reducing the 17 platform capacity of the station by approximately 12%. The anticipated partial closure of the concourse over a period of 4 years, together with the anticipated closure of up to 50% of the Tube Station, during the construction works is highly likely to result in a significant health and safety issue, notably at rush hour, which does not appear to have been considered or, more importantly, mitigated for as part of the proposals. The proposals also appear to result in the closure of the station control room, which would include significant cabling and electronics that do not appear to have been considered. Similarly, it appears that ticket Hall B would be partially closed, but no assessment of the impact of this on pedestrian flow has been provided. Ticket Halls A/B/C constructions appears to run concurrently but no details have been

	provided on how this will be achieved without significantly impacting pedestrians or commuters. In summary, the significant disturbance caused by the construction works has not been adequately dealt with as part of the proposals: this will lead to further stress within the station and may create a very real health and safety issue which has not been considered. Throughout the duration of the construction works, the Andaz will require access to the rear of the property which has been similarly ignored in the planning documents. The application indicates that rail services may be utilised for waste removal from the demolition process, as well as to help facilitate construction. However, this is very heavily caveated, '<i>... providing this is logistically practical</i>'. A review of the demolition / construction plans show no direct secure linkage between the relevant platforms (i.e. platforms 16 and 17 during phase 1 and platforms 1 and 2 during phase 2) and annexed construction areas. This means that any transfer of materials, either from demolition or for construction, will need to cross active pedestrian routes which are being maintained within the station for its continued operational use. We therefore seriously question the efficacy of any transfer of material in this manner being achieved across an operational station which is already compromised, without significantly impacting health and safety; particularly given that the pedestrian routes are necessary to keep the station operational and are likely to become more heavily pedestrianised during demolition and construction due to the reduction of commuter space. Any closure of platforms will also necessitate trains being taken out of service (the CEMP suggests trains may be diverted or dropped, but no further detail is provided) or the platform usage being extended beyond operational hours.

	This latter option indicates a very real prospect of building operations extending to 24hrs, exacerbating an already significantly compromised operation for the Andaz hotel for a period of 8 years and possibly more. The Application outlines the potential impact of construction traffic resulting from the development. In terms of access by road, it is acknowledged that the construction process will require the significant use of pitlanes to allow for deliveries and remove waste from site, including in particular the following: • The pitlane at Bishopsgate will require the entrance to Liverpool Street immediately outside the hotel be closed for at least 2 years, therefore placing construction activities immediately alongside the Andaz • Construction compounds and pitlanes in Hope Square appear to be in place for almost 7 years • The use of pitlanes also means that there is not going to be any access from Liverpool Street or Sun Street for over 2 years: it is not clear whether this will also limit access to buses during the same period. Clearly these closures are based on a 'best case scenario', with a real prospect for extended demolition and construction periods requiring further additional closures. The CEMP estimates up to 350 vehicle movements per day at peak, and up to 140-150 HGV movements per day and low loader vehicles movements of up to 12 per day during the main construction period. Most of this vehicle movements are expected to take place overnight / out of working hours, with the potential for the loading of demolition waste and unloading and movement of construction materials across the site expected to take place between 00.30 and 03.30 in the morning. Additionally, if it turns out that the platforms cannot be used to transfer waste / import construction material as

	anticipated, this will further increase the number of vehicular movements, working hours or extended use of these pitlanes. The CEMP appears to consider this as a very real prospect, by acknowledging this as an option, but provides no further detail. No account has been taken of the 40+ deliveries per day which the Andaz averages, alongside the very significant drop offs by taxis and other vehicles. The pitlanes along Liverpool Street will result in there being significant construction traffic in front of the Andaz for years; impacting deliveries, taxis bringing guests and accessibility to the hotel overall. More widely, pitlanes will also impact Bishopsgate significantly. As one of the key arterial routes into the City this will have a long term impact on both one of the City's primary roads, and also the extensive use of Bishopsgate for buses. Similarly, the pitlane proposed within Sun Street passage will have a long term material impact on the existing TFL bus station serving Liverpool Street Station. Any diversion of these routes and services will have a transferred impact elsewhere. The true impact of this is not considered at all in the planning documents. The resulting development does not increase the capacity of the main concourse and, in fact, reduces it as a consequence of the removal of the upper concourse. Platforms 1 and 2 need to have columns sunk down, meaning that platform 1 may not be able to re-open and may not be able to remain in service. Narrow station platforms with large columns may not be safe to re-open. As a consequence, the benefits of the scheme to Liverpool Street station are overstated. Further to the above, it is clear that there will be significant impact and harm to both the operation and setting of the Andaz, which includes:

	• Significant alterations to station concourse, train sheds, and truss/columns, • Demolition of 50 Liverpool Street, as well as the Bishopsgate Square entrance and Hope Square entrance; • Creation of new upper concourses and associated new public access from Exchange Square, including new walkways; • New entrances onto Liverpool Street and Bishopsgate; • Provision of over-station development reaching a maximum height of 97.67m AOD to accommodate Class E use (commercial, service and business); including an auditorium (Sui Generis) at Level 18 with terrace; as well as provision of private office terraces; Notwithstanding the fact that the scheme is not presently viable, the major disruption caused by the development on the hotel over a significant period of time, combined with the potential uncertainty over its delivery, means that the Andaz is likely to be blighted for at least, and possibly more, than a decade. Such impact, whilst acknowledged is likely to occur, is not considered in the planning application. The suggestion that this is left to condition is wholly unacceptable. In combination with the additional impact on operations identified in this letter, the resultant 'benefits' to Liverpool Street station appear minimal, and do not outweigh such significant harm to a Grade II* listed building. We note LISSCA (Liverpool Street Station Campaign) has commissioned carbon expert Simon Sturgis to examine the proposals. The carbon report prepared by Simon Sturgis of Targeting Zero in relation to the proposed Liverpool Street Station redevelopment has been reviewed and has been picked up in the press. It is considered that Sturgis's report provides a clear, well-evidenced analysis which shows that the proposals fail to

	comply with sustainability requirements set out in local, London, and national policies. The report suggest that the results are likely to underestimate the carbon emissions by 15 to 25%. The scheme's whole-life carbon intensity of 2,200 kg CO₂e/m² GIA is very poor, and somewhat comparable to 1990s buildings; failing to meet any contemporary standards. The proposed scheme does not meet the City of London or GLA policies on operational carbon reductions which is for a 35% reduction against Part L, with the intent that 15% is saved through "be lean" measures. The proposal offers a 13.2% saving against Part L, a very significant departure from policy. Recent applications and consents of similar scale developments are materially more aligned to policy, with examples including 63 St Mary Axe (33% reduction), 60 Gracechurch Street (29% reduction), 1 Appold Street (28%) all demonstrating far greater policy alignment is achievable. As the Sturgis report notes, the robustness of the applicants Carbon Optioneering Report, developed in response to the City of London's landmark Planning Advice Note, is unclear. Aside from valid technical concerns Sturgis has flagged, there seems little, if any review of options that allow for partial retention. Presenting options as either (a) full retention or (b) full demolition does not allow the assessment of the potential carbon savings from any partial retention. The Optioneering report is therefore misleading, as it doesn't assess real alternatives for the development. The embodied carbon assessment of the development reports values of 1,107kgCO₂e/m² GIA for the whole development and 1,094kgCO₂e/m² GIA for the OSD component only for A1-A5. These are both significantly above the GLA WLC A1-A5 benchmark for offices of

	<950kgCO₂e/m² GIA and presents an unacceptable level of performance. Within the detailed WLC reporting no significant opportunities have been identified for how the WLC carbon of the proposed development will be reduced as the design progresses. The use of CLT slabs has been noted as providing a marginal improvement, but it is not viable due to regulatory and insurance requirements. A nebulous approach to finishes is mentioned, but no expected savings nor routes to savings that are within the development's control are noted. While the WLC benchmarks are not policy imperatives, the City of London have included the following condition in recent consents (emphasis added): <i>Prior to the commencement of the development an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions of the development are on track to achieve at least the GLA's Standard Benchmark set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on whole life-cycle carbon assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the lifecycle of the development.</i> As these conditions have been imposed on other developments, there would be an expectation for uniformity of decision-making, that a similar condition would be imposed on the proposed scheme. At present, the proposed development is clearly not on track to achieve, at the very least, the GLA's standard benchmark

	and therefore demonstrates that the current proposal is unacceptable and should not be progressed. As the applicant has not identified viable further reductions in WLC, it would require the fundamentals of the proposed development to be changed to bring the scheme into alignment with the GLA benchmark targets. Such significant changes will result in a scheme that cannot be the same as the proposal being contemplated by officers and the committee. The upfront (A1–A5) carbon emissions of the transfer structure alone account for around 25% of the scheme’s already excessive carbon footprint. Sturgis highlights that proven alternatives exist: Exchange House, which spans the same tracks with a parabolic tension structure, achieved dramatically lower carbon impacts. The refusal to consider Cross Laminated Timber, dismissed only on <i>“insurance concerns”</i> despite successful London precedents, further underlines the lack of ambition. A lower-carbon structural strategy is both possible and necessary, yet has been rejected. The demolition strategy represents a wholesale abandonment of circular economy principles. The removal of major 1990s station elements—part of the acclaimed conservation scheme that itself prevented demolition in the 1970s—is indefensible. This approach directly contradicts Network Rail’s own commitment to <i>“reuse, repurpose or redeploy all surplus resources”</i> by 2035. The proposed rebuild of the Tube station is equally damaging. Demolition of the Hope Square concrete roof will generate vast demolition waste for the sake of accommodating lift cores for the commercial overbuild. This is not an upgrade but a degradation: it risks reducing operational capacity at the very moment pedestrian flows are at their highest following the opening of the Elizabeth Line.

	This is fundamentally at odds with sustainable transport planning and, as set out elsewhere in the letter, will fail to achieve any meaningful improvement / public benefit to alleviate congestion or passenger flow. The proposed development does not meet the separate GLA and City of London policy identified 0.3 Urban Greening Factor, and only “achieves” the policy requirements by changing the assessment area to not be the red line boundary of the application. It is unclear if the nuanced differences between the City of London and the GLA requirements for Urban Greening Factor have been taken into account. Therefore, even with the reduced site area, it’s unclear whether the scheme complies with both GLA and City of London targets. Major international occupiers and investors require strong sustainability credentials. Given the shortcomings in the ACME scheme there will be significant risk to both yield and rental levels which will have an additional significant effect on viability. Taken as a whole: flawed carbon accounting, high-impact structural design, abandonment of circular economy principles, and harmful operational impacts shows that the scheme is fundamentally incompatible with declared sustainability policies. As Sturgis concludes, this is <i>“essentially the same as buildings designed in the last decades of the 20th century.”</i> We therefore fully support Sturgis’s recommendation that the application be rejected outright on sustainability grounds. Any future proposal must: • retain the majority of the existing station roof, • deliver genuine operational improvements, and • demonstrate full alignment with circular economy principles.

	This application cannot credibly be described as sustainable and the level of changes required to enable policy compliance would fundamentally result in a different set of proposals. The application should be refused in its entirety and trying to achieve policy alignment through conditions is not appropriate. It is notable that the earlier Sellar/Herzog & de Meuron scheme adopted a far more responsible approach. By retaining the majority of the Hope Square roof, it avoided significant Underground demolition and achieved a substantially lower embodied carbon footprint. The alternative proposed development for the site demonstrates much closer policy alignment, saving against Part L of up to 37%, and a WLC A1-A5 projection of 867kgCO₂e/m² GIA, demonstrating that it is possible to deliver policy-aligned development on the site, and that the failure to adhere to policy is a result of the specific proposals of the applicant. We understand that the development at the present time is not viable and therefore we question whether application Ref:25/00494/FULEIA is only ‘the tip of the iceberg’, and whether, ultimately, a larger scheme is required to achieve a viable development. Network Rail acknowledges within the application that “<i>..the Proposed Development is not viable..</i>” and the base case appraisal shows a deficit of -£220.2m based on present-day numbers, and a deficit of -£209.7m using market growth assumptions for costs and values. The supporting viability study (over) optimistically states “<i>... improvements in the programme, costs and values could mean that the development becomes viable...</i>”. This question over viability appears to be the subject of press debate and, whilst deliverability may be considered outside the planning process, it does bring into question whether the scheme’s ‘benefits’ such as they are, should be disapplied.

	A sensitivity analysis in the Financial Viability Assessment (that assumes a 5% increase in rental value and a 5% decrease in gross construction costs) still estimates a deficit of -£131.7m based on present-day numbers and a deficit of -£92.8m using market growth assumptions for costs and values. If rental values and construction costs are sensitised by the same 5% but in the opposite direction, the deficit increases to in excess of -£300m. It is only when a further separate sensitivity appraisal is presented in the Financial Viability Assessment, with: • average office rents of over £140 psf (compared to £95 psf in the base case ie a circa 50% increase on base assumption); • retail rents increased by c.11%; • the retail investment yield decreased by 25bp; • void and rent free periods reduced; and • the build programme reduced by 6 months. that the project makes a small surplus of some £53.7m. Unless the public sector plans to fund all the development costs, attracting external capital will be necessary to build and deliver the project. At present the evidence shows there is not a viable development to fund. A review of the study suggests that the cost of finance used in the appraisal is below market indicators. The appraisals assume an all-in cost of finance of 6%. The Financial Viability Assessment itself acknowledges: <i>“...This assumes rates drop prior to the start on site and is below expected debt pricing in the current market....”</i>. Attracting external equity capital to finance the project is necessary and is likely to require higher target returns. For a project of this nature, being a speculative office-led ground-up development of c.800,000 sq ft, with a build cost of over £1.5bn and a Practical Completion date over 8 years away, investor equity capital is likely to be extremely limited.

	Current 10 year swap rates, which are based on market expectations of future interest rate changes, are currently c.4.1%. When a lender's margin is factored in on top of that, which for speculative development is likely to be in excess of c.4%, all-in cost of finance is likely to be over 8%. We consider these figures potentially more realistic given the extended length over which the build period will be factored and a likely letting void of 18-24months, which will increase, rather than decrease the risk and thus the availability of likely commercial lending rates. To attract finance, a higher rate of return than that currently assumed in the appraisal is likely to be required, potentially some 15% on GDV for the office and 10% of GDV for the retail. This would further reduce, rather than improve, economic viability. This is likely to have 2 potential outcomes for the scheme / the Andaz: 1. A more significant scheme will need to be advanced which is financially viable; or 2. Any approval will sit unimplemented in lieu of better market environments catching up, representing a 'Sword of Damocles' to future business planning and viability at the Andaz. Very little thought or regard appears to have been given to this, albeit it is understood that the development will only be delivered by one of the stakeholders rather than by a private developer. This further suggests that the true deliverability of the scheme has not been fully audited. Moreover, neither option benefits the hotel's operation, or its function as a key Grade II* Listed Building.
Members of the public	Harm to heritage assets, including the historic character of the area, heritage in general, or listed buildings in general.

	Demolition of the roof, and the quality or appropriateness of its proposed replacement. Harm to the train shed or the setting of the 19th Century train shed. Expansion of retail space as unnecessary or excessive. The proposed retail expansion of the retail and the harm this would cause to the Station. Failure to adhere to paragraph 213 of the National Planning Policy Framework. Inappropriateness of the Over Station Development in principle. In appropriateness of the site to accommodate a tall building, or a building of the height proposed. Criticism of the design or design quality of the proposed Over Station Development. Construction disruption, including noise disruption, and length of disruption. Environmental and sustainability reasons – including embodied carbon, lack of trees, lack of sustainability credentials. Question of the need for the proposed office space, with existing vacancy levels and working from home practices.

	Criticism of accessibility at the Station. Criticism of the justification based on crowding/capacity/passenger flow. Proposals do not comply with the Local Plan, City Plan, London Plan or NPPF. Proposals do not comply with St. Paul's Heights policies.

6.10. Of these circa three thousand six hundred representations, the application has been the subject of one thousand one hundred and thirty six (1,136) representations made in support of the proposals at the time of writing.

Representor	Summary
Association of Jewish Refugees	Support offered to the proposed incorporation of the Kindertransport Monument into the renovated Liverpool Street Station, alongside support for the overall renovation project for the station. The plans ensure that the statue, which adds enormous heritage and cultural value, will remain a central feature of the proposed significant station works being funded by the commercial oversite development. As the agency that commissioned the monument, the consultative and collegiate approach is greatly appreciated as well as the sensitive for the memorial and the special place it has in the history of the Station. We look forward to discussing ways in which additional information about the history of the Kindertransport and those who came on those life-saving journeys can be provided, such as through audio-benches and digital information.

	We are grateful for the constructive discussions about where to place the statue during redevelopment including the possibility of locating it elsewhere in the station so as to maintain the tangible historic link and reassured that the memorial will continue to be integral to the façade after redevelopment.
CPA/WPA	I am writing on behalf of the London Property Alliance (LPA). The LPA is a not-for-profit organisation that represents the leading owners, developers, investors and professional advisors of real estate operating across central London, providing a unified voice for over 300 organisations ranging from FTSE 100 companies to affordable housing developers. The LPA is the voice of property in London's Central Activities Zone (CAZ), which in 2024 generated an estimated £315bn of GVA (over 10% of UK economic output) and was home to 48% of the capital's output and 41% of its jobs. We understand Network Rail has submitted revised plans for a £1bn redevelopment of the station aimed at improving accessibility, reducing congestion and creating an enhanced public transport interchange with expanded concourse capacity and enhanced step-free facilities. These improvements will be funded through building an office development above the station, with the intention that there should be little or no cost to the taxpayer. The LPA is therefore strongly supportive of Network Rail's plans to upgrade the capacity of Liverpool Street station. As is often the case, the scheme has generated concerns over its potential impact on the heritage features of both the station and its surrounding area. Some critics of the revised scheme have also argued that the proposals fall short on sustainability grounds, claiming that they do not meet net zero targets. The LPA recognises that there will always be a debate about the impact of development on heritage assets and their

	immediate surroundings. However, the major contribution an enhanced, higher-capacity Liverpool Street station would make to London's overall economic prosperity and sustainability risks being overlooked in the current debate. According to research by Arup (a leading built environment consultancy) for the LPA, the CAZ is the most sustainable location for employment in England and Wales. As their research highlights, central London boroughs have the lowest levels of carbon emissions per job across the country, with an average annual greenhouse gas emission level of 0.6 tonnes of CO₂ equivalent (tCO₂e). Furthermore, the City of London has the best performance with just 0.3tCO₂e of emissions per job. In comparison, the average level in England and Wales is 2.5tCO₂e, around four times higher than the CAZ average and eight times higher than the City of London. This remarkable performance in sustainability terms is underpinned by a number of factors, not least the increasingly sustainable real estate that central London offers to tenants underpinned by a high-capacity, extensive rail and Underground network which makes public transport the overwhelmingly preferred choice for commuters. A 2017-2020 study by the City of London found that some 93% of all trips to, from and within the City were by public transport or walking and 'wheeling'; fewer than 3% of those travelling used private cars or taxis. None of this would be possible if developers were prevented from delivering high-capacity, high-quality places of work complete with excellent sustainability credentials. As LPA's <i>Retrofit First Not Retrofit Only</i> report argues, the best overall outcome in sustainability terms is at least some of the time for existing buildings to be redeveloped in part (or indeed their entirety). London and, in particular, central London is the engine of growth for the UK. The central area supports 2.2 million jobs and makes a major contribution to UK public finances. Its

	economy is inextricably linked to regional economies across the country. Furthermore, central London and the City of London are the most sustainable locations in the country for sustaining and growing employment. This sustainability is driven by major factors such as the availability of high-quality office space and the very high levels of employment density underpinned by public transport and specifically rail networks. A bigger, better Liverpool Street station would help to reinforce and maintain the ability of central London and the City of London to deliver growth, prosperity and employment for the foreseeable future in the most sustainable location in England and Wales. The London Property Alliance strongly supports Network Rail's plans to upgrade the station and in doing so, deliver lasting benefits for Londoners, the UK economy as we together pursue the goal of net zero and sustainable economic growth.
Members of the public	Support for modernisation or improvement in principle. Increase in accessibility and inclusive access – including step-free access, provision of lifts, provision of accessible toilets. Support for new entrances and wayfinding improvements, including improvements to the public realm and pedestrian environment. Station capacity, congestion relief, and passenger growth accommodation. Transport network benefits, including those at TfL and the Station as an interchange. Economic benefits, including jobs, growth and investment. Design quality, or praise for the proposed design. Praise for restoration/conservation of heritage assets, or respect for the listed buildings. Sustainability and environmental performance.

	Provision of/improvements to the retail offer at the station, food and drink offer, or amenities in general. Safety, security and/or comfort. Provision of needed quality office space. Acknowledgement of proposed mitigation of construction impacts.

6.11. Letters of representation have also been received from the Aldgate Connect BID, the Eastern City BID and the Culture Mile BID. Each letter notes that the letter is not made in support of the proposals and the role of each BID in not supporting or opposing any specific planning application. Each letter then drew attention to those aspects of the proposals which they state relate to the aims and delivery objectives of each BID. These are listed below in summary:

- Improved wayfinding and permeability to station entrances, including connections through the Station. More clearly defined routes in and out of the station through clear visual lines and decluttering.
- Enhanced public realm around the station entrances, complementing investment that has already been made in key developments and areas around the station
- Enhanced pedestrian connection to neighbouring developments, opening up new and intuitive routes into the City.
- Increased green infrastructure, including additional tree planting
- Enhanced retail, food and beverage offering
- Improved lighting around the station entrances to enhance visual appeal, celebrate heritage and support a safer environment.
- Enhanced facilities for families, neurodiverse needs, visually and mobility restricted users.
- The integration of improved cycling infrastructure, including secure cycle parking and clearer cycle routes, supports active travel and aligns with broader sustainability goals for the City.
- The architectural approach to respect the historic fabric of Liverpool Street Station while introducing contemporary elements that enhance functionality. We encourage continued sensitivity in design detailing to preserve heritage assets.

- The incorporation of smart technologies—such as real-time travel information, digital wayfinding, and energy-efficient systems—will improve user experience and operational efficiency.
- Opportunities for cultural programming and public art installations within the station and surrounding public realm could further reinforce Liverpool Street’s role as a gateway to the Culture Mile and a destination in its own right.
- Enhanced emergency access routes and improved safety measures, including CCTV coverage and clear evacuation signage, will contribute to a more secure environment for all users.
- Meanwhile public realm intervention, to be accommodated where possible to discourage the area from being a building site. Encourage various purposeful meanwhile experience for the surrounding neighbours.

6.12. During the reconsultation exercise, on 23rd January 2026, John McAslan + Partners submitted material related to a proposed alternative scheme at the Station site. This alternative scheme, hence referred to as the JM and Partners Scheme, has been published and publicised by John McAslan and Partners architectural firm where it has been endorsed by SAVE Britain’s Heritage and The Twentieth Century Society. The JM and Partners Scheme proposes an Over Station Development in office use and similarly linked to the funding and realisation of station improvements.

6.13. In reply to the publicising of the JM and Partners Scheme, Network Rail have published a response as quoted in news articles related to the alternative scheme which is copied below:

“Why our approach works

Network Rail conducted a thorough review of all development options. The JMP alternative scheme closely mirrors one of the many options we explored in detail and included in the planning application – and concluded it was undeliverable.

We commissioned an independent team to review the JMP proposal to ensure no areas or options were overlooked or discounted. They endorsed our findings: building over the Victorian train shed is undeliverable due to structural complexity, the need for prolonged station closures, and securing the necessary funding required.

The JMP scheme also proposes building on land outside Network Rail’s ownership and building on the original Victorian train shed it claims to protect.

Our solution

Network Rail's scheme builds over the 1990s concourse roof – not the Victorian heritage. This approach:

- *Avoids station closures and minimises disruption*
- *Celebrates and preserves the Victorian train sheds*
- *Delivers the new office development needed to fund station improvements*
- *Provides a deliverable, fully funded solution*

The JMP scheme has helpfully provided further independent validation of our approach. We're delivering the station London needs – and without compromising our heritage."

6.14. The material which has been submitted includes no information concerning its viability or deliverability, nor its environmental impacts – including any impacts regarding embodied carbon or operational sustainability. It is apparent that there would be an embodied carbon cost associated with the construction of an Over Station Development which has not been quantified and that heritage harm could likely arise from the introduction of an Over Station Development directly above the remaining original fabric of the statutorily listed Victorian train shed roof. It should also be noted that a description of the reasonable alternatives studied by the developer is a required part of the Environment Statement and such an assessment has been included as a part of the submitted EIA documentation, as well as a carbon optioneering exercise undertaken as a part of the application, with the relevant sections of this report addressing such alternatives where relevant. Regard has been had to alternative schemes in the context of the submitted application material and associated Environment Statement. The material relating to the JM Partners scheme before officers at time of assessing this application, can be regarded at this point in time as indicative only, typical of schemes at an early stage of gestation, . In the view of officers, the JM Partners scheme, represents a hypothetical scenario and, for the purposes of considering this application is either not relevant, or if relevant, should be given no weight.

6.15. Within the submitted objections, the veracity and method of submission has been criticised with regards to the representations received in support. As Local Planning Authority, all representations which have been made to the application have been taken into consideration where they include the relevant identifying information, in this circumstance a name and address for each representation submitted. Both objections and representations of support

have been scrutinised identically, while the comments made regarding the nature of the letters of support has been taken into consideration by officers.

7. Policy Context

7.1. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report. The application of the relevant policies are considered when addressing each main issue later in this report.

7.2. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation on 18 April 2024. It was then submitted to the Secretary of State on 29th August 2024, and has completed the formal hearings of its Examination in Public. The Inspector provided their recommended Main Modifications to the City Plan 2040 in September 2025 and at time of writing these modifications are currently the subject of formal consultation. Emerging policies are considered to be a material consideration with the weight being given to them increasing as objections are resolved, and as the City Plan progresses towards adoption, in accordance with paragraph 49 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

7.3. The consultation on the Main and Additional Modifications will conclude as of 6th February 2026. In accordance with the above, limited weight has been given to all the policies within the City Plan 2040 in planning decisions, except for policies without any significant outstanding objections which will be given moderate weight. These policies are:

- HL1 Inclusive buildings and spaces
- HL4 Contaminated land
- SA2 Dispersal routes
- SA3 Designing in security
- HS2 Loss of housing
- HS8 Self and custom housebuilding
- RE4 Markets
- IN2 Pipe subways
- DE5 Shopfronts
- VT1 Impacts of development on transport

- VT4 River transport
- VT5 Aviation landing facilities
- CR2 Flood risk
- CR4 Flood protection
- S16 Circular economy and waste
- CE1 Sustainable waste facilities and transport
- CE2 New waste management sites
- PC1 Viability Assessments

7.4. City Plan 2040 policies will gain additional weight at the following stages: a) once a Final Inspectors' Report has been received; and b) on adoption of the City Plan. The Director for Planning and Development requests additional delegated authority to issue a decision notice, giving due weight to the emerging policies at the date of the decision notice, however it is not anticipated that this would change the officer recommendation at the beginning of this report.

7.5. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2024 (as updated in February 2025) and the Planning Practice Guidance (PPG) which is amended from time to time. A new draft version of the NPPF is the subject of ongoing consultation at time of writing, and as such these changes are given no weight.

7.6. The National Planning Policy Framework (NPPF) states at Paragraph 2 that "planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise". Other relevant sections of the NPPF are set out in the following paragraphs.

7.7. The NPPF states at Paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

7.8. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:

- a) approving development proposals that accord with an up-to-date development plan without delay; or

- b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

7.9. Paragraph 49 states that local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

7.10. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

7.11. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.

7.12. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

7.13. Paragraph 98 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

7.14. Paragraph 104 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

7.15. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 109 sets out that “Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

- a) making transport considerations an important part of early engagement with local communities;
- b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
- c) understanding and addressing the potential impacts of development on transport networks;
- d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
- e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and
- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains

7.16. Paragraph 110 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health”.

7.17. Paragraph 117 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all

modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles; and it should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

7.18. Paragraph 118 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored”.

7.19. Paragraph 125 (c) of the NPPF gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Clause d) then states that planning policies and decisions should “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)”.

7.20. Chapter 11 of the NPPF promotes making effective use of land. Paragraph 124 asks that planning decisions “promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”, and that decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless

substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

- d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and
- e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is an exceptional justification.

7.21. Paragraph 129 then states that decisions should support development that makes efficient use of land, taking into account the following:

- a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places

7.22. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

- 7.23. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space); and create places that are safe, inclusive and accessible and which promote health and wellbeing.
- 7.24. Paragraph 136 of the NPPF states that 'Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...'
- 7.25. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 7.26. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 161 states that the planning system should support the transition to net-zero by 2050. 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 conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 7.27. Paragraph 164 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems.

7.28. Paragraph 166 states that, in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

7.29. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 187 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by, inter alia, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.

7.30. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 208 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

7.31. Paragraph 210 of the NPPF advises, "In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness."

7.32. Paragraph 212 of the NPPF advises "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.”

7.33. Paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

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

7.34. Paragraph 215 of the NPPF states “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.

7.35. Paragraph 216 of the NPPF states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

7.36. Paragraph 212 of the NPPF states “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.”

7.37. In December 2025 the Government published a consultation draft NPPF. This document indicates a change of the approach to be taken in national planning policy. The document can be given little weight given that it is a draft subject to consultation.

8. Decision Making

- 8.1. The Corporation, in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 8.2. In considering whether to grant planning permission for development which affects a listed building or its setting, to 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. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
- 8.3. Part of the planning application site lies within the Bishopsgate Conservation Area, and therefore when exercising powers under the planning acts, such as when dealing with the planning application, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that conservation area (S72(1) Planning (Listed Buildings and Conservation Areas) Act 1990).
- 8.4. In considering whether to grant the listed building consent applications the Corporation 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 (Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990).

9. Main Considerations

9.1. In determining the planning application, consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including the NPPF, PPG, SPGs, SPDs and emerging policy. A draft NPPF was published in December 2025 for consultation. The publication of the draft indicates the Government's intention to change existing national policy. As the draft NPPF is at early stage it should be given little or no weight when determining this application.

9.2. It is necessary to assess all the policies and proposals in the development plan and come to a view as to whether in light of the plan as a whole the proposal does or does not accord with it.

9.3. The principal issues in considering this application are:

- a) The principle of development, including the appropriateness of the proposed uses (Section 10)
- b) The economic impacts/benefits of the proposal (Section 10)
- c) The impact of the of the development on the character and appearance of the area and the design of the building itself (Section 11)
- d) The impact on strategic views in the London Views Management Framework and on other strategic local views (Section 11)
- e) The impacts of the proposal on the setting and significance of heritage assets (Section 11)
- f) The impact of the proposal on existing public realm and the acceptability of the proposed new public realm (Section 11)
- g) The potential impacts of the development on buried archaeology (Section 12)
- h) The impacts of the development in terms of accessibility and inclusivity (Section 13)
- i) The impacts of the development in highway and transportation terms and cycle parking provision (Section 14)

- j) The environmental impacts of the proposal including wind microclimate, daylight, sunlight and overshadowing, light pollution and solar glare, noise and vibration, health and wellbeing, air quality, building resource efficiency, energy consumption and sustainability (Section 15)
- k) The impact of the proposed development on the amenity of nearby residential and other occupiers (Section 15)
- l) The impact of the development in terms of energy, sustainability and climate change (Section 16)
- m) The impact of the development on ecology and net biodiversity gain (Section 16)
- n) The impact of the proposals in terms of the cultural and public offers proposed (Section 17)
- o) The impacts in terms of security, suicide prevention and health (Sections 18, 19 and 20)
- p) The impacts of the development on fire safety (Section 21)
- q) An assessment of the public benefits of the proposal and whether they would be sufficient to outweigh any heritage harm (Section 22)
- r) The requirement for the development to secure financial contributions and other planning obligations (Section 23)
- s) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and the Human Rights Act 1998 (Section 24)

10. Principle of Development and Economic Considerations

10.1 The National Planning Policy Framework (NPPF) places significant weight on the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development (paragraph 85). Significant weight is to be given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at Paragraph 8 of the NPPF). In deciding this application, the weight to be given to the economic benefits will depend on the nature and extent of those benefits in the light of any other planning considerations relevant to the assessment.

- 10.2 The policy (at paragraph 85 of the NPPF) does not require a decision maker to assign a uniform level of weight; the weight to be ascribed to the economic benefits depends upon the nature and extent of the benefits in the light of any other planning considerations relevant to the assessment. The NPPF (at paragraph 87) also states that planning decisions should recognise and address the specific locational requirements of different sectors.
- 10.3 Paragraph 7 of the NPPF states that “the purpose of the planning system is to contribute to the achievement of sustainable development, includingt...supporting infrastructure in a sustainable manner”. Paragraph 8 adds that the overarching economic objective of achieving sustainable development includes doing so by identifying and coordinating the provision of infrastructure.
- 10.4 Paragraph 125 of the NPPF goes on at clause d) to state that planning policies and decisions should promote and support the development of under-utilised land and buildings, and notes that this is especially the case if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively – referencing railway infrastructure as an example of under-utilised land.
- 10.5 Chapter 9 of the NPPF addresses the promoting of sustainable transport, and its Paragraph 109 sets out that transport issues should be considered from the earliest stages of development proposals, and should use a vision-led approach to identify transport solutions that deliver well-design, sustainable and popular places which should, in turn, involve:
- a) making transport considerations an important part of early engagement with local communities;
 - b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
 - c) understanding and addressing the potential impacts of development on transport networks;
 - d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
 - e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and

- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

- 10.6 Paragraph 129 adds that decisions should support development making efficient use of land, taking into account identified need for different forms of development and the availability of land suitable for accommodating it, local market conditions and viability, the availability and capacity of infrastructure and services (both existing and proposed) and the potential for further improvement and the scope to promote sustainable travel modes that limit future car use, alongside the desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change, and the importance of securing well-design, attractive and healthy places.
- 10.7 London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.
- 10.8 London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.

- 10.9 Turning to local Development Plan policies, Policy CS16 of the Local Plan seeks to promote development which builds on the City's strategic central London position and good transport infrastructure to further improve sustainability and efficiency of travel in, to, from and through the City. It looks to achieve this by securing increased public transport capacity, facilitating further improvements to public transport capacity and step-free access at existing mainline rail and London Underground stations, improving conditions for safe and convenient walking and cycling, incorporating adaptation to the City's anticipated future climate, improving access routes and the streetscape around stations including Liverpool Street Station, designing and implementing public realm enhancement strategies that encourage pedestrian and cycle travel and take account of the needs of disabled people.
- 10.10 The site also falls within the area identified within the Local Plan Policy CS5 – the North of the City. This policy seeks to ensure that the City benefits from the substantial public transport improvements planning in the north of the City, and realising the potential for rejuvenation and “eco design” to complement sustainable infrastructure. It seeks to achieve this by requiring improvements to pedestrian and cycle routes to maintain safe, effective and efficient pedestrian and cycle flows, including for disabled people, within and through the north of the City, ensuring the retention and improvement of pedestrian permeability and connectivity whilst preserving privacy, security and noise abatement for residents and businesses, identifying and meeting residents' needs including protection of residential amenity and open space.
- 10.11 In the emerging City Plan 2040, Strategic Policy S25 addresses Liverpool Street which, where relevant to the proposals, seeks to enhance the Moorgate-Liverpool Street area, taking advantage of opportunities presented by good public transport accessibility which includes the opening of the Elizabeth Line, by transforming the overall user experience permeability and supporting improvements to the accessibility and capacity of Liverpool Street Station and its surroundings in support of its role as a key element of national infrastructure and gateway to the City of London and driver of economic growth, including enhancing step free access and improving entry points; improving the safety and capacity of pedestrian routes around Moorgate and Liverpool Street Elizabeth Line stations, and between the stations and key destinations; and improving pedestrian routes in and around the bus station and enhancing the user experience through provision of seating, legible wayfinding and ease of access.

- 10.12 The applicant has submitted reports and evidence related to the need for improvements at Liverpool Street Station, evidencing current operational shortfalls including those related to accessibility and inclusivity within the Station as well as those related to current capacity and the ability of the current Station to accommodate increased passenger numbers and station users into the future.
- 10.13 These documents comprise an Operations Requirements Specification document which sets out the operational requirements of the Station in the context of existing operations and associated challenges. The document states that it is to serve as a baseline for future planning, potential upgrades, and emergency response procedures, and notes that it is not intended to comprehensively cover every aspect of the operation of the Station in detail. This document is supported by an Asset Health Report, a Pedestrian Capacity 'Do-Minimum' Model Report, an Accessibility Report, and a Station Footfall Report. All such reports have then informed a Need Report produced by Network Rail.
- 10.14 The Needs Report summarises need at the Station as this relates to recommendations as to how some of the issues identified at the Station could be resolved. The report notes that the Station has seen little investment since its redevelopment in 1991, and that it has significant shortcomings in its ability to serve all station users at the volumes it currently experiences. The report first identifies the lack of an appropriate level of accessibility throughout the Station, which constrains the ability of people to travel through the Station independently, a problem then compounded by a lack of step-free access at the interchanges between the Station and TfL underground lines, and with a lack of adequate accessible facilities including poor toilet facilities, a lack of suitable waiting areas, and lack of a permanent passenger assistance desk.
- 10.15 It goes on to highlight historic and future demand and the ability of the Station to manage passenger numbers now and into the future, highlighting that the station has experienced 2.7 times higher passenger numbers since 1997 and which totals a figure higher than Britain's busiest airport, Heathrow. It references footfall forecasting for the Network Rail domain as estimating an increase of 35% by 2041, or an increase from 97 million passengers to 131 million passengers, based on Office of Rail and Road (ORR) statistics tracking growth from 1997 to 2023.

10.16 The report also notes that this growth has outstripped expectations, and that this then drives the need for planned station upgrades to accommodate a further amount of growth beyond 2041 to avoid the need to expand or upgrade the station again over the next 30-60 years. In this vein, this Report identifies a need for:

- Additional concourse floorspace, to provide space for people to wait and move around the Station comfortably;
- Areas of seating stepped back from the main desire lines for circulation;
- Significantly increased vertical circulation capacity, in particular lift and escalator provision;
- Reconfiguration of existing elements of vertical circulation, especially the stairs at Hope Square;
- Further improvements to the gatelines to increase their capacity beyond the Do-Minimum infrastructure layout; and
- Fully reconfigure and enhance the Customer Information System.

10.17 In addition to needs arising in relation to pedestrian capacity, the Report also summarises needs for the Station directly related to its operational management. The report recommends improved staff facilities, including provision of centralised station operations/control rooms alongside improved office space and mess facilities for station staff, ticket machines adjacent to entrances and waiting areas positioned so as to cause no obstruction, reduction of obstruction around gatelines, customer information on all levels of the Station and the relocation of these to more preferred places, signposting and wayfinding for information and help points as well as increase in scale of these features commensurate to demand, rationalised and simplified wayfinding and advertising space creating clear separation from passenger information, dedicated waiting areas and information areas for buses, and relocation and betterment of existing cycle storage and parking facilities.

10.18 The Report then sets out the benefits of comprehensively changing the station to accommodate its recommendations, and the disbenefits or unfeasibility of delivering on its recommendations without a comprehensive scheme of station improvements, chiefly noting that without substantial intervention the Station will become increasingly difficult to manage and that minor interventions to keep the Station function at a minimally acceptable level which would be untenable for station users.

10.19 The Needs Report also addresses funding for the Station enhancements and upgrades it recommends. Highlighting significant and sustained funding pressure on the existing enhancements portfolio, continued revenue challenges for the industry post-COVID and the ongoing costs of HS2, it concludes that it is not anticipated that government funding would be forthcoming. Associated with these documents and their conclusions as to the sources of funding, the application has been submitted with a supporting Financial Viability Appraisal.

10.20 The submitted Financial Viability Appraisal (FVA) sets out the above requirements and recommendations within Station needs assessments undertaken by Network Rail, the comprehensive package of Station improvements and enhancements which are included as a part of the proposed development, and that the construction of an Over Station Development alongside new retail floorspace would provide the funding required to deliver the recommended Station reconfiguration/enhancement. The conclusion of the FVA is that the quantum of office floorspace proposed as the OSD is the minimum necessary to fund the required Station enhancements.

10.21 This FVA was subject to independent third-party review, carried out by BNP Paribas Real Estate as independent experts. The third-party review stated that its purpose was to provide an objective assessment of the Applicant's FVA to determine whether the position as per the FVA report was correct, or whether the proposed quantum of floorspace exceeded the amount necessary to fund the station improvement works. In undertaking the review, BNPP carried out an adjusted appraisal departing from the submitted appraisal in the following ways:

- Network Rail has been assumed as development manager, reflecting approach taken at other stations across London, removing interest costs for the station works and removing a development management fee;
- Consistent approach to preliminaries and overheads and profit (OHP) taken across all three elements of the project (station works, OSD, and retail);
- Removed varying contingencies in costs plans, providing for one contingency in the appraisal for 5% of costs;
- Removed marketing allowance for the office floorspace; and
- Land value taken out at the end of the project.

10.22 Section 5.3 of the review sets out these changes in assumptions, and that an appraisal undertaken with these changes results in the generating of a residual land value of the office and retail elements of the proposal covering 92% of the identified costs. The review then concludes that “If the scale of the proposed office were to be reduced, then the deficit would increase and our appraisals confirm that the quantum of office floorspace is the minimum necessary to fund the station works. Removal of storeys from the office building would worsen the outcome, as the fixed costs of the transfer slab above the station concourse would be shared by a decreasing quantum of revenue generating space. This impact would accelerate with every storey removed.” It then goes on to ultimately conclude that the Applicant has in their view adequately demonstrated in financial terms that the proposed quantum of office floorspace is the minimum necessary to fund the station works costs.

10.23 There is broad policy support at a national level, through the NPPF, and general support in the Development Plan as represented through the good growth policies of the London Plan, for the improvement and enhancement of Liverpool Street Station as a public transport hub promoting sustainable travel and supporting development in a sustainable location. This is still furthered by the site-specific policies within the Local Plan and the City Plan 2040 which offer more targeted support for the same types of improvement. In this context, and in the context of the needs and operational requirements evidence submitted by the application, there is policy support for the improvement of the Station in principle.

Proposed Uses

10.24 The proposed development would be mixed use, with the below sections of the report providing an assessment of the acceptability of each proposed use in principle, excepting the station improvement works themselves as addressed above. The proposed development would comprise:

Proposed Use	GIA Proposed (m2)
Office (Class E(g))	88,013
Retail (Class E(a)-(b) or Sui Generis)	11,077
Elevated Public Space and Auditorium (Sui Generis)	3,936

10.25 These are addressed in turn below.

Office

- 10.26 The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
- 10.27 Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The newly launched Small and Medium Enterprise Strategy (2024) includes the City's strategy to attract and support the growth of SMEs. The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.
- 10.28 The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 66,000 from 2021 to 2041. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
- 10.29 The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

- 10.30 In terms of the Local Plan 2015 Strategic Objective 1 seeks to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sqm gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. Local Plan Policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
- 10.31 The Strategic Priorities of the emerging City Plan 2040 set out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces and creating an inclusive, healthier and safer City for everyone.
- 10.32 The emerging City Plan 2040 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 1.2 million sqm NIA (1.6 million GIA) during the period 2021-2040. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
- 10.33 Office demand in the City is current and pressing. Floorspace coming forward in the City will be of the highest standard, meeting the needs of occupiers across the City, including more agile working environments with lower workplace densities and higher amenity offices, implying a shift in the market in terms of demand for 'best in class' office space, focusing on environmental, health and wellbeing, amenity provision and transport connectivity. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are also reflected in the Corporations 'Destination City' vision for the square mile.

10.34 The proposed office floorspace has been designed with flexibility in mind, with an arrangement of cores allowing each floor to be split to allow for multi-tenanting of the building, and with each floorplate featuring several potential “soft spots” allowing for the introduction of further horizontal movement between floors. In addition, the façade design has allowed for the provision of terraces and balconies at several corners of the building ensuring that the floor-by-floor external space could also be enjoyed by each tenant should the building be split. Additionally, the auditorium roof space and elevated space available for office users represents a unique offer for future tenants, complementing the wide range of amenities and end-of-trip facilities available on the lower floors of the OSD.

10.35 The proposed development would secure a significant increase of best-in-class, next-generation workspace, in an eminently sustainable location. The scheme meets the aims of Policy E1, E2, GG2, GG4, SD4 and SD5 of the London Plan, CS1, CS5, DM1.2 and DM1.3 of the Local Plan 2015, as well as S4 and S25 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a considerable uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Retail, Food and Beverage, Hot Food Takeaway

10.36 Policy DM 1.5 encourages a mix of commercial uses within office development which contribute to the City’s economy and character and provide support services for its businesses, workers and residents. Similar support of other commercial uses particularly at ground and basement levels is also provided by policy OF1 of the emerging City Plan. Strategic Policy CS20: Retailing seeks to improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them. Policy DM 20.1 of the Local Plan 2015 resists loss of retail, prioritises the PSCs for shops and seeks to provide new retail floorspace.

10.37 Emerging Policy RE1: Principal Shopping Centres seeks to resist the loss of ground floor retail frontage or floorspace, states that where planning permission is required, proposals for changes between retail uses within the PSCs will be assessed against the following:

- a) The contribution the unit makes to the function and character of PSC;
- b) Maintaining an active frontage; and
- c) The effect of the proposal on the area in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

10.38 Policy S5 (Retail and Active Frontages) of the emerging City Plan 2040 states that “The City Corporation will seek to make the City’s retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City”. The supporting text to Policy S5 notes that over the longer term, evidence shows significant demand for growth in retail uses in the City. The City’s growing working population and the increasing number of visitors create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.

10.39 London Plan Policies SD6 and SD7 seek to promote and enhance the vitality and viability of London’s town centres, asking boroughs to adopt a town-centres-first approach for town centre uses, and states that development proposals should ensure that commercial floorspace relates to the size and role and function of a town centre, that it be appropriately located, and should consider delivering and servicing provision so as to minimise any negative impacts thereof.

10.40 The proposal would expand and improve the retail offer at the Station when compared to the retail floorspace currently provided on site. The proposed units would be of an improved design and layout, with the existing retailing being poorly designed and inappropriately positioned within the Station. New retail uses would also be introduced at upper concourse level and span south from the concourse itself to the north along the trainshed walls and alongside the new routes from the upper concourse to Exchange Square. Local Plan Policy CS20 (Retailing) makes reference to the focussing of new retail development on the Principal Shopping Centres (PSC), with the site technically lying within a PSC through the small section of the PSC and designated frontages at the TfL arcade and opposite Hope Square. This policy does not prohibit the development of retail floorspace outside of PSCs. Part 2 of the same policy then asks that a sequential approach to major shopping proposals be taken, looking firstly at locations within the PSCs then at sites immediately adjoining the PSCs. It is considered that this approach is satisfied in the proposed development.

10.41 Further, within the emerging City Plan 2040 Policy RE1 (Principal Shopping Centres), Principal Shopping Centres are defined as being in their entirety within the PSC where the site includes part of a designated frontage. This is true of the subject site, although it is recognised that this represents only a small part of a larger site. Further support is found in Policy S5, with Part 3 of this policy asking that major retail developments be located within or near to PSCs. It is noted that the uplift proposed is than 2,500m². As such, the proposed retail uses comply with adopted Local Plan policies, London Plan policies, and the NPPF and emerging City Plan 2040.

Elevated Public Space and Auditorium

10.42 Policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy by:

- Providing, supporting and further developing a wide range of cultural facilities
- Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.
- Protecting existing cultural facilities where they are needed.
- Providing visitor information and raising awareness of the City's cultural and heritage assets.

- Allowing hotel development where it supports the primary business or cultural role of the City.

10.43 Emerging City Plan 2040 Policy CV2 promotes opportunities to provide new cultural, infrastructure, leisure, recreation and visitor facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City. Policy DM 1.5 encourages a mix of commercial uses within office development. Complementary uses, include within others retailing, leisure, education and health facilities to contribute to the City's economy, character and appearance. Strategic Policy CS22 supports the provision of health, social and educational facilities and opportunities for the City's residents and workers. London Plan Policy SD4, providing guidance on uses in the CAZ, supported "the unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions" being promoted and enhanced within the CAZ.

10.44 London Plan Policy D9 part D seeks to incorporate free to enter publicly accessible areas in tall buildings. Policy DM10.3 of the Local Plan encourages high quality roof gardens and terraces where it does not cause other impacts with public access secured where it is feasible. Strategic Policy S8 of the emerging City Plan 2040 seeks to deliver publicly accessible spaces in tall buildings and emerging Policy DE4 requires all tall buildings to provide free to enter, publicly accessible elevated spaces, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities to create attractions in the City and views from the skyline. Strategic Policy S21 (City Cluster) of the emerging Plan requires the provision of open spaces at ground level free to enter publicly accessible spaces such as roof gardens and roof terraces, and cultural and leisure destinations and other facilities, that will provide additional public space and experiences for people working in the City alongside visitors and residents.

10.45 Although the principal public benefit being achieved within the development proposals is represented by the extensive and significant upgrades and enhancements to the Station, in line with the policies above the proposal also includes an elevated public space and auditorium. The elevated space would be accessible to the public, the terms of which would be agreed through a Management Plan secured through s106 legal obligation. As a fundamental, the elevated space and auditorium would be used publicly and privately, with full public use on weekends and Fridays, with split use between the two purposes on Mondays, Tuesdays and Wednesdays, and with the elevated space in full commercial/private use on Thursdays. The expected management and details of these spaces is covered in the relevant section of this

report, below. Notwithstanding this detailed assessment, the provision of this space is supported by the policies referenced above.

11. Design, Heritage and Public Realm

- 11.1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
- 11.2. This section assesses the architecture, design and public realm of the scheme as well as considering the impacts upon the significance of heritage assets. Consideration of strategic views is assessed separately in a later section.
- 11.3. The relevant policies for consideration as relate to design and heritage include: Local Plan 2015 Policies: CS10 Design, DM10.1 New Development, DM10.7 Daylight and Sunlight, DM10.8 Access and inclusive design, CS12 Historic Environment, DM12.1 Managing change affecting all heritage assets and spaces, DM12.2 Development in Conservation Areas, DM12.3 Listed Buildings; Emerging 2040 City Plan Policies: S8 Design, DE1 Sustainable Design, DE2 Design Quality, DE8 Lighting, S11 Historic Environment, HE1 Managing Change to the Historic Environment; and London Plan 2021 Policies D3 Optimising site capacity through the design led approach, D4 Delivering Good Design, D5 Inclusive Design, HC1 Heritage Conservation and Growth, HC3. This is in addition to the relevant sections of the National Planning Policy Framework, the National Design Code.
- 11.4. Additionally as relates to public realm, policies for consideration include: London Plan 2021, Policy D8 Public realm, Policy T2 Healthy Streets; City of London Local Plan (2015) Policy DM10.3 (Roof Gardens and Terraces), Policy DM10.4 Environmental enhancement, Policy DM16.2 Pedestrian movement, Policy CS19 Open spaces and Recreation, Policy DM19.1 Additional open space; Emerging City Plan 2040: Policy S10 (Active Travel and Healthy Streets), Policy AT1 (Pedestrian Movement, Permeability and Wayfinding) and Policy DE3 (Public Realm) as well as Supplementary Planning Guidance City of London Public Realm SPD and City Public Realm Toolkit.

- 11.5. Comments on the scheme have been received from the GLA, Historic England, the Georgian Group, Save Britain's Heritage, Historic Building's and Places as well as other heritage organisations and third parties. These are set out in detail elsewhere in the report and in the background papers. Officers have considered these representations and carefully afforded them considerable importance and weight, further referenced in the below assessment.

The Site

Historic Development

First phase of development.

- 11.6. The arrival of the railways into London from the 1840s onwards radically transformed the site and surroundings. In 1862, the Great Eastern Railway (the GER) was formed, leading to proposals for a major terminus which capitalised on the suburban traffic into the London area. Liverpool Street Station was built to designs by Edward Wilson between from 1873 to 1875. It entailed the radical transformation of this part of the City, including the reconfiguration of its urban grain and the loss of many historic buildings.
- 11.7. As first built, the station was set about 5m below ground level, behind an L-shaped range of neo-Gothic buildings, housing offices and station rooms. The massing of this building was orientated away from the street front, with frontage onto Liverpool Street itself relatively minimal, principally comprising access onto a series of sloping walkways and roads descending to the platforms. The station did not at this time have any frontage onto Bishopsgate, with station located well to the west of this street behind a dense domestic streetscape. The overall presence on the street was limited to the shortest pavilion of the L-shaped range.

- 11.8. Key architectural features of Liverpool Street Station as first built included the neo gothic decorative expression to the L-shaped range including polychromatic approach to the brick work, the descending slopes to the platforms and a wide-span wrought iron train shed roof to the interior. This train shed survives, with alterations today, comprising the northern half of the existing trainshed. The decorative cast iron spandrels and columns and the longitudinal reach of the structure was celebrated at the time of the building's completion, however there was criticism of the 'confusing' layout which some publications felt lacked architectural clarity. The truss types used in the trainshed construction was novel for the use of cantilever brackets and suspended trusses.

The Great Eastern Hotel

- 11.9. Following the station's completion, The Great Eastern Hotel was built in 1883-4 by Charles Barry Jr and Charles Edward Barry. As originally built it had a split mass, with a large square-plan west block creating hotel rooms adjoining the station, and a narrow rectangular-plan east block at the junction with Bishopsgate Street, housing more public facilities such as the dining rooms. The Bishopsgate block adopted a richer decorative aesthetic, reflecting its highly visible junction location. The west block fronting Liverpool Street was however the principal structure, and included the main entrance in the easternmost bay. Between the west and east block was a wide arched opening to provide a cab road to the platforms, effectively dividing the hotel plan between the two ranges. The station remained inaccessible from Bishopsgate at this time.

Victorian Extension Works

- 11.10. The station was expanded to the east in 1890-94 by John Wilson in collaboration with W.N. Ashbee. These works comprised new platforms and train shed east of the original western side of the train shed, creating an entirely new frontage onto Bishopsgate. This again necessitated the clearance of a number of buildings along Bishopsgate, including Sir Paul Pindar's House of around 1599, as well as the partial demolition and rebuilding of the existing eastern train shed wall. The new Bishopsgate frontage included a booking hall, known as Harwich House, flanked by a covered glazed roadway. To the north of Harwich House was a decorative brick screen and a series of office buildings. To accommodate the change in levels between the different phases of the station, differing platform lengths and access points the station started to develop a complex system of raised walkways to the interior.

- 11.11. In 1899 the Great Eastern Hotel's eastern range was expanded to the north, alongside a series of internal alteration undertaken by Sir Robert Williams Edis. The extension was constructed in red Essex brick in the same Neo-Renaissance style. The north elevations of both phases interfaced with the trainshed and buildings of the station, with these spaces including lavishly decorated public function rooms such as Hamilton Hall, the Cambridge Room, Essex room.

Early Twentieth Century

- 11.12. The connection to the metropolitan railway was removed in 1907, with the old station buildings converted into an arcade by Frank Sherrin in 1912. The connection into the London Underground also arrived to Liverpool Street at this time. The World Wars resulted in considerable damage to the station and surroundings, particularly north-west of Sun Street as well as along Bishopsgate, necessitating widespread clearances. It is thought that damage to Sun Street resulted in the partial blocking up of the lancet windows along the western elevation. In 1922 a war memorial was erected in the station booking office dedicated to Great Eastern Staff who lost their lives in the First World War. Memorials to Captain Charles Fryatt and separately Field Marshal Sir Henry Wilson, were also installed to either side. Sir Henry Wilson was tragically assassinated on the day of the First World War memorial's unveiling, with both plaques holding particular inter-related significance.
- 11.13. In the 1930s Liverpool Street was central to the 'Kinderstransport' evacuations from Nazi controlled Europe, being the location where newly arrived children who had sailed into Harwich were met by their sponsors. Precautions in the pre-war period included the removal of the glass to the roof to the station at the onset of World War Two.

Late Twentieth Century Redevelopment

- 11.14. By the late twentieth century calls for a wholesale redevelopment of the station were rising, as the number of commuters into the City increased. Partially in response, Liverpool Street Station was listed at Grade II in 1975. The list description described the 'Gothic style offices flanking the ramp, and the 2 western bays of the train sheds'. The retention of the original western trainshed became the focus of the debate around redevelopment and various proposals were extensively debated.

- 11.15. While the final scheme (approved 1979) subsequently retained the western train shed and Great Eastern Hotel, it resulted in extraordinarily high levels of demolition of original Victorian fabric: the later 1890s eastern trainshed, the associated buildings fronting Bishopsgate (which had been listed at grade II only four years earlier, and Broad Street Station adjacent were all lost. The whole redevelopment was funded by the creation of the Broadgate office development complex, which included the covering over of the northern railway lines to create Exchange Square.
- 11.16. The first phase of redevelopment included the repair of the western trainshed roof and alteration of its structure to reinforce with steels. These works included the replacement of gutters and re-instatement of the roof covering with poly-carbonate sheets. The cast-iron acanthus scroll details were reinstated to the columns of the original trainshed.
- 11.17. British Rail architect Nick Derbyshire designed the new southern concourse and entrances to the station. His design incorporated a historicist extension to the western trainshed, bringing both the Liverpool Street and Bishopsgate entrances into a single cohesive rationalised space. The two wrought-iron naves of the western trainshed were extended, copying the form in steel and creating a new second southern transept running behind the Great Eastern Hotel over the new east-west concourse. A mezzanine level wrapped around the perimeter of the new concourse to create street level access from Bishopsgate to Liverpool Street. Metal-framed glazed shop units lined the mezzanine, in a deliberately high-tech style contrasting to the historicist aesthetic of façades.
- 11.18. The new roof intersected with the north elevation of the hotel, creating aisles with a central nave which adjoined the hotel fabric. The western elevation of the hotel was concealed behind an entirely new red brick wall with further alterations to the north elevation in the surround of the taxi arch. Elsewhere the arched openings accessing the demolished 1890s eastern trainshed were infilled, forming recessed arches with modern decorative lunettes added. Internally to the east of platform 10 within the western trainshed, the former cab road became a service area for use by delivery traffic. The new Bishopsgate entrance concealed the rear four and half bays of the flank elevation of the Hotel. At lower ground level the basement of the Great Eastern Hotel was incorporated into the scheme to form shops with glazed frontages onto the station floor as well as a ticket office.

- 11.19. Externally the ramps to street level were replaced with entirely new entrances via Hope Square and Bishopsgate. These featured a central brick gable flanked by towers with projecting glazed canopies over the ground level entrances. 50 Liverpool Street was built to replicate the southern pavilion of Wilson's original office range, located to the western end of the Hotel. Derbyshire extended the Sun Street Passage screen wall, with the new fabric largely replicating the original design. However accommodation for a new western entrance from Sun Street Passage resulted in a larger entrance bay, featuring a much taller gable end composed of three recessed arches surmounted by five lancet windows.
- 11.20. The Great Eastern Railways First World War Memorial and the London Society of East Anglians First World War Memorial were repositioned as part of the station remodelling, and placed on the return wall of the Great Eastern Hotel. An extra plinth was added below the plaques and adapted to create a lift opening, to jarring effect. Remnants of the demolished station reincorporated elsewhere, including a series of carved brick reliefs, which were relocated to the northern rebuilt elevation of the hotel facing the upper level of the concourse. Others were placed in a stores or entered private collections. The stone archway of the former cab-road was reset into this façade, alongside the Great Eastern Railway sign, taken from the façade of Harwich House. A stone door architrave from Harwich House was reinstated on the northern tower of the Bishopsgate façade. The carved 'G', 'E' and 'R' cartouches, originally located on the 1890s Bishopsgate elevation, were also salvaged, with copies made and reincorporated. Copies of the piers which demarcated the old slopes into the station were also reproduced to define the new public squares on Liverpool Street and Bishopsgate.
- 11.21. The new scheme was generally well received, praised for its clarity and deft balance of old and new. Critics drew attention to the amount of space in the main concourse given over to shops and signage, however the redevelopment of the station was awarded the Peter Manisty Award for Excellence by the Association of Railway Preservation Societies and a Civic Trust award in 1993. It must be borne in mind, though, that this new scheme was only made possible by very high levels of demolition of original Victorian fabric, and the construction of large new office blocks immediately adjacent as a funding mechanism.

Recent Alterations

- 11.22. The Great Eastern Hotel was listed at Grade II in 1993, with wide ranging internal alterations occurring by 2000. These works were undertaken by Manser Associates and Conran Design to update the interior whilst retaining and restoring selected parts of the historic fabric. The original mansard was replaced by three bedroom floors with a curved outline to the roof.

- 11.23. In 2003, a bronze sculpture was installed in front of the Liverpool Street Station entrance to recognise the historic and central role the station played during the Second World War to Kindertransport, titled 'Für das Kind – Displaced' by Flor Kent (b. 1961). This was later moved to the main concourse, and re-set with a new plinth alongside a new sculpture of a seated boy and suitcase. In 2006, a second sculpture, named 'Kindertransport – The Arrival' by Frank Meisler and Arie Ovadia was unveiled in the courtyard, which was renamed Hope Square at this date in association with this installation. This was dedicated to the Association of Jewish Refugees and the Central British Fund for World Jewish Relief.
- 11.24. The ticket office on the lower ground concourse within the basement of the Great Eastern Hotel was converted into shops in 2013 and a new ticket office was erected adjacent to platform 10. In 2022 the station's special architectural and historic interest – its 'listing' – was reappraised, clarifying that the later 1980-1990s historicist work is of special interest. At this point the frontages of the principal entrances to Liverpool Street and Bishopsgate, along with the retail structures, fixtures, signage, toilets, stairs, escalators, raised walkways, and inserted offices within the upper and lower station concourse were determined to not hold special historic or architectural interest. At this time the Great Eastern Hotel's listing was also upgraded to II*.

Summary Site History and Phasing

- 11.25. As existing the station therefore generally conforms to the following key phases:
- 1862 Formation of Great Eastern Railway
 - 1873 Construction of Western trainshed to Liverpool Street commences.
 - 1883 First phase of the Great Eastern Hotel completed
 - 1894 Expansion of the station, creating the eastern train shed and Bishopsgate entrances.
 - 1901 Extension of Great Eastern Hotel
 - 1922 Installation of First World War memorials
 - 1985 Demolition of Eastern trainshed, southern roof structure, concourses and entrances onto Liverpool Street and Bishopsgate.
 - 1991 Completion of southern transepts, new concourse and entrances including Hope Square.
 - 2003-11 Arrival of Kindertransport commemorative sculptures.
 - 2022 Updated listing for the station and Great Eastern Hotel.

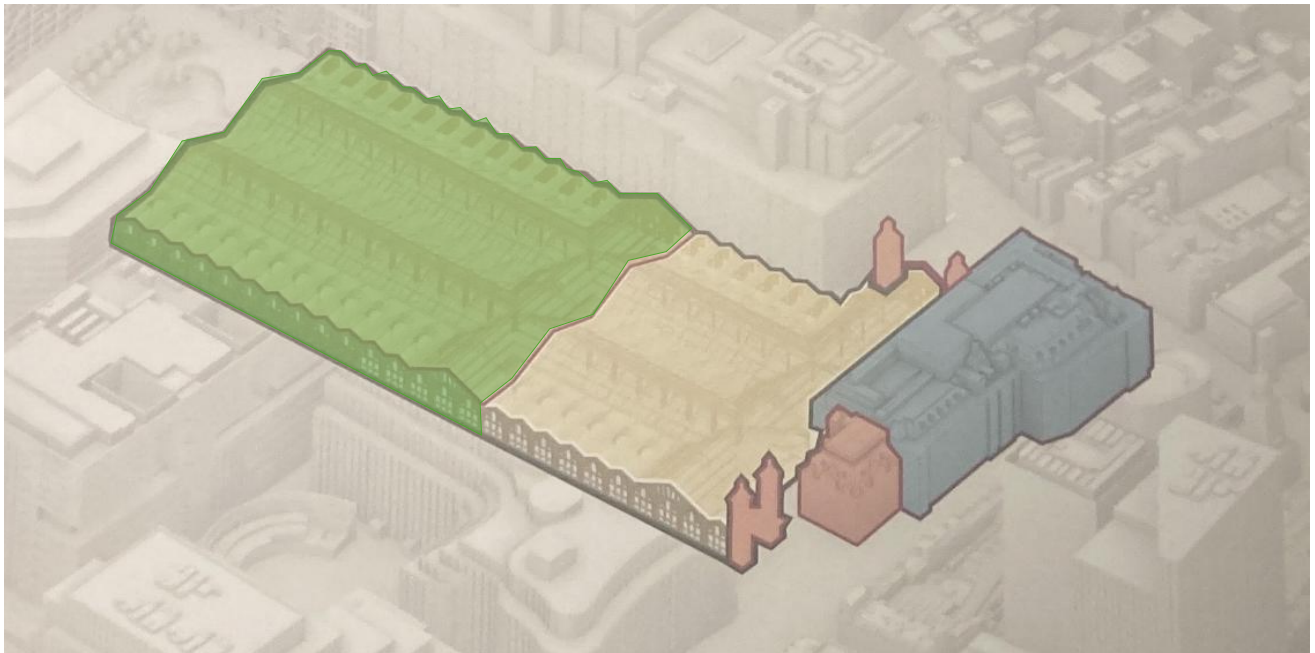


Figure 1. Diagram of indicating phases of fabric within the station. Green: 1870s Western Trainshed Structure, retaining elements of the now demolished 1894 eastern extension within the eastern facade. Yellow: 1980-90s redevelopment, rebuilding the entrances and main concourse. Red: Areas of no special interest identified in the updated listing entry dating to the 1980s-1990s. Blue: Great Eastern Hotel. Please note this is intended to aid and understanding of the location of fabric across the site, please see full assessment of special interest at paragraph in the sections below.

Existing Site

Context and Approaches:

- 11.26. The site occupies a transitional location at the eastern boundary of the City. The principal thoroughfares of Liverpool Street, aligned east-west and Bishopsgate, aligned north-south, as well as the open area of Exchange Square to the north define the site's limits. The large commercial office sites such as Broadgate Circle define the urban grain to the west and north of the site, contrasting to the smaller, more domestic scale of the predominately Victorian and Edwardian architecture east of Bishopsgate, and south along Liverpool Street. The City Cluster of tall buildings lies a little way south of the site.

Station Entrances:

- 11.27. The station has two principal entrances, set either side of the Former Great Eastern Hotel, to Liverpool Street and Bishopsgate respectively. These entrances are demarcated by two yellow stock brick towers and set back from the street behind raised and enclosed squares. While having expressive entrance features, these gateways into the station occupy a secondary position in the composition of the streetscape in relation to the height, extent and elaborate decorative treatment of the Former Great Eastern Hotel, which pronouncedly occupies the corner junction plot and screens the full extent of the station from view.

South, Liverpool Street, Hope Square:

- 11.28. Hope Square and the southern station entrance is, as identified above, made legible in the street scene and on approach from the west, through the composition of the entrance towers which frame the routes into the station, and through the delineation of the square which is bounded by stone pillars and metal railings to the south and west, and to the east is framed by 50 Liverpool street, and its active ground floor retail frontage. However, due to the level changes between the station concourse and Liverpool Street, this enclosed square is, with the exception of a small entry point adjacent to the western tower, only accessible via steps, which both limits the physical level of its accessibility and its perception of accessibility on approach. The Square is well used both as a primary entry route into the station and as an informal meeting space and space to dwell, in part due to good levels of sunlight to ground; the activation provided by McDonalds, and the steps and plinths of the railings, which are used as informal seating places. The square also features tall 'architectural' lighting and CCTV poles, in addition to the railings, which, while arguably enhancing the legibility of the Station entrance, also serve to clutter the Square, and impede pedestrian movement. Located towards the centre of Hope Square is the Kindertransport sculpture which acts as a positive focal point, however is often also used as an informal place to perch, and/or is littered, thereby undermining its important historic contribution to the Station's history and significance. Overall, while Hope Square marks the southern entrance of the station, and provides some informal dwell space, it is also a barrier to accessibility.

East, Bishopsgate entrance:

- 11.29. Like Hope Square the station entrance onto Bishopsgate is also recessed significantly from the street edge. It is extent more subtly demarcated through granite paving and a series of steps which enclose its edges. Between the two stone pillars on its northern edge, a small length of sloped paving offers step-free access into the station. Within the centre of the Square a bank of stairs and escalators, covered by a glazed arched screen, provide connectivity with the lower concourse. There is no lift provision at this end of the station. Behind the escalators there are narrow openings onto the upper concourse, though these are not readily apparent on approach, being blocked by the escalator screen in front. This entrance offers very little in the way of informal dwell spaces, and due to the location of the escalators which creates congestion at the entrance of the station. Equally, while the two towers are applicable along with the pitched brick arches in between, views into the station concourse are highly limited from this approach, which in addition to the clutter presented as a result of the escalator screen, offers a poor sense of arrival to the station and presents a barrier to inclusive access.

Bus station interface:

- 11.30. The southern section of Sun Street passage is currently in use as a TFL bus terminal, and as such, several bus stops have been located along the western flank of the station's southern transept. As aforementioned, the pavements in this location are very narrow (approx. 50cm) and there is no formal crossing between the ground floor shopping parade of 100 Liverpool Street, which sits on direct alignment with the station's concourse. Furthermore, the permeability of this station elevation is limited to only a number of single leaf openings, constraining access to the bus stops and the station more generally, which limits connectivity at this interface, and is another example of poor arrival experience to the station, and again highly problematic in terms of inclusive access to the bus network more generally. Internally within Liverpool Street station, the bus station lacks clear demarcation, so that the internal spaces are not legibly associated with the bus stops, in addition to lacking appropriate and varied seating options such which combined make the use of the bus station off-putting to the full range of visitors.

Sun Street Passage and Great Eastern Walk:

- 11.31. Flanking the west and east edges of the station are two pedestrian routes to the north, Sun Street Passage and Great Eastern Walk (GEW) respectively. GEW is accessed via a narrow escalator to the north of Bishopsgate entrance and is poorly signposted. It runs along the rear façade of 135 and 155 Bishopsgate. Owing to its raised position, the narrowness of the escalator, and its location along the backs of these buildings, which do not open out and engage with it, it is not a highly accessible or animated pedestrian route, which likely accounts for its limited pedestrian footfall.
- 11.32. Sun Street Passage is by contrast a well-trafficked pedestrian route connecting Liverpool Street, Hope Square and the western Broadgate complex to the north along the train sheds. At the intersection of Sun Street Passage and Liverpool Street, the full western elevation of the station can be appreciated. Here the subtle transition between the Victorian trainshed walls, and the historicist 1980-90s extension to the station's southern transept, are discernible, but give the elevation a consistent and cohesive appearance.
- 11.33. The quality of the route however is highly constrained by a number of factors. At its southern end, which is shared with the station's bus terminal is constrained by narrow pavement widths, bus stops, tall metal fences, bollards, and a tall stone wall, which act as significant barriers to movement, and force users to move into the station in order to continue their route north. At the pedestrian junction adjacent to Broadgate, beyond the metal barriers, the route narrows and awkwardly doglegs into the station, being limited to a single narrow point of entry, creating a pinch point in pedestrian movement. From this point northwards, the passageway ramps down, running parallel to its lower-level route that connects into the lower station concourse and basement level of 100 Broadgate. While the western edge of the route, within the ownership of the wider Broadgate campus, features a colourful finned façade and is well lit at night, the route offers no activated frontage and very limited levels of greening, which are delivered though the inclusion of two trees, towards its northern end. As such, the overall the character and quality of the route is that of a secondary back-land, ad-hoc route, which fails to signal the important function of the Bus Station and route through to Exchange Square, and given the level changes, and its compromised accessibility to the north, hampers its usability and effectiveness as a connective route to the north.

North of the station:

- 11.34. Immediately to the north of the station is Exchange Square, a large and well-used public space. Recently redesigned, the square is a very high-quality and multi award-winning piece of landscape design, which features high levels of urban greening and plant diversity, a wide variety of seating options, and interactive features. The landscape design specifically responds to the importance and interest of the station, though its layout and levels which were designed to enable unobstructed views down the entirety of the trainshed and of the original twin spans of the station roof – the square now being the place from which this key feature of the station is now best appreciated.
- 11.35. There is no direct access from the square into the station however, limiting the potential for users of the station to wait and dwell or enjoy this greenspace despite its proximity. Equally, the entrance into the square from Primrose Street is stepped, so that through views into the square are limited and those that require step free routes can only access the square from the west via a separate ramp. The southwestern connection of the Square from Sun Street passage is also accessed via a stair and lift, so that the route is not easily discernible on approach, and lacks appropriate wayfinding. The square is therefore experienced separately from the station despite its relative proximity.

South of the Station: Liverpool Street

Liverpool Street West:

- 11.36. The approach from the west benefits from the pedestrianisation of the western end of Liverpool Street, following the arrival of the Elizabeth Line and new pavilion over the entrance down to underground level. From here there are good views of the station's south entrance, Hope Square and the south elevation of the Hotel as a group, which collectively read as an important civic node, created by the juxtaposition of the historic hotel and historicist confection of the Derbyshire station entrance and 50 Liverpool Street.
- 11.37. Pedestrians can remain at ground level in the approach into the station from Liverpool Street and enter the upper concourse via Hope Square or via the western Sun Street Passage elevation, or use the stairs west of 100 Bishopsgate and enter through the public route beneath the building at lower ground level which passes under Sun Street Passage, entering the station level with the platforms. This route picks upon the desire lines heading east from Finsbury Square and Eldon Street, so that it forms a principal route into the station from the heart of the City to the west.

Liverpool Street East:

- 11.38. The eastern section of Liverpool Street, which stretches from Hope Square to Bishopsgate is not pedestrianised, and save for a short section of restricted access shared carriageway, is predominantly taken up by the taxi rank to the south of the Former Great Eastern Hotel. Given the high volumes of pedestrians which use this route, the pavements are highly congested, which results in a high number of informal pedestrian crossings. The character of the eastern section of Liverpool Street is harsher than the west, and more cluttered with street furniture (including congested cycle stands). Furthermore, the railway station entrance is concealed from view behind 50 Liverpool Street on approach from Bishopsgate, which limits its legibility in the streetscape.

Underground entrances:

- 11.39. Separate entrances into the station are via the Elizabeth Line escalators on Liverpool Street, as well as from within the Metropolitan Arcade, entering into the below ground level via the modern interface with the underground.

Station interior:

- 11.40. The interior of the station is complex, reflecting its phased development, and as currently existing can broadly be divided into two elements.
- 11.41. Firstly, on the northern part of the site, the original trainshed of 1873-1875, constructed principally of Suffolk stock brick with Bath stone dressings, with the roof constructed from a combination of wrought and cast-iron columns and trusses. This covers the northern part of platforms 1-10 and comprises two central longitudinal bays flanked by narrow aisles. The two broad twin naves rise to 76ft, separated by a double row of columns. The outer aisles are composed of a series of vaulted bays, set square to the central naves. The roof has a cantilevered spandrel-bracket form, with light suspended trusses, reworked in during the 1980s.
- 11.42. The only remaining portion of the later 1890s trainshed is the section of wall in red brick with Bath stone dressings that is retained on the eastern face of the 1870s trainshed. This is built with contrasting red brick and rounded and keyed arches with blank recessed panels set beneath. To every third arch there is a stone console bracket, from which the trusses of the eastern trainshed would have been supported.

11.43. Secondly, to the south, the 1985-1992 Derbyshire extension of the Wilson trainshed, which covers the southern parts of the platforms, the concourse and the entrances to Liverpool Street (south) and Bishopsgate (east). The platforms from 11 onwards continue underneath the office block (Broadgate phases 6-7) to Bishopsgate and also date from 1985-1992 (this office block occupying, approximately, the position of the Victorian station ranges and trainsheds that were demolished as part of the late twentieth century works). In addition to the street entrances, the station can also be accessed at lower concourse level directly from the Underground station (not included in this listing) from the south end and the west. The form of the later extension broadly recreates the longer historic portion covering the mainline platforms, albeit with a new modern transept integrated as part of the southern bays. This southern transept was introduced as part of the remodelling to cover the new unified concourse.

Concourse upper:

11.44. The concourse itself is divided across two levels, and a defining, and much appreciated, feature of the overall southern transept and station design is the lofty volumes created through the inclusion of three large lightwells within the upper concourse slab, which enable sunlight to penetrate down onto the lower concourse, and views up towards the station soffit and clear views across the full length of the station. However, the composition of this upper gallery concourse results in narrow walkways which constrain movement from Bishopsgate to the Bus station, and offer very few places to sit or dwell. Furthermore, lining the northern edge of the upper concourse is a row of single-storey retail units, which due to their scale and location block of views down along the rail lines and towards Exchange Square. The commercial units and overall structure of the concourses are in a vaguely High-Tech idiom, of glass and steel finished in white, and somewhat at odds with the historicist character of the station's structural transept design and now appear very dated.

11.45. Vertical circulation between the station concourses is provided via two banks of stairs each served by two escalators at each station entrance. The station currently has one passenger lift, somewhat bizarrely located within the War Memorial towards Hope Square, which is undersized and life-expired. Owing to its location, it has been designed to blend in with the Memorial's white marble, making it less visible and less readily understood as a passenger lift. The limited provision of step-free vertical circulation between the concourse levels for a station of this size and throughput is a significant barrier to accessibility, and also results in long queues and wait times.

- 11.46. Within the upper concourse there are two First World War memorials, the Great Eastern Railway memorial and another erected by the London Society of East Anglians, which are respectively positioned on the east and north elevations of the hotel (separately detailed under NHLE entries 1483817 and 1483820).

Concourse lower:

- 11.47. On the south side of the lower concourse are a second range of retail units and cafés, some of which fall within the footprint of the former Great Eastern Hotel. The adaptation of these units over time have resulted in an ad-hoc appearance and with poor interfaces with the station itself frequently stepped or set behind glazed balustrades with confusing lines of sight. The Underground entrance is located underneath the steps to the Liverpool Street entrance. The underground ticket hall is located below Hope Square, with several substantial piers creating awkward exit routes through onto the concourse, this route is also stepped with a ramp creating a separated access for those that require step free routes. Only one lift is located to the north west corner of the Former Great Eastern Hotel, accessing the underground ticket hall, which as elaborated elsewhere is undersized and often out of service. Neither the upper or lower concourses provide toilet or changing facilities, with these currently being located via steps/escalators below the lower concourse.

Assessment of Significance

- 11.48. This section assesses the significance of heritage assets within the site boundary. All other heritage assets potentially affected by the proposals are assessed later in the report.
- 11.49. This includes, designated heritage assets Liverpool Street Station (Grade II), The Former Great Eastern Hotel ('FGEH' Grade II*), The Great Eastern Railway War Memorial (Grade II), The London Society of East Anglians War Memorial (Grade II), the Police Call Box outside Liverpool Street Station (Grade II), and Bishopsgate Conservation Area. Non-designated heritage assets within the site boundary include the Metropolitan Arcade, 50 Liverpool Street, the Kindertransport Memorial Sculpture, and Hope Square.

Liverpool Street Station, Grade II

- 11.50. The listing description for the station was reviewed and updated by Historic England in December 2022, clarifying the elements of the station considered to be of special interest. This review process clarified that in addition to the original, Victorian train sheds, special interest lies in the Derbyshire trainshed extension. The review process clarified that the frontages of the principal entrances to Liverpool Street and Bishopsgate, along with the retail structures, fixtures, signage, toilets, stairs, escalators, raised walkways, and inserted offices within the upper and lower station, are **not** of special interest. The below summary reflects this assessment, with additional comment where appropriate in the view of the application at hand. Please note, Hope Square and 50 Liverpool Street are assessed in their own right as non-designated heritage assets below. The level of detail is proportionate to the assets' importance in compliance with paragraph 207 of the NPPF.

Summary of Significance

Architectural

- 11.51. Interest arises through the architectural expression of the station, reflecting an idiosyncratic Victorian and Neo-Victorian gothic style, which combines ambitious engineering with gothic and classical architectural flourishes. This is expressed through the column and truss designs, cathedral-like nave and transepts, the use of lancet windows and pointed arch motifs throughout.
- 11.52. For the innovative cast and wrought iron construction of the original western trainshed, which cantilevered to create an impressive span to the interior. Officers note the trusses incorporate later adaptations to reinforce the structure and replace the glazing following the twentieth century re-development works.
- 11.53. Relatedly for the landmark scale of the station, drawing upon 'cathedral' nave and transept typologies to create a building of monumental size which defines a significant block of development at the eastern edge of the City.
- 11.54. Associative interest arises as examples of work by architects Nick Derbyshire, John Wilson, W.N. Ashbee and Edward Wilson.

- 11.55. Richly decorated and polychromatic materiality including, red and yellow brick work, painted iron spandrels, decorative acanthus leaf capitals and carved stone reliefs. Fabric of interest includes re-incorporated fabric from the now demolished Ashbee phase of construction, such as a stone door architrave from Harwich House, now attached to the station on Bishopsgate to the north of the entrance and replicas including the Cartouches from Harwich House to the station towers.
- 11.56. For the scholarly historicist trainshed extension of 1985-1992 which carefully follows the detailing, form and proportions of the 1870s structure to create a unified concourse and simplify what had become a confusing interior space.
- 11.57. Three vaults beneath No.50 are remnants of the Victorian station development, with some residual interest in the extent to which they illustrate the historic limits of the earlier station complex and interconnection with the Former Great Eastern Hotel. However these have been curtailed and cement rendered, with lift shafts inserted and modern services added. Their inherent interest and contribution is therefore low.

Historic

- 11.58. The western trainshed possesses considerable representative significance, illustrating the vast physical impact of the Steam Age on the Capital. The station illustrates how the ambitious engineering sophistication of the period was achieved without compromising on a finely executed decorative architectural character.
- 11.59. The scholarly historicist extension of 1985-1992 is illustrative of the rise and professionalisation of major architectural conservation-inspired schemes during the late twentieth century, alongside other major historicist schemes such as at Richmond riverside and Poundbury.
- 11.60. Communal and commemorative value as a key site during the 'Kindertransport' evacuations from Europe on the advent of the Second World War.
- 11.61. Association with the assassination of Sir Henry Wilson, a key event in the Irish Civil War.
- 11.62. Inherent evidential value of the remaining Victorian fabric, showing the breadth of materials, manufacturing and engineering systems of the period, and particularly those associated with the Fairburn Engineering Company and the innovative truss system they designed;

11.63. The overall architectural and historic interest of the building is **high**.

Contribution of setting

- 11.64. The contribution of setting to an appreciation of the station's significance varies. The below street level platforms reduce the overall presence of the station in the streetscape, as well as limit the range of views towards it. The Station therefore appears surprisingly sheltered from view, and despite its function as critical infrastructure is largely perceptible only in the immediate approach from the surrounding streets. Notwithstanding this, the 'sunken' quality of the station is itself illustrative of the scale of engineering works required during its initial construction and subsequent phases of alteration.
- 11.65. In easterly views from the junction of Liverpool Street and Old Broad Street (AVRS 63-66) the station is perceived as part of a defined group with a strong and consistent classical architectural character either side of the eastern termination to Liverpool Street including No 50, the Metropolitan Arcade and the FGEH. The use of classical and gothic detailing in the surroundings re-enforces the historicist character of the entrance structures, as well as signalling their shared use as part of a larger railway terminus.
- 11.66. Sight lines from this approach take in views north along Sun Street Passage, providing the longest range vantage point from which the full scale of the station can be appreciated (AVR 67) amplifying an appreciation for the building's landmark scale and strategic civic function. While the majority of visible fabric from this viewpoint relates to the 1980-90s redevelopment works, the detailing and material palette appears consistent across its elevation, highlighting the attention to detail of the later phase of works. The overall spatial quality of the passage is however narrow and cramped, with a general back-land character exacerbated by the successive alteration and repair works from the post-war period on and clutter hard-landscaping. This undermines the importance of the north-south route across the site and limits an appreciation of some of the earliest station fabric seen along the street.

- 11.67. From Hope Square (AVRs 65,66 A56) the towers of the station entrances, whilst identified in the listing of no inherent interest, do have a landmark quality which signals the entrance to the station to the passerby, in turn enhancing an understanding of the station's important civic function. This is further amplified by the formal quality to the enclosure to Hope Square and the placement of the Kindertransport sculpture such that it appears as a public piazza with appreciable classical influences, as well as alluding to the original set back of the station frontage from the street. The views towards and across Hope Square are therefore successfully illustrative of the aspirations, scale and intention of the 1980s-90s redevelopment works and the extent to which it reflected contemporary historicist architectural movements at the end of the twentieth century. As such, while the square does not reflect the Victorian condition of the street, its positive contribution to the setting of the station is noted.
- 11.68. Moving further east along Liverpool Street the station fabric quickly disappears from view and the Former Great Eastern Hotel ('FGEH') rather than the station becomes the principal structure, seen prominently on the junction with Bishopsgate. Relatedly the set back of the station structure from Bishopsgate, where the station is in-set east of the building line established by the FGEH, reduces the street presence of the station in views from Bishopsgate (AVR 36-40, 45-46). Much less landmark quality is therefore derived from these views. The functional relationship between the station and FGEH is however perceptible through their immediate proximity and their inter-connected use remains legible. Also appreciable is the clear hierarchy established between the two buildings, in which the hotel was built to be the grander, more opulent architectural statement. The FGEH therefore makes a strong positive contribution to the setting of the station, recognisably forming a Victorian station/hotel typology complex despite the changed nature of the junctions with the station's fabric. Officers note that the retained original station vaults underneath no 50 to an extent reflects a better preserved relationship between the hotel and Victorian station, however their below ground location, utilitarian use and adapted form substantially limits the degree to which this junction contributes to an appreciation of the station's significance.

- 11.69. Further north along Bishopsgate the substantial mass of 135 Bishopsgate entirely screens the station from view (AVR A38, 35-36) appearing to overwhelm the entrance, further diminishing the overall contribution of this view. The relative contribution of this approach is therefore diminished in comparison to elsewhere, with less ability to understand the landmark quality, full scale or quantity retained historic fabric within the station complex. The historicist approach to the 1980s-90s entrance from Bishopsgate is appreciable, retaining importance as one of two key views of the new entrances constructed by Derbyshire, however the spatial layout is rather more cramped and uncomfortable, with the glazed canopy over the escalators protruding awkwardly into the public realm and creating a slightly confused building line where ground-level entrances into the station are unclear. The overall appearance is less successful than at Hope Square appearing rather cluttered and ill-considered particularly where the towers immediately abut the FGEH fabric, exacerbated by the looming mass of 135.
- 11.70. From Exchange Square the full span of the station is seen, including the decorative dagger boards which form the timber valance to the northern end of the original trainshed. These views enable the viewer to understand the level changes across the site, as well as the dramatic scale of the engineering works during the various phases of construction. The open, green quality of the square also compliments the civic purpose of the station, creating an overall positive relationship. While this elevation is functionally the rear of the site, its overall positive qualities mean that it makes an equal contribution to an overall appreciation of the building's significance as that of the main elevations to Liverpool Street and Bishopsgate.
- 11.71. In light of this appearance within the street scene, high group value arises through its proximity to and appearance with the neighbouring Former Great Eastern Hotel, Metropolitan Arcade and reconstructed No. 50 Liverpool Street, creating a concentrated High Victorian character to the streetscape, further unified through their interlinked use and association with railway infrastructure.

Former Great Eastern Hotel, Grade II*

- 11.72. First listed at Grade II, the integrity of the hotel's architectural and historic interest following the 1990s alterations was recognised to merit upgrading to Grade II* status in the relisting completed in December 2022. The majority of this building is located outside of the redline of the site, notwithstanding where fabric interfaces with the station.

Summary of Significance

Architectural

- 11.73. The building exhibits a particularly refined façade treatment, designed to promote the principal terminus of the Great Eastern Railway within the Capital. Its composition adopts a Neo-Renaissance architectural language, drawing upon both Dutch and French influences.
- 11.74. The building retains landmark quality with principal elevations to the south and east appreciably responding to the important junction of Liverpool Street and Bishopsgate.
- 11.75. Inherent high architectural and artistic interest is generated through its highly decorative exterior, exhibiting lavish attention to detail in the carved terracotta and red brick exterior with additional stone detailing. Materials used include Essex red brick with Portland and Corsehill stone dressings.
- 11.76. The renaissance character of the expressive roofline, incorporating a series of turrets and stepped gable ends, is representative of the eclectic Victorian commercial architecture of the period, although what survives is largely of the C20, without its original richness and fineness when viewed closely, and therefore of only limited inherent interest.
- 11.77. The highly decorative internal spaces illustrate the intent to provide a competitive offering to Victorian and Edwardian commuters, with luxurious amenities for socialising and doing business particular to the Station hotel typology, of which it is a strong example.
- 11.78. The openings between the Hotel and station concourse are illustrative of the historic functional relationship between the two buildings which were conceived as part of a single railway complex.
- 11.79. The reincorporated decorative elements from Harwich house including the Great Eastern Railway sign and a series of carved brick relief panels featuring a locomotive, an ocean liner and a lunette with a cherub stoking an engine, were relocated to the north elevation of the hotel.

11.80. Officers note these intersections have undergone substantial alterations following the redevelopment of the station complex in the 1980s. This includes the glazing line where the station roof meets the hotel, the enclosure of the western elevation with a new red brick wall, alterations to the northern elevation facing into the station concourse, as well as the extension of station fabric to directly abut the northern elevation on the entrance from Bishopsgate. At basement level earlier vaults belonging to the Victorian station adjoin the hotel vaults, to a degree reflecting the historic connection between the two buildings, however these have also been substantially altered and are of relatively reduced interest given their below ground, utilitarian function.

11.81. While the fabric associated with the 1990s extension and internal alterations is of no inherent sensitivity, association with noted designer Joseph Conran is also of interest.

Historic

11.82. Associative value with Charles Barry, Charles E Barry and Sir Edward Edis.

11.83. Important group value is generated through association with the arrival of the railways into the City, transforming the connectivity of what was medieval London.

11.84. The Flemish aesthetic of the exteriors expresses historic associations between with the East Anglian railway companies connections with the low Countries.

11.85. The overall architectural and historic interest of the building is **high**.

Contribution of Setting

11.86. The setting of the hotel makes a range of contributions to an appreciation of its significance. The specific contribution of its corner plot is high, with the important junction location deliberately exploited to create a landmark on the corner of these two major roadways, which in turn illustrates the historic importance of the structure as the 'frontispiece' for the station, signalling the ambition of East Anglian railway within the competitive railway market.

- 11.87. An appreciation of the flamboyant roofscape is seen enhanced through its appearance against open sky, as seen in views from (AVRs 37-38, 40, 44-45, 51, 64-65,). Views in the approach to the junction along Liverpool Street and Bishopsgate also clearly illustrate the hierarchy within the terminus group, in which the Hotel is clearly the grander architectural statement, occupying a greater proportion of the frontage along the streetscape and dominating that of the station architecture. While later 2000s roof extensions are visible, the expressive gothic and Flemish forms to the roof remain easily legible.
- 11.88. The contribution of the station to the setting of the Hotel is however not always comfortable. At the Bishopsgate entrance the western tower of the station and northern façade of the Hotel awkwardly abut each other, with the station appearing to block views out from the Hotel interior. The stepped entrance into the station constrains the level extent of ground alongside this elevation, exacerbating the sense of constraint which detracts from the commercial and public nature of the ground floor of the hotel. The 'high-tech' elements of the station entrance at Bishopsgate, such as the canopy over the escalators adds further complex geometries within the space, increasing a sense of clutter and confusion in the approach to both buildings.
- 11.89. This indifference is also reflected in the quality of the station interiors where these interface with the Hotel along the northern elevation. Here the much later date of works during the 1990s is most acutely appreciable, with the re-arrangement of the concourse resulting in the glazed infill and blocking off of a number of the original entrances onto the concourse, including the original Taxi arch. The level difference between the upper concourse and the openings into the hotel are poorly mediated and lack the refined decorative treatment seen elsewhere.
- 11.90. Overall while the material palette and gothic character of the Derbyshire scheme shares commonalities with the hotel, the overall quality of the juxtaposition between the two seems ill-considered which diminishes the stature and importance of the Grade II* listed building. The sense of permeability between the two buildings is however legible and the strong visual presence of the hotel along the concourse asserts the historic function and grander architectural character. The contribution of the station to the setting of the hotel is therefore mixed, its positive contributions reflecting the degree to which the historic functional relationship between the hotel and station remains perceptible, and the extent to which the Derbyshire works preserved views to the northern elevation of the hotel from the concourse interior.

- 11.91. More widely glimpsed views of the Hotel from Devonshire Square and St Botolph Without Bishopsgate Gardens are incidental and partial in nature, however these views making a positive contribution, in which the landmark quality of the hotel signals the location of the wider station complex, in addition creating the sense of a continuance to the historic streetscape in the wider surroundings.

The Great Eastern Railway War Memorial, Grade II

- 11.92. A carved marble memorial plaque, fixed to the rebuilt red brick wall which appears as the western elevation of the FEGH, having been moved from its original location within the station as part of the 1980s-90s redevelopment works.

Summary of significance

Historic Interest

- 11.93. Illustrative of formal memorialisation of War Dead and rise of commemorative architecture during the end of the nineteenth century on.
- 11.94. High commemorative interest and association with the community of rail workers for which Liverpool Street was a central place of meeting and work.

Architectural Interest

- 11.95. Inherent decorative quality and classical expression of the carved marble and flanking fluted Roman Doric columns with a spiralling carved wreath of bay leaves as well as a segmental broken pediment in the tympanum in which are richly and deeply-carved ribbons and foliage in high relief.
- 11.96. Artistic interest generated through busts of Captain Charles Fryatt and Field Marshal Sir Henry Wilson Bart, designed respectively by Van Golberdinge and C L Hartwell.
- 11.97. The overall architectural and historic interest of the building is **high**.

Contribution of Setting

- 11.98. The contribution of setting is layered, with the current position of the plaques altered, fixed into what appears as the return elevation of the Great Eastern Hotel within the station interior, following the redevelopment of the station between 1985 and 1992. The integration of a lift entrance directly below the memorials is jarring and undermines the very high commemorative value of the memorials which is unfortunate. The overall station context however is important, and underscores the relationship with the community which the memorials commemorate.

The London Society of East Anglians War Memorial, Grade II

- 11.99. Black granite and Portland stone memorial plaque, moved from its original location to within the rebuilt return of the northern elevation of the FGEH.

Historic interest

- 11.100. High commemorative interest is generated as a witness to the tragic impact of world events on the East Anglian counties of Cambridgeshire, Essex, Norfolk and Suffolk and the losses suffered in the First World War.
- 11.101. illustrative of formal memorialisation of War Dead and rise of commemorative architecture during the end of the nineteenth century on.

Architectural interest

- 11.102. Inherent decorative quality as an ornate and richly-carved war memorial tablet, of black granite and Portland stone, carrying its original inscriptions and the amalgamated coats of arms of the counties to which the memorial is dedicated.
- 11.103. Artistic, sculptural interest is generated through a classical female head and the arms of the four counties above, all picked out in colour and set into a broken pediment with the flag of the Society at the apex.
- 11.104. Group value arises through its placement within Liverpool Street Station, as well as proximity to the other memorials on the upper concourse.
- 11.105. The overall architectural and historic interest of the building is **high**.

Contribution of Setting

11.106. As above the setting of the memorial makes an overall positive contribution, however its resiting to the upper concourse during the 1990s as somewhat diminished its prominence, awkwardly placed on a small return elevation which limits its visibility in the approach. The overall impression of its siting is as an afterthought. Nonetheless its position within the station underscores the connection to the community it memorialises, furthering the ability of the onlooker to appreciate its significance.

Police Call Box, Liverpool Street, Grade II

11.107. Early twentieth century call box located on Liverpool Street, outside of the station.

Summary of Significance

Architectural interest

11.108. The building retains inherent material value through its cast iron form and decorative, tall, rectangular form with segmental-arched head and narrow projecting hood.

11.109. Detailed decorative consideration includes globe light to top set within a small flat topped cupola with corner bars on a stepped base, and embossed coat of arms.

Historic Interest

11.110. Historic interest arises from its rarity value as an early twentieth century survival in the street scape, thought to date to approximately 1935 or earlier.

11.111. The overall significance of the building is considered to be high.

Contribution of setting

11.112. The setting of the Police box makes a positive contribution to an appreciation of significance, with the Victorian and neo-Victorian character of the station complex together with the civic quality of Hope Square enhancing the historic aspects of significance.

Bishopsgate Conservation Area

- 11.113. The character and appearance of the conservation area is defined within the Conservation Area Management Strategy Document (CAMSD) (September 2014). The conservation area reflects a roughly L shaped district, principally defined by the junction of Bishopsgate and Liverpool Street. While the oldest, most significant portion of the station falls outside of the conservation area, the 1990s frontage to Liverpool Street, including Hope Square and the Great Eastern Hotel are located within its boundary. The Great Eastern Hotel therefore occupies a large extent of the street front along the northern side of the Liverpool Street, and is appreciated as the dominant building in the approach towards the junction. The overall character of the conservation area draws on a consistency of Victorian and Edwardian style buildings with small-scale commercial uses. Whilst the roofscape in the area reflects the eclecticism of these periods, the use of brick with classical stone and stucco detailing is notably consistent. The core of the conservation area, first designated in 1981, is centred on the dense urban grain east of Bishopsgate. This area is formed by a narrow historic network of streets lanes, overlaid with key examples of Georgian town planning. The scale within this core is more domestic and consistent, predominantly 4-5 stories, with a clear hierarchy to each floor level conforming to classical architectural vocabulary.
- 11.114. Victorian railway infrastructure informs the character around Liverpool Street, including the Metropolitan Arcade, rebuilt frontage to the Station and the Great Eastern Hotel. Here the roofscape and heights to the street front is more varied, reflecting the infrastructure and engineering associated with the station. Aside from the more open axial views east-west, and north-south along Liverpool Street and Bishopsgate, other views of importance highlighted in the CAMSD include views north across St Botolph's church yard, and west from the narrow lanes within the original conservation area core. In these views the roofline of the Former Great Eastern Hotel are glimpsed together with the spire of St Botolph, or framed by the narrow street widths. Additionally view 1 looks north along Sun Street Passage, from which point the full scale of the station is appreciable.
- 11.115. All of these views take in contemporary development in the immediate surroundings of the conservation area, this includes 100 Liverpool Street to the west of the station, 135 Bishopsgate to the north, and 'the crosspoint' 34 Liverpool Street seen within the Conservation Area boundary, as well as the Heron Tower and 99 Bishopsgate seen to the south. The quality of contrast between the taller heights of the surroundings and the interior of the conservation area is noted within the CAMSD as a defining characteristic.

11.116. The overall architectural and historic interest of the conservation area is **high**.

11.117. The contribution of the site to the conservation area is layered, forming an integral part of the rail-terminus architecture which establishes the western portion of the conservation area. The CAMSD describes the site as:

11.118. *'Liverpool Street Station (opened 1874) is one of London's great Victorian stations, and is a dominating presence in Liverpool Street and 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. It is of five storeys and attic, built of red brick with stone and terracotta dressings. Its façades are very busy, with projecting bays, and has tall gables and dormers which create a complex and intricate roofscape. The heavily articulated and florid façades are emblematic of the original desire to create a high status Victorian building... At the northwest corner of the conservation area, Hope Square is a raised area framed to the front by tall stone columnar gate piers, with elaborately detailed iron gates. To the rear of the space, tall brick towers with a glazed canopy mark the entrance to the Station. Hope Square is a busy area, used by large numbers of people, passing through the Station and the retail areas. Sun Street Passage, to the west of Liverpool Street Station, offers a fine view of the richly arcaded side elevation of the train sheds, outside the conservation area.'*

11.119. Positive contributions therefore include the considered historicist treatment to No 50, while a late twentieth century facsimile of the older rail-architecture, it is understood as a faithful reproduction that helps to underscore the civic and public function of the station and its immediate surroundings. Likewise the formality of Hope Square, demarked by the stone piers, railings and statuary also creates a sense of civic purpose and ownership. The plainer quality to the brick work of the station frontage, its glazed curtain wall and contemporary lighting means it is discernible as a later addition, however the rebuilding works are, when taken as a whole, successful in blending into the remaining Victorian trainshed and western elevation of the Great Eastern Hotel.

11.120. The Neo Gothic Station entrance to Hope Square is part of the station listing but is not of inherent special interest through a listing lens. It does however fall within the conservation area boundary and is considered to make a positive contribution to the character and appearance of the area, principally through the 'Neo-Victorian' character of the towers and entrance group and the ways these relate to the hotel and other railway buildings in this location.

Non Designated Heritage Assets (NDHA) within the site

50 Liverpool Street

11.121. This is a late twentieth century reproduction of the Victorian station range, located west of the FGEH on Liverpool Street, added as part of the 1980s-1990s redevelopment works.

Summary of Significance

Architectural Interest

11.122. High architectural interest is generated as a facsimile of the original flanking pavilion of the 'Ruskinian' Venetian Gothic office range by architect/engineer Edward Wilson.

11.123. Considerable group value is generated with the station development as a whole, including the piers of Hope Square as well as to the Former Great Eastern Hotel. Clear consideration given to the scale and interior elevations in order to frame the entrance to the station.

11.124. Inherent decorative value of the neo-gothic treatment to the facades, creating a continuity with the station interior, and reinforcing the High Victorian gothic railway character in the immediate surroundings.

Historic Interest

11.125. While as a twentieth century reproduction its evidential value is limited, it remains an important illustration of the historicist conservation movement which were increasingly influential during the late twentieth century.

11.126. The overall significance of the building is considered to be **moderate** local significance, making a strong contribution to the Bishopsgate Conservation area but also retaining interest in its own right, as well as generating group value with the station sheds, associated station hotel (GII*), the Metropolitan Arcade and the Railway Tavern.

Contribution of Setting

11.127. The contribution of setting to an appreciation of the building's significance is high, providing in the context in which its significance as a facsimile of now demolished fabric can be understood. The surrounding functional group of railway related infrastructure furthers this understanding, as well as the reinforcing the sense of an inter-related group of neo-Victorian buildings. The site therefore makes a positive contribution.

Metropolitan Arcade

11.128. This two storey brick building range dates from 1876, originally designed to house the metropolitan line, located to the south side of Liverpool Street, later converted in a commercial arcade.

Historic Interest

11.129. Historic Interest is generated as the remaining fabric associated with the first subterranean urban railway.

11.130. Associative interest as an example of the work of Fred Sherrin, dated 1911-12 and was sympathetically reconstructed in 1994-95.

Architectural Interest

11.131. Decorative external facades completed in an Edwardian French pavilion style.

11.132. Architectural interest as an example of historicist revival architecture.

11.133. Group value with other railway linked buildings, such as the Railway Tavern nearby and wider complex of buildings associated with Liverpool Street Station.

11.134. The overall significance of the building is **moderate/low** local significance.

Contribution of setting

11.135. The contribution of setting is high, with the approach from the west along Liverpool Street enabling an understanding of the functional relationship and spatial connection between the train station and former underground entrance. As above the surrounding functional group of railway related infrastructure furthers this understanding, as well as the reinforcing the sense of an inter-related group of neo-Victorian buildings. The site therefore makes a positive contribution.

Hope Square and Associated Piers and Railings

11.136. A raised piazza dating to the 1980s-1990s redevelopment works, surrounded by cast iron railings and facsimile stone piers which are designed to reflect the original road markings either side of the original sloped entrance into the station. The piazza is stepped, and located to the west of the FGEH on Liverpool Street.

Architectural Interest

11.137. Architectural interest arises through its formal civic character, located at a key area of public realm at the historic entrance to Liverpool Street Station.

11.138. The decorative detail of the replica neo-gothic piers, including ornamental globe lanterns to their tops is well considered, enhancing the sense of a civic space.

11.139. Associative interest is generated as a replica of earlier station fabric found within the site.

Historic Interest

11.140. Historic interest arises as an expression of the ambition and scale of the twentieth century re-development of the station.

11.141. Strong group value arises as part of the scholarly historicist station complex, elevating its significance.

11.142. The overall significance is considered to be of **moderate** local significance.

Contribution of setting

11.143. The overall contribution of setting is positive, enabling an understanding of the important functional relationship between the whole of the station redeveloped station complex, as well as appreciating the consistency achieved in the neo-Victorian and High Victorian architecture in the streetscape. The site therefore makes a positive contribution.

Kindertransport Sculpture

11.144. A large commemorative bronze sculpture set on a plinth, located centrally within Hope Square at the Liverpool Street entrance to the station.

Architectural Interest

11.145. Architectural and artistic interest arises as an important piece of commemorative sculpture, creating a moving portrait of young children arriving with luggage on their own to the station.

11.146. Associative interest arises as an example of Frank Meisler and Arie Ovadia's work.

Historic Interest

11.147. The building retains very high commemorative interest, dedicated to the generation of children arriving into the country during World War Two and the Association of Jewish Refugees and the Central British Fund for World Jewish Relief.

11.148. The overall significance is considered to be of **high** local significance.

Contribution of setting

11.149. The proximity of the sculpture to the station, located within Hope Square at the Liverpool Street entrance, makes an important contribution to an appreciation of this significance, emphasising the journey of the children which it depicts. There are however some limitations with its present siting, with the lack of seating within the square resulting in the plinth often being used to lean against or sit on. The overall contribution of setting is however mainly positive.

Proposals and Assessment of Impact

11.150. Works to the site are considered in turn, grouped as appropriate according to location and/or nature of impact upon the heritage assets

Overview of proposals:

11.151. Extensive analysis of the station's current functionality, facilities, and projected future capacity, have been undertaken to inform the proposed design, layout and facilities of the station, which in general terms aim to facilitate extensive and transformational alterations to the station and ameliorate critical issues identified relating to station capacity, and inclusivity and accessibility for both to the railway terminal and TFL underground; the permeability and arrival experience of the station entrances and concourses; the lack of multimodal transport inter-connectivity; and poor pedestrian connectivity to the north.

11.152. As such, the proposals relating to the urban design and direct heritage impacts of the application site consist of:

- The demolition of 50 Liverpool Street, Liverpool Street Stations 90s southern transept and existing upper level concourse retail units;
- The erection of a new southern transept roof and over station development supporting structure
- New bus station facilities;
- New internal station cycle hub;
- Station concourse enhancements including: extended concourse areas at street and lower ground floor level; with two new internal routes north; a significant uplift in vertical circulation, including step-free movement; inclusive station facilities; repurposing of the internal taxi route to accommodate station and over station development servicing requirements;
- New station entrances including reimagined Hope Square and Bishopsgate entrances and squares; levelled and upgraded Sun Street Passage;
- Over-station development (OSD) of office accommodation with a separate entrance Liverpool Street and a publicly accessible roof garden on top.

Demolition and internal station alterations:

Southern transept and station entrances:

11.153. The proposal would entail the demolition of the majority of the existing stations' southern transept roof and columns, entrances, and the flanking elevation onto Sun Street passage, in addition to infilling areas of the upper concourses' lightwells.

11.154. A new functional load-bearing station roof, composed of structural trusses, arches and columns, which closely reinterprets the Victorian language of the original trainshed, would be erected in its place. The design would maintain the height and volume of the existing station roof through building to the same height as the original roofs central pitch. The roof has also been designed to transfer the loads of the OSD and bring these to ground through a total of 19 structural columns. The design of these columns within the concourse also follows in the Victorian tradition, being forged from metal, and designed share the typical components of Victorian columns, those being a base, torus, shaft, and capital, while also being octagonal in plan form as the existing. The position of the columns has been carefully considered, and would largely share the alignment of the existing, ensuring that views across the station, from north to south and east to west are clear, and do not impede pedestrian or passenger movement. This placement also helps to maintain the lofty, cathedral-like quality of the existing station roof. Acknowledging the importance of daylight to the character of the station, the proposals would also maintain an area of glazed roof at the interface with the Former Great Eastern Hotel, which retains the existing structure at the junction of the Former Great Eastern Hotel, as well as setting back the southern volumes of the proposed OSD volumes above, to enable as much natural light as possible to reach the concourse.

11.155. The structural complexity of the proposed station roof design is considerable, being composed of a lattice of trusses, arches and a suspended ceiling, and the faithful interpretation of the Victorian structural design, with areas of ornamentation, for example in the design of the columns and perforation of the lateral arch plates, in addition to replicating the overall colour scheme of green and whites, which is welcome. The roof /soffit would, however, have to accommodate and integrate the lift pits from the OSD, in addition to the rise of the OSD's escalator located within the entrance to the office on Liverpool Street, which would be visible from the concourse. The escalator would be clad in green metal aluminium, and lift pits clad in a reflective mirror finish, which would help both sets of features visually integrate within the composition of the roofscape. The final appearance and materiality of the station roof, and its individual components will be conditioned to ensure that they are of an acceptable visual appearance and fulfil the ambition of making these features discreet elements, which sit recessively within the wider more intricate design of the station soffit. Lighting would also be sensitively integrated into the station roof design, being mounted alongside structural elements, and with a specific station soffit lighting strategy, to ensure the station ceiling contributes to ambient light levels thought the day – in an attempt to replicate the light quality of the existing concourse - which would also be combined with the underside of the OSD being finished in a luminance surface treatment. The final details of this strategy are reserved for condition, though the principles underpinning the strategy are considered to be sound.

11.156. Overall, while this design of the proposed concourse structures and roof are not like for like replicas of the historic or 1990's structure, their qualities in terms of height, volume, materiality and expression are both historically sympathetic, and of a requisitely high architectural calibre, and will enable the station concourses to expand successfully.

New Station Entrances:

11.157. Along with the station's southern transept and existing entrance arrangements, the proposals also include the demolition of 50 Liverpool Street, in order to reprogram the ground plane of the station, Hope Square, and provide a new entrance to the OSD - and its associated structural requirements.

11.158. For both Liverpool Street and Bishopsgate, the entrances to the station would be reimagined and formed of large vaulted brick archways, which reinterpret a more traditional railway station language where the entrance threshold is defined by robust masonry, with steel train sheds behind. The exact geometries of these highly expressive gothic archways come from a synthesis of the existing character of the station's arches and the spans/structural composition of the train sheds. The predominant material for these entrances is yellow stock brick, to match that of the existing station; however, moving towards the top of the arches, glazed and/or glass bricks will be threaded into the bond, to provide a contemporary twist on this historic typology. The columns in these locations are large and highly robust, to accommodate the loading from above, in addition to concealing impact/blast requirements, and in the case of Bishopsgate accommodate two integrated 26-person Lifts. Stone relics from the original station entrance have also been proposed to be re-mounted on the Bishopsgate columns, to bring some of the rich heritage of the original station back into focus. Furthermore, while the scale of the columns is great, their form is given interest and relief through the inclusion of vertically strung brick rib courses which define the crests of the archways from above, but which also flow into the ground and shape the fluted, undulating planform of the columns, in gothic fashion. Both entrances, which would be formed by multiple layers of vaults, would be of a grand scale, with the height of the Bishopsgate archways aligning with the base of the Former Great Eastern Hotel's northern gables, and 18m tall at their apex on Hope Square, creating a dramatically sculpted and guiding entry sequence into each entrance of the station. The archways would also include a clear glazed wind and rain screen to help control the internal microclimate of the station, the base of which would also be used as the mounting zone for station signage. A difference between the expression of the two principal entrances is that at Hope Square, the top of the vaults intentionally fan up and outwards, to shift the massing and weight of the OSD upwards, to enable greater levels of daylight/sunlight to reach the ground in the Square.

11.159. The southern vaults on the south western corner of the station would seamlessly transition in to into a smaller scale iteration, marking the entrance to the OSD, which also steps back from the principal arches of the Hope Square entrance, and aligns roughly with the existing junction between the Former Great Eastern Hotel and 50 Liverpool Street, leaving the south westerly corner of the Former Great Eastern Hotel standing proud. Here, while sharing the same overall language, the stepping down in scale and back in building line differentiates the entrances, so that the OSD remains subserviently the secondary entry point, which, combined with its barrel opening doors, altered glazing pattern and signage, would make it legibly distinct from the station. In this composition, the station's open vaults would clearly remain the primary entry point.

11.160. The Sun Street Passage entrance would also be reformulated to transition between the more organic, sweeping arches of the Hope Square entrance, and the simpler pitched gables which run along the western flank of the Station. At the alignment of the exit to 100 Liverpool Street, one large archway would be formed, with several layers of brick reveals, to give definition and depth to the opening. The apex of this pitch/gable would align with the central pitch of the new station roof, and enable unobstructed views through to Bishopsgate. Opening up a larger entrance along this elevation increases the permeability of a pedestrian desire line and an access constraint of the existing station. The transition between the modern arch forms and the original trainshed elevations is considered subtle and sophisticated. Full details of these materials, including a 1:1 construction/mock-up sample will be conditioned to demonstrate that the buildability and durability of the design will be commensurate with the ambition of its proposed visual expression.

11.161. Overall, while the scale of the new station entrances are undoubtedly grand, officers consider that their character and expression would successfully balance the need for civic monumentality and street presence, and integrate this with the finer-grained Victorian station ensemble, befitting a station of this magnitude and historic interest and character. Furthermore, this scale is considered to successfully welcome pedestrians into the station through the opening up of views and making the inner workings of the station appreciable externally, a condition absent from the existing, and vice versa with greater views out to the surrounding streets, that arguably detracts from the sense of arrival, legibility of the station and significance of the station overall. The scale of the openings also offer functional benefits through providing much greater permeability into and out of the station, which has been identified as critical to meet the demands of passenger numbers, both at present and in the projected 2041 +35% modelling scenario. This aligns with the GLA's assessment of the proposed new entrances design, finding them to be an "effective signpost" into the station, of quality and robust, noting also the considerable improvements to permeability they offer.

Hope Square and Bishopsgate forecourt:

11.162. The fluidity and accessibility of the arrival experience at the station would also be significantly enhanced through the redesign of the landscape at each entrance, both of which would be made entirely step-free and more permeable. As a founding principle, the layouts for each respond to the vast pedestrian flows and modelling undertaken for the 2041+ 35% scenario, as well as ameliorating the accessibility barriers both entrances present in their current condition.

- 11.163. At Hope square, the existing 674 m² forecourt would be extended southwards and re-provide 1,230 m² of resurfaced step-free surface. The existing railings, pillars, and modern lighting posts would also all be removed, to create a decluttered, more seamless entry to the station. The south and western edges of the square would incorporate tree planting, adding softness and greening to this hardscaped area, in locations which will not conflict with pedestrian movement and the spatial requirements of the space. The 12 trees specified would be large, bedded within tree pits, with a 2.75-metre canopy clearance to ensure unobstructed visibility and wayfinding towards station entrances.
- 11.164. At the centre of Hope Square, the Kindertransport sculpture would be carefully relocated and its position slightly adjusted, making it a celebrated focal point at the heart of the Square. The sculpture would also be sympathetically encircled by three large bespoke benches, which both define its prominence and invite people to sit and reflect, reinforcing its historic significance. The spacing and gentle curves of the benches would enable pedestrians to flow around and between them, and not act as a barrier to movement. In a further elaboration of the monuments history, the names of the cities from which the children were rescued will be engraved on the benches, serving as a poignant reminder of their journeys and the Square will feature linden trees, a symbol of the Czech and Slovak Republics, often referred to as the “tree of love”, which offer bright yellow foliage in autumn, adding vibrancy to the space. The location of the monument and its seating also benefits from the shelter of the station entrance overhang, offering visitors protection from the rain.
- 11.165. The Bishopsgate entry forecourt would also be cleared of redundant street clutter, with its primary design focus to facilitate seamless movement into and out of the station on Bishopsgate. All primary routes are step-free, though, on its northern boundary, the greater level change would be dealt with through the inclusion of a landscaped ramp. This feature, while still presenting a degree of route separation would be optimised through the inclusion of seating, groundcover planting and trees in an area open to the sky. A total of 15 new trees are proposed at this entrance, though the exact number may change, subject to further design development.

11.166. For both entrances, level changes would be mitigated through gently sloping gradients, none greater than 1:21, with landings incorporated at every 500mm rise, as well as level access in front of lifts and escalators. The squares would be paved with a natural stone, to provide a high-quality and durable material finish, as well as expressing the bounds of the square which would be defined and contrast with York stone pavers, which would be used to connect into the wider City of London streetscape, in line with City of London's Public Realm Toolkit. The ground plane of the squares would also take on a subtle pattern of sweeping directional lines to help define its character and wayfinding into the station, the upper concourse of which would also share this material. Hostile vehicle mitigation is also proposed, with the detailed design of these measures to be reserved for condition. As a major transport hub, with very high level of pedestrians, such features in the urban realm are considered proportionate.

11.167. Overall, the proposed landscape enhancements to both entrances are well considered and of high-quality. They would significantly improve the accessibility and arrival experience of the station, resolving many of the constraints the Station currently faces.

Concourse alterations, upper and lower:

Upper:

11.168. Proposals seek to extend and increase the total area of the upper concourse, within the southern transept, where areas of the existing lightwells would be infilled and walkways enlarged and extended northwards towards the rail lines, creating addition space to both move through the station, and dwell. Equally, two new routes, running parallel to the train lines on each side of the station, would be added, which would land level with Exchange Square. The eastern route would be located on top of the existing service route below, which would be fully enclosed as part of these proposals, whereas the western route, much like the concourse at present, would be suspended above the platforms, carefully fixed to existing structures (conditioned to ensure the construction methodology conserves the stations historic fabric and requiring methods and details of this). In addition to providing additional concourse space, and animated, sheltered connections to the north, these routes would also provide additional station retail and activation, which unlike the existing, would not impede views along the train shed, preventing one's appreciation of the train sheds engineering ingenuity and significance. Spill out seating associated with the retail units would also be provided, though leaving 3m and 6m clear width for passenger movement, on the west and east respectively.

- 11.169. The majority of retail units would be single-storey, with a block of five double height units, incorporating a set back at the upper level, located centrally on the eastern edge. These higher level units would serve as spaces for station operations, and to their north above the final lower level retail unit, would be a terrace, with access to both being made step free. All units would be united in their design, being predominantly glazed and featuring curved corners, which specifically on the east, is a careful response to the listed fabric, which they would not interact with, curving around and behind the station's columns – to retain their legibility as important components of the station's structure. The use of curved corners, which is also proposed for smaller-scale kiosk units, would also help to soften and improve the movement experience of passengers around the station, as well as provide visual interest and their own unique character as part of an updated design language.
- 11.170. Details on the materiality of these units have been provided, and officers consider they would complement the historic character of the station. Rooftops to all retail and station operation units would be free from plant and ventilation equipment, which would be housed internally, and conditioned as such, to prevent visual clutter and ensure unobstructed views to historic station features such as the columns and tops of the trainshed arches. While the proposals will further enclose the platforms and concourse at lower ground level, the two proposed lightwells are still of a substantial scale, ensuring the dramatic volumes of the shed and concourses remain legible.
- 11.171. Overall the proposals are considered true to the existing 'gallery' quality of the existing upper concourse albeit re-orientated to better allow for unobstructed north south views which take in the full scale of the station complex.
- 11.172. Additional space at this level would also be provided at the interface with the bus station, where two new dedicated waiting areas with seating would be provided. In addition, the external pavement would be widened and there would be an increase in in the width and number of openings to the Bus stops, vastly improving the quality and usability of the bus station, and its presence as a feature within the station.

11.173. At the south end of the eastern route north, banks of station toilets (including wheelchair Accessible toilets for each sex, Female (F), Male (M), Gender Neutral (GN), and a Changing Places toilet), and other accessibility and inclusivity facilities such as a Family room, multifaith rooms, and an accessibility lounge would be provided. Given that the station currently provides none of these features at the upper concourse level, their inclusion in such a prominent and accessible location is a significant benefit of the proposals.

11.174. The public waiting area providing access to the roof garden on top of the OSD would also be located in a prominent location on the southern edge of the concourse. The internal elevations of this space continue the large curved brick archways of the station entrances, giving the waiting area presence and a special, monumental quality, befitting the entrance to the public roof garden. Equally, its layout has been programmed to include space for queuing, sitting, and bag checks, so that visitors are moved away from key passenger movement flows on the concourse.

Lower:

11.175. At the lower level, the concourse would also be extended, to the north and south, and generally decluttered with vertical circulation being re-provided, at greater density in more suitable locations. More specifically, the rail tracks between platform no.s 1-10 would be pushed backwards by two meters, creating greater space behind the gate line to ease congestion at this threshold. To the south, the TFL Underground station concourse would be pushed back and retail units adjacent to the east (within the station red line) would be removed, creating an additional space on the concourse. The reformulation of TFL Ticket Hall B, would be made possible through the demolition of 50 Liverpool Street, enabling the substantial columns to be removed, which along with the widening and straightening of this area, creates a much larger ticket hall. A new set of escalators would also direct passengers down to this ticket hall directly from Hope Square, meaning that cross-flows between the rail and underground networks from street level would be reduced.

11.176. The quality and quantity of vertical circulation between concourse levels, and to TFL tube platforms, would transform passenger movement and help alleviate capacity issues, as demonstrated by the station passenger modelling. In particular, it is worth highlighting the substantial increase in lift provision, with station concourse lifts being expanded to 4, 25-person lifts, over the single 4 person lift which currently serves the station. Equally, stairs and escalators have been moved away from the entrance to Ticket Hall B, enhancing flow across the concourse, in addition to increasing the numbers of escalators at the Bishopsgate entrance from two to five.

11.177. The lower concourse would be de-cluttered and expanded to create a larger, more cohesive concourse, with larger seating areas, while also providing new additional features such as Cycle hub and additional toilet and inclusivity facilities (additional family room, accessibility lounge with calm corner, and another large bank of toilets and Changing Places toilet), which would be located away from key passenger desire lines.

11.178. The existing internal service road and ramp would be redesigned to accommodate servicing facilities for both the station and OSD, in addition to station operation facilities. For security reasons, this road would be fully enclosed, with the route to Exchange Square located above. The western elevation of the enclosure would front onto the station platforms, and to integrate it into the wider station, it would be dressed with, and given rhythm through, a run of decorative green arches and simple projecting columns. Within each niche of the arches, salvaged metal screens from the 1990s service yard would be installed. The facing material would be concrete, though final details of the materiality, finish and finer-grained façade expression is to be reserved for condition.

11.179. Overall, alterations to the lower concourse are deemed to be well considered, and would successfully integrate into the fabric of the station, and importantly enhance the station's provision of passenger and operational facilities.

Sun Street Passage, cycle way and Northern Station interfaces:

11.180. In conjunction with alterations to the station's concourses, enhancements to Sun Street Passage are also proposed, and include the reformulation of the upper-level external route, in addition to a lower-level enclosed cycle route to the cycle hub.

11.181. The upper level of Sun Street Passage, from the Bus station onwards would be levelled, with existing ramps demolished, in order to make a direct step-free connection to Exchange Square. Given the level differences between the two there would be mild gradient changes, mitigated through gentle slopes. This top level would provide a wider pedestrian route, with landscaping running along its entire western edge, made from a long, raised planting bed filled with flower-rich perennials and tree planting. This planting bed would gently undulate, softening the western boundary of the route and providing pockets of seating (at 50m intervals) and cycle parking, which would not obstruct views to Exchange Square or screen the original listed trainshed walls.

11.182. The southern end of the route would remove existing barriers to movement and views, and the northern end would enable step-free connectivity into the station, in addition to two new openings from the retail units within – aiding passive surveillance and adding a degree more activation to the route. Adjacent 1 Appold Street, a number of steps would take you to the landing of the higher level within Exchange Square, which would also incorporate the ventilation lightwells down to the parallel cycle route below. The lower Sun Street passage route would come to serve as the enclosed/covered cycle way into the station cycle hub from Primrose Street. In terms of landscape impacts, this proposal would result in the loss of two existing street trees, however, the additional planting proposed at this level, which would re-provide a greater number of trees, all be them smaller specimens, and significantly greater ground-level planting, is considered acceptable and adequately mitigates their loss. The proposed hardscape materials for Sun Street, would be high quality stone, with granite sets lining the route, and natural stone borders to the planter beds.

11.183. The lower-level cycle route would be managed and secured by NWR, as part of the station. The look and feel of the route is to be conditioned, with careful consideration of user safety, acoustics and lighting levels given to ensure the route is safe, welcoming and inclusive.

11.184. Over Station Development (OSD)

Height and massing:

11.185. The OSD at 50 Liverpool Street would rise to total height of 97.67m (including rooftop plant and lift overruns), formed of 13 full above-station floors (levels 4-17), with a smaller double-storey rooftop pavilion at the eastern end (levels 18 and 19), and a roof garden on the western end (level 18).

11.186. While the overall height makes the proposed development a tall building, and the tallest in its urban block, it sits within a context of other tall buildings and buildings of height and scale within a short local radius with 135 Bishopsgate (north) reaching 81.23m; 100 Liverpool Street (west) being 66.27m; 5 Broadgate (north west) being 82.1m tall; 1 Appold Street (north west) 79.6m AOD. Slightly further to the north and southeast, much taller buildings exist for example: Broadgate Tower (north) at 165m AOD; 55 Old Broad Street (south), at 103.15 m AOD. To the south east along Bishopsgate, within the eastern cluster, there are also various examples of towers with the closest being the Pan Pacific at 158m AOD; the Heron Tower 230m AOD and (in the cumulative scenario) 63 St Mary Axe consented at 190.65m AOD.

11.187. In terms of overall bulk and scale, the proposed massing would be roughly L-shaped in form, covering the full length of the station's southern transept, and extending southwards over Hope Square; northwest over the first two bays of the station's train sheds, tapering back to overhang a single bay of the trainshed on the east; and eastwards over the Bishopsgate forecourt. The massing has been designed to step back around the perimeter of the Former Great Eastern Hotel, the majority of the building lines of which it would be set back from.

11.188. The L-shaped plan form would then be extruded upwards, forming large office floorplates in a broadly rectilinear shape. While elevated, the massing is also generally comparable with the large-scale 20th and 21st Century commercial developments which surround the site to the west, north and east, which also adopt large floor plates, and simple overall massing forms. That said, in this instance, the bulk and massing has been extensively modelled in response to townscape views, with large volumes carved away from its top corners, to reduce the overall scale and bulk of the massing, and ease it away from highly sensitive heritage receptors; this also had the effect of differentiating it quite profoundly from the plainer buildings of the Broadgate complex.

11.189. On the north west corner, from levels 14- 17, four large, intensively planted terraces would step back and cut away the massing. While the depths of the terraces vary according to the faceted building lines behind, they are each of significant depth, all greater than 6m, and in total the building would recede by approximately 37m from the north west corner of level 14 to the centre point of level 17, making a meaningful reduction in the bulk and perceptions of the building's mass when viewed from the north in Exchange Square.

- 11.190. On the south-eastern corners, between levels 11 - 17, shallower terraces, with integrated planters, which cascade down the elevation, are used to scoop and carve out the edges of the block, softening the most prominent corners of the development in an attempt to depressurise the juxtaposition in bulk and scale of the OSD and the Former Great Eastern Hotel. While the height and massing of the proposed development is clearly apparent in the background of the Former Great Eastern Hotel, the treatment of the south-eastern corners would considerably soften the townscape impact of the new building, reducing its overall massing, and the stark contrast in scale between the two.
- 11.191. In a further modulation and breakdown of the massing, all elevations are stepped or corrugated, pushing and pulling the vertical planes of facades to create depth and variation.
- 11.192. The western façade, and turning the corner onto the southern façade over Hope Square, the building would utilise a stepped plan form that would unfold symmetrically in pairs of glazed modules, to create a more traditional bay expression and emphasise the prominence of this corner. Transitioning between the southerly element and the returning flank of the Former Great Eastern Hotel, behind its south western cupola, the facades massing would step back a further 9 times, creating a gently sweeping concave transition to the rest of the southern elevation on to Liverpool Street. Along the longer southern façade set behind the Former Great Eastern Hotel, the façade would be divided into five waves of corrugation, each again transitioning back to the façade line with multiple steps. This effect would give the façade a rhythm of dissipating vertical bays, helping to animate and break down the length of the frontage. The north elevation also steps, though in shallower more regular intervals, a total of 15 times, angling the building line back towards the southern façade line of 135 Bishopsgate.
- 11.193. The eastern elevation above the Bishopsgate entrance would be treated in a similar fashion to the south and also utilise the stepping/corrugation in plan form in a more regular way with two projecting bays. The northern bay splaying symmetrically from a double-glazed module, and the southern, a simpler triple glazed model, which would run into the terraces above. The eastern wing of the proposed OSD would also be set back from the 135 Bishopsgate to the north, providing a meaningful degree of breathing space between the two buildings (which would also allow daylight and rain to fall on the planting at grade) and making the Bishopsgate façade of the OSD more slender and therefore more compatible in scale with other frontages along the street.

11.194. At roof level, there would be three protrusions. The two, to the west and centre of the plan, are single storey, and house lift overruns and the lift access points to the roof garden, with the westerly serving the public, and the central one serving the offices. Both are set in substantially from the leading edge of the building, and so are not readily visible in local views. Further to the east, covering approximately one third of the roof area is a double height pavilion, which would provide public toilets for the roof garden (including a Changing Places facility). It would also contain a café and auditorium, which would be used by both members of the public and future office tenants, albeit not simultaneously, as described in the relevant section of this report below.

11.195. Its form to the south and east is stepped, and on the southeast corner specifically, is also curved in plan to continue the geometries of the scooped terraces below, and ensure the corner reads softly in local views. To the rear, sitting externally to the north of the pavilion, would be the BMU rig, ungaraged. Though, in this location at level 18, and sitting below the top of the balustrade height, its visibility would be negligible, being screened by the rooftop of 135 Bishopsgate from Exchange Square, and again set-in from the northern edge of the facade. As the eastern pavilion would be of greater scale and closer proximity to the façade edge, it would therefore be more apparent in easterly views. However, as proposed, it reads as a well-integrated and well-proportioned rooftop addition, subservient and responsive to the massing below.

11.196. Overall, while the massing of the proposed development is considerable and it would be a prominent new feature in the local townscape, it has been thoughtfully designed to mitigate and reduce its scale, as well as imbue its facades with rhythm and dynamism. The modulation of the facades would therefore go some way in reducing its dominance, and help meld it into the wider urban context.

Expression and appearance:

- 11.197. The OSD's elevations would be predominantly glazed, with a refined and simple expression and material palette, designed to sit in subtle contrast and neutrality with the ornate, red-toned, and richly detailed elevations of the Former Great Eastern Hotel. As such, the elevations would be formed from a grid of 1.5m wide full-height unitised glass panels, with frames, spandrels to conceal bulkheads/slabs; solar blinds; insulation, all integrated internally within the cavity system, with minimal/fine horizontal jointing to give the external appearance a virtually flush and seamless finish. The fundamental principle for the specification of the glass is for it to be highly reflective and light grey in tone, to aid its neutral appearance and help it to blend into the sky, rather than appear dark and imposing in both local and long-range views. The vertical stacking of the units, as the primary façade material, would layer the elevations with a fine vertical expression, reminiscent of the scale, texture and proportion of the traditional fenestration found within the Victorian architecture in the immediate context.
- 11.198. According to the orientation of the façade, the unit type would vary either in its cavity build-up or in the case of the southern façade over Hope Square and Bishopsgate facade, be formed from convex curved glass. The utilisation of curved glass in these important and prominent locations is considered to add greatly to the architectural quality and richness of the OSDs elevations, with the fluted expression enabling a crystalline rhythm of staccato distorted reflections, making them uniquely elegant and captivating. The use of curves would be a signature element of the OSD's overall architectural expression, applied to all other facades, where convex curves are used to turn the corners at every step in plane, unifying the elevations into a single sinuous form. These would either be curved back-painted glass or polished aluminium, to retain the flush reflective properties of the rest of the façade and conceal ventilation panels. Areas of façade which require screening to plant or back-of-house spaces would be back-painted glass with an insulated spandrel panel within. Similarly, at roof level, where the pavilions would screen fireproof lift cores or plant enclosures, these would follow the 1.5m full-height grid but be clad in anodised aluminium. A small number of areas, in discrete locations across the façade, predominantly at low level, that require ventilation, would be clad in mirror-polished, perforated stainless steel.

- 11.199. External façade projections would come in the form of fine horizontal bands (L-shaped) or vertical external solar fins. The horizontal bands, struck at the top of every third floor, would subtly define horizontal datums, and help clarify the expression of curved elements. Whereas the fins would be a vertical element, to provide passive heat reduction, and be distributed in line with the grid of the unitised panels and evenly cover all elevations. The depth of both the horizontal and vertical fins responds to the depth of corrugation in the façade, with the deepest fins used where the façade flattens out. Both the fins and banding would be powder-coated aluminium coloured and finished a lightly metallic light grey. Full details, samples and mock-up panels are to be agreed via condition. The application of these features is considered to both help the environmental performance of the building, while also adding a secondary layer of filigree to the elevations, which would create interest, but not compete with the ornate character of the Former Great Eastern Hotel.
- 11.200. The 5th elevation has been designed to be fully integrated into the architectural envelope. In the case of the rooftop pavilions, the open areas of plant would be screened from above, as detailed via condition, and areas of solidity would be covered in brown roofs with PV panels.
- 11.201. The interface between the OSD and station has been carefully considered, with the design establishing a clear sense of differentiation between the architectural language of the Station and office development above. This would be achieved both through the change in materiality, and setting back the glazed elevations from the brick parapet. While some consultees raise concerns with this approach, CoL officers endorse the logic of the proposed design, considering it to be a sound and indeed successful way of promoting the legibility and primacy of the station entrance, with the OSD above being read more as a secondary component within the townscape, rather than together as a singular object.

Roof Gardens and terraces

Level 18, roof garden:

- 11.202. The level 18 roof garden would be 3,936m², and be a shared space, split, in area with office occupants and the public, governed by bespoke hours allowing the public and private use of the roof garden in its entirety at different times across the week. The overall character of the roof garden would be that of a richly verdant garden, with high-density seasonal and climate resilient planting that incorporates a wide range of planting typologies, carefully selected to thrive in the sites environmental conditions, and provide year-round interest and enhanced biodiversity. The roof garden would provide 2,550 m² of softscape (planting) and 1,669 m² of hardscape (paving, seating etc), to maximise access to nature. To help protect the views of St. Paul's Cathedral, the landscape has also been designed to incorporate a zone where the height of planting would be capped at a maximum of 2m, managed both through careful plant selection and the landscape management and maintenance regime, secured and controlled via planning condition. However, outside of this zone, taller species, including 13 evergreen and 18 deciduous trees would be accommodated across the garden. Within this height restricted landscape zone, the proposed condition will also limit hardscape installations and furniture, to ensure the area remains clear of other rooftop and amenity features which could add further clutter to the views of St Pauls.
- 11.203. Boundaries between public and private areas would be subtly defined through dense planting zones and carefully designed soil build-ups and separate paths with closing gates positioned in two specific locations to manage access while still allowing for the possibility of full public use at agreed times.
- 11.204. In addition to the density of planted areas, the garden would also incorporate a dedicated destination garden offering new views of St Paul's Cathedral and flexible event space; a tranquil relic garden designed to rediscover reclaimed elements from the station's history, set within a natural environment with seating areas for relaxation; a key viewpoint overlooking the train shed and Exchange Square, all connected by sinuous paths, lined with generous levels of inclusive seating, which would cater to a wide range of users. As aforementioned, the roof garden would be served by a bank of publicly accessible toilets within the eastern roof pavilion during opening hours.

11.205. The design of the gardens to provide a new high level viewing experience of St Paul's, and the Station's historic train sheds help to reinforce and enable the appreciation of the site's history and important location within the City of London; and the significance of both heritage assets. The relocation of historic and original station features – relics- such as the turret and doorcase from Harwich House (formerly on site), back to the station, and this being integral to the design of the garden, would also reinforce the heritage contribution of the proposals. By drawing moments from the history of the site to its roofscape, proposals would firmly embed the historic significance of the station into the design, such that the association of the station below would be affirmed within the public domain. Further, officers consider that enabling the decorative, artistic interest of these features to be read in a public display within the context of the station, would help them to regain appreciation and significance, and by virtue of this, be a heritage benefit of the proposals. Final details on the historic interpretation of these features, their protection, and maintenance will be secured via condition.

11.206. Officers consider that the landscape design would provide an immersive experience that would successfully cater to a wide range of users, including children and young people. Final details of the urban furniture and seating will be secured via condition, however proposals offer a range of seating, and would provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, in addition to options for seating with backs and armrests for support when rising, as well as a wheelchair user to transfer. In addition, the garden would incorporate a 10 m² assistance animal spending area. The final specification of all seating and urban furniture will be conditioned to ensure it meets the highest standards of inclusivity and design quality.

11.207. Balustrades running around the full perimeter of level 18 would be glass and 2.5m tall, and are compliant with the City of London Suicide Prevention SPD and will be secured via condition.

Office terraces:

- 11.208. On the north west corner, from levels 14- 17, four large, intensively planted and fully accessible terraces are proposed. The large size of these terraces enable extensive areas of planting, within raised planters, which in addition to trees, would also accommodate flower-rich perennial and herbaceous planting. These terraces would also offer generous levels of external seating, and amenity spaces for office occupants. Like the roof garden, the balustrades to these terraces are set to 2.5m. At level 15, the terrace would also feature an integrated BMU track, with the BMU equipment housed internally, such that it does not detract from the quality of the terrace, or be visible in views.
- 11.209. On the southern elevations, the shallower terraces would still be planted, but would function as Juliet balconies, to provide ventilation, and allow for limited external use, owing to their shallower depth, rather than intensive external amenity spaces for office occupants, which are found on the north west, and roof level of the development.

Conclusion on roof gardens:

- 11.210. The high quality of the landscape design of the roof garden, with links to the heritage of the site and station, ambitious levels of planting, and provision public toilet and café facilities, would make a unique contribution to both the City, and London's network of gardens and public spaces. The dense nature and scale of the office terraces would also make a positive contribution to urban greening, and provide high quality amenity space for office occupiers, while also enhancing local biodiversity, and expressing urban greening as a positive characteristic of the buildings architectural design.
- 11.211. All planting, seating, and terrace safety measures for the high-level gardens will be secured via condition, requiring a full set of approved details. These will cover: soft landscaping layouts and species schedules, with seasonal interest, substrate requirements, and biodiversity value; specifications for all trees, including size, form, canopy spread, and tree pit design in line with British Standards; rainwater harvesting for irrigation; irrigation and nutrient delivery systems; urban furniture such as planters, seating, bins, and wildlife habitat structures; hard landscaping materials; landscape lighting; and a Landscape Management and Maintenance Plan for all soft and hard elements. An Access and Management Plan, secured through a Section 106 agreement, will ensure the space aligns with London Plan Policy D8 and the Public London Charter, detailing strategies for safety, accessibility, inclusivity, public access, events, and maintenance to keep the space functional and welcoming to all.

Conclusion on Architecture, Urban Design and Public Realm

- 11.212. The proposed alterations and extensions to Liverpool Street station and its associated external routes and spaces would be a substantial and transformative enhancement when compared to the station's current condition. The legibility, connectivity and accessibility of the station would be profoundly enhanced, and better integrated into the wider urban realm, with improved connectivity to the west and two entirely new access points to the north. The proposed station entrances with their grand scale, traditional materiality, and opulent, neo-gothic character would enhance the arrival experience and build on the sense of awe that the current station provokes. They would also better manage passenger flows while providing seating, greening and a far enhanced setting to the Kindertransport sculpture.
- 11.213. In respect of the OSD, with the massing, architectural expression and materiality taken together, officers consider that the proposed design would create a high-quality and innovative piece of architectural design, which would form a harmonious backdrop within a varied but also historic Victorian context. The verdant and generously sized public roof garden would also add to London's network of publicly accessible green spaces, while also contributing to the historic significance of the station. The aesthetic expression of the new entrances and the OSD would be singular, and have a unique identity amidst the other buildings and areas in this part of the City, amplifying the legibility of and orientation towards this important transport hub. Ultimately, Liverpool Street Station, and all its functional requirements, would be retained, reimagined and importantly remain the undisputable heart of the composition.
- 11.214. The proposals would optimise the use of land, delivering high-quality office space, of the very highest architectural design quality. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 Policy S8 and DE3, London Plan Policies D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1, GG2, GG3, GG5, GG6.
- 11.215. This is in accordance with London Plan policies D5, City Plan policies S10, 10.3 and 10.8, and emerging City Plan 2040 policies DE2, DE4, DE8 and HL1, and relevant sections of the NPPF and National Design Guide.

Delivering good design and design scrutiny:

- 11.216. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design.
- 11.217. In respect of D4B, the pre-application process including formal meetings, workshops using visual tools and site visits and has applied a holistic lens to the design analysis to optimise the potential of the site. Officers with expertise in sustainability, microclimate, daylighting, policy and land use, accessibility, heritage, archaeology, urban design, public realm, transport and urban greening have been engaged and shaped the final application proposals.
- 11.218. A development carbon optioneering process has been followed which has had external scrutiny and is set out elsewhere in the report. At an early stage, transport and pedestrian data informed options for the service route layout, cycle routes and public realm development. Environmental microclimate, daylight and sunlight analysis informed the massing and design treatment as well as the public realm and landscaping. Wider engagement by the applicant is set out elsewhere in the report.
- 11.219. Part D4 C has been met and a detailed design and access statement has been submitted.
- 11.220. In respect of D4 D, the proposals were referred to and presented to an independent design review, the GLA's London Review Panel. The scheme has also been presented to expert accessibility bodies, such as Network Rail's Built Environment Accessibility Panel (BEAP), and City of London Access Group (CoLAG), multiple times at both pre-app and application stages, and modifications to the designs have been made in response to feedback.
- 11.221. Proposals have also undergone a rigorous local "borough" process of design scrutiny as required by the policy, and been reviewed by the City of London Conservation Area Committee. In addition, the applicants undertook preapplication engagement with St Paul's Cathedral, Historic England and the GLA.
- 11.222. In relation to D4 E, parts 1-6, there has been a "City" level of scrutiny comprising extensive officer topic-based reviews over multiple preapplications; external input has been provided by other experts as set out above; feedback has been recorded and provided to the applicants; the evolution of the proposals is summarised in the DAS; and within the Committee report.

11.223. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on the drawings to minimise ambiguity.

Heritage

11.224. This section assesses the direct impacts of the proposals on heritage assets within the site boundary and the proposals' indirect effects, via setting impacts, upon heritage assets outside the site boundary.

11.225. There have been many representations making objections or raising concerns about the perceived impacts of the proposals on relevant heritage assets, including from Historic England, the GLA, the National Amenity Societies, SAVE Britain's Heritage, St Paul's Cathedral and others. The assessment references responses from consultees as they relate to the impact upon these asset's significance, indicating where necessary on where officers' conclusions differ. Please refer to the consultee summary table above for the full text of each response.

Direct Impact to Liverpool Street Station (grade II)

11.226. Officers find that the proposals create a range of impacts to Liverpool Street Station from high, moderate and low levels of less than substantial harm, as well as some beneficial impacts. This is assessed in full below.

11.227. Responses including from LAMAS, SAVE, the CBA, Historic Buildings and Places, Twentieth Century Society, Victorian Society, SPAB and others raise objections on grounds of harm to the Grade II listed station, both through impact to its fabric and setting. The Victorian Society, SAVE, LAMAS and the Twentieth Century Society find substantial harm to arise as a result of these impacts. Historic Buildings and Places also find substantial harm to arise, when considering this harm in a cumulative scenario with the impact to other assets.

11.228. Whilst not objecting to the scheme, the GLA and Historic England identify a very high and high degree of less than substantial harm to the station respectively.

Partial Demolition of Derbyshire Roof

- 11.229. The partial demolition of the roof structure associated with Nick Derbyshire will result in the loss of most of the present intact 1990s-1980s phase of works within the station. This demolition work is considered by Historic England, SAVE and others to result in a high level of less than substantial harm to the building's significance, which they consider to impact a key element of the station and diminish its architectural unity. Officers note the overall extent of demolition has been minimised as far as possible throughout the pre-application process, noting that the efficiencies gained in loading also minimises the need for excessive additional columns within the new concourse.
- 11.230. Furthermore the scheme does not result in the total demolition of the Derbyshire roof, partially retaining its form so that its design, construction and an indication of its original scale will remain appreciable, albeit considerably diminished. The extent of demolition is limited to the terminating bays where each nave reaches the east-west concourse. This retention also means that the new portion of roof will not be required to tie directly into the earlier, more sensitive trusses of the original western train shed.
- 11.231. Notwithstanding the twentieth century fabric is identified to be of special interest, the level of harm arising through this loss is considered relative, noting the much later, twentieth century date of the fabric when considering the fabric of the listed building as a whole. This fabric to be lost, while of significance as part of the 1990s conservation led redevelopment works, is considered of relatively reduced sensitivity and rarity value in comparison to the earliest phases of the station.
- 11.232. Nevertheless the partial loss of the Derbyshire roof will severely affect the degree to which the twentieth century fabric of the station contributes to its significance, curtailing an appreciation of the full scope of the historicist redevelopment works and diminishing its present in-tact quality. As a key aspect of significance as identified within the updated listing description, this loss is given particular weight, albeit it is not considered to seriously affect a key element of the special historic or architectural significance of the station, or amount to a total loss of this phase of fabric and its significance. As such officers agree with Historic England and the GLA in this regard finding the overall level of harm arising from this aspect of the proposals to be a high level of less than substantial, but disagree with SAVE, HB&P and Twentieth Century Society who find this loss, particularly when considered in combination with the effects of the OSD, discussed below, to amount to Substantial Harm.

The dismantling, reconstruction and tying in of new concourse roof to retained portion of Derbyshire roof

- 11.233. The new connections between the retained Derbyshire roof with the proposed new concourse roof and supporting structure to the OSD will utilize steels to extend the form of the existing Derbyshire trusses, with the new trusses over the concourse following the angle and pitch of the Derbyshire trusses at their apex.
- 11.234. The trusses and glazing adjacent to demolition works will be temporarily dismantled during construction, and stored off-site. The final details of the junction with the new concourse roof including tying in of the truss structures will be controlled via condition to ensure there is no adverse loading to the retained historic structure.
- 11.235. While these works will be controlled via condition, the removal of small portions of fabric is likely to facilitate these works and create the new fixings required to support the new structure. It is noted that the fabric is not of interest for its age or inherent evidential qualities, being late twentieth century date and of standardised materials. Impacts of this type are therefore considered to only affect those aspects of its historic or architectural interest which contribute to significance to a very limited degree. The resulting harm arising as a result of these works is therefore considered to be neutral/low, and will be controlled via condition to ensure the maximum retention of all dismantled fabric as well as to ensure the fixings are appropriate in scope.

Partial demolition of nineteenth century columns

- 11.236. It is proposed to remove the lower sections of two columns located to the east of platform 10 to enable construction of the bomb proof service enclosure in this area. While some harm arises through the partial loss of these elements, noted by Historic England, SAVE, the GLA, the Victorian Society and others, the overall degree of fabric removed is minor in the context of the wider retention of all other original columns. The resulting level of harm is considered to be minor and a low level less than substantial.

Demolition of C19 vaults beneath No 50 Liverpool Street.

11.237. In order to facilitate the creation of a larger ticket hall B, it is proposed to demolish four Victorian vaults located beneath 50 Liverpool Street. These vaults are remnants of the 1870s station development, successively altered following the twentieth century redevelopment of the station and partially interconnected with the Former Great Eastern Hotel. Their removal is a necessity to facilitate the public benefits to the station. Some harm arises through their loss, as remnants of the original station fabric, however their overall interest is very low by virtue of their altered form and below ground, back of house location and the harm to the significance of the listed building will be very low and less than substantial. The loss of this fabric is considered to be justified in order to deliver critical improvements to the ticket hall.

Demolition of the Station Entrances.

11.238. These external elements are identified in the list description as not being of special interest, and their loss would not result in harmful impact to the significance of the station. Twentieth Century Society find the loss of the entrances to be harmful, however here officers disagree with this conclusion.

Demolition of modern 1990s concourse, including gallery level, retail units, circulation infrastructure such as stairs, escalators and lift and modern signage, modern departure board, 2013 ticket office and station reception building and all existing retail kiosks.

11.239. The removal of all unlisted modern fabric including modern unsightly offices and back of house spaces east of platform 10 as well as the east-west retail units would open up north-south views across the concourse and into the trainshed. Some benefits arise in the removal of these elements, improving an appreciation of the scale of the station and engineering of the western trainshed. Officers note Historic England and the GLA also recognise these benefits in their response. Given this enhancement amplifies perhaps the most sensitive part of the station, this benefit is given particular weight.

Re-opening of lancet windows within the 1870s western trainshed wall and re-levelling of Sun-Street Passage

11.240. The re-opening of original windows to the western trainshed is considered to partially restore the original extent of glazing within this elevation, with some benefits arising. While this portion of the station reflects the earliest phase of the remaining built fabric, it is noted this elevation has undergone waves of alteration through post-war repairs and the 1980s-1990s redevelopment works. The proposals to this elevation include the re-levelling of Sun Street passage to enable sloped access towards Exchange square and the cycle store. The GLA find some harm to arise as a result of these works, through loss of views towards the existing extent of brick work. Officers acknowledge this will result in alterations to cill levels across the existing windows, with low level of harm arising through the minor loss of fabric and amendment of their existing proportions. However in view of their present blocked condition, beneficial impacts are also found to arise, as a result of this aspects of the proposals, restoring the spirit of the original façade design and improving light levels into the station. The final details of the junction between the proposed works and Sun Street Passage elevation will be controlled via condition.

Re-painting of station interior.

11.241. The proposals will restore the original colour scheme to the station interior. Officers find benefits to arise as a result of these works, also noted by the GLA in their consultee response. The final colour selection, application and material mix of the paint will be controlled by condition.

Alteration of Western Elevation to improve access between Bus Station, Cycle Store and waiting areas.

11.242. This aspect of the proposals requires the reconfiguration of the openings within the 1980s-90s portion of the station to improve permeability and accessibility into Sun Street Passage at ground and lower ground levels. The fabric affected is considered to date to the late twentieth century and is less inherently sensitive to change, noting that the overall historicist character of the elevation is preserved. To that end, which a small amount of fabric will be lost as a result of these works, the overall impact is considered to be neutral, with no reduction in the extent to which this area of the station contributes to significance.

Construction of new station roof and entrances.

- 11.243. The redevelopment of the entire southern range of the station will fundamentally alter the way in which the western trainshed, and remaining extent of the Derbyshire roof is experienced. Officers acknowledge the new entrances represent an entirely new termination to the southern half of the station, creating a much more dramatic scale and physical presence along Bishopsgate and Liverpool Street.
- 11.244. Historic England and the GLA have found the monumental scale and aesthetic of the entrances to be harmful, citing the degree of contrast and domination of the surrounding street scenes. However as outlined above, the detailed design of the new roof trusses and entrances has sought to take inspiration from the western trainshed as the Derbyshire scheme did before. While of a new scale, the arched forms, use of stock brick and ribbed detail all seek to draw upon an established neo-gothic design rhetoric common to railway architecture. Moreover the overall height of the arches is dictated by the existing interior trusses, so that an appreciation of the internal volumes within the trainshed is expressed externally.
- 11.245. While the architecture of the entrances is not a direct continuation of the Derbyshire roof form, officers note this was true of the original condition of the station as first built, with the original Victorian gothic of the pavilions to Liverpool Street having little structurally to do with the trusses of the trainshed.
- 11.246. Therefore while the GLA, Historic England, Historic Buildings and Places and others find the introduction of a new scale and transitioning structural forms across the entrances and interior to be harmful, officers here disagree, concluding that a phased character between the entrances and station interior is not in principle considered harmful to the significance of the station, noting the successive alteration to the station entrances over-time, which has always been layered, expressing the evolving requirements of the station over time.
- 11.247. As such the proposals for the station roof and entrances, when considered independent of the demolition works, are understood as in keeping with the existing character of the station which has evolved continuously throughout its history to result in its current phased condition. The detailed design of the roof and trusses are considered to be complimentary to the remaining historic fabric, as an honest contemporary re-interpretation of the neo-gothic trainshed typology. Considering the full history of the site and layered significance of the station itself, the overall impact of the new station roof and entrances upon the significance of the station is considered to be neutral.

11.248. While Historic England finds the contrast between the character of the entrances and OSD above to draw attention to the latter, officers find this contrast aids the sense of distinction between the two, reflecting their different use and function, avoiding the over scaling of the frontage to the street.

Insertion of new lower ground and ground floor concourse including north-south extensions towards Exchange Square, alongside the installation of retail units and operation offices

11.249. The extension of the concourse north along the east and west walls of the train shed will provide internal pedestrian routes to Exchange Square and additional retail units and offices, including a mezzanine level to the eastern side. In order to facilitate access onto Exchange Square the works will result in the loss of the 1990s railings which enclosure tunnel to the north. The extended concourse level will enclose the train shed wall, resting on the new enclosed service road to the east and columns to the west through a clamped interface. This aspect of the works will be controlled via condition to secure the final details of the tying-in works, and to ensure any additional loading will not create risk of degradation, noting that a small loss of historic fabric is likely.

11.250. The new walkways, retail units and station office elements will obscure some existing views of the columns and visible extent and volume of the trainshed interior. Historic England, the GLA, the Victorian Society and others find this aspect to the proposals harmful, through the loss of views to the east and west interior elevations. Officers note however the overall volume of the trainshed interior will be abundantly appreciable through the full length north-south views which are newly opened following the removal of the existing east-west retail units. The extended concourse will also enable new close-up views of the trainshed elevations, roof-structure and columns. The detailed design of the retail units to the concourse will be controlled via condition to ensure their appearance is sympathetic to the interior character of the trainshed. The overall impact, is considered to be neutral, notwithstanding the small loss of fabric required to fix-in these new elements. While these works will alter the interior character of the trainshed, they are considered to preserve those elements which contribute to significance, notably improving the overall appreciation of the north-south volume.

Enclosure of bomb-proof Shelter to service road

11.251. A bomb-proof enclosure to the new proposed service yard is required to ensure the safe running of the station. The eastern walkway will therefore be slightly deeper and extend further into the trainshed to accommodate this, creating a new rectilinear enclosure within the trainshed. As above, the GLA and Historic England and others find this aspect of the proposals to be harmful. These works also require the enclosure of the open arches within what remains of the eastern trainshed wall. The proposals will repurpose the existing decorative reproduction metal screens inserted in the 1990s within the eastern arches, inserting them into the new elevation to the platforms to complete the enclosure. In considering the impact of these works, officers note the extensive successive alterations to the eastern side of the station, following the construction of the eastern trainshed extension in the 1890s and then the 1980s-90s redevelopment work. Notwithstanding this, a slight degree of less than substantial harm is considered to arise through the insertion of this enclosure and the overall loss of volume to the trainshed interior. The final details of this enclosure, dismantling and reinstatement of 1990s screens and final elevation design will be controlled via condition.

Re-siting of 'Für Das Kind' statue.

11.252. The 'Für Das Kind' statue will be re-sited to a roughly approximate location at the upper concourse. The evocative relationship between the statue and its location within the busy station setting will remain, preserving the degree to which its location reinforces the powerful commemorative value of the statue. The overall citing of the statue is considered to be improved, given greater consideration in the approach towards it and the overall space given to contemplation. Some benefits are therefore considered to arise with the statues re-siting, improving the degree to which the sculpture contributes to the historic and architectural significance of the station, with a beneficial impact upon significance. This benefit is also recognised within the response from Historic England.

Reinstatement of historic cartouches to Bishopsgate entrance, War Memorial and historic relics to Roof Garden.

11.253. The reinstatement of decorative detail from earlier phases of development within the station, currently in storage strengthen the overall intrinsic historic interest and decorative quality of the station architecture with heritage benefits arising, increasing the proportion of Victorian fabric within the station interior. Equally the re-citing of the War Memorial is considered to improve the public approaches to these memorials, giving them adequate space for contemplation. This is considered to improve their present ad-hoc condition, improving the degree to which these contribute to the station overall. Similarly as described above, the reinstatement of architectural relics within the roof garden will bring back an important phase of the station's development to within the site, enhancing an understanding of its layered history, additionally creating benefits. These benefits are recognised in the response from Historic England and the GLA.

Over Site Development (OSD).

11.254. The OSD will introduce a much taller element within the site boundary, additional to the railway function of the existing complex. The position of the new office development over the concourse will necessarily limit the natural light levels within the interior of the station, including within the retained western trainshed, notwithstanding the set-backs from the FEGH. Low levels of less than substantial harm arise through this loss of light, diminishing the contribution of the glazed roof to the interior character, identified by the GLA, Historic England, SAVE, HB&P and others in their response.

11.255. The OSD would introduce an entirely new modern element which is not functionally linked to the station (though there is, of course, an economic link in the way the OSD is proposed to fund the station improvements). Historic England and others find the scale and massing of this new element and contrasting contemporary aesthetic to result in a high level of less than substantial harm to the significance of the station.

11.256. By virtue of its height the OSD will be prominent in views of the station from the surrounding streets and this prominence would affect the historic visual hierarchy of the site, where the FGEH acted as the 'frontispiece' to the architecture of the station beyond. However, this would be counterbalanced by the very clear legibility and prominence of the new station entrances which, as set out above, are considered to have a grand, opulent quality speaking to and broadcasting the station's civic presence. Moreover, the carefully considered massing and simple, crisply glazed architectural treatment of the OSD would make it aesthetically, if not quite spatially, subordinate to the new entrances. In the longer viewing experiences, including from Exchange Square and south from Bishopsgate, the OSD would be read as another large modern office building in a densely developed focal point for such buildings, and would be visually disassociated from the station.

11.257. The new public roof garden would provide new views of the exteriors of the original Victorian trainsheds, enhancing an appreciation of their architectural interest.

11.258. Nevertheless, in closer viewing experiences, such as from Liverpool Street itself, such is the OSD's scale and mass that it would reduce the degree to which the station's entrances and trainshed are understood as the building's core and alter their hierarchical relationship with the FGEH. Moreover, the considerable new scale of the OSD would radically alter the station's visual identity when seen from Bishopsgate and Liverpool Street, in a way which introduces stridently modern forms which depart from the prevailing Victorian and neo-Victorian architectural identity of the station (though noting that the new concourse interior and entrances are of this architectural spirit). Whilst the new work would have an intrinsic positivity, quality and interest, it would nevertheless erode this aspect of the station's significance. The overall effect of the OSD would be a moderate level of less than substantial harm.

Overall conclusion on Liverpool Street Station

11.259. As set out above, the proposals would entail the near-wholesale removal of the late C20 work and the insertion of a new concourse, station roof and entrances and OSD above. These works amount to a transformation of the station. Such is the complexity of the station as a heritage asset, and such is the complexity and ambition of the proposals, that there would be a range of impacts to the fabric and the visual character of the listed building, ranging from harms to benefits.

- 11.260. Importantly, these impacts have been minimised through the care and attention taken with the design approach, which is considered to align with the mood of ambition and aesthetic flair which underlay the previous phases of station development on this site. Additionally, the most significant elements of the station – the original Victorian trainsheds – would be preserved – and new views enabling an appreciation of them created. Nevertheless, heritage harm there would be, ranging from low to high on the less than substantial scale, arising through the fabric losses and visual impacts described above.
- 11.261. In view of all of this, the overall level of harm to Liverpool Street Station is considered to be high on the less than substantial scale. This falls below the substantial level of harm identified by the Twentieth Century Society, Victorian Society, SAVE, LAMAS and Historic Buildings and Places in their consultation response.
- 11.262. As identified above, there are also a range of heritage benefits arising to the Station, ranging from the repainting works to the reinstatement of historic features, removal of detracting modern clutter and the creation of new views of the original Victorian trainsheds. The overall level of benefit to Liverpool Street Station is considered to be low.
- 11.263. The harms identified will be weighed against the public benefits arising from the proposals in the NPPF paragraph 215 exercise later in this report.

Former Great Eastern Hotel (grade II*)

- 11.264. Responses from Historic England, the GLA raise concerns on grounds of harm to the Grade II listed building, both through impact to its fabric and setting. HE and the GLA identify a 'middle of the range' and 'High' level of Less than substantial harm to the hotel respectively. Victorian Society, SAVE, LAMAS, The CBA, Historic Building and Places, SPAB, Twentieth Century Society, object to the scheme in view of the harm they consider to arise as a result of the proposals to this asset. SAVE, LAMAS and Historic Buildings and Places also find substantial harm to arise to this asset, in the case of HB&P this is when considering this harm in the cumulative scenario with the impact to other assets.

Direct Impacts

- 11.265. Whilst the Former Great Eastern Hotel would remain largely outside the scope of the application proposals as a standalone building, the proposals would entail a number of works to the junctions and facades of the FGEH which neighbour or abut the station boundary.

Demolition of 1990s Station Entrance Structures along Bishopsgate

- 11.266. The current relationship of the hotel and station entrance at Bishopsgate is somewhat cramped, where the Derbyshire scheme extended the station's building line further east, so that the northern elevation of the hotel became partially obscured. As the return façade facing the descending slope into the station, this elevation was always plainer, however the existing condition is awkward and crowded, with no through route into the station. The proposals will open up a continuous passage along the northern façade of the hotel, allowing closer range and more complete views along this elevation, with a beneficial impact to the hotel, improving an appreciation for the northern elevation and its function within the wider hotel composition.
- 11.267. Areas to be made good following this demolition of existing station structure will be controlled via condition to ensure the decorative character of the façade is preserved and enhanced. The GLA and Twentieth Century Society find the demolition here to be harmful, considering it to diminish the 'historical links between the station and the hotel'. With respect to the demolition works specifically, officers note the existing relationship does not reflect the historic condition of the station and hotel, and notwithstanding the impact of the proposals upon the hotel's setting, assessed separately below, the loss of the existing station entrances on Bishopsgate are not considered harmful to the significance of the hotel. It is acknowledged that the OSD and station entrances will have a strong presence in these views, with the impact of this aspect of the proposals considered separately below.

Demolition at lower Ground Concourse level within ticket Hall B, rear vaults and within lower ground retail and back of house areas to create of new seating, retail and back of house areas

- 11.268. The lower ground of the FGEH currently houses a range of modern retail, back of house, office and circulation space accessed from the station. While on plan the footprint of the hotel is legible, the extent of the alterations in this area is such that these spaces are of very little interest and generally reflect successive alteration and fits-outs with modern lightweight partitions and servicing to support the retail units accessed from the main concourse.

11.269. Officers note the existing condition at lower ground includes access into the brick vaults of what was the original Victorian station range via a passage east of ticket hall B. As indicated above, the vaults have undergone substantial alteration, having been truncated with modern services inserted. The exact interface and use of these vaults with and for the hotel as first built is unclear, however aside from the brick work clearly being of an age, these are considered to contribute very little overall to the significance of the hotel, with the earliest vaults pre-dating the Hotel's construction belonging to the now lost office range of the station.

11.270. The proposals here involve substantial demolition including ticket hall B, the passage between the hotel and ticket hall, vaults of the original station range and the retail units to the east, resulting in rationalised back of house access from the south and a much more permeable space underneath the hotel footprint to be used as a seating area and information desk. Structural piers are retained as part of the proposals, so that the rectilinear plan form of the area and building line of the hotel will remain appreciable. It is acknowledged that some historic fabric will be lost and the area as a whole will become much more open onto the concourse, however the overall impact upon significance is considered neutral given the very limited contribution of this area of the hotel. The overriding present experience of the space is already as part of the back of house or modern commercial units of the station, and this condition will be maintained, with no loss of decorative detail of interest. This is consistent with the assessment by Historic England who find these works to result in a negligible impact.

The methodology for the demolition works, as well as final internal elevations of this area, particularly where the demolition works will reveal historic fabric, will be controlled via condition

Internal alterations to northern façade at the interface of the upper concourse

11.271. The proposals include the demolition of existing concourse, the insertion of a new concourse slab and installation of a new gate line. The position of the new concourse slab matches that of the existing, limiting the need for more intrusive loss of fabric to tie the structures in. These works will include the stripping back of the existing stepped over-cladding between the concourse and openings to the northern elevation.

11.272. The northern façade has been successively altered over time, noting the alteration to the taxi opening arch and tying-in of the 1990s concourse. Officers note this existing junction appears in places ad-hoc and ill-considered, particularly to the western end of the elevation, diminishing the contribution of this façade and an understanding of the original circulation from the hotel into the station.

11.273. While the proposed new concourse will further alter this elevation, resulting in some loss of fabric, the proposals are considered to preserve the degree to which this façade contributes to the significance of the hotel, notwithstanding the benefits of altering the station building line separately identified at above. The removal of the over cladding and more responsive connection with the concourse is therefore considered beneficial. The making good of these openings, and the connection with the new concourse to better integrate the historic openings within the northern façade, will be controlled via condition to ensure these works remain high-quality and conserve the decorative features of the façade. All re-exposed brick work is to be repaired and made good to a like for like standard to adjacent materials.

11.274. All junctions with the fabric of the hotel will be controlled via condition to ensure the protection of fabric and decorative details during the demolition and construction phases ensuring the minimum amount of disturbance to ensure the structure of the proposals.

Internal alterations to the western façade and north-western corner at upper concourse level and re-location of World War Memorials and Great Eastern Railway Lettering.

11.275. The western return elevation to the Hotel and northwestern corner have undergone substantial alteration and rebuilding works following the twentieth century redevelopment of the station. These works included the construction of a new false western wall, the installation of the War Memorials and Great Eastern Railway lettering, as well as the insertion of lift shafts and interface with the Derbyshire roof. The visible red brick within the western elevation dates to the 1990s work, effectively re-establishing a new building line to the hotel where it faces onto the concourse. The sensitivity of this portion of the hotel is therefore substantially reduced, albeit the red brick to the elevation and position in the concourse ensures the total volume of the hotel is easily legible from the station interior.

11.276. The War Memorials and Great Eastern Railway lettering are proposed to be re-sited to the northern side of the concourse. This is considered to better reflect their position as first built, with an overall neutral impact upon the significance of the hotel, noting their previous removal and re-siting.

11.277. The western façade of the hotel will be substantively altered, in effect covered up by the proposals and located to the rear of the new circulation and support structure to the OSD, noting a set back from the proposed OSD is integrated at the upper levels. This alteration will reduce the degree to which the hotel is visible from the concourse interior, and diminish the extent it appears as the primary building within the station complex. However the severity of harm arising through this loss of visibility is limited by the plain quality of the elevation as existing, and in view of its extensive alterations, with its current appearance and material character a result of 1990s alteration. The overall level of harm arising through these works is therefore considered to be low and less than substantial, relatedly chiefly to the degree to which this change will alter the existing hierarchy within the station complex, where the hotel remains appreciable from the majority of the station interior.

11.278. The alterations to this façade and making good of the hotel fabric where new interfaces are created will be controlled via condition to ensure the retention of historic brickwork, any decorative features, surrounds and finishes where they remain in situ.

Demolition of the existing Derbyshire roof and tying in of proposed new station roof into FGEH.

11.279. The existing 1990s roof interfacing materials will be removed and fabric of the hotel made good to be controlled via condition. The loss of the 1990s fabric is not considered harmful to the significance of the hotel, given its later date and arrangement which did not reflect the historic condition of the connection between the hotel and the station. The proposals will connect into the hotel fabric at the same level as the existing roof, minimising further loss of fabric where historic brick work remains.

Construction of new external station interfaces at proposed new entrances to Bishopsgate and Liverpool Street

11.280. Please note the effect of the new station entrances and OSD on the setting of the hotel is assessed separately below.

- 11.281. At ground level Liverpool Street the new office entrance architecture will directly adjoin the hotel, in-set further to the north than the existing building line between the hotel and no 50. The re-exposed brickwork of the hotel is to be repaired and made good using like-for-like materials, finishes and construction techniques to be controlled via condition. This includes continuation as appropriate of the brick and terracotta/stone banding to the façade as appropriate. Behind the façade line of the station entrance, a new concrete wall is proposed to create a fire rated enclosure. Externally this joint will be finished with a dusted mastic joint to match the hotel fabric.
- 11.282. This junction had previously undergone substantial change, noting that No 50 was entirely rebuilt as part of the 1990s redevelopment works so this return elevation is considered less sensitive to alteration. While the works will result in a change to the current intersection between the station and hotel, the overall impact of the works is considered to be neutral.
- 11.283. Along Bishopsgate where the new concrete slab to form the concourse is proposed, this follows the line of the existing, utilising the existing location of structural beams to avoid the need for additional intrusive tying-in. The concrete slab is to be independently supported, avoiding additional loading into the façade of the hotel. The external pavement is to be finished in York stone, with terrazzo floor tiles to the new platform steps and with a flexible movement joint used where adjacent to a historic wall.
- 11.284. The overall approach is considered to carefully minimise intrusive works, limited to where necessary to ensure the durability and waterproofing of the new connections. These details will be conditioned to ensure a high-quality finish of materials as specified is retained.
- 11.285. At roof level, new stone coping is proposed to abut the junction between the station and hotel along Liverpool Street, ensuring environmental protection to the hotel façade below. Between the OSD and the hotel, a new freestanding party wall is constructed and finished with lead flashings, retaining a gap between the hotel and OSD within the interior of the station. The existing plant to the western elevation of the hotel is to be maintained, and the existing 1990s steel roof structure and flashings re-instated along the northern elevation, to create a translucent roof light adjacent to the entrance from Bishopsgate, set in behind the proposed brick entrance structure.

11.286. While the fabric of the hotel will be disturbed as a result of these works, the overall level of intervention is considered to be minimal, and consistent with the existing character of the junction between the station and hotel which has evolved following the 1990s redevelopment works.

Indirect Impacts

11.287. The proposals would transform the immediate surroundings of the listed building, with the GLA, Historic England, The Twentieth Century Society, SAVE and others finding harm arising through changes within the Hotel's setting. The station entrances would achieve greater prominence in both position and aesthetic, emphasising the civic function of the station within. In this respect their relationship with the hotel would be one of continuity, although in some views the greater prominence of the entrances would alter the existing visual relationship and hierarchy between the hotel and the station. The OSD would introduce prominent modern architecture as a backdrop to the hotel (AVRS 44-46, 48-51, 55-56, 63-65). The hotel already has such a backdrop in the north and south views along Bishopsgate, and in westerly views along Liverpool Street, but the OSD would amplify both the scale and proximity of it.

11.288. In the approach along Bishopsgate (AVR 36, 37,38), the station entrance and OSD would be a prominent new presence next to the hotel. In the longer-range views south along Bishopsgate the effect would be anodyne. In these, the hotel is glimpsed between modern office blocks. The proposals would maintain this situation, introducing a more prominent and legible station entrance which would be read alongside the hotel whilst the full profile of the OSD would be read stepping deferentially away from the hotel at its upper levels.

11.289. Because both the station entrances and the OSD are set further forward than the existing station entrances, some elements of the northern elevation of the hotel would be obscured from view by the proposals, with a corresponding diminishment of the presence of the hotel in the closer approach along Bishopsgate. This would be most apparent in closer views along Bishopsgate, where the prominence of the OSD would challenge the hotel's existing prominence in the streetscape, and the top of the station entrance canopy would cut across the hotel elevations.

11.290. This challenge to the hierarchical presence of the hotel would be similarly experienced in the easterly approach along Liverpool Street (AVRs 64, 65), where the massing, scale and building line of the OSD and new entrances would screen from view a large proportion of the hotel, including the loss of easterly views towards the cupola to the western range. It should be noted that the existing building at 50 Liverpool Street already screens most of the west elevation of the hotel in these views, but the forward building line of the station entrance canopy and OSD would screen more of it. However, in the reimagining of Hope Square and the bold new station entrance to Liverpool Street, the proposals would maintain the essential relationship between hotel and station entrance, albeit adjusting the balance of their relationship to amplify the latter instead of the former.

11.291. Both the GLA and Historic England find this aspect of the proposals to be harmful, diminishing the ability to appreciate the rooftop silhouette of the hotel, with HE finding a high level of less than substantial harm arising.

11.292. In the views looking north from Bishopsgate, the OSD would be a considerable new visual presence behind the hotel, which is presently seen against clear sky from many positions. The OSD would have a prominence which would undoubtedly compete, visually, with the hotel. However there are a number of ways in which the design of the proposals would mitigate this effect. Firstly, the terraced profiles of the upper west and east corners would exhibit deference to the hotel. Secondly, the long scale of the OSD would be broken up with a 'rippling' effect of stepped bays, most crucially on the long south façade (not dissimilar to the treatment of the hotel itself). Thirdly, the quiet, crystalline architecture of the OSD would be aesthetically subordinate to the Renaissance stylings and the rich masonry of the hotel. Fourthly, and perhaps most importantly, the neo-Gothic station entrances would 'anchor' the proposals against the hotel and, though they would have more prominence than the existing entrances, they would ensure that the hotel's fundamentally important relationship to the station remains legible.

11.293. Nevertheless, despite the positive mitigations of the design approach, officers consider that the proposals' height, mass and scale would result in the hotel appearing more enclosed, diminishing the degree of spaciousness at the junction it presently enjoys which facilitates its landmark character. Its position as the principal structure on the junction between Liverpool Street and Bishopsgate would be affected, reducing its landmark quality, and an appreciation for its historic functional relationship with the station, where it was designed as the opulent 'frontispiece' to the station would be slightly undermined, though not drastically so.

11.294. Officers note the pull-back of the station building line to limit these effects was a focus of the pre-application process and the proposals reflect the maximum set back in order to deliver the new station entrances and OSD. To that end the harms arising are considered to be minimised and justified as far as possible, acknowledging that Historic England, the GLA and others still consider these impacts to be harmful.

11.295. Officers further note there are improvements in the spatial relationship between the station architecture and that of the hotel, noting the current abrupt relationship particularly of the towers to Bishopsgate and northern façade. The creation of a complete route through along the northern façade of the hotel as described above is beneficial with an overall less cramped relationship between the two, and establishing a continuity to the northern façade and opening up immediate views to the hotel's fabric.

Demolition of 1990s Station Entrance structures along Liverpool Street

11.296. The existing station entrance complex, including the glazed canopy, flanking brick towers and brick gable end at present makes a positive contribution to the setting of the Hotel in so far as the twentieth century neo-gothic style demonstrably creates a consistent character to the streetscape and is recognisable as Neo-Victorian station architecture. It is noted this arrangement does not reflect the historic Victorian condition of the site in either materiality, height, mass or building line. The loss of these elements therefore gives rise to a very low degree of less than substantial harm, with the overall level of harm limited given the considerable change that occurred over the late twentieth century at this location. This harm is in part mitigated by the proposed new entrances use of gothic arch forms, which while different from the existing, ensure that the sense of a neo-gothic railway station in immediate proximity to the hotel will remain appreciable.

Demolition of 50 Liverpool Street, Hope Square and surrounding stone piers.

11.297. No 50 and the stone piers to Hope Square make a positive contribution to the setting of the hotel, to the extent they are a replica of an earlier nineteenth century phase to the station. As such the loss of No 50 and re-siting of the piers to the proposed roof garden will remove the existing ability to understand the historic relationship between the station and Hotel as it appeared prior to twentieth century redevelopment. The scale of the harm is however somewhat limited by the late date of the fabric, which while finely detailed, holds little intrinsic heritage interest as it relates to the hotel. The overall level of harm arising via changes to the setting of the hotel as it relates to these aspects is therefore low.

Overall Conclusion on Former Great Eastern Hotel – direct and indirect impacts

11.298. The harms identified are in the main related to the indirect impact of the proposals in views along Bishopsgate to the extent that it will provide a new backdrop to the hotel, as well as instances where aspects of the roofline will be screened from view. Despite positive mitigations inherent to the design approach, which have sought to retain a contrasting condition to aid the legibility of the roofline, a diminishment of the hotel's landmark character, and relatedly an understanding of its position within the architectural hierarchy of the site is found to occur by officers, notwithstanding its prominent location on the junction, the chief contributor to this 'frontispiece' quality will remain. Overall, taking both the visual impacts of the OSD and the loss of features which contribute positively into account, officers consider that a moderate level of less than substantial harm would arise to the significance of the hotel via these setting impacts. In this, officers concur with Historic England, the GLA and others that harm would be caused, but disagree as to the extent.

11.299. As identified above, there are also a range of benefits arising to the Hotel, ranging from the opening up of a through route along the northern elevation and more sensitive resolution to the interface between the concourse and this facade. The overall level of benefit to Great Eastern Hotel is considered to be low.

11.300. The harms identified will be weighed against the public benefits arising from the proposals in the NPPF paragraph 215 exercise later in this report.

Direct and Indirect Impact to Bishopsgate Conservation Area

11.301. The application site is partly within and largely neighbouring the conservation area, and as such the proposals would have both a direct and indirect setting impact on the conservation area; officers consider it reasonable and proportionate to take the two impacts together in the assessment below.

11.302. Both the GLA and HE raise concerns on grounds of harm to the conservation area finding a high level of less than substantial harm arising. With objections received from SAVE, LAMAS, the CBA, Historic Buildings and Places, SPAB, CAAC, Twentieth Century Society, Victorian Society and Georgian Society in view of these harms, noting SAVE, LAMAS and the Twentieth Century Society finds substantial harm arising to the conservation area as a result of the proposals. Buildings and Places also find substantial harm to arise, when considering this harm in the cumulative scenario with the impact to other assets. The Georgian Society find a mid to high level of less than substantial harm to arise. Historic

Demolition of No 50, Hope Square and the station entrances

11.303. Impacts to the conservation area are layered and varied, reflecting the nuanced history of the station complex, the changing character of the views across it and the overlapping group value contributions of the various elements within the site. Hope Square, the station entrances and 50 Liverpool Street at present make a positive contribution to the character of the western end of the Conservation area and unifying a neo-Victorian and Victorian character to the streetscape on the approach along Liverpool Street. While the fabric itself is not nineteenth century in origin, the loss of these features and 50 Liverpool Street in particular, will remove what remains appreciable of the overall scale and alignment of the original station range, noting No. 50 and piers to Hope Square were designed as a facsimile of the southern station pavilion. Additionally to the extent that they hold significance as a piece of academic conservation led architecture which now defines this part of the conservation area, this historic and architectural interest will also be lost. There is therefore harm arising through this loss, also identified by the GLA, HE, SAVE, the Twentieth Century Society and the Victorian Society.

11.304. The overall level of harm is considered by officers to be commensurate with the more limited inherent evidential value of the fabric itself given its later date, the overall harm arising from this loss is therefore low and less than substantial. Officers note the harm arising through the removal of the piers is mitigated by their reinstatement to the proposed roof garden within the scheme so that the removal from their current position is not a total loss.

Alterations to no 17 and 18 Liverpool Street, 70 Old Broad Street

11.305. Limited demolition and modification is proposed to no 17 and 18 Liverpool Street and 70 Old Broad Street to facilitate the station entrance changes. The final details of which to be controlled via condition to ensure retention of any decorative details of interest. The impact of these works is considered to be neutral, preserving the positive contribution of the arcade buildings to the conservation area.

Impact of new station entrances and OSD

11.306. The new entrances and oversailing development will transform the scale of the station as seen in the approach to and within the conservation area. As assessed above, this is considered to affect the hierarchical relationship of the station and hotel as currently perceived, as well as partially screening this important junction building from view and appearing within its backdrop (AVR 62, 64). There would be a reduction in the understanding of the historic shared function between the two and the contribution of the site as a combined Victorian station/hotel typology will be less readily appreciable. The GLA finds a high level of less than substantial harm arising through this loss of historic coherence, when considered alongside the loss of the existing station entrances, with the Twentieth Century Society, The Victorian Society, CAAC and Historic England also finding harm arising.

11.307. Noting that the proposals lie largely at the fringe of or outside the conservation area to the north, the height and scale of the OSD is such that it will bring the scale of a tall building to within the conservation area interior (for example AVR 50). While tall buildings do currently appear within the immediate locality, these are largely perceived as in the backdrop to the finer, historic street grain in the conservation area interior (AVRS 36-39). This effect would be most apparent in the views east and west along Liverpool Street, where that part of the OSD over Hope Square would read as a 'stepping forward' of this higher scale from the background to the foreground, with concomitant effect on views and the prevailing sense of an intact, lower-rise Victorian historic streetscape across the conservation area which continues up until this northern fringe. This effect can be seen in views both from the west along Liverpool Street but also the east, from Bishopsgate Plaza in particular, where the proposals would, through their scale and height, introduce a sense of enclosure and loss of sky around the historic scale of the streetscape that is considered harmful (AVRS 40, 41, 42, 44, 50). This would be particularly acute in the case of the churchyard of St Botolph and the buildings contained therein (AVR 49, 52, 54, 55).

11.308. Notwithstanding this, officers note the impact of the proposals is softened by the clear references to a neo-gothic station typologies made by the proposed new entrances. While of a much grander scale, their monumental arched forms, use of stock brick and ribbed detailing reinforces the high Victorian appearance of the streetscape in this location. In particular the height of the arches which mimic the grand volume of the western train shed have enables an understanding of the interior scale of this part of the station to be appreciable from the street (AVR 39, 66). This amplifies the important contribution of this structure so that it is legible from both Bishopsgate and Liverpool Street.

11.309. The improvements to the landscaping and public realm along Liverpool Street (assessed above) will also create a sense of civic ownership to the public realm. Equally the sensitive design and re-location of the Kindertransport sculpture is also beneficial to the conservation area, reinforcing the significant communal value of these assets and amplifying their overall contribution to the conservation area.

11.310. Nevertheless, as a result of the proposals, the conservation area would experience a new sense of enclosure at its northern fringe and a dramatic increase in scale coming up to and partially overstepping the CA boundary, which would reconfigure – and make less legible – the surviving Victorian hierarchy and layout of historic railway buildings which form this northern fringe. This would harm that sense of an intact, low-rise Victorian streetscape characteristic of the CA and the legibility of how the railway functions of the area developed.

11.311. Conversely, the CA's densely urban setting, with a general backdrop of taller, modern development proliferating in most views through and of the CA, mean that the proposals' impact would not be irredeemably stark, but rather an amplification and intrusion of this existing modern backdrop. This effect would be felt in many parts of the CA, but not throughout. As such, taking into account all of the above, the overall level of harm resulting from the proposals is considered to be a moderate level of less than substantial.

Impact to War Memorials including The Great Eastern Railway War Memorial, Grade II, The London Society of East Anglians War Memorial (Grade II).

11.312. As described above, the proposals will sensitively re-site these important memorials, improving the sense of spaciousness in the approach and giving consideration for those who may wish to dwell and contemplate. Given the re-siting of these important features throughout their history, their movement within the site is not considered to cause any harm, with the overall impact of the proposals resulting in benefits to each asset respectively. This aligns with comments from Historic England. These works will be controlled by condition to ensure their safe removal, storage and reinstatement.

Impact to Police Box, Grade II

11.313. 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 not considered to cause any harm to the significance of the box, subject to the proposed methods of work, safe storage and reinstatement, the final details of which are to be controlled via condition.

Impact to Non-Designated Heritage Assets within the site

Impact to Metropolitan Arcade

11.314. Limited demolition and modification is proposed to no 17 and 18 Liverpool Street and 70 Old Broad Street, these works will facilitate the improvements to the station, the final details of which to be controlled via condition to ensure retention of any decorative details of interest. The impact of these works is considered to be neutral, preserving the significance of the arcade buildings.

11.315. While Historic England find the OSD to create harmful impacts to the setting of the arcade through its scale and mass which would 'draw attention' away from the arcade. Officers disagree noting that the existing relationship between the site and arcade is of different scales. The improvements and greening to the public realm, will also create a more permeable open route from the arcade into the station, so that the two will be read as part of a shared railway estate. While the proposals will dramatically alter the condition in the surroundings the proposals are considered to preserve the significance of the non-designated heritage asset.

Impact to No 50 Liverpool Street

11.316. Total loss of this non designated heritage asset. This heritage harm is considered in the full planning balance at paragraph below.

Impact to Hope Square

11.317. Total loss of this non designated heritage asset. This heritage harm is considered in the full planning balance below.

Impact to Kindertransport Sculpture

11.318. This asset will be retained within the reimagined Hope Square, at the entrance on Liverpool Street. Officer's note the care and attention given to the context for the statue, cited in the arrival space which amplifies the historic context and associated highly emotive communal values. The incorporation of seating to the surround of the statue's plinth is considered sensitive and appropriate to the subject matter noting that its existing position does not allow adequate space for consideration and reflection. The removal, storage and reinstallation of the statue will be controlled via condition to ensure the protection of its fabric during construction phase. The overall impact of the works are considered to be beneficial, through positive improvements within its setting.

Other Designated Heritage Assets

11.319. The following heritage assets outside the site boundary are considered to be potentially affected by the proposals, through indirect impacts via setting. Assessment of impact to the significance of designated assets will be grouped where the nature and extent of impact is consistent and a grouped assessment is proportional to understand the impact of the proposals.

St Paul's Cathedral, Grade I

11.320. A summary of the significance of St Paul's Cathedral, and the contribution of setting are set out within the 'St Pauls Setting Study', currently in draft, produced by the Dean Chapter of the Cathedral in 2025. The below summary makes reference to this assessment where appropriate, highlighting areas of particular relevance to understand the potential impact of the proposals.

Summary of Significance

- 11.321. St Paul's Cathedral was built between 1676 and 1711 to designs of Sir Christopher Wren. It was erected 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. Considerable associative interest arises through connection with Sir Christopher Wren, appointed Surveyor in 1672, is regarded as one of England's greatest architects and scientists, with the cathedral widely considered his masterpiece. The building is symbolic for its adoption of a baroque classical style, at that time more strongly associated with the Catholicism of continental Europe, indicating a stylistic shift within the architectural culture of the period. The building has outstanding artistic interest through its rich decorative expression inherent to its use of sculpture, ornamentation, geometry and form, achieving a dramatic internal and external appearance. Its ionic drum and dome, together with the western towers are symbolic for their widely recognised silhouette. Beyond its unparalleled spiritual importance, the cathedral has taken on a rich symbolic identity closely associated with, and sometimes synonymous for London itself.
- 11.322. The historic interest of the Cathedral is commensurate to the maintenance of long-established tradition of Christian worship on an elevated site in the City of London. To that end the Cathedral also symbolised the rebirth of the capital after the Great Fire and serves as a representation of the union of Church and Crown, achieved through its position, scale and ornament. It was historically intended to be the principal building in London to provide a public site of celebration or consolation.
- 11.323. It has a singular commemorative function, further enhanced by the associations, architecturally, visually, culturally and intellectually, with Wren's other great achievements in London including The Monument and the City Churches.
- 11.324. The overall architectural and historic interest of the building is exceptionally **high**.

Contribution of setting

- 11.325. The cathedral has a setting that takes in large stretches of Greater London thanks to the monumental and central presence of its dome in city panoramas and strategic metropolitan views. The contributions of setting are nuanced, layered and varied reflecting the extent from which views of the cathedral and its approaches are perceived and experienced, together with their changing and relative communal, historic, or artistic associations.

11.326. Briefly these include:

The elevated topography of the site which contributes to:

- The historic interest of the symbolism of the building as the highest point in the City of London and connections to its predecessors on the site.
- Enhancing the intended visual prominence of the architectural design including its scale.
- Enabling appreciation of the architectural composition above the river corridor.
- Emphasising the architectural drama of the western towers and west elevation when approached from the west, which is integral to the Baroque style.
- Enabling an appreciation of St Paul's Cathedral in combination with and alongside other heritage assets.

The Clear skyspace around the cathedral which contributes to:

- The optimum condition for appreciating the architectural composition and forms of the Cathedral, including the silhouette of dome, western towers and overall composition of the upper parts of the building, which is significant both architecturally and culturally.
- It enhances and ensures visual prominence and therefore the intended architectural effect.
- It enhances the dynamic impact of the Baroque west towers in the round.
- It allows an appreciation of the magnitude and scale of the Cathedral, including when appreciated at a distance.
- It is significant to the understanding and appreciation of the relationships of St Paul's with other heritage assets with a skyline presence, in particular the spires and towers of the City Churches and The Monument which amplifies the significance of the Cathedral.

The river corridor which contributes to:

- An appreciation of the scale and visual prominence of the Cathedral.
- Illustrating the historic dominance of the Cathedral in, historically, the principal approach to the capital along the river from the east.
- Understanding of how the Cathedral was built by using the river for transporting construction materials and disposing of construction waste, and the associated relationship with St Benet Paul's Wharf.
- An appreciation of the architectural, visual and historical relationship between the Cathedral and the City Churches.
- An appreciation of the relationship between the Cathedral and the City of Westminster and London to the west, and providing visual connections between these.
- Making connections with artistic representations of the Cathedral usually depicted from the south and west with river in the foreground and, in particular, the views painted by Canaletto.
- An appreciation of the architectural and cultural significance of the Cathedral through a kinetic experience of the Cathedral in its wider urban context, from the water, the bridges or the south bank.

St Paul's Churchyard or close setting which contributes to:

- Experiencing and understanding the architectural scale and composition of the building at close proximity as it towers above you.
- An appreciation and experience of the high quality of architectural detail and decoration including the iconography.
- The cultural importance of the Cathedral, in particular the part played by the west entrance and steps in London's cultural and ceremonial life.
- The culmination of the ceremonial route which is integral to the role of the Cathedral historically and culturally.
- The designed connection with the river over the Millennium Bridge which enhances appreciation of the architectural significance and an understanding of the historic river connections of the Cathedral.

Contribution of the site

11.327. The site is not currently visible from the cathedral, or seen in distant views towards it, making a neutral contribution to setting. It does however fall within the wider/ intermediate setting as defined within the 'Setting Study'.

11.328. Therefore of relevance to this application are the views to and from the river, as well as more distant pan-London linear views, where the proposals and the site have the potential to be seen together and impact upon an appreciation of the Cathedral's significance. As set out within the 'Setting Study' within SB9 and SB10, these aspects of setting contribute in the following ways of relevance to an assessment of the proposals:

11.329. The elevated topography of the London bowl as well as Ludgate Hill provides opportunities to experience the Cathedral in its intended symbolic and architectural roles, particularly where elevated views allow the dome and towers to be seen against clear sky and the intended dominance of the building as an ornament to the city is appreciable. Specifically this is true where the Cathedral dome breaks the horizon of the wooded ridges of the London bowl from Richmond (AVR2), additionally these views also enable an appreciation of the architectural relationship between the Cathedral and Wren's work at Greenwich (AVR1);

11.330. In the approach to the Cathedral from the east and west along the river (AVRS 3-24) the silhouette of the Cathedral, principally the dome and towers, are set within a complex skyline that has evolved over centuries. The sweep of the river is seen below the dome which is framed by or within a group of taller structures. Relatedly, intervisibility with the City Churches and The Monument enhance significance (AVR25). The approaches along the river and over the river include significant areas of open sky space that contribute directly to the visual prominence and the intended architectural effect of the design. Here the articulation and massing of the towers can be understood in greater detail, and the rhythm of solid to void in the peristyle is particularly prominent. The statuary along the entablature of the Cathedral can also be appreciated from certain areas when against clear sky. In the area of the St Paul's Heights policy generally the entablature of the Cathedral can still be seen in combination with the drum, dome and towers, although in places this is eroded.

11.331. In general the river corridor provides the ability to appreciate in greater detail the upper sections of the Cathedral below the cornice. In the kinetic experience walking along the South Bank of the river, the three-dimensional composition of the Cathedral changes and the visual weight of the western towers also changes commensurate to the viewing angle.

11.332. Negative contributions of setting identified within the setting study relevant to the application include: "Developments in the sky space behind the Cathedral from the southern, river setting has eroded its visual prominence. Recent development to the north-west competes with the dome of the Cathedral, and in some parts of the setting appear to be visually eroding the geometric clarity of its form and intended effect."

Impact of the proposals

11.333. Relevant views are illustrated within the HVIA at illustrations in AVRs 1-25 and 73-75. Please note a separate assessment of these views as part of the London Views Management Framework is undertaken in the Strategic views section below.

11.334. Officers note that the Surveyor to the Fabric found the submitted materials insufficient to understand the impact of the proposals, noting the compression of the images. This limitation is set by the data limits of the external planning portal. Officers have been in receipt of 3D virtual modelling sufficient to understand the extent and nature of the impact.

11.335. In the more distant views from Greenwich Park (AVR1) and King Henry's Mound (AVR2) while the proposals will be seen distantly on the horizon line, they are perceived well to the east of the silhouette of the cathedral, with intervening tall building development between the two. The height of this existing development is such that the proposals do not meaningfully alter the existing character of these views and the quality existing built horizon line, with no effect on of the ability to appreciate the silhouette of the Cathedral, the clear sky space surrounding it or its landmark presence on Ludgate hill. Those positive qualities of setting articulated above are therefore considered to be preserved, with no impact upon significance. It is acknowledged in the case of King Henry's Mound the proposal's location on the skyline is relatively closer to the cathedral, however the new built form will be entirely obscured by the vegetation that encloses the viewpoint. No harm is considered to arises as a result of changes in these views, with no alteration to the contribution of setting.

11.336. In many views from the riverside the proposed development would be fully occluded by built development, with no harm arising from visible change within these viewpoints (AVRS 6, 7, 21-23) or is seen at some distance from the Cathedral with intervening development ensuring no further encroachment around the Cathedral occurs as a result of the proposals (AVRS 20, 24). These views are considered to preserve those aspects of significance appreciated through setting identified above.

11.337. In Kinetic views from Waterloo Bridge (AVR views 8 – 13 (day) and 73 - 75 (night)) elements of the OSD's uppermost floors would appear behind the Cathedral, in the background of the Western Towers, appearing just below the top of the drum, and above the pediment of the western front, extending into and behind the base of the colonnade to the northern western tower as the passerby moves south along the bridge.

11.338. In the majority of this kinetic experience, these views are substantively screened by the mature trees which line the Embankment, screening views of the pediment so that this juxtaposition would be imperceptible. However, in AVR 10, while slight, the uppermost massing of the development would fleetingly come into view above the tree line, and be visible behind the apex of the Western transept pediment and the prominent statue of St Pauls which sits atop it, filling in what is currently clear sky around the pediment and base of the statue. This additional massing would erode the viewer's ability to appreciate some of the most highly significant features and elements of the Cathedral's architecture, through a loss of the definition and silhouette of these features in the skyline. This would harmfully interact with those contributions of setting identified at above, specifically the completeness of the architectural composition, diminishing an understanding of the decorative scheme of the western front, in turn undermining the dominant and landmark quality of the cathedral on the skyline.

11.339. While officers note that the trees the foreground of this sequence provide screening, City of London officers do not consider this sufficient to mitigate the potential harm to the significance of St Paul's Cathedral which arises through proposed development within its backdrop, as indicated from the entirety of the kinetic sequence (AVRS 8-13), in agreement with representations made by St Pauls Cathedral.

11.340. Officer's note that both the GLA and Historic England find the tree cover sufficient mitigation for the impact arising through changes in these views, finding negligible and no harm respectively with both finding this mitigation to be dependent on the longevity of the trees in question, and their maintenance.

11.341. However, Officers consider that trees, as living organisms, have finite lifespans and potentially evolving forms as a result of managed change such as pollarding but also unmanaged change such as via the ill effects of climate change or disease. Trees are therefore not considered adequate full mitigation of potential impacts on the Cathedral, notwithstanding their present role in screening the pediment and base of the western towers from view. Officers further note the composition of the trees in question, being all of the same age and species, planted in a linear route along the river are therefore more vulnerable as opposed to a mixed woodland across a wider expanse where losses of individual trees would have less of a dramatic effect on through views.

- 11.342. Within the nighttime views while these do not show any further encroachment of the silhouette of the Cathedral, however Officers note these are taken post lighting curfew at 7pm, and therefore do not represent the impact of lighting proposed before nautical dusk. In order ensure this condition is accurate, and fully aligns with the future lighting strategy, new nighttime views will be the subject of details reserved via condition, so that officers can ensure no additional impact will result from light pollution from the roof garden, and OSD development.
- 11.343. Officer's assessment of these impacts aligns with that of the Surveyor to the fabric, the GLA, SAVE and the Victorian Society finding the proposals to result in low levels of less than substantial harm to the Cathedral, through the way in which the proposals would appear behind important architectural elements of the Cathedral's western front where these are currently unblemished against sky.
- 11.344. In views from Hungerford bridge and further east along the Southbank, AVR's 3-5, 14, and night views 72 and 75, the submitted visuals indicate that the proposed development would come into view to the east of the Cathedral, seen within the backdrop of Faraday House, appearing between the horizon line between the two buildings. Within these views the proposals will create a change on the horizon line. While the perceptible form of the proposed development will have no interaction with the Cathedral's silhouette and would be relatively low lying -- of a comparable height to the existing development seen to either side, the height of the proposed massing would approximately align with the drum of the Cathedral and is considered draw the north eastern boundary of the Eastern Cluster marginally closer to the Cathedral. To that end, the proposals are considered to increase the extent to which the cluster challenges the landmark status of the cathedral in these views, diminishing the clear sky space around the cathedral. A slight level of less than substantial harm therefore arises as a result of these views, through this slight diminishment of the Cathedral's symbolic dominance and landmark setting on the riverfront.
- 11.345. The Georgian group consider a middle range of less than substantial harm to arise to the cathedral as a result of these impacts, however officer's disagree with the level of harm found in this assessment. Taking into account all of the impacts identified above, the overall impact to St Pauls is considered to be a low level of less than substantial harm.

St Botolph Without Bishopsgate, Grade II* St Botolph Church Hall Grade II, 2 Drinking Fountains, 3 Overthrows and Lanterns to Botolph Church Yard, Grade II, Bishopsgate Parish Memorial, Grade II and Bishopsgate Churchyard Non Designated Heritage Asset

11.346. Assessment of these assets have been grouped given their shared setting and similar nature of impact upon significance. Historic England, the GLA and Victorian Society raise concerns regarding the impact upon the church, and Church Hall's setting, with the GLA finding low to middle and middle level of less than substantial harm arising to the church and hall respectively, and HE finding a modest level of less than substantial harm arising to these assets. Additionally SPAB have objected on grounds of harm to the listed church. The Georgian Society find a mid to high level of less than substantial harm to arise. Historic This is discussed in detail below.

Summary of Significance

11.347. The church of St. Botolph Without-Bishopsgate was designed by James Gould and George Dance senior in 1728, with significant later alteration. Historic interest arises as a more domestic remnant indicating the historic suburban quality to the area which was located outside of the City walls. Architectural interest arises as a grand eighteenth century church. The Portland stone elevations includes a tower and spire addressing Bishopsgate, with more subservient red brick return and rear elevations. The building draws landmark quality from its silhouette and a commanding presence on Bishopsgate, with the tower seen against sky in many approaches from the surrounding area.

11.348. St Botolph's Churchyard includes the open space to the south and south-west of the Church of St Botolph without Bishopsgate. Its origins date back to the 15th century, and it was expanded to its current size in 1760. In 1863, it was transformed into a public garden. It includes an east-west path that runs through the application site and connects Bishopsgate and Old Broad Street. The Church Hall is located within the north-western part of the Churchyard, as well as the Bishopsgate Parish memorial, two drinking fountains, three overthrows and lanterns, all of which are Grade II listed.

11.349. This historic area, despite changes over the years, holds historic interest as a historic churchyard associated with the Church of St Botolph. It is a defining element of the setting of the Church, the Church Hall, and the other listed structures with which it has group value. Some artistic interest derives from the design of the Churchyard, including paths and landscaping. There is a sense of calm within the Churchyard that contrasts with the busy roads that surround it.

11.350. 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.

11.351. The overall architectural and historic interest of these listed building is **high as relates to the Grade II* and Grade II buildings, the non-designated heritage asset is of moderate local significance.**

Contribution of setting

11.352. Setting makes a high positive contribution to the setting of the church and listed group particularly as relates to its landmark skyline presence, its verdant immediate surroundings within the listed church yard and proximity to the listed church hall to the rear, forming a cohesive historic group. The site in general makes a positive contribution to the setting of the church with proximity to the fine facades of the FGEH is also beneficial, with the church perceived as part of the better preserved townscape within the conservation area at the junction of Liverpool Street and Bishopsgate. Modern tall buildings are seen within the surroundings of and backdrop to the church, however overall its skyline presence remains distinct.

Assessment of Impact

11.353. The GLA finds Low to Middle levels of less than substantial harm arising to this asset through impact upon the contribution of setting to significance. This is discussed below.

11.354. The proposals would backdrop the tower of St Botolph, mainly in the views looking north along Bishopsgate. Along this viewing experience the church tower is seen against clear sky with the modern Broadgate buildings visible further behind. The proposals would reduce the extent of this viewing experience where it is possible to see the church tower against sky, approximately until the junction with Wormwood Street where the proposals would gradually recede and release sky again. In other viewing experiences, for instances from the east and north, the church tower would maintain its skyline presence, with the proposals appearing as a prominent though more neutral element of the modern backdrop. Nevertheless, the proposals would, in this way, diminish the landmark quality of the church.

11.355. As well as this specific impact on the church tower, the proposals would introduce a new sense of enclosure to the churchyard and church hall which would harmfully intrude on the sense of a preserved historic churchyard (AVRS 49, 52, 54, 55). This would affect the churchyard as an open space and the Church Hall more than the church itself.

11.356. Overall, the proposals would cause low levels of less than substantial harm to the church and church hall and low level of harm to the churchyard.

11.357. Given the diminutive scale of the drinking fountains, lanterns and memorial, the harm to these assets is negligible, with the degree to which they delineate and decorate the church yard, and are seen within it, will remain unaffected.

11.358. **St Mary Le Bow, Grade I**

11.359. The GLA finds a very low level of less than substantial harm arising to the church as a result of the proposals. This is discussed below.

Summary of Significance

11.360. The Church of St Mary le Bow, initially known as 'Mary New Church' was rebuilt by the Archbishop of Canterbury, Lanfranc, in c.1077-87, and has exceptionally high historic and architectural interest. The church was said to be the first in London to be built with stone arches, hence the name 'le bow'. The Bow bells have a strong communal identity, first referenced in 1469 when used to enforce a 9pm curfew, and today colloquially being born within the sound of the bells is the sign of a true Londoner, additionally the 11th century crypt is the meeting place of the Court of Arches.

11.361. The church was rebuilt by Wren following the Great Fire, with considerable architectural interest arising through this association, belonging to the family of Wren spires across the City, of which St Paul's is the head. The exterior is characteristic of Wren's work, completed in a baroque classical style, with the exterior faced in red brick with dressings of Portland stone. Damage in World War Two was severe, with only the tower and an outer shell of brick and stone escaping the need for reconstruction. The crypts were also damaged and repaired. It was incorporated into Wren's post-Fire church and the post-war re-building in the 1950s.

11.362. The overall architectural and historic interest of the building is very **high**.

Contribution of setting

11.363. The immediate churchyard and position on Cheapside make strong positive contributions to the setting of the church, in which the cosmopolitan and historic nature of the parish is easily appreciable, drawing upon the formal axial route of Cheapside as well as the denser medieval street pattern to the south. The spire of St Mary le Bow is distinguishable across many riverside views, creating a landmark character and reinforcing the characterful historic skyline within the city, generating significant group value between the cathedral and other church spires. The site at present is not appreciable from or with the church, making a neutral contribution.

Impact of Proposals

11.364. GLA have found a very low level of less than substantial harm arising as a result of the proposals. This is discussed below.

11.365. In AVR15s and 16 (National Theatre) the upper stages of the Spire, currently seen against sky would be backdropped by the development. This is considered to erode its clear sky backdrop and ability to appreciate its silhouette against the sky. Similarly, though to a lesser extent AVR 19, also shows the proposals will backdrop the base of the spire's plinth, diminishing the extent to which the spire is easily legible in these more distant views. While the proportion of the tower's silhouette is relatively limited in all instances, when taken cumulatively, and noting the important contribution of these viewing locations, it is clear that the proposal would result in its diminishment of the churches landmark character and correspondingly reducing the overall group value drawn from the other Wren churches. The overall impact is considered to result in a slight level of less than substantial harm, through a reduction in the contribution of setting.

St Augustine, Grade I

Summary of Significance

11.366. A 1695-6 Wren tower with post-war restored Hawksmoor spire that forms an ensemble of outstanding special interest. The building comprises a Portland stone tower in three stages with an oculus at the second stage and rectangular belfry apertures at the third stage, capped with a cornice, a Baroque pierced parapet and corner pinnacles of Baroque obelisks. Rising behind this is the lead spire, restored in 1967. The original church body was destroyed in 1941 and the spire of 1830 was reconstructed by Paul Paget of Seely and Paget. It is widely considered one of the most successful and distinctive City spires, culminating in a elongated onion dome. It has particularly strong group value being the closest of the City Churches to Wren's Cathedral. Although the most characteristic feature is post-war in date, and the church body is now lost, it remains a special landmark tower, both for its original design and for its strong relationship with St Paul's.

11.367. The overall architectural and historic interest of the building is very **high**.

Contribution of setting

11.368. Proximity to the Cathedral, falling within the wider cathedral yard on the prominent east west route of Cannon Street makes a strong positive contribution to significance. Similarly the spire of St Augustine is distinguishable across many riverside views, creating a landmark character and reinforcing the characterful historic skyline within the city, generating significant group value between the cathedral and other church spires. The site at present is not appreciable from or with the church, making a neutral contribution.

Impact of the Proposals

11.369. AVRs 4, 5 and 14 show how the proposed development backdrop the silhouette of the church spire, eroding its existing clear sky setting. This effect is exacerbated by the spires' dark tone and fine profile, which when perceived against the proposed development results in a loss of legibility. This would therefore diminish the contribution of these views, and reduce the extent to which the setting positively contributes to significance, resulting in a low level of less than substantial harm.

Christchurch Spitalfields, Grade I

11.370. The church dates to 1723-29, designed by Nicholas Hawksmoor. The building retains high architectural interest and associative value as a strong example of his work, with the western portico of four giant Tuscan columns characteristic of his designs. The building is constructed of white ashlar, with a tower and spire which dominate the local surrounding streets. The building retains high historic interest as a parish church outside the bounds of the City, reflecting the expanding urban realm during the Georgian period. The listing includes gate piers to the churchyard.

11.371. The overall architectural and historic interest of the building is very **high**.

Contribution of setting

11.372. The building draws group value from the nearby drinking fountain and trough, as well as the street bollards, creating the appearance of a well preserved historic street scene, together with the Ten Bells Public House. The spire of the church is visible from the Golden Gallery of the cathedral, as indicated in AVR 25. As such the setting of the church draws a positive contribution to significance from this visual connection with the Cathedral, noting that in these views the church spire is not seen against sky, so that it is not overtly legible, albeit still visible. The site at present is not appreciable from the church, but is seen from the Golden Gallery as part of a wider panorama of London, its overall contribution is neutral.

Impact of the proposals

11.373. Tower Hamlets have raised concerns regarding the potential impact to Christchurch Spitalfields, commenting upon the use of wirelines in the AVRs to illustrate visual change in the surroundings. This is addressed below.

11.374. The impact upon the wider surroundings of the church are illustrated in AVRS 25 and 27 to 29. These show the proposals will not be visible in the approach to the church from the east, only coming into view as the junction of Commercial Street and Fournier Street is reached. While the proposals will be visible, they will not increase the height of the built horizon line, nor change its existing architectural quality which is contemporary and or late twentieth century in character. No harm to the church is considered to arise through changes in its immediate and local setting therefore. Officer's find the use of wirelines in the AVRS to be appropriate to understanding impact, noting Tower Hamlet's query on the matter. AVR 25 shows that in distant views from the Golden Gallery of the cathedral, the church spire will be screened from view, severing the visual connection between the cathedral and the church. While it is noted this loss is limited given the limited legibility of the spire within this view, a slight level of less than substantial harm is considered to arise given the important and specific contribution of this view in allowing the significance of Christchurch Spitalfields to be appreciated, in particular through the historic and spiritual relationship between the Cathedral and surrounding churches.

Bishopsgate Fire Station, 162-174 Bishopsgate Grade II

11.375. Built as a fire station by George Vulliamy in 1885, 162-164 Bishopsgate holds high architectural significance through its elaborate Tudor-Renaissance utilising a four-storey red brick and Portland stone façade, with lavish embellishment and a distinctive gabled roof. The building holds high historic interest as purpose built fire-station, signalling the professionalisation of this important civic role, and the rise of civic architecture during the Victorian period.

11.376. The overall architectural and historic interest of the building is **high**.

11.377. The building's setting is that of Bishopsgate, comprising a busy and varied commercial thoroughfare with a distinct Victorian and Edwardian townscape. This includes Liverpool Street Station and the former Great Eastern Hotel, which are located directly opposite. They make a positive contribution to the setting of the fire station, to the extent that they conform to the Victorian and Edwardian character, underscoring the importance of the area as a densely populated urban centre during this period, of sufficient density to required hotels, stations and fire-stations. Limitations of the contribution of the site reflects the later date of the Bishopsgate entrance to the station, and the cramped conditions in relation to the northern façade of the hotel as described in detail above. To the south-east, a cluster of modern towers rise above the relatively small-scale of the older streetscape.

Impact of the proposals

11.378. Views 39 and A40 illustrate the change in views west from the fire station. The proposals will create a high degree of change in the immediate surroundings, with the most influential aspect of the proposals upon this change being the new station entrance to Bishopsgate. The overall effect on the setting of the firestation is mixed, with the new arches considered to maintain a Victorian neo-gothic character within the surroundings, noting the present condition is also not original to the Victorian period.

11.379. To the extent that the proposal also improve the condition with the hotel and provide an appropriately grand civic space to the station entrance some the overall effect is considered appropriate. While the taller height of the OSD will transform the open character and skyspace to the street where immediately adjacent, this will not be particularly perceptible in relation to the former Fire Station due to the tight urban grain and limited direct intervisibility between the two. As such, the setting and significance of the listed building would be preserved.

Listed group along Devonshire Square and News Street, including: Port of London Authority's Warehouses and Boundary Walls to Middlesex Street Grade II, Pair house Houses north of entrance to Port of London Authority's warehouses Grade II, gatepiers at entrance to Port of London Authority's warehouses Grade II, House to East of entrance to Port of London Authority's Warehouses, grade II and Shield House grade II.

11.380. This group of listed buildings principally relate to the Port of London Authority Warehouses located to the north of Devonshire Square and along News Street. The significance of this group comprises, the large late-18th and early-19th century warehouses were originally constructed for the East India Company, later converted into offices in the 1970s. They form a large and irregular group of brick and Portland stone warehouses, generally of six-storeys, set over courtyards. They are of architectural and historic interest as good examples of late-18th century warehouses, linked to the expansion of trade and reflecting the industrial history of the City of London. The flanking houses and gate-piers express a formality in the approach, with the group appearing as part of a formal enclosed historic space, with strong group value arising.

11.381. The overall architectural and historic interest of the building is **high** in respect of each heritage asset.

11.382. The setting of the group includes tall and contemporary buildings immediately to the south, to the south side of Devonshire Square as well as lower rise historic terraces to the west, terminating Devonshire Square and along New Street. The Bishopsgate entrance to the station is obliquely visible from the western elevation of the warehouses at New Street, when looking away from the entrance into the building from this location (AVRS 39-42). To the extent that it appears consistent with the 19th century character to the townscape west of News Street, the site makes a limited positive contribution, noting its later date and backdropping by No 100 Liverpool Street within these views.

Impact of the proposals

11.383. As illustrated in AVRS 39-40 the massing within the site will increase the visibility of the scheme, appearing to backdrop the eastern approaches from the warehouses towards Bishopsgate along News Street and Devonshire Square, with some loss of clear sky space and backdropping of the historic roofline. Officers note that this change is largely experienced obliquely from the principal entrances of the warehouses. Therefore notwithstanding the visibility of the proposals, officers consider the overall impact to be neutral, given the preservation of those aspects of setting considered to make a positive contribution, namely the character of the historic streets immediately to the west, and the formal entry from Devonshire Square. Furthermore, the proposals, through their arched forms at the entrance to Bishopsgate, are considered to respond to the historic character in the intervening streets.

Group of listed buildings along Devonshire Row and New Street including, 5-7 New Street Grade II and 12-13 Devonshire Square Grade II and Wall to rear of 4-18 Devonshire Row.

11.384. These buildings comprise remnants of Georgian domestic architecture to the east of Bishopsgate. They have their own distinct townscape character and setting, composed of a dense urban network of brick-faced buildings to the north and west near New Street. Together they form part of a historic enclave east of the site which appears well preserved, with a consistency in heights along New Street and Devonshire Row, where the roofline is presently appreciated against sky.

11.385. The overall architectural and historic interest of the building is **high** in respect of each heritage asset.

11.386. The site is seen to the western end of New Street, disappearing from view further to the east and from the south along Devonshire Row. Where the site is glimpsed 100 Liverpool Street is seen in the backdrop, albeit at a distance. As above, the site makes a positive contribution despite its later date through its materiality and neo-gothic character, appearing sympathetic in the wider surroundings.

Impact of the proposals

11.387. As illustrated in AVRS 39, 40, 43, 44, the massing within the site will increase the visibility of the scheme, appearing to backdrop the eastern approaches from Bishopsgate along News Street and Devonshire Row. Officers note that this change is largely experienced obliquely from the principal entrances of these assets, which face south onto each lane. Therefore notwithstanding the visibility of the proposals in the wider surroundings, officers consider the overall impact to be neutral, given the preservation of those aspects of setting considered to make a positive contribution, namely the character of the historic streets which comprise their immediate setting. Furthermore, the proposals, through their arched forms at the entrance to Bishopsgate, are considered to respond to the historic character in the intervening streets.

Finsbury Circus Conservation Area (

11.388. The GLA have found a low to middle level of less than substantial harm arising as a result of the proposals to the asset listed above. This is discussed below.

Summary of Significance

11.389. The conservation area boundary is tightly drawn, covering a rectilinear urban block containing the buildings set around Finsbury Circus Gardens, an oval shaped green space built on the remains of Moor Fields, situated between London Wall and Eldon Street. The green space holds significant historic interest arising as London's first public park, dating from 1607. The present garden was originally laid out in 1815 to a design by George Dance the Younger. The oval form of the gardens has strongly influenced the surrounding architecture, creating large curving quadrants of commercial built office space with classical façade designs. The design and respective age of each quadrant varies, with some redevelopment works occurring however in general a strong consistency is created to the conservation interior as well as long the external facades of London Wall, creating a unique formal planned townscape with a distinct picturesque character. There are important townscape views looking in and out of the conservation area, although due to the height of surrounding contemporary development these are not extensive in length.

Setting

11.390. The surroundings of the conservation area and listed group is varied, but in general conforms to a larger grain of commercial development reflecting the extensive rebuilding works to the east of Moorgate throughout the late twentieth and early twenty first centuries. This has resulted in a number of tall buildings being visible from within the interior of the square, creating a degree of enclosure to the surroundings. The residential towers of the Barbican are visible to the west of the Gardens, with other, contemporary, taller buildings visible within its immediate setting particularly to the south and east. Owing to the imposing buildings contained within such a tightly planned space, the sense of enclosure is extensive, meaning that long vistas outwards are limited. Tall buildings set beyond the gardens within the City Cluster are a characteristic of the wider surrounding vicinity in which the asset is situated, as seen in AVRS A49, A50, A52, 59-63. This includes 100 Liverpool Street, seen prominently from the surrounding streets. The site is currently visible from the eastern boundary of the conservation area, looking east from Blomfield Street, however it is not visible from the interior with the eastern façade of No 50 and return elevation of the FGEH seen centrally in views along Liverpool Street (AVR63). The site is considered to therefore make a positive contribution to the listed group and conservation area's wider setting, though seen within a layered context including recent contemporary development.

Impact.

11.391. While the upper levels of the OSD will become visible in places from within gardens to the interior of the conservation area, as well as seen directly east from the northern boundary along Eldon Street, this change is not considered to affect the existing character and contribution of these views which is defined by tall buildings and contemporary development within the immediate and middle distance. A greater impact will occur through the arrival of the redeveloped Liverpool Street station entrances seen to the east along Liverpool Street when exiting the square. Officers note however the existing contemporary character of the surrounding townscape such that this is considered a continuation of an existing characteristic of the setting and the character of the Bishopsgate Conservation area will continue to be appreciable to the eastern side of the street, preserving a sense of historic continuity. As such officers disagree with the GLA, finding an overall neutral impact to this conservation area.

New Broad Street Conservation Area and 76-80 Old Broad Street, Grade II.

11.392. Due to similar impacts to the settings of both assets, the assessment here has been grouped. The GLA finds a very low level of less than substantial harm arising to the conservation area. This is discussed below.

Summary of significance

11.393. The character of this conservation area is derived partly from the fact that it was redeveloped over a relatively short period of time; between the 1880s and 1920. The most notable exception is No. 85 London Wall, in the south-west corner of the conservation area, by Casson Condor Partnership, 1987-9. Although a variation in style and materials is seen across the conservation area, the buildings in New Broad Street, by virtue of their scale and massing, give the street a sense of unity, generating high architectural interest. The buildings are generally of uniform height, with ground and four upper stories and additional accommodation set within the roof. The buildings on the north side were built within a short period of time, between 1907 and 1909, and each has an elaborate Portland stone elevation. London Wall, which marks the southern boundary of the conservation area, is dominated by the Church of All Hallows on the Wall. The current building by George Dance, the Younger, was built in 1765-7. Mature trees, immediately to the west and east of the church both enhance the setting of the church and are an important element in the views along London Wall. 76-80 Old Broad Street is located just north of the north east corner of the conservation area, comprising a commercial four storey building, dating to 1860, with an elaborate Italianate stone façade, including large entablature above panelled timber shopfronts to the street.

11.394. The overall architectural and historic interest of the building and conservation area is **high** in respect of each heritage asset.

Contribution of setting

11.395. The setting of the conservation area and 76-80 Old Broad Street includes Finsbury Circus to the west and Bishopsgate Conservation Area further to the north east, which contributes the sense of a continued historic character to the streetscape in the wider surroundings. To the south and directly east, the townscape context is large scale and contemporary. As a whole the contribution of setting is therefore mixed, reflecting the tightly drawn boundary of the conservation area, which illustrates where the breaks in historic character occur. The site is seen only obliquely in views from the north eastern corner of the conservation area, to the north east from 76-80 Old Broad Street. These views look north along Sun Street passage, taking in the full eastern elevation of the station as well as the western tower of the Liverpool Street entrance. These views however include the eastern termination of 100 Liverpool Street and are backdropped by contemporary development, such that the site in this view does not appear as a pristine historic streetscape, noting also the later date of the Liverpool street entrance.

Impact of the proposals

11.396. The OSD will be visible in the backdrop of views from the north east of the conservation area, appearing above the western elevation of station as seen along Sun Street Passage. However the site and glimpses along Sun Street will remain legible. Given the extent to which these views take in contemporary development in the existing scenario the overall impact is considered to be neutral.

St Helen's Place Conservation Area

11.397. The GLA has found a low level of less than substantial harm to the conservation area. This is discussed below.

Summary of significance

11.398. St. Helen's Place Conservation Area is a small, tightly defined area on the east side of Bishopsgate, in close proximity to the Bank Conservation Area and the heart of the City. The conservation area is focused primarily on those buildings which enclose, and define the space of St. Helen's Place, and those buildings in Great St. Helen's which contribute to the setting of the Parish Church of St. Helen, Grade I. It includes the linking group of buildings on the eastern frontage of Bishopsgate, including church of St Ethelburga the virgin, Grade I. The conservation area draws significance from the sense of a formally enclosed courtyard of St Helens Place, the tranquillity of the church yard to the west of Great St Helens and formal frontage to Bishopsgate. The churchyard is a small triangular green space with two important trees, which remains intimate in scale despite the contrasting townscape to the south. The grain of the physical fabric provides a cohesive and modest scale in Great St. Helen's which is also reflected in those buildings within the conservation area on Bishopsgate to the west.

11.399. The overall architectural and historic interest of the conservation area is **high**.

Setting

11.400. The setting of the conservation area makes a range of contributions to its significance. The north south route of Bishopsgate which flanks the western boundary, includes a number of tall buildings within the immediate proximity as well as large scale contemporary development. The conservation area therefore draws minimally upon its setting, with little stylistic consistency in terms of massing, materials or grain within the surroundings. The site is not visible from the interior of St Helen's Place or from outside its western boundary on Bishopsgate, making a neutral contribution (AVRs 47).

Impact of the proposals

11.401. While the upper levels of the OSD will be obliquely visible at a distance to the north from the western boundary of the conservation area, given the existing character of this view, which is defined by large scale contemporary development, this is considered to have no impact upon the current contribution of this view to an appreciation of significance. Officers therefore disagree with the GLA, finding a neutral impact arising as a result of the proposals, noting the limited extent to which the conservation area draws upon its setting for an appreciation of its significance. Views from within St Helen's Place will be unaffected.

Bunhill Fields & Finsbury Square Conservation Area

11.402. Bunhill Fields and Finsbury Square Conservation Area is located to the north west of the site, north of the Moorgate entrance to the City of London. The area comprises three distinct character areas: Bunhill Fields and Wesley's Chapel, a historic graveyard enclosed with railings, of high, historic and commemorative interest; Finsbury Square, a large open green space surrounded by commercial character late-19th and early-20th century buildings, and City Road and Tabernacle Street, also lined with late-19th or early-20th century commercial and warehouse buildings. The area reflects the layered character of the fringes to the city and the impacts of large scale interventions which resulted in the well defined geometries of the square and cemetery. The overall significance of the conservation area is high.

11.403. To the east of the conservation area in views across Finsbury Square, the tall buildings which comprise the city cluster are seen prominently in the middle distance.

11.404. The overall architectural and historic interest of the conservation area is **high**.

Impact of the proposals

11.405. AVR A53, shows the top of the OSD will be just visible from the north west corner of Finsbury Square, seen as part of the existing line of tall buildings which backdrop the squares south eastern roofline. To that end the proposals are considered to preserve the existing character and contribution of these views, with no harm arising.

Artillery Passage Conservation Area

11.406. Tower Hamlets raised concerns regarding the impact to the Conservation Area, and the loss of skyspace, which they consider to reduce the 'relief' and overpower this 'transitional' approach into the conservation area, they however did not conclude an overall level of harm. This is addressed below.

11.407. Located in the London Borough of Tower Hamlets and to the east of the site, this conservation area is designated on account of its architectural and historic interest, with Artillery Passage forming a surviving fragment of 17th century street pattern, characterised by its network of narrow passages, lanes and courtyards. The buildings are predominately Georgian, narrow fronted brick terraced houses with later, 19th century shopfronts to the ground floor, aside from a Georgian shopfront at 56 Artillery Lane (Grade-I). These buildings retain their historic grain and appear generally as a well preserved historic streetscape. Views east from Brushfield Street at the western boundary (AVR 34) and along Whites Row (AVR 32) take in mixed development to either side of the street, with large contemporary and tall buildings seen in the middle distance. The station is not visible in these views due to the distance and intervening development, making a neutral contribution to setting.

11.408. The overall architectural and historic interest of the conservation area is **high**.

Impact of the proposals

11.409. The upper levels of the OSD will be visible in these views, however where seen these will appear as part of an existing built horizon line comprised of contemporary development. Officers consider this will not alter the existing contribution of these views to the conservation areas, setting with no impact upon significance. Given the very limited contribution of the site which is appreciated at distance from the conservation area, and experienced as part of the larger scale development along Bishopsgate including no 135, officers disagree with the concerns raised by Tower Hamlets, finding no harm arising as a result of the proposals. Officer's find the use of wirelines in the AVRS to be appropriate to understanding impact, noting Tower Hamlet's query on the matter.

Brick Lane and Fournier Street Conservation Area

11.410. As above, Tower Hamlets raised concerns regarding the impact to the Conservation Area, and the loss of skyspace, which they consider to reduce the 'relief' and overpower this 'transitional' approach into the conservation area, they however did not conclude an overall level of harm. This is addressed below.

11.411. This conservation area is situated within the London Borough of Tower Hamlets, located to the northeast of the site. The area has a number of distinctive character areas, including one of the most important early Georgian quarters in England around Fournier Street, Wilkes Street, Princelet Street and Hanbury Street. These streets are characterised by the exceptionally consistent quality of original 18th century houses, as well as Christ Church Spitalfields, designed by Nicholas Hawksmoor. The view along Brushfield Street towards the west front of the church is one of the most significant pieces of townscape in the Borough. Spitalfields derives its character from its past development as the centre for London's silk weaving, and the Old Spitalfields Market is an important building in the conservation area.

11.412. The overall architectural and historic interest of the conservation area is **high**.

11.413. AVRS 27-32 illustrate the views east looking from the north and south boundaries of the church yard towards 135 Bishopsgate. 135 terminates these views creating a large commercial structure seen in the medium distance. The site itself is not visible, given the alignment of the roads and lower profile of the station entrance onto Bishopsgate, making an overall neutral contribution.

Impact of proposals

11.414. As above, while the upper levels of the OSD will be distantly visible, however where seen these will appear as part of an existing built horizon line comprised of contemporary development. Officers consider this will not alter the existing contribution of these views to the conservation area's setting, with no impact upon significance. Given site is experienced as part of the larger scale development along Bishopsgate including no 135, in the approach towards it, officers disagree with the concerns raised by Tower Hamlets, finding no harm arising as a result of the proposals. Officers therefore disagree with the concerns raised by Tower Hamlets, finding no harm to significance arising as a result of the proposals. Officer's find the use of wirelines in the AVRS to be appropriate to understanding impact, noting Tower Hamlet's query on the matter.

Wentworth Street Conservation Area

11.415. As above, Tower Hamlets raised concerns regarding the impact to the Conservation Area, and the loss of skyspace, which they consider to reduce the 'relief' and overpower this 'transitional' approach into the conservation area, they however did not conclude an overall level of harm. This is addressed below.

11.416. This conservation area is located to the west of the site within the London Borough of Tower Hamlets. It encompasses a narrow band of townscape that extends from Middlesex Street in the west to Commercial Street in the east. It is a small conservation area that is architecturally and historically significant for its blocks of 19th century commercial development, with some newer office blocks between, as well as its historic street pattern. In views west at the junction of White's Row and Commercial Street (AVR 32) and west from Wentworth Street (AVR33) the site is not visible, screened from view by intervening development along Artillery Lane as well as Wentworth Street. In the latter tall buildings are seen centrally in the middle distance. The site therefore makes a neutral contribution.

11.417. The overall architectural and historic interest of the conservation area is **high**.

Impact of the proposals

11.418. As above, while the upper levels of the OSD will be distantly visible, where seen the proposals will appear as part of an existing built horizon line comprised of contemporary development. Officers consider this will not alter the existing contribution of these views to the conservation area's setting, with no impact upon significance. Given site is experienced as part of the larger scale development along Bishopsgate including no 135, in the approach towards it, officers disagree with the concerns raised by Tower Hamlets, finding no harm to significance arising as a result of the proposals. Officer's find the use of wirelines in the AVRS to be appropriate to understanding impact, noting Tower Hamlet's query on the matter.

Non-Designated Heritage Assets

Non-designated group at 117 Bishopsgate and 119-121 Bishopsgate

11.419. These buildings comprise the re-faced 117, a much altered stuccoed Georgian building in neoclassical style on a much earlier plot, with strong architectural and historic group value with the adjacent church and 119-121 Bishopsgate as rare surviving Georgian townscape of contrasting domestic scale beyond the original City walls. 119-121 Bishopsgate is a much altered 1829 re-build of 15th Century White Hart Inn with simple stuccoed classically proportioned Georgian exterior. Both buildings are of low local significance, noting their extensive alteration and extension.

11.420. They hold a moderate local significance in respect of each asset.

11.421. The setting of these buildings includes proximity to the church and church yard of St Botolph, which make a positive contribution through proximity to a historic and greened enclave to the south. The FEGH is located across the junction to the north, and this series of historic structures creates a group value and sense of a relatively well preserved historic streetscape. In the approach from the north and south the non-designated group is directly backdropped by the large roof extension of the Crosspoint at 34-37 Liverpool Street as well as 99 Bishopsgate respectively.

11.422. While the proposals will add to the extent to which the buildings are seen in the foreground of tall contemporary buildings, the existing condition is such that this change is not considered to diminish the current contribution of setting to these assets, noting that their proximity to the church and churchyard and FEGH will remain. The overall impact is therefore considered to be neutral.

152-154 Bishopsgate

11.423. This building comprises a well-detailed and ornate prominent corner plot with large Dutch gable in complementary style to the opposing FGEH and Bishopsgate Fire Station, to the east side of Bishopsgate. The buildings possesses a characterful façade, including polychromatic banding and areas of terracotta relief. It is of moderate to high local significance.

11.424. The building holds a moderate local significance.

11.425. The setting of the building to the building makes a positive contribution to an appreciation of its significance, seen as part of a group with the Fire-station and retained façade of 150 Bishopsgate. The FEGH is directly to the west, with its lengthy eastern façade facing onto this group and reinforcing the sense of a well preserved historic streetscape.

11.426. The position of the building to the south of the Bishopsgate Station entrance is such that while the proposals will create a substantial change in the immediate surroundings, the positive relationship between this non designated asset and those features within this setting noted above will remain the same, noting that the full appearance of the OSD will not be appreciable given the width of Bishopsgate and its set back behind the Andaz. The overall impact upon this non-designated heritage asset is therefore considered to be neutral.

11.427. The new connections between the retained Derbyshire roof with the proposed new concourse roof and supporting structure to the OSD will utilize steels to extend the form of the existing Derbyshire trusses, with the new trusses over the concourse following the angle and pitch of the Derbyshire trusses at their apex.

Other Heritage Assets

11.428. The definition of setting is the extent to which an asset is 'experienced,' which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is potentially within the setting of an enormous amount of heritage assets, and it would be impractical, and indeed disproportionate, to assess them all.

11.429. Officers have undertaken a scoping exercise to explore the intervisibility and quality of association/disassociation of the proposals with designated heritage assets in the surrounding locality, to discern the potential for impacts. This assessment is in accordance with the NPPF and is deemed proportionate, no more than is sufficient to understand the potential impact of the proposal on its significance.

11.430. Some assets were scoped in and these have been fully assessed above. In accordance with paragraph 201 of the NPPF a number of heritage assets were scoped out of further assessment, accounting for their significance and contribution of setting to that significance. This is because they either would have nil to very limited intervisibility with the proposals, with any perceptible visual change amount to a *de minimis* visual effect, or because there would be clear visual disassociation between the asset and the proposal, with the latter being, while visible, clearly belonging to background layers of modern city development – a presence that might be seen but crucially not *felt* as part of the experience of the significance or setting of that asset. In all cases it was, for these reasons, judged by officers that the proposals would have no potential impact. In some cases, these include assets which the GLA consider would be harmed by the proposals; but officers for the aforementioned reasons take a different, proportionate view.

11.431. The assets scoped out include: Lutyens House Grade II*, Salisbury House Grade II, Finsbury House Grade II, Park House and Garden House Grade II, Finsbury Circus Gardens Registered Park and Garden Grade II, Bishopsgate Institute and Library 6 Brushfield Street Grade II*, the Guild Church of St. Ethelburga's the Virgin Grade I, 162 and 164 Bishopsgate Grade II, 10-14 Brushfield Street Grade II, 1,3 and 5 Stone House Grade II, St Mary's Moorfields Grade II, Spitalfields Market Grade II, Liverpool Street London Underground Signal Box Grade II, Drinking Fountain and Shelter, North Side of Finsbury Circus Gardens Grade II, London Wall buildings, 25 Finsbury Circus Grade II, Business School of London Metropolitan University Grade II, Gateway to 21 New Street Grade II, 8 Bishopsgate Churchyard Grade II, 1 Finsbury Avenue Grade II, Flying Horse Public House Grade II, 52-68 Bishopsgate Grade II, London Wall – Section Bounding All Hallows Churchyard Scheduled Ancient Monument, London Wall – Remains of Roman and Medieval Wall from western end of All Hallows Church to 38 Camomile Street Scheduled Ancient Monument, London Wall – Remains of Roman Wall and Conduit and Medieval Postern, Bloomfield House to site of Moor Gate Scheduled Ancient Monument Sun Street Conservation Area, South Shoreditch Conservation Area, Elder Street Conservation Area, Creechurch Conservation Area and Bank Conservation Area.

Conclusion on Heritage

11.432. The proposals would be transformative in its impact to the station and surroundings, reflecting a new chapter within its complex, phased, history. While most of the assets affected are connected in some way to the history of the railway in the City, they reflect a spectrum of styles, uses, materials, scales and periods of construction. This has resulted in a wide range of impacts, commensurate to aggregate nature of the site and the nuanced, interrelated significances of the assets in question and reflective of the changed nature of several of their settings.

11.433. These impacts have been assessed in detail in this section above and are summarised below.

11.434. The proposals would preserve the significance and contribution of setting of all the aforementioned heritage assets except that of the following:

Direct and Indirect setting impacts on designated heritage assets on or near the application site:

- Liverpool Street Station (grade II), high level of less than substantial harm (direct impact)
- Former Great Eastern Hotel (Grade II*) – moderate level of less than substantial harm (indirect setting impact)
- Bishopsgate Conservation Area – moderate level of less than substantial harm (direct and indirect setting impact)
- St Botolph Bishopsgate – low level of less than substantial harm (indirect setting impact)
- St Botolph Church Hall – low level of less than substantial harm (indirect setting impact)

Skyline impacts on designated heritage assets further away

- St Paul's Cathedral (grade I) – low level of less than substantial harm (indirect setting impact)
- St Mary-le-Bow (grade I)– slight level of less than substantial harm (indirect setting impact)
- St Augustine Watling Street (grade I)– low level of less than substantial harm (indirect setting impact)
- Christchurch Spitalfields (grade I) – slight level of less than substantial harm (indirect setting impact)

11.435. Additionally, two non-designated heritage assets (NDHAs) would be removed by the proposals: 50 Liverpool Street and Hope Square and, a low level of harm has been found to arise with respect of Bishopsgate Churchyard (NDHA) through indirect effects on its setting.

11.436. As such, the proposal would result in conflict with Local Plan Policies CS12 (1 and 2), DM12.1 (1, 4), DM12.2 (1 and 2), DM12.3 (2), draft City Plan 2040 policies S11 (2), HE1 (1 and 6) and London Plan Policy HC1(C), and with the objectives set out in Section 16, 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.

11.437. The proposals comply with policies CS 12 (3-5) DM12.1 (2, 3 and 5) DM12.2 (3), DM12.3 (1), DM12.4 and DM12.5, Draft City Plan 2040 S11 (1,3-5), HE1 (2-5,7-9) and HE2, and London Plan Policy HC1 (A-B,D).

11.438. A range of heritage benefits have also been identified comprising:

11.439. Low level of benefit to Liverpool Street Station (Grade II), Former Great Eastern Hotel (Grade II*), The Great Eastern Railway War Memorial (Grade II), The London Society of East Anglians War Memorial (Grade II), and Kinder Transport Sculpture (NDHA).

11.440. The benefits and harms are considered as part of the paragraph 215 and 216 NPPF balancing exercise (and the balancing exercise contemplated by HE1(2) and (5)), and reflected in the final planning balance at the end of this report.

11.441. Objections on heritage impacts have been received from St Paul's Cathedral, CAAC, The Victorian Society, Twentieth Century Society, Georgian Society, SPAB, LAMAS, HB&P and many others. Historic England and the GLA have also raised concerns with regards to heritage impacts. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Strategic Views

11.442. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and CS14 emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. The Strategic Views referred to London Plan policies HC3 and HC4 are listed in Table 7.1 (pp. 293-4 of the London Plan). The Mayor's London View Management Framework (LVMF) SPG (the SPG) provides further guidance on the management of views designated in the London Plan. The City's Protected Views SPD gives further guidance on the implementation of policies relating to protected views.

11.443. A Built Heritage, Townscape and Visual Impact Assessment (HTVIA) has been prepared and submitted as part of the application documents. The views selection was informed by extensive testing. The split of view visualisation types (render, wireline, and computer-modelled representation) is based on the proximity and sensitivity of the views, to represent the impact of the proposed development. All of the viewpoints were agreed in consultation with officers. The split of assessment and appendix views, of verified and non-verified views, and of render, wireline and computer modelled representation, is based on the proximity and sensitivity of the views.

11.444. Consultee responses and objections have been received from the GLA, Historic England, St Pauls Cathedral, SAVE British Heritage, Victorian Society, Georgian Group, among others. The themes of these are referenced and discussed in detail below. Some of these criticise the quality and conclusions of the submitted application material, including the HTVIA. Officers however consider the submitted information sufficient and satisfactory in its presentation of the proposals.

London View Management Framework (LVMF) Impacts

11.445. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's identity and character at a strategic level.

11.446. The location of the proposal avoids the majority of designated Protected Vistas towards Strategically Important Landmarks (SILs), including St Paul's and the Tower of London (ToL). However, it would be visible from several assessment points, these are discussed below.

London Panoramas

11.447. Designated London Panoramas at View 1A (Alexandra Palace), View 2A.1 (Parliament Hill), View 4A.1 (Primrose Hill), View 5A.1 (Greenwich Park) and View 6A.1 (Blackheath Point) are all tested in the submission. In views from the north, the magnitude of change in these broad panoramas is considered negligible, with only small glimpses of the proposed development being visible, due to other built forms largely occluding the development, in both the existing and cumulative scenarios. Similarly, in views from the south the proposed development would be almost fully occluded by other development. From both northern and southern perspectives, where the development would be visible, it would be seen as a peripheral built element. In all viewing experiences, it would accord with the visual management guidance by fitting within the prevailing pattern of buildings, preserving their composition, and the viewers' ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral.

Linear Views:

9A. 1: King Henry VIII's Mound, Richmond to St Paul's Cathedral

11.448. This view (AVR2) has been tested in the submission since the rear of the trainshed would partially fall into the background wider setting consultation area of the view. However, owing to its orientation, the massing of the OSD would be set at some distance away from St Paul's Cathedral and the focus of the viewing corridor, within the foliage of the trees to the right hand side, which form the outer frame of the view. As such, the proposed development would have no effect on the view and would fully preserve its composition, and the viewers' ability to recognise and appreciate the Strategically Important Landmark - St Paul's Cathedral.

River Prospects

11.449. Officers have assessed the extent of visibility of the proposed development in LVMF river prospect viewing experiences, both at pre-application and application stages. As demonstrated within the zone of theoretical visibility, owing to the location of the site to the north west of the City, in the majority of river prospect views, including those which take in the Tower of London, the proposed development would be fully occluded by built development. In views from the west, the development proposal would be more visible; these viewing experiences are considered below.

Views 15B 1&2: Waterloo Bridge

- 11.450. This viewing experience comprises two assessment points, 15B.1 and 15B.2 and encompasses the kinetic experience in between. It is an iconic London view with important views east towards St Paul's Cathedral and the City of London. St Paul's Cathedral is identified as the SIL.
- 11.451. AVR views 9 – 13 (day) and 73 - 75 (night), moving north to south, take in the kinetic sequence of the bridge between the two viewpoints, and in wireline identify that the massing of the proposal would fall behind the Cathedral, in the background of the Cathedral's Western front, reaching alignment in height with the plinth of the colonnade to the western towers, made up from elements of the OSD's uppermost floors. These views illustrate the extensive screening provided by the mature trees which line the Embankment. However, in AVR 10, while slight, the uppermost massing of the development would still come into view above the tree line, and be visible behind the apex of the Western transept pediment and the prominent statue of St Pauls which sits atop it, filling in what is currently clear sky around the pediment and base of the statue. This additional massing, all be it slight, would erode the viewer's ability to appreciate some of the most highly significant features and elements of the Cathedral's architecture, through a loss of the definition and silhouette of these features in the skyline.
- 11.452. Furthermore, while officers note that the trees the foreground of the sequence provide screening and are an established component of the LVMF views, as identified by representations made by the GLA, City of London officers do not consider this screening sufficient to mitigate the potential harm to the significance and setting of St Paul's Cathedral of proposed developments within its backdrop, in agreement with representations made by St Pauls Cathedral. Officers consider that trees, as living organisms that have finite lifespans, and change in their form and appearance over time, and that are also subject to management through pollarding and pruning, should not be used to conceal potential impacts on the Cathedral, which should inevitably outlive them.

- 11.453. In this instance, officers have undertaken further impact analysis through the use of 3D modelling software (Vucity), to gain more definitive clarity on the extent the proposed massing would encroach into the clear sky backdrop of St Pauls from these LVMF locations. The 3D digital model studies, conducted by officers, in baseline and cumulative scenarios, confirm that at LVMF location 15B.1 the proposed massing would fill in the clear sky gap between the north western tower and western pediment, aligning in height with the top of the clock face, and also wrap around and behind the northern tower at a similar height, though due to the stepped massing, on this northern edge it would recede in views. Moving further south, towards 15B.2, within the kinetic sequence, approx. between AVR views 9-11, the massing would recede but still be visible in the sky gap behind the pediment, aligning with the drum of the Cathedral, which would still backdrop the statue of St Pauls on top of the pediment.
- 11.454. The extent of encroachment into these views, and the kinetic viewing experience at the northern end of the bridge, with trees removed, demonstrates that a significant proportion of the silhouette of the Cathedral's Western front (and entrance), between the drum, pediment and north western tower, would be lost as a result of the development. Therefore, while the Cathedral's dome would still remain recognisable and appreciable in this view, the intact nature of the composition of the western front would be diminished as a result of proposals and as concluded elsewhere, this is considered harmful to the significance of the Grade I heritage asset.
- 11.455. The nighttime views provided for moments along this sequence do not show any change to the composition of this view, and as above would be heavily screened by trees. Though, in lower light conditions officers consider that illumination from the proposed development would likely be apparent through them, as demonstrated in AVR73, where the illumination of the Cathedral's drum and peristyle are read through the tree cover. In order to demonstrate that illumination generated from the proposed development would not impact this viewing experience at night, a condition for updated dusk through to darkness/nighttime AVR3 photography will be applied, to ensure that light pollution from the roof garden, and OSD development, will indeed not alter the composition of the views.
- 11.456. In this instance, officers conclude that the proposed development would result in some conflict with the visual management guidance at paras 267 and 57 of the SPG, given that new built form would be added behind the Cathedral, which would diminish the viewer's ability to recognise and appreciate elements of the Strategically Important Landmark, and harm key elements of the views character and composition.

View 16B.1 & 2: Gabriel Wharf, South Bank

11.457. The view comprises two Assessment Points located close together on the viewing platform both orientated towards St Pauls Cathedral. The Cathedral is identified as the Strategically Important Landmark (SIL).

11.458. In both baseline and cumulative scenarios, AVR 19 and view A23 demonstrate that the proposed development, and its low laying profile, would come into view to the east, and at some distance from of St Pauls, in-between Faraday House and Angel court. The location and form of the proposed development would not disrupt, dominate or encroach into views of the Cathedral. In accordance with paragraphs 280-283 of the SPG. In both cumulative and baseline scenarios, the proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks identified in the view.

11.459. *View 17B.1 and 17B.2: Golden Jubilee/Hungerford Footbridges*

11.460. LVMF view 17B.1 and 17 B.2 is a kinetic viewing experience between the two Assessment Points from the Golden Jubilee / Hungerford Footbridges looking downstream with St Paul's the Strategically Important Landmark the centrepiece of the view. The LVMF guidance identifies the setting of St Paul's Cathedral within the view as the singular most important structure which should be preserved or enhanced. Paragraph 302 of the guidance states "New development should strengthen the composition of the existing clusters of tall buildings".

11.461. AVR views 3-5, and night view 72, in baseline and cumulative scenarios demonstrate how the Proposed Development would appear in the background of the view, where the upper glazed floors would rise above the skyline and occupy a band of clear sky between Unilever House and the Farraday building. The height of the proposed massing would approximately align with the top of Unilever House and the drum of the Cathedral, and be taller than other existing buildings which occupy this space in the baseline photography. Its position and mass would therefore add a taller horizontal element to the skyline between the Cathedral and the lower stages of the Eastern Cluster. Occupying this position, the proposed development is considered to slightly blur the north eastern boundary of the Eastern Cluster and draw it marginally closer to the Cathedral, rather than strengthen its composition. It should also be noted that while the final specification and colour of the development's glass is to be reserved for condition the pale grey tones of the facades depicted in the AVRs would have, in of themselves, an appropriate presence. In this instance, while the proposals would not impact on the viewer's ability to recognise and appreciate St Pauls, the Strategically Important Landmark, officers conclude that the proposed development would result in a minor degree of conflict with the visual management guidance at para. 302.

Summary of LVMF Impacts:

11.462. In the majority of LVMF views where the proposal would be visible, given the minor glimpsed nature of these viewing experiences, the proposal would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks.

11.463. However, from views along Waterloo Bridge, LVMF 15B 1 & 2, the proposed massing would impact St Paul's Cathedral as the SIL, due to its encroachment into the clear sky space behind the Western Towers, western pediment and statuary of St Pauls; it would also slightly reduce the perceived dominance of the Cathedral in LVMF 17B.1 and 2 by raising the level of modern development nearby. As such, the development would conflict with London Plan Policy HC4, Local Plan Policy CS13(1), emerging City Plan Policy 2040 S13, and guidance contained in the LVMF SPG.

11.464. Lighting will be detailed by condition and managed to ensure the development would not command the focus within these views or distract unduly from other elements of their composition, but be visually compatible with them after dark.

City of London Strategic Views:

11.465. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new built development.

St Pauls Cathedral

11.466. The proposal is not located within the St Paul's Heights grid, would not be visible and would be out of scope of many of the Viewing Points identified in the Protected Views SPD (fig. 3), as demonstrated by the submitted zone of theoretical visibility, cast at a 6km radius.

11.467. As identified above, the proposed development would be visible to varying degrees in the kinetic riparian sequences along the South Bank and from the Thames bridges, where its impact would be as described in the sections above on Waterloo Bridge, Gabriel's Wharf and Hungerford Bridge.

11.468. In addition to the LVMF guidance, the City of London SPD makes specific commentary on the need to maintain the clear sky backdrop of the Cathedral (paragraphs 2.19 and 2.20). As demonstrated in AVR view 10, while only a moderate volume of the proposed massing would be visible above the tree line, it would nevertheless impair the outline of the Western Towers, the western pediment and Statue of St Paul, intruding into their backdrop of clear sky, and worsen the view.

11.469. Furthermore, in views further west from the bridges, the SPD makes specific reference to the existing presence of a *"clear gap on the skyline between the Cathedral and the cluster, which it is important to retain...This is important to the visual relationship between the Cathedral and the cluster, and so should be maintained."* In the case of AVRs 3-5 as argued above, this clear gap would be lost, blurring the boundary of the cluster, and drawing larger glassy built forms into the sky gap and closer to the Cathedral, which the policy seeks to maintain (paragraph 2.20). While noting that the overall loss of clear sky gap is relatively minor, it still does change the composition of this important view, and one of its defining characteristics, detracting from it, contrary to policy.

The Monument

- 11.470. The proposal site is outside the spatially defined views from the Monument which are protected under Local Plan policy. The proposal would be completely obscured in views from the north of the Monument viewing gallery; it would not be in the Monument's 'Immediate Setting' and would not therefore harm or obstruct important views from afar or locally.

Historic City Landmarks and Skyline features:

- 11.471. The proposal would have the potential to affect views of historic City Landmarks and Skyline Features, which have a presence on the wider skyline, and which in accordance with CS13, should be protected and enhanced. These are addressed individually below:

St Mary Le Bow:

- 11.472. AVR15 (southern end of Waterloo Bridge, above the Lambeth bank) and 16 (National Theatre) reveal impact to St Mary Le Bow, where the upper stages of the Spire, currently seen against sky would be backdropped by the development eroding its clear sky backdrop and ability to appreciate its silhouette against the sky. Similarly, though to a lesser extent AVR 19 (LVMF 16b.1) also shows how the clarity of the shoulder of the spire's plinth/base would be eroded as a result of the proposals. While the intervisibility is limited in AVR19, with only a minor portion of the proposed roofscape of the proposed development adding to the backdrop of darker-toned buildings within the background of the spire, across all of these views, it would still result in a negative change to the silhouette. While relatively minor in their respective instances, when taken cumulatively, from these prominent viewing locations, it is clear that the proposal would add additional built form within the clear sky space behind the spire, which would erode the skyline presence and result in its diminishment as a feature of the City's skyline, and also the setting and significance of the Grade I Listed Wren Church which also holds group value with Wrens other City Churches which contribute to the skyline.

St Augustine Watling:

11.473. AVRs 4, 5 and 14 show how the proposed development would fill in the clear sky around the remaining spire of St Augustine Watling. Owing to its spires' darker tone and finer profile, against the scale and tone of the proposed development, would mean its silhouette and skyline presence would be lost from these views, and its contribution as a feature in the City's skyline from these locations, significantly diminished. As above, the setting and significance of this Grade I Listed Wren Church would also be negatively impacted, and more so given it holds group value with Wren's other City Churches.

St Botolph without Bishopsgate:

11.474. St Botolph without Bishopsgate, while surrounded by taller buildings, still retains moments of presence against clear sky, reinforcing the architectural ambition of its tower as an important feature within the local townscape. AVR 48 is one such view that in the existing condition, preserves the uppermost stages of the spire against sky, which would be lost as a result of the proposals.

11.475. Officers note that the current skyline presence of the church tower is now constrained to closer range viewing experiences, and that owing to the distance between the OSD and the tower, its presence in the local skyline would be predominantly retained.

Christ Church Spitalfields:

11.476. AVR 25 from St Pauls Golden Gallery shows that the proposed development would result in the complete occlusion of the spire of Christchurch Spitalfields from this viewing location. However, in all other ground level viewing locations, the skyline presence would be preserved. As set out above, officers consider that while there would be a harmful impact in the viewing experience from the Golden Gallery.

Neighbouring Borough Views

11.477. London Boroughs of Camden, Islington, Hackney, Kensington and Chelsea, Tower Hamlets, Lambeth, Southwark, Richmond, Wandsworth and Westminster were all consulted and have made no comment in relation to strategic views.

11.478. The proposal's appearance and impact on views from neighbouring boroughs has been considered, and assessment on the proposals impact in views of heritage assets is detailed within the relevant section of this report.

Conclusion on Strategic Views:

11.479. There would be some diminishment of the primacy of St Paul's Cathedral as the Strategically Important Landmark in LVMF River Prospects 15 B.1 and 15 B.2 and LVMF 17 B.1 and 17B.2, contrary to London Plan Policy HC4 (A), LVMF SPG and City of London Protected Views SPD.

11.480. The proposals would draw some conflict with City of London Local Plan policy CS13 (1 and 2), and emerging City Plan Policy S13 (1 and 2), in that it draws some conflict with LVMF River Prospect views, adversely affecting views of St Paul's Cathedral from Waterloo Bridge and Hungerford Bridge, in addition to the viewing experiences of St Mary Le Bow and St Augustine Watling when seen from riparian viewpoints, and to a lesser extent Christ Church Spitalfields when seen from the Cathedral's Golden Gallery.

11.481. The proposal would preserve the composition and characteristics neighbouring borough views.

Principle of a Tall Building

11.482. At a maximum height of 97.69m AOD, the proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12(1), >75m AOD) and London Plan D9 (A).

11.483. This section considers the question of the suitability of a tall building for this site against London Plan policy D9, Local Plan policy CS 14 and draft City Plan policy S12.

11.484. As mentioned in preceding sections of this report, the application site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant economic activity, in line with London Plan Policy SD4. It would be in a very highly accessible (and therefore sustainable) location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel.

- 11.485. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent Eastern Cluster (CS7 and CS14 (1)), an approach carried forward in the draft City Plan 2040 (as the 'City Cluster', 'Fleet Valley' and 'Broadgate' tall building areas; policies S12 (2) and S21).
- 11.486. The application site is not located within the 'Eastern Cluster' policy area in the adopted Local Plan (CS7, fig G). The application site is not located within any of the Tall Buildings Areas identified in the draft City Plan 2040.
- 11.487. London Plan policy D9 B (3) stipulates that tall buildings should only be developed in locations that are identified as suitable in Development Plans. While seeking in an overarching sense to cluster tall buildings within the Eastern Cluster, the City's adopted Local Plan defines 'inappropriate areas' in which tall building proposals would be inappropriate in principle and should therefore be refused (CS14 (2), fig. N). These areas include conservation areas, the St Paul's Heights Policy Area, St Paul's protected vista viewing corridors and Monument views and setting.
- 11.488. A small portion of the application site lies within the Bishopsgate Conservation Area: that part encompassing Hope Square, 50 Liverpool Street and the Station entrance to Liverpool Street. On this part of the site the proposals would rise to 90.785m AOD and so would be a tall building. As such, the proposals would partly fall within an area identified as inappropriate for tall buildings and conflict with CS14 (2) and London Plan D9 B (3).
- 11.489. Under the provisions of the 2015 Local Plan, where a site lies both outside the Cluster and these 'inappropriate areas', as does the majority of the application site, then the proposal would trigger policy CS14 (3), under which tall buildings would be permitted elsewhere in the City only on those sites which are considered suitable in relation to skyline, amenity, and heritage impacts. With reference to this policy, most of the application site lies outside these inappropriate areas and therefore a tall building here could be acceptable subject to consideration of the criteria in CS14 (3). These impacts are assessed in detail below.

11.490. The emerging City Plan 2040 specifies, in accordance with London Plan D9, areas where tall buildings would be appropriate in principle. As mentioned above, the 2040 Plan identifies such areas in the existing City Cluster, the new proposed Cluster at Holborn and Fleet Valley and the new Tall Building Site at Broadgate. The application site is not within any of these areas so may be considered inappropriate in principle for a tall building in respect of the 2040 Plan. While the City Plan 2040 is yet to be adopted and is currently the subject of consultation on the Main Modifications suggested by the Planning Inspectorate, these modifications do not relate to the subject site and its consideration as being suitable for a tall building. The weight afforded these emerging policies is summarised in the policy context of this report.

11.491. Notwithstanding this, in *R (OAO LB of Hillingdon) v. Mayor of London* [2021] EWHC 3387 (Admin) the High Court held that London Plan policy D9 B was not a pre-condition or 'gateway' to the application of the criteria in D9 C, a qualitative assessment of the impact of a proposed tall building. In other words, even where a proposed tall building falls outside an area identified as suitable in a Development Plan under part B, the impacts of the proposed tall building as set out in part C should still be considered. An assessment against London Plan Policy D9 (C) and (D) is made below, with reference where relevant to other sections of this report for more detail.

Tall Building – Impacts

11.492. This section assesses the proposals against the requirements of policy D9 C (Impacts 1-3) and D (Public access) of the London Plan, CS14 (3) of the 2015 Local Plan and S12 (8), (9) and (10) of the draft City Plan 2040 (these policies broadly sharing the same objective). Further assessment of the architectural approach and design details follow on below.

Visual impacts:

11.493. The overall height and form of the proposals have been amended following extensive pre-app discussions to achieve an appropriate relationship with the London skyline, historic skyline features, local views and the significance of strategic heritage assets. Careful attention has been paid to the height and massing of the southern and north-east corners in order to respond to sensitive views of St Paul's Cathedral and the Former Great Eastern Hotel in particular.

11.494. The application site is located to the north-east of the City. It sits at the southern end of the Liverpool Street & Broadgate Character Area, delineated in the Topic Paper in the City Plan 2040 Evidence Base, and within that Plan's Liverpool Street Key Area of Change. The defining character is of a major inner-city transport interchange which has acted as a catalyst for large-scale commercial development (Broadgate) on its edges.

11.495. The general scale of the area is between six and 20 storeys in height; the office blocks of the Broadgate complex surround the application site and are of this mid-high rise character, forming a prominent backdrop to the application site in westerly and northerly views. The application site itself is of a lower scale corresponding with the low-rise buildings of the Liverpool Street Arcade and others immediately to the south. Immediately to the south, too, is the much greater scale of the City Cluster, very prominent in easterly and southerly views of the application site.

11.496. A number of tall buildings are located close to the application site, as follows;

- Heron Plaza (south, 158m AOD)
- Heron Tower (south, 230m AOD)
- Broadgate Tower (north, 178.4m AOD)
- 2-3 Finsbury Avenue (north, under construction, 170.29m AOD)

In the cumulative scenario, there would be in addition:

- 55 Old Broad Street (south, 103.15m AOD)
- 99 Bishopsgate (south, 253.5m AOD)

11.497. Finally, the Broadgate Tall Building Site in the draft City Plan 2040 would be located to the north of the application site, immediately west of the Broadgate Tower, and would provide for a potential tall building of up to 160m AOD.

11.498. In this way, whilst itself currently of a low-rise character, the application site is framed by tall buildings to the north and particularly to the south, and to the east and to the west by substantive midrise buildings on big plots. Whilst the proposals would greatly increase the scale of the application site itself, the proposals' height and massing would not appear atypical in this immediate and wider context.

- 11.499. The proposals would also be sufficient distinct from the City Cluster, and would not appear to draw it, as an urban form and composition, further to the north. This because, considered as a tall building typology, the proposals would not read as typical of or belonging to the Cluster. The broadness and lateral quality of its large, L-shaped plan are utterly unlike other Cluster towers, which achieve significant heights from smaller footprints; the proposal would instead rise to a comparatively modest height from a much larger footprint. In this, it would be more akin to the buildings of Broadgate which frame it to the east and west.
- 11.500. The proposals would be lower than those Cluster towers nearest to it, and higher than those Broadgate buildings nearest to it; in height and massing, the proposals would combine qualities found in both, and stand sufficiently distinct from either to read as a singular act of densification situated, appropriately enough, above a singularly busy, major inner-city transport interchange.
- 11.501. Of the long range views, D9 C (1; a; i), these have been tested in the HTVIA. Some of the comments received from statutory consultees, including Historic England and the Victorian Society relate to these views, the impacts of which are discussed throughout the report and in detail in the Strategic View and Heritage sections of the report.
- 11.502. The application site is not crossed by any landmark viewing corridors or other geometrically defined constraints; the height of the proposals is not sufficient to be readily apparent in the more distant long-range or panoramic views from the edges of London. The height of the proposals would instead be more apparent from long-range views from the South Bank and river crossings including Waterloo and Hungerford Bridges.
- 11.503. While visible, the proposals would integrate comfortably into the skyline, and would not be readily apparent in and so would preserve the characteristics and composition of all relevant LVMF Panoramas and Linear Views, and the presence of St Paul's Cathedral as Strategically Important Landmark in these. Because of their relatively modest height the proposals would have only a limited presence on the City skyline when viewed from the South Bank and bridges.

- 11.504. However, from certain locations, the proposals would be comparatively prominent. As set out in more detail below, the proposals would, from some of the LVMF positions on Waterloo Bridge, be seen behind western front of St Paul's Cathedral, which is currently seen against clear sky, and would resultingly undermine the clarity of its silhouette and an appreciation of this important architectural composition. While there would partial mitigation through screening by the trees on the Victoria Embankment in the foreground, this would not be enough to avert a harmful impact on the Cathedral in this viewing experience.
- 11.505. From Hungerford Bridge, the proposal would be at its most visible on the skyline, and would appear prominently to the east of the Cathedral. Whilst it would not interact with the Cathedral's silhouette directly, it would consume presently free sky space nearby, concurrently raise the modern skyline height and, resultingly, slightly affect the Cathedral's intended dominance of the skyline. This would be a slighter impact than that perceived from Waterloo Bridge, but an impact nonetheless.
- 11.506. There would also be instances where the proposals would appear behind the spires of St Mary Le Bow and St Augustine Old Change, causing slight/low degrees of harm, and would obscure the view of Christchurch Spitalfields from the Cathedral's Golden Gallery.
- 11.507. In the baseline and cumulative scenarios, while the articulated skyline profile of the proposals would appear an attractive addition to the skyline where most apparent, in the Hungerford Bridge views, it would adversely affect the aforementioned strategic riparian views through the impacts described above. As such, in relation to long range views, the development would not comply with Policy D9 C (1 a; i).
- 11.508. In relation to mid-range views, and consideration of London Plan D9 C (1; a; ii), the impacts are demonstrated in the HTVIA. Some of the comments from statutory consultees, including Historic England and the Victorian Society, relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.
- 11.509. In longer approaches to the site, for instance from Spitalfields, Bishopsgate or London Wall, where there is a clear line of sight to the proposals, they would appear as a carefully proportioned, crystalline mass seen amongst other modern buildings of broadly comparable scale and modern architectural treatment. In some instances, the tight grain of the street pattern and intervening buildings – this, of course, being a densely urbanised location – mean that the proposals are more glimpsed than prominent.

- 11.510. Compared to the other buildings in these views, the form and proportions of the building would be unusual, with its crystalline, rippling OSD distinct from the more conventional treatments of the Broadgate buildings and the very different identities of the Cluster buildings to the south; the great terraced south corners at its upper levels would be distinct and distinguishable features to aid orientation. Whilst it would not be labelled as the OSD to Liverpool Street Station, it would be distinct enough in its form and treatment as to aid legibility.
- 11.511. As such, the proposals are considered to make a positive contribution to the local townscape in terms of legibility, proportions and materiality and to comply with D9 C (1; a; ii).
- 11.512. In relation to immediate views (D9 C (1; a; iii)), a number of views in the HTVIA demonstrate the potential impacts. The proposals would have a commanding, transformational presence when viewed at close range. The new station entrances would have a greater prominence to the streets, entirely appropriate in view of their function as portals to this very busy mainline railway interchange. Though of a dramatic scale, this is considered necessary in order to achieve their essential prominence to the street and function as legible orientation points; they would be of an appropriate scale for this reason, and also in view of the vast footfall they will handle; they would unquestionably maintain and even boost the vitality of Bishopsgate and Liverpool Street.
- 11.513. The proposals would be adjacent to buildings of significantly lower height – the Former Great Eastern Hotel to the south and the historic buildings across Bishopsgate to the east. The amenity and privacy of this surrounding context would not be unduly or excessively by the proposals, as detailed in the relevant sections of this report. As such, in relation to immediate views the proposals would comply with D9 C (1; a; iii).
- 11.514. In relation to D9 C (1; b) the proposal would reinforce the spatial hierarchy of the local and wider context by amplifying the presence of Liverpool Street Station, a critical transport hub, and being of a singular scale which would belong neither to the Cluster or the Broadgate complex, but which would instead be singular and, consequently, help to single out the presence of the station in the surrounding townscape. As discussed above, the terraced upper corners of the OSD and the bold new brickwork entrances would be recognisable features that would aid legibility and wayfinding. As such, the development would comply with D9 C (1; b).

11.515. In relation to D9 C (1; c), the architectural quality of the proposal would be exemplary and would be maintained throughout its life span. The proposal would bring together an extraordinary fusion of styles: the striking neo-Gothic station entrances and interiors and subtly rippling, crystalline OSD. The proposals would have a playful and complex geometry throughout, resolving and responding to the site's hard constraints (railway tunnels, platforms, St Paul's Cathedral silhouette and soft constraints (views of heritage assets, townscape considerations and other factors). In the new station entrances and Hope Square there would be moments of extraordinary civic grandeur announcing and befitting to the transformed station within. Overall, the architecture is well-considered in the round, and of a high quality, which would be visually distinctive and an attractive addition to the skyline in of itself, and is considered to comply with D9 C (1; c).

11.516. In relation to D9 C (1; d), a full assessment of impact on heritage assets is set out in the Heritage section of the report. Officers have identified the following impacts to designated heritage assets:

Direct and Indirect setting impacts on or near the application site

- Liverpool Street Station (grade II) – high level of less than substantial harm (direct impact)
- Former Great Eastern Hotel (grade II*) – moderate level of less than substantial harm (indirect setting impact)
- Bishopsgate Conservation Area – moderate level of less than substantial harm (direct and indirect setting impact)
- St Botolph Bishopsgate – low level of less than substantial harm (indirect setting impact)
- St Botolph Church Hall – low level of less than substantial harm (indirect setting impact)

Skyline impacts on heritage assets further away

- St Paul's Cathedral (grade I) – low level of less than substantial harm (indirect setting impact)
- St Mary-le-Bow (grade I) – slight level of less than substantial harm (indirect setting impact)
- St Augustine (grade I) – low level of less than substantial harm (indirect setting impact)
- Christchurch Spitalfields (grade I) – slight level of less than substantial harm (indirect setting impact)

11.517. Additionally, two non-designated heritage assets (NDHAs) would be removed by the proposals: 50 Liverpool Street and Hope Square and one, the churchyard of St Botolph Bishopsgate, harmed.

11.518. The application site is highly constrained physically; the proliferation of heritage assets on and around it extensive; the vision and objectives of the proposals ambitious. As set out in previous sections of this report, there is clear and convincing justification for the harm caused. The optioneering exercise demonstrates how a number of alternative locations and forms for the OSD and station entrances were considered that might achieve the objectives whilst minimising harmful impacts; over the course of the pre-application process, the proposals were significantly modified to take account of heritage assets, both through adjustments to the overall scale, height or bulk and more architectural amendments.

11.519. To give one example, through the optioneering process, it became apparent that the optimal place to position the OSD was across the existing concourse and Hope Square. This was most workable from the point of view of the tunnels and other physical constraints of the site, and for that reason most buildable, too; it also entailed the demolition only of comparatively less sensitive C20 station fabric (though, of course, possessing special interest, and so with harm arising through its loss).

11.520. As set out in the detailed assessment below, the proposals would reconcile the twin demands of delivering a bold, transformational scheme for the station whilst avoiding or minimising harm to relevant heritage assets by putting them at the heart of the design approach. In particular, the architectural language of the trainsheds has fundamentally influenced the spatial and aesthetic approach to the new station interior while, more abstractly, the modelling of the bays of the long elevations of the Former Great Eastern Hotel inspired the treatment of the rippling mass of the OSD.

11.521. The proposals should rightly be viewed as being driven, ultimately, by kindred civic ambition as drove the creation of the original station in the first place, and its subsequent enlargement and remodelling; all these phases of work involved similar trade-offs between impacts and benefits. The proposals would deliver significant improvements to the capacity, legibility and accessibility of this very busy mainline terminus and interchange, to the benefit not only of the City but also London; they would deliver other benefits, too, including the unprecedentedly large public roof garden and a notable contribution to the City's office floorspace targets. The proposals would have clear public benefits which would outweigh their harmful impacts and, notwithstanding these, as set out in the architecture section above, the proposals would positively contribute to the character of the area in a range of ways.

- 11.522. In line with NPPF 216, officers have had regard to the scale of the harm caused and the significance of the non-designated heritage assets and have reached a balanced judgement that this harm would not be of the order of magnitude to make the proposals unacceptable, particularly when considering the benefits arising from the proposals as part of the overall planning balance.
- 11.523. Though the proposals would cause harm to heritage assets, this harm is considered minimised, through high quality design and the exploration of alternatives, and clearly and convincingly justified; clear public benefits flow from the development to outweigh the harmful impacts. As such, the proposal is considered to comply with D9 C (1; d).
- 11.524. In respect of D9 C (1; e) the proposal would not be visible in relation to the Tower of London WHS as demonstrated by HTVIA. As such, there would be no potential to affect the Outstanding Universal Value of the Tower of London World Heritage Site, or the ability to appreciate it. The development would comply with D9 C (1; e).
- 11.525. In respect of D9 C (1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area as such, it would preserve the open quality and views of/along the River, avoiding a 'canyon effect' when seen in association with the London Bridge Cluster, in accordance with D9 C (1; f).
- 11.526. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered to be minor adverse but the effects are not significant as discussed in the relevant section of this report. Further details would be requested as a S106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if considered necessary). The proposed development would comply with Policy D9 C (1; g) of the London Plan.

11.527. In accordance with D9 C (1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via condition which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. The development would comply with Local Plan policy D9 C (1; h).

Functional Impact

11.528. Through the pre-application process and consultation, the internal and external design, including construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants, these issues have been covered in more detail in the architecture and accessibility and inclusivity section of this report and are considered to be in accordance with London Plan policy D9 C (2;a).

11.529. The proposed servicing strategy would accommodate the servicing needs of the station retail and enhanced station as well as the OSD from the existing NR service yard. This ensures that delivery and servicing traffic is separated from pedestrians and other activities on Liverpool Street and Bishopsgate. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b). Further details in respect of the servicing approach are set out in the Transportation section of this report.

11.530. The proposals are designed to improve passenger flow, reduce congestion within the station, and enhance multimodal connectivity by integrating pedestrian, cycling, and public transport access, thereby ensuring a seamless travel experience for thousands of daily users. As such, it is in accordance with D9 C (2; c).

- 11.531. As discussed in the transport section of this report, the proposals include targeted enhancements to the surrounding transport infrastructure, improving safety, accessibility, and overall efficiency of movement for all users. By prioritising sustainable transport options and strengthening connections with bus and rail services, the development aligns with broader city transport strategies and policies that encourage walking, cycling, and public transport use, in accordance with D9 C (2;d).
- 11.532. In particular, the provision of the office floor space, the flexible uses including retail and food and beverage would promote the creation of jobs, services, facilities and economic activity and will act as a catalyst for future growth and change in the locale in accordance with D9 C (2;e).
- 11.533. No adverse effects have been identified on the operation of London's aviation navigation and the proposals also have been found to avoid significant detrimental effect on solar energy generation on adjoining buildings and thereby comply with D9 C (2;f).
- 11.534. Overall, it is considered that the proposals would meet the functional considerations of Policy D9 C (2).

Environmental Impact

- 11.535. In regard to D9 C (3; a), the proposals have been found to provide safe and satisfactory levels of wind, daylight and sunlight and temperature conditions would not compromise the comfort and enjoyment of the public realm at ground floor level around the building, and on the public and private external spaces across the building. In regard to (D9 3b-c), the design has given consideration for how the proposals can assist with the dispersal of air pollutants and which will not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses, preserving the comfort and enjoyment of surrounding open space. Thermal comfort, pollutants dispersal and solar glare are analysed in detail elsewhere in the report.
- 11.536. It is considered that the proposal would meet the environmental consideration of Policy D9 (C;3).

Public Access

11.537. The proposal would provide an extraordinary new public roof garden of unprecedented scope and extent. It would provide fine new views of the station train sheds and fine new prospects of St Paul's Cathedral. It would be thoughtfully landscaped and would include a display of relocated historical features from the previous station buildings and spaces on the site. It would be well provided with lifts and requisite waiting areas at ground floor level, which would be spacious and clearly legible. It would be of the highest standards of accessibility. It would be a singular new addition to the City's array of elevated public spaces.

11.538. As such, the proposal would fully accord with D9 (D).

Tall Building, Principle, Conclusion

11.539. A small part of the application site is within the Bishopsgate Conservation Area, an area identified as inappropriate for tall building development in Local Plan policy CS14 (2). As such, the proposals would conflict with that policy, and consequently with D9 B (3). Further, the proposal would cause harm to the Bishopsgate Conservation Area although, as set out above, the proposal has clear and convincing justification, alternatives have been explored, and there are clear public benefits which outweigh the harm. This would mean compliance with D9 C (d), but conflict with draft City Plan S12 8 (c).

11.540. The majority of the application site is located outside the Conservation Area and, in its entirety, falls outside the Eastern/City Cluster delineated in the 2015 Local Plan as suitable for tall building development. It is also outside the Tall Building Areas in the draft City plan 2040. While this could also represent conflict with D9 B (3), it is also noted that policy CS14 (3) allows for consideration of the suitability of other sites for tall buildings outside the Cluster, having regard to skyline, character and amenity and heritage impacts.

11.541. These have been assessed above in the sections on D9 C and D. As set out above, the proposals would comply with all parts of D9 C and D except for part C1 (a) (i) in relation to long-range views, as a result of its impacts upon the skyline silhouettes of St Paul's Cathedral, St Augustine, St Mary-Le-Bow and Christchurch Spitalfields.

11.542. While not particularly conspicuous, these impacts would still lead to adverse effects on the viewing experiences in question and lead to non-compliance with C1 (a) (i) and with draft City Plan policies 8 (a) and 10 (b) on the same theme. The proposal would not otherwise have a particularly prominent skyline presence, being frequently masked by intervening development, but it would have an elegant and refined skyline presence in the limited instances where it is particularly visible (Hungerford Bridge).

11.543. In sum, the proposal would have both adverse and beneficial effects on the skyline as a whole; it would also lead to the heritage impacts detailed above; but it would have largely beneficial effects on the character and amenity of its surroundings. This question of the overall suitability of the site for a tall building, as borne out by the tests in Local Plan policy CS14 (3) – and hence D9 B (3) – is a considerably nuanced one, and these policy conflicts and compliance will be considered as part of the overall planning balance at the end of this report.

12. Archaeology

12.1. Policy DM12.4 of the Local Plan 2015 and policy HE2 of the Emerging City Plan 2040 outline the requirements with regards archaeology, outlining that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.

12.2. Section 16 of the NPPF and Policy HC21 of the London Plan recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. Paragraph 207 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.

12.3. 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 states 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.

- 12.4. Archaeological details have been submitted under Environmental Statement (ES) Chapter 7: Archaeology, and Appendix 7-1: Archaeological Desk Based Assessment, prepared by AECOM, dated March 2025. The reports highlight that the proposed development is located in an area of high archaeological interest.
- 12.5. The study area for the assessment is defined as an 80m buffer surrounding the Site and has been used to identify designated and non-designated assets, their setting and geographical extents, and to inform the context for and potential survival of archaeological remains. The 80m study area was agreed in consultation with the GLAAS Archaeological Advisor for the City of London on 22/10/2024 at the Pre-Application stage.
- 12.6. 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.
- 12.7. An assessment of the impacts relating to the demolition and construction of the Proposed Development upon below ground designated and non-designated heritage assets is included within this ES chapter. Potential impacts arising from the Demolition and Construction Phase of the Proposed Development include:
- The presence and movement of construction plant and equipment which has the potential to impact upon the setting of heritage assets;
 - The siting of construction activities within working areas, including associated construction noise and lighting, which have the potential to impact on the setting of heritage assets;
 - The use of traffic management and increased volumes of traffic on the local road network, which may impact on the setting of heritage assets; and
 - The potential to encounter, disturb or truncate to the depth of construction, previously unrecorded buried archaeological and palaeo-environmental remains.

- 12.8. The ES chapter concludes that there are 'Minor Adverse' residual effects on seven archaeological assets dating to the Roman and medieval periods. A further three 'Minor Adverse' residual effects have been assessed on previously unrecorded archaeological remains within the Site that date to the Palaeolithic, Roman and medieval periods. 'Negligible' permanent residual effects have been assessed for 11 archaeological assets dating to the Roman, medieval and post-medieval periods.
- 12.9. The impacts on archaeology from the proposed development are more extensive than those of the previous scheme (2023, pending consideration) and comprise pile caps, ground reduction and drainage in areas that the ES chapter suggests have been only moderately impacted by previous development.
- 12.10. 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. These are secured via conditions.
- 12.11. Although the NPPF envisages evaluation being undertaken prior to demolition, in this case considering the nature of the development, the archaeological interest and/or practical constraints are such that Historic England 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. In addition, a condition requiring a detailed design and method statement for foundations and piling configuration is also attached.
- 12.12. Subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

13. Accessibility and Inclusivity

- 13.1. Accessible and inclusive design is covered by NPPF paragraphs 96 and 135, London Plan policy D5, Local Plan policy DM10.8 and emerging City Plan 2040 policy HL1. These policies seek to ensure that the City is inclusive and welcoming for all, with no disabling barriers, and minimising separation or special treatment.

- 13.2. The planning application has been assessed for the highest standards of accessibility having special regard for NPPF paras 96 and 135, London Plan 2021 Policy D5, S6 and T6.5, Local Plan 2015 Policies DM 10.8 and 22.2 and draft City Plan 2040 policies HL1 and HL6T
- 13.3. London Plan policy D5 sets out how development should be informed by an inclusive design statement and provide detail of engagement with relevant user groups. An Inclusive Design Statement has been prepared by ACME and MIMA, as inclusive design consultants, as part of the Design and Access Statement.
- 13.4. The proposals were presented to and reviewed by the City of London Access Group (CoLAG) on 19th Feb 2025, and 7th March 2025, at the pre-application stage. The submissions have been reviewed by the City's Access Advisor at the pre-application and application stages.

Existing Context

- 13.5. At present, Liverpool St Station is notable for very limited accessibility and lack of inclusion. This was reported through pre-application engagement and is recognised across the application documents.
- 13.6. The station serves as a major regional transport interchange for London and the City. It is a complex site comprising listed buildings, parts of a conservation area, multiple entrances, level changes and interchange options, as well as a host of different services.
- 13.7. The nineteenth century construction and major refurbishment of the station in the late twentieth century, were informed by the underlying assumptions of the time. Principles in the Equality Act 2010 and subsequent policy, guidance and best practice advice are to remove, avoid or mitigate barriers to access. London Plan policy D5 seeks to avoid separation, special treatment or undue effort. As user numbers at the station have grown, the lack of step-free access, overcrowding and high sensory load mean that many people, including disabled people, are disproportionately disadvantaged in the station. The station is, and is experienced as, an inequitable space.
- 13.8. There is potential for major improvements for inclusion that would open the space and services to many people who are currently excluded. The proposals for both the station and over-station development also present a unique opportunity to deliver 'more than' technical compliance and to prioritise 'an inclusive user experience.

- 13.9. During the course of the pre-application process, the project team engaged with officers and people with disabled experience, leading to a number of significant design changes. These relate particularly to the relationship between the station and the bus interchange, lift capacities, connections to underground stations, arrival at site from Sun St, cycle storage, and design for neurodiversity.

Documents

- 13.10. Information that is relevant to access and inclusion is located in a number of application documents. These are detailed in the Accessibility Statement. Of particular relevance are:
- Design and Access Statement
 - Design and Access Statement Addendum
 - Accessibility Statement
 - Accessibility Clarifications
 - Equality Impact Statement
 - Transport Assessment
 - Framework Travel Plan

Methodology

- 13.11. The approach to securing inclusive access has been shaped by a range of methods including access auditing, surveys, staff and disabled experience engagement, document research and expert consultant analysis. This is consistent with the London Plan's requirement for engagement with relevant user groups as part of securing the highest standards of accessibility.

Accessibility Audit

- 13.12. A detailed Network Rail Accessibility Audit and a London Liverpool Street Station Accessibility Insights informed an Accessibility Needs Assessment. These were based on the Network Rail Inclusive Design Manual. The report uses five categories to identify 'additional needs' [sic], plus considerations such as religious belief, baby feeding, baby changing and familiarity. The audit is supplemented by an analytical narrative grounded in the experiences of disabled, and other people with protected characteristics, and which is aligned with current good practice. There is clear recognition of the impact of different barriers to access for current and potential station users.

13.13. Key issues which are highlighted by the report include (but are not limited to):

- Separation and a need for special treatment and, or additional effort, overcrowding, poor wayfinding, lack of connectivity, lack of step free access, lack of customer facilities including seating and accessible toilets, insufficient lifts, high sensory load, insufficient material contrast, lack of tactile wayfinding, confusing ticket purchase options, no accessible cycle storage, poor visibility across the station, lack of hearing induction loops, inaccessible retail units, poor customer information systems and variable staff attitudes.
- Challenges from the station environment are recognised in the Accessibility Statement as compounded by some inaccessible underground lines and lack of step -free connections for onward travel. The bus exchange has a narrow pavement, poor inter-visibility and no comfortable waiting area. There is a lack of accessible cycle storage. These barriers exclude many people, and particularly people who require step-free access.

Data

13.14. Liverpool St Station is avoided by many disabled and encumbered people owing to poor accessibility. LEGION modelling submitted for the application shows a 'low' presence of 'persons of reduced mobility' with lack of station accessibility noted a 'likely deterrent'.

LEGION modelling

13.15. LEGION modelling has been used to interrogate who is, and who is not currently using the station and what using Transport for London's 'Do Something' approach might mean. The LEGION modelling found a disproportionately low number of disabled and encumbered people in survey data. The applicant team used Victoria and Waterloo stations as comparators. Recognising the limits of the comparators, the applicant team was asked to stress test inclusive design proposals and assumptions by using plausible scenarios.

13.16. *Persona Journey Mapping*

13.17. Officers' concern that assumptions from missing data should be robust resulted in the development of the Persona Journey Mapping by MIMA. This uses plausible characters and scenarios to identify where 'pain points' might occur, and so be avoided, or mitigated. It is a real strength of the application.

Design with Disabled Experience

- 13.18. The RIBA Inclusive Design Overlay to the Plan of Work (2023) and recent mayoral guidance in Designing with Disability (2025) set out how to deliver inclusive engagement through the design and construction process. The approach taken for Liverpool St Station broadly aligns with the Overlay and is addressed in the Accessibility Considerations. Ensuring later project stages are designed with lived experience and inclusive access consultant expertise is a critical part of securing, and managing an equitable and inclusive development. It is consequently recommended that existing specialist inclusive access consultant expertise is retained for all remaining RIBA project stages and secured through the Section 106 obligations. The inclusive access consultant will create a framework with triggers at each relevant RIBA design stage for project-specific engagement with people with relevant lived experience. This project-specific guidance would amplify engagement from the existing Network Rail Built Environment Accessibility Panel (BEAP.) having increased frequency, wider scope and longer duration of relevant engagement. This retention is recommended to continue through to occupancy and monitoring.
- 13.19. During design development the applicant team worked with consultancy Shared Voice to engage relevant users. As part of this a series of pre-application meetings was held with City of London Corporation officers. Officers also attended meetings of the Network Rail Built Environment Advisory Panel (BEAP) and City of London Access Group (CoLAG).
- 13.20. Key recommendations from the engagement and consultation are summarised in the application documents as:
- A better and more inclusive range of toilets, including identified dog spend areas
 - More step-free access that can accommodate more than one person using a wheelchair
 - Better information and wayfinding, including tactile wayfinding
 - A Quiet Space and Sensory Room near wheelchair accessible toilets (AWC)
 - Room for prayer/reflection
 - A fixed, staffed assistance point near the information desk
 - Supplementary assistance/information call points located at different places around the station

Methodology conclusion

- 13.21. Recognising the presence in limited numbers of disabled station users, the applicant team were encouraged to enhance qualitative data and develop rigorous stress-testing of assumptions informing their proposals, through a range of scenarios. Officers recognise that the range of methods to interrogate the inclusivity of the proposals is well-considered, representative of good practice, and seeks to achieve the highest standards of inclusive design. It is welcome that this pre-application engagement resulted in significant design changes.
- 13.22. It is recommended that a project-specific inclusion advisory group is established to maintain engagement for subsequent stages of the design process, through all stages of construction and once fully occupied. Details of this group and its terms of reference should be reserved as a pre-commencement condition, rather than through the Inclusive Access Management Plan.

Whole journey approach

- 13.23. Current good practice is to consider how people experience a site in the round, from information available in advance of visiting, through arrival by a range of transport modes, to building entrances, vertical and horizontal movement, sanitary and other building facilities, onward movement and emergency evacuation.

Preview information /visual stories

- 13.24. Good preview information can have great effect in removing barriers to access and reducing anxiety, as set out in best practice Standard PAS 6463: Design for the Mind. The importance of prior information for a range of station visitors is recognised in the Accessibility Clarifications submitted. It will be fundamental to how inclusive the experience is of both station and over-station development.
- 13.25. Accordingly, it is recommended that details of preview information are reserved by condition as part of an Inclusive Access Management Plan (IAMP) and made available by Network Rail, and on the over-station development building operator's websites, for the lifetime of the development.

- 13.26. Information should be provided in a range of formats including an easy-read version and 'visual story' which uses visual cues and limited text. There should be provision for information about temporary changes (such as lift breakdown), alternative routes or services and clear timescales for the issue to be resolved. All information should also be accessible in non-digital formats.

Arrival at the site

- 13.27. London Plan D5 says that Entrances into buildings should be easily identifiable and should allow everyone to use them independently without additional effort, separation or special treatment' There are currently many barriers to arrival, and entry to the station from the different modes of transport. There is a pronounced lack of step-free provision. The Transport Assessment identifies the current dominance of stepped entrances/exits and the 'woefully inadequate' four person lift as the only means of achieving vertical, step-free movement. Arrival by Sun St Passage is particularly convoluted. There is only a small section of step-free access from Hope Square.

Arrival by public transport

- 13.28. The station has a PTAL of 6b but not all modes of arrival are step free. Boarding ramps are required for arrival by National Rail, some overground and underground services and passengers are encouraged to book in advance for step-free journeys. It is regrettable that the proposals do not extend to securing step-free accessible arrival from all trains to street at the station.
- 13.29. There is not currently consistent step-free access from the underground services to the station concourse and platforms, at present, and existing step-free routes are long. The creation of new lifts and step-free routes to ticket halls and between levels is welcomed.
- 13.30. Officers' concerns about the bus stops and waiting areas have been addressed in the revised designs submitted. There is a more intuitive and welcoming connection between the stops, waiting areas and information points than at present. There will be greater natural surveillance and more comfortable movement from the station building to the bus stops.

Arrival by car

- 13.31. London Plan policy T6.5 states that all developments should be car free except for at least one on, or off-street disabled persons parking bay. There are four existing on-street parking bays and these would be retained. It is noted that Blue Badge holders are restricted to four hours stay in the on-street spaces. The City of London runs the Red Badge scheme and the same constraints on time are not applicable as those for Blue Badge holders. As part of the proposed development, two disabled persons parking spaces have been identified; one for each use. Conditions are included as part of the Travel Plan to ensure that these spaces are free for users and available for the lifetime of the development. It is recommended that monitoring use of both on and off-street spaces is reserved by condition through the Travel Plan.

Setting down and arrival by taxi

- 13.32. Proposals will not change the existing taxi capacity but there will be improvements to sightlines and connectivity through interventions in the public realm, which is welcomed.
- 13.33. As public transport is not accessible for all people, details of informal setting down points in the vicinity have been included in the submission. Details of these should be secured through the Travel Plan and information included in the Inclusive Access Management Plan that is secured by condition.

Resting points

- 13.34. Good practice standards in DfT publication Inclusive Mobility recommend no greater than 50m distance for walking without access to resting points. As part of the Inclusive Access Management Plan (IAMP), details of resting points at 50m intervals from points of arrival by public transport would be reserved and mapped and made available on the station and building operator's websites.

Cycle storage and mobility scooters

- 13.35. There is currently no accessible cycle storage for larger and adapted cycles. London Cycling Design Standards require that 5% of spaces are for larger and adapted cycles with standards for associated access lifts and end-of-trip facilities.

- 13.36. New long stay cycle storage would meet, or exceed these standards for both station and over-station development. Indicative layouts show that consideration has been given to minimising travel distances between key spaces. The approach route to the station store requires careful design and detailing at the next stage of the design process to balance lighting levels that are comfortable and well-tolerated by neurodivergent people, with lighting that is sufficient for creating a perception of safety. It is recommended that details of cycles storage and associated lighting are reserved by condition for both station and the over-station development.
- 13.37. It is regrettable that charging points for mobility scooters are not a definite feature of the proposals, but the concerns about fires arising from lithium batteries are noted. It is recommended that this is kept under review with options for the future location of charging points identified, should technology and safety allow.

Entrances

- 13.38. The London Plan D5 states that building entrances should be easily identifiable and should allow everyone to use them independently without additional effort, separation or special treatment. There are multiple entrance points to the station and which will be variously reconfigured, upgraded or introduced, including the new access into the Over Station Development and the direct route into the station from Exchange Square/Sun St Passage/Half Moon St.
- 13.39. The creation of direct links between the station and Exchange Square would secure a less effortful connection coming from Primrose St and Exchange Square. There is some concern that a stepped route for more immediate access could introduce an element of separation from people who use step-free routes. It is regrettable that shop units will back onto the route, as this will limit natural surveillance and in turn may limit the sense of safety. The path will be bordered by undulating beds and seating, although with a limited outlook. There is some concern about planting resilience. Lighting, materials and planting will all be important to consider as part of the next stage of the design process. It is recommended that further details of the entrance to Exchange Square and Sun St Passage/Half Moon St are reserved by condition.

Vertical access

Station lifts

- 13.40. At present the station is served by one passenger lift which is regularly out-of-service and hard to find, and a second lift outside of the main concourse area. It is an inadequate provision. In total, eight new passenger lifts are proposed as part of the scheme, offering greater numbers and capacity, and with shorter travel distances and options in case of breakdown.
- 13.41. Two, new, 25-person capacity passenger lifts are proposed towards the Bishopsgate entrance. This capacity has been tested through the modelling and there is confidence that it is sufficient. There are new lifts between upper and lower concourse and London Underground ticket halls. This marks a significant improvement on the existing situation and is welcomed.
- 13.42. Step-free access to Ticket Hall B will be by a returning slope, rather than lift. This form would not usually be supported; it is tucked to one side of the ticket hall and returns upon itself. However, there is a clear argument for it being the most suitable proposal in a context where there is high footfall and high demand for step-free access. There are already frequent breakdowns of the existing lift. LEGION modelling has been useful in identifying stress points and the most appropriate location. Further details should be reserved by condition.
- 13.43. Details of new lifts and their management should be reserved by condition to ensure that there is adequate material contrast, a suitable range of controls and communication systems as well as information about maintenance and response in case of breakdown.

Escalators

- 13.44. Escalators are proposed as the principal means of vertical movement in the station and can be used by a range of people in large volumes. Six additional escalators will provide a 77% increase in overall vertical circulation capacity.
- 13.45. Details should be reserved to ensure that there is sufficient visual contrast, lighting and signage for alternative routes in case of breakdown.

Stairs

- 13.46. Level changes across the site are managed by slopes no steeper than 1:21 where possible, with landings at appropriate levels and lifts, escalators and stairs for greater changes in height. Slopes and ramps are not suitable for all people with impaired mobility and stairs are also provided across the development. Details, including handrails and appropriate tactile paving and contrast and should be reserved by condition. It is welcome that lift and stair cores are inter-visible for intuitive wayfinding.

Horizontal movement

- 13.47. The most significant improvements to horizontal movement through the station come from reconfiguring the Sun St Passage, the creation of a wider upper station concourse, and a slightly wider pavement to the bus stops. All of these will improve passing space, room for manoeuvre and room to dwell. More, wider gatelines to platforms are proposed, which will reduce the need for people who use wheelchairs, scooters or who have mobility impairments to cross busy pedestrian flows to access platforms, as at present. There is also a commitment to changing management practices to focus on decluttering the station and removing incidental – but cumulative – barriers to access This is welcome.
- 13.48. Horizontal movement in the over station development will adhere to dimensions set out in the current Building Regulations, Approved Document M(2) to allow for sufficient room to manoeuvre and pass others.

Customer facilities

- 13.49. A strength of the current proposals is the range of facilities proposed for station customers. These range from the step-free units for retail, food and beverage through to specific in-station facilities to improve customers' experience. Included are: Customer and Assistance Travel Lounges, Family Rooms, a Multi Faith space, a Quiet 'corner' and a mix of seating and rest points around the station. The Assisted Travel Lounge will be in sightlines from station entrances on the lower concourse. It is important that the range of formats described for customer information is delivered and that there is enhanced disability inclusion training for all station staff, not just those based in the Assisted Travel and Passenger Lounges. Details of many of these facilities are currently fairly cursory and details of the Assisted Travel Lounge to include access to sanitary provision, communication screens, reception desk, hearing induction loop, seating and Quiet Corner should be reserved for further clarification at the next stage of the design process as part of the Inclusive Access Management Plan.

Toilets and end-of-trip facilities

- 13.50. Local Plan policy 22.2 requires large scale developments that are open to the public, and large areas of public realm, to provide free publicly accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities.
- 13.51. Toilet facilities at the station are currently inadequate and do not support the greatest range of station users. Proposals would create centrally located sanitary cores to both upper and lower concourse levels. They are designed to meet current Building Regulations in offering single sex Female and Male toilets as well as separate universal toilet facilities. Single sex toilets will include cubicles for wheelchair users, ambulant disabled people, and enlarged cubicles. The universal facilities will provide three fully enclosed rooms, including one wheelchair accessible toilet. All facilities have been designed to meet the revised Building Regulations Approved Document T. The Wheelchair Accessible toilet cubicles have been designed following current best practice guidance and are more generous than the requirements of Building Regulations. Options for both right- and left-hand transfer in the Wheelchair Accessible toilets are shown for both upper and lower concourse in the station and should form part of the next stage of the design process and be reserved by condition as part of an Inclusive Toilets Statement.
- 13.52. Changing Places toilets are toilet facilities designed for people who have multiple and, or complex impairments and up to two companions. Building Regulations now require Changing Place toilets in larger places of assembly or at key locations. A total of four new Changing Places toilets are proposed by this application: two at the station, one within the over-station development and one at its roof terrace level. There are currently no Changing Places toilets in the station and this is a significant, and welcome, introduction. Further details should be reserved by condition as part of an Inclusive Toilets Statement. It is important that colour and patterns do not create an uncomfortable environment for people with sensory processing differences and so surface materials and colour should form part of this. Similarly people should be able to avoid triggering automated hand dryers by locating them away from entrances, or using lower decibel models instead.
- 13.53. Separate family rooms are located outside the gender and universal toilets, which have a toilet with room for baby changing within the same space. These are separate to the wheelchair accessible toilets, which is welcomed.

13.54. Toilets in the over-station development would include wheelchair accessible toilets in all sanitary cores, with options for both right- and left-hand transfer. As for the station, there would be a mix of male, female and unisex toilets. A separate Changing Places facility would be provided at Level 04. Accessible end of trip facilities would be provided on levels 04 and 06 with accessible shower facilities. It is recommended that further details of these are reserved by condition.

13.55. There are more dogs at stations than in the past, with the associated need for suitable spend areas. This was raised by officers at pre-application stage. A dog spend area has been located on the publicly accessible roof terrace. Whilst this would require people with assistance dogs in the station to divert to find a formal designated space, it does provide a dedicated space where there is currently none. Details should be reserved by condition.

Wayfinding and signage

13.56. The pre-application engagement process with people with disabled experience revealed consistently high levels of dissatisfaction with existing wayfinding and signage which was felt to be confusing, hard to locate and inconsistent.

13.57. It is welcomed that a comprehensive review of all signage at the station is proposed, informed by the Network Rail 'Wayfinding Design Manual NR/GN/CIV/300/01'. An Inclusive Wayfinding Signage Strategy should be reserved by condition to be developed at the next stage of the design process and to include options for emerging technologies such as, but not limited to, longer range QR code readers such as Navilens, This should be reserved for both the station and over-station developments.

13.58. A separate point was raised in the engagement process about the lack of tactile wayfinding through the station. This is now proposed, but details are not provided as part of the current proposals. Details should be reserved by condition for the station and its entry points, to ensure that vision impaired people are not disadvantaged. As suggested in the proposals, it should be co-designed with relevant users.

Public realm

13.59. A public/private roof terrace is proposed as part of the over-station development. The inclusion of Changing Places and wheelchair accessible toilets are positive aspects of the proposals and will mean that a greater range of people are able to use the terrace without additional effort.

Paths

- 13.60. Paths should provide stable and slip-resistant surfaces without significant level changes where they can be avoided. There should be room for wheelchair and mobility scooter users to pass and people with buggies. Tactile paving should be used as appropriate.

Seating

- 13.61. Consideration should be given to the provision of seating at a range of heights and with options for backs and arm supports, for wheelchair users to transfer and to sit alone, or in groups, as set out in good practice guidance. This is referenced in the submitted proposals. It is recommended that details of external seating should be reserved by condition.
- 13.62. It is noted that there are several aspects of the application where such consideration is already in place including the surround-seating to the Kindertransport sculpture. This has been consciously designed to be 'completed' by people who use wheelchairs or mobility scooters, or have buggies whereby the seating line is maintained, which is welcomed.

Planting

- 13.63. Planting in the public realm and at terrace levels should consider the location of highly scented and sharp foliated plants for people with sensory processing differences. It is recommended that details of the location of highly scented or sharp foliated plants are reserved by condition through the Inclusive Access Management Plan.

Options for shade and shelter

- 13.64. The station environment and its immediate vicinity are currently characterised by hard surfaces with limited planting and connections to nature. As part of the next stage of the design process it is recommended that options for a cool route are explored to offer station users respite.

Auditorium in over-station development

- 13.65. The Accessibility Clarifications detail how the proposed roof level multi-use space/auditorium will include options for wheelchair users and people with assistance animals, as well as provision of induction loop and space for BSL interpreters. This is welcome in principle. A layout and inclusive design statement for this space should be reserved by condition.

Soffit materials

- 13.66. Concerns were raised during the pre-application process regarding proposals for a reflective soffit to the station roof. Acoustic and visual noise, glare and the potential for sensory overwhelm are of particular relevance. It is noted that the Accessibility Clarifications make a number of suggested mitigations that could reduce adverse impacts. However, this remains a significant issue to address at detailed design stage and it is recommended that all details of the soffit materials are reserved by condition and accompanied by a report demonstrating how it has had regard for design for neurodiversity.

Emergency evacuation

- 13.67. London Plan D5 says that all building users should be able to evacuate with dignity and as independently as possible. It says that one lift per core should be an evacuation lift. A Fire Statement is provided by AECOM.
- 13.68. Emergency evacuation from the station is described in the application details as constrained for both Network Rail and TfL functions. The principal evacuation route for National Rail users will be step-free and directed away from the platforms. However, there is also the possibility of people requiring step-free evacuation routes having to use secondary, end-of-platform escape routes via stair climbers. Stair climbers are not considered to offer an equitable escape process to that of non-disabled people and, during the pre-application process, officers asked the design team to investigate alternatives. The current proposal has consequently been subject to close scrutiny. It is regrettable that existing platform constraints mean that a more dignified alternative secondary route has not been secured. However, it is also noted that the applicant has detailed how the need for deployment of the stair climbers would be exceptionally rare. Information on relevant training for station staff should be included in the Inclusive Access Management Plan.
- 13.69. From TfL platforms there are consistently two means of escape and compartmentalisation allow for step-free egress from each level, except for Ticket Hall B1, which is served by passenger lifts. Whilst there is potential for some passenger lifts being considered for emergency escape, this is not certain. It is noted that the current approach proposed would maintain the existing conditions without worsening them. However, officers are concerned to provide as inclusive an emergency evacuation process as is feasible.

- 13.70. Further details will be developed at the next design stage and this should be informed by input from the Access Consultant Team. Details of an Inclusive Emergency Evacuation protocol, with details of stair lifts, refuge points, communication systems and relevant training, should be reserved by condition to be made available as part of the Inclusive Access Management Plan.

Construction

- 13.71. Construction has the potential to have disproportionately adverse effects on disabled, D/deaf and neurodivergent people. It is recommended that conditions ensure that information regarding phases of development, timelines and quieter routes is made available on the station website to enable people to check on potential noise levels, route disruptions etc. Any on-street disabled persons' parking spaces should also be reprovioned in the vicinity and details reserved through the Travel Plan.

Conclusion

- 13.72. Liverpool St Station is currently experienced as a hostile environment for many disabled, D/deaf and neurodivergent people. The proposals would make Liverpool St Station significantly more inclusive of a greater range of people, removing and mitigating barriers to access and focussing on the experience of a range of people.
- 13.73. The scheme would provide limited disabled persons' parking on site and new long-term storage for larger and adapted cycles. There would be better visual connectivity to taxi drop-off and bus stops, with improved bus passenger waiting areas and access to information.

- 13.74. The proposals would secure step-free routes throughout the station and over station development, an increased number and capacity of passenger lifts, allowing a range of people to move comfortably through the station, improved interchange with other modes of transport including TfL underground services, improved pedestrian flow, increase in the quantity and range of accessible facilities such as wheelchair-accessible toilets, Changing Places Toilets, Quiet space, Family rooms, baby change facilities, Multi-faith room, the addition of a range of seating and resting points, and better signage and wayfinding. Information and communication points will be delivered at a range of scales and there will be a dedicated Passenger Assistance Lounge. There is greater consideration of neurodiversity and the potential for overwhelm, and of inclusive wayfinding. There is a Quiet Corner created in one of the concourse Family Rooms and tactile wayfinding from entrances to the Passenger Assistance Lounge. Retail units and food and beverage facilities would be accessed step-free.
- 13.75. The over-station development would provide step-free access to all floors, including the private and publicly accessible roof terrace, which would also have a separate Changing Places and wheelchair accessible toilets. Associated works to the public realm and roof terrace would provide paths, features and planting with the potential to provide an inviting and inclusive environment for the greatest range of people.
- 13.76. As well as working to best practice standards, changes to attitudes through station staffing and management are proposed. This will serve to consolidate and enhance the improved accessibility and inclusive design proposed.
- 13.77. As with all proposals related to improved inclusive access, details of the proposals will be critical in a successful delivery of this as an inclusive development. Both pre-commencement and pre-occupation conditions are proposed as well as a detailed Inclusive Access Management Plan.
- 13.78. In summary, the proposals would significantly and positively transform the station's accessibility and the experience of disabled, D/deaf and neurodivergent people.
- 13.79. Many aspects of the proposals will need to be developed in the next stages of the design process. It is considered essential that disabled experience and specialist access consultant expertise are retained through the next phases of project development, discharge of conditions and post-occupancy monitoring.

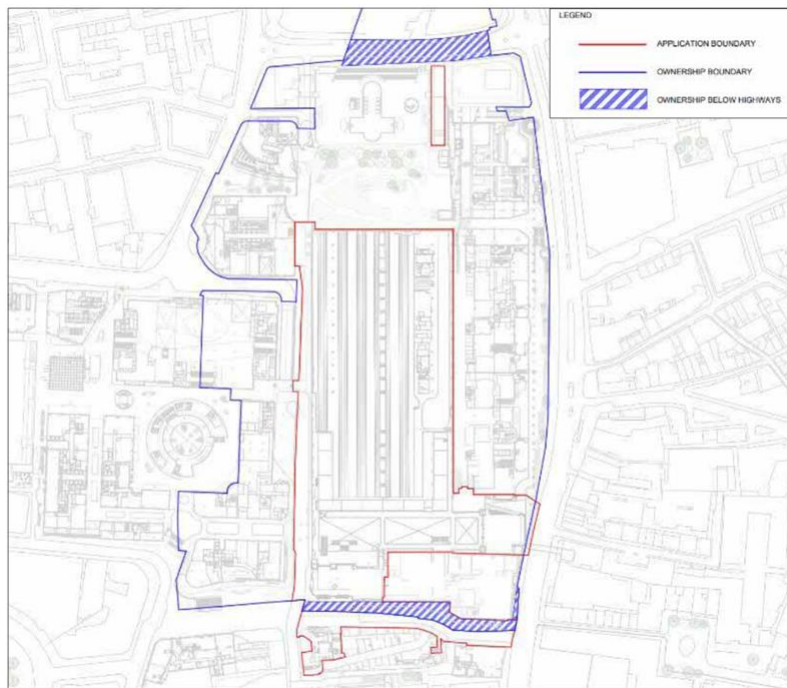
- 13.80. This is a scheme that is welcomed for its ambition to create an inclusive development and to remove many existing barriers to access. Pre-application engagement and disabled experience have been central to the project's evolution and the design team's responses. The proposals would deliver the high standards of inclusive design expected, would be transformational in nature and, would be consistent with London Plan 2021 Policies D5, S6 and T6.5, Local Plan 2015 Policies DM 10.8 and 22.2, and draft City Plan 2040 policies HL1 and HL6, with appropriate conditions attached to ensure that the ambition and promise of the proposals are realised to the full.

14. Highways and Transportation

Surrounding Network and Site Accessibility

- 14.1. The site is located in the north-eastern extent of the City of London, within the designated Liverpool Street Area Healthy Streets Plan (LSAHSP), which was approved in April 2024. The site comprises Liverpool Street Station, 50 Liverpool Street, Hope Square and Bishopsgate Square and has a combined red line area of 5.6ha. Liverpool Street Station is recognised at the busiest station in the country and is one of the most important interchanges in the UK. The station functions as a key gateway to the City of London.
- 14.2. Liverpool Street is immediately to the south of the site, Bishopsgate to the east, Sun Street Passage and 100 Liverpool Street to the west and Exchange Square to the north (with Primrose Street to the north beyond). The south-west extent of the red line extends down to Old Broad Street, to the south. Finsbury Circus Gardens and Moorgate Station are located to the west of the site and Spitalfields Market is located to the east.
- 14.3. The site includes 50 Liverpool Street but excludes the Andaz Hotel that fronts Liverpool Street and Bishopsgate. The application boundary (at upper concourse level) is shown in Figure 1.5 of the submitted Transport Assessment (further details of which are provided below), which is reproduced for information below.

Figure 1-5: Site Boundary (at Upper Concourse Level)

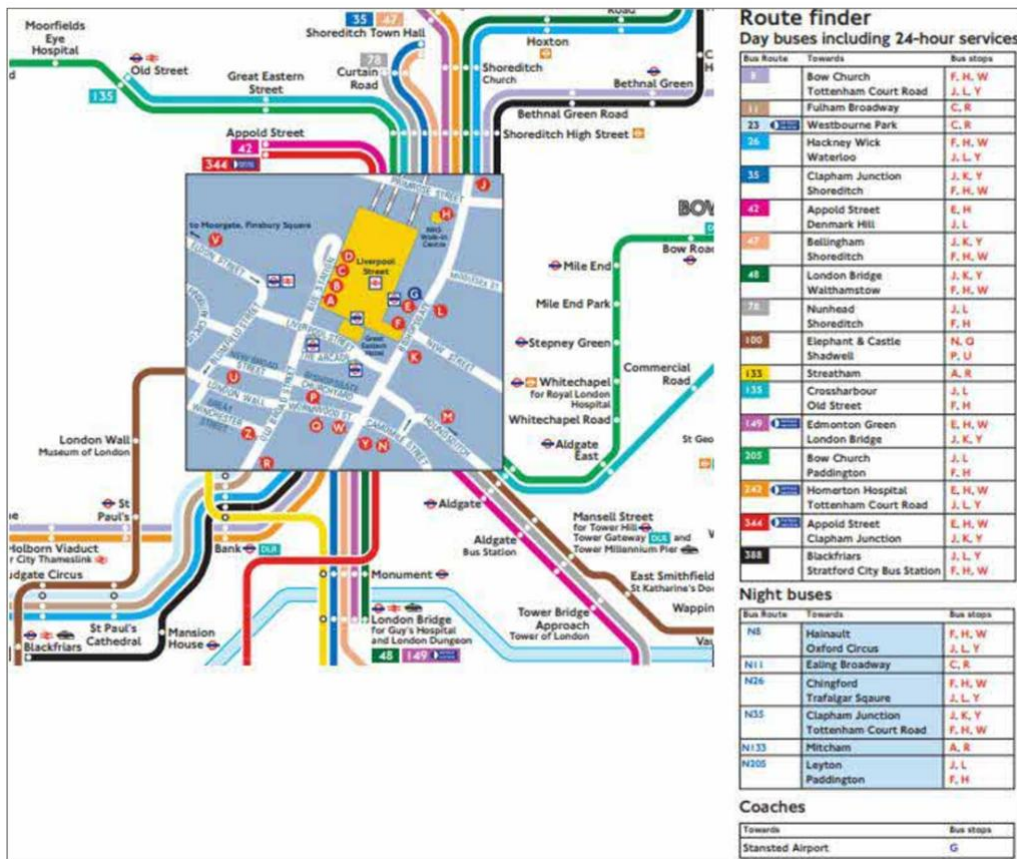


Source: ACME Drawing no. LSS-ACME-XX-00-DR-A-03-110 P01

- 14.4. Liverpool Street, Primrose Street and Old Broad Street are adopted City of London highways. Sun Street Passage, which runs on a north/south axis to the west of the station, is permissive path (further details provided below). All public roads within the site's vicinity are subject to a 20mph speed restriction.
- 14.5. Liverpool Street is a two-way road between Bishopsgate and Old Broad Street. At its western end there is a no through route for vehicles (except cycles), so it is effectively a cul-de-sac. There is a taxi rank at the western end of Liverpool Street (with space for ten taxis), where taxis are required to U-turn to pick up passengers on the north (station-side) side of the road. There are also five pay-by-phone parking bays (north side); two parking bays allocated for doctors (north side) and one on-street disabled persons' parking bay (south side) on Liverpool Street.
- 14.6. Sun Street Passage, north of Liverpool Street, is not designated as public highway and is a 'bus only' route, although it is also part pedestrianised. Old Broad Street, to the south of the site, is a designated pedestrian and cycle zone, with vehicle access from the A1211 London Wall / Wormwood Street restricted at all times except for access and buses.

- 14.7. The nearest Transport for London Road Network (TLRN) is the A10 Bishopsgate, to the east of the site, which also has a 20mph speed restriction in place. This route is the responsibility of Transport for London (TfL).
- 14.8. The site benefits from excellent public transport connections, with a Public Transport Accessibility Level (PTAL) rating of 6b, which is the maximum possible score.
- 14.9. Liverpool Street Station is served by four London Underground (LU) Lines: the Central Line, the Circle Line, the Hammersmith & City Line and the Metropolitan Line. It is also served by the Elizabeth Line. It is possible to access Moorgate LU Station from within Liverpool Street Station via the Elizabeth Line interchange.
- 14.10. The station is a key entry point for National Rail services. The station is a major rail terminus on the Great Eastern Main Line and connects London with destinations in the East of England. The majority of services on this line are operated by Greater Anglia, with some late-evening and weekend services to Stratford and Barking operated by C2C. The station is also the central terminus of the Weaver Line, which operates as part of the London Overground network and provides regular services to the north and north-east of London.
- 14.11. The site is also served by several bus services at nearby bus stops, including those on Sun Street Passage and Bishopsgate. The local bus routes serving the station are shown in Figure 3.14 of the submitted TA, which is reproduced below for information.

Figure 3-14: TfL Route Finder – Liverpool Street Station



- 14.12. There is no existing off-street car parking provision associated with the station. The only vehicular access to the site is via Primrose Street for servicing vehicles. Servicing matters are considered in more detail in the report below.
- 14.13. The applicant states that Liverpool Street Station passengers experience several issues, including overcrowding in the ticket halls and concourses. There is poor pedestrian permeability through the station and overcrowding on the external streets in the vicinity of the station. Overall, accessibility for persons with reduced mobility is poor due to the provision of only one lift serving the station, with limited capacity. There is no step-free access to a number of LU platforms at the station, as set out below.
- 14.14. The station, in its current configuration, is not fully accessible. Currently, the station has a single four-person lift to serve the entire station. Furthermore, the lift only provides access to the lower concourse and Ticket Hall B from street level (the upper concourse level). There is currently no lift provision to the west-bound sub-surface platform (Circle Line, Hammersmith & City Line and Metropolitan Line services) or the Central Line in either direction. This existing level of provision is, therefore, wholly inadequate and sub-standard.

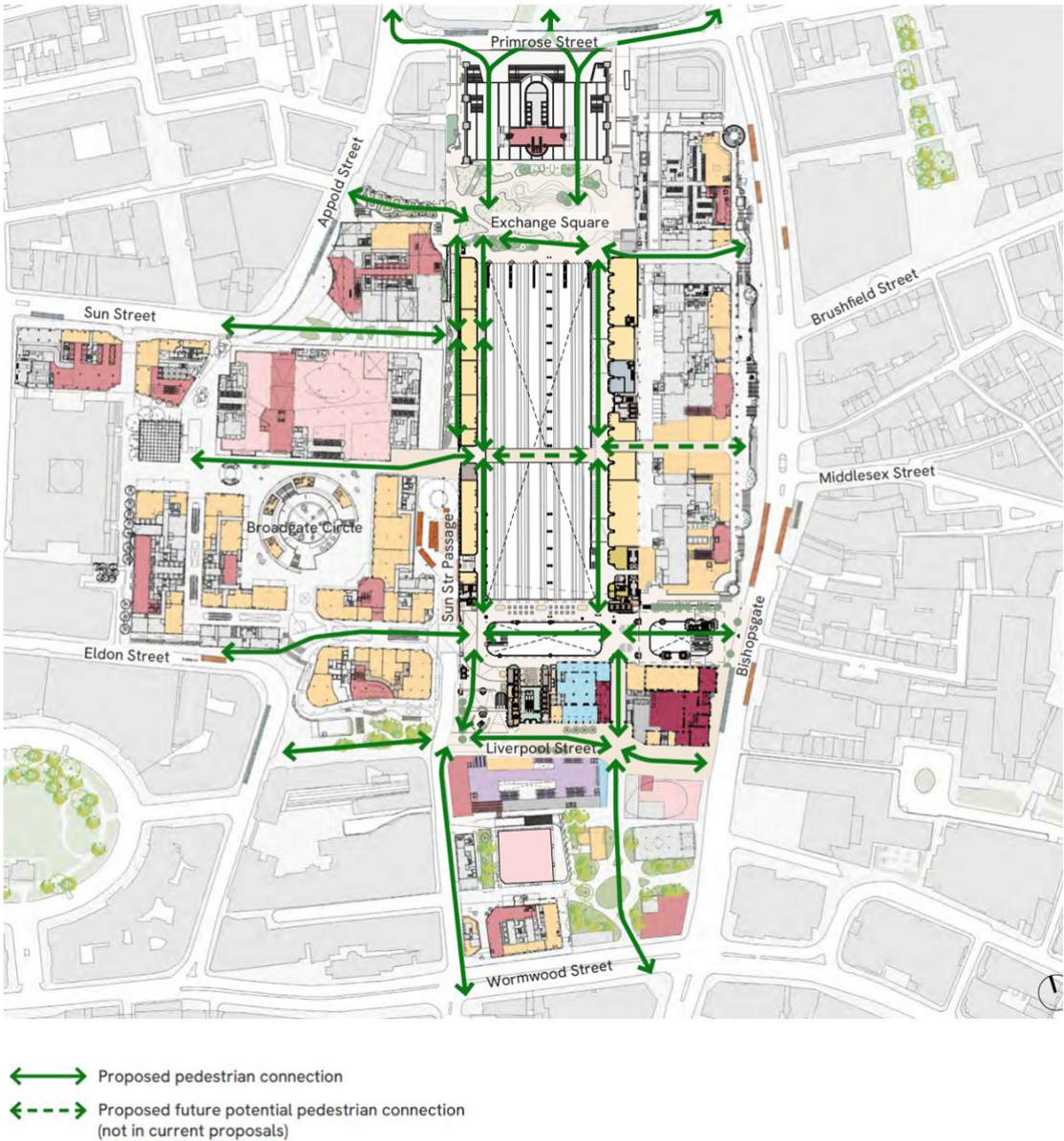
- 14.15. Furthermore, both the Liverpool Street and Bishopsgate station entrances are dominated by stepped access (shown in Figure 1.2 of the submitted TA). Alternative approaches using the steps are available at both locations, but they are narrow points of side access that are not immediately obvious.

Proposed Development

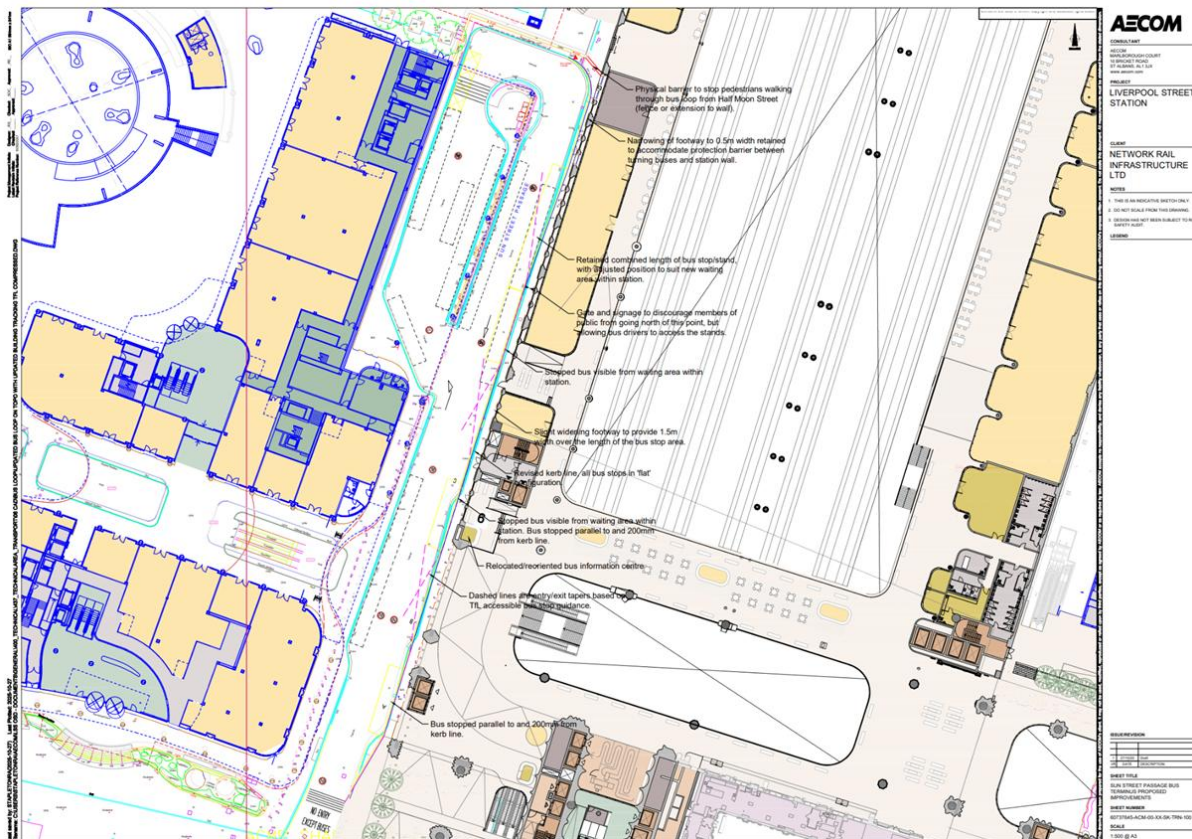
- 14.16. The applicant for the proposed development is Network Rail Infrastructure Ltd. (NR). The planning application is supported by a Healthy Streets Transport Assessment (TA), prepared by AECOM Ltd. (AECOM), dated April 2025. The TA includes an Active Travel Zone (ATZ) Assessment. The applicant has provided supplementary information with respect to the proposed development, with the submission of a Transport Addendum (dated 06/11/2025), also prepared by AECOM. The planning application is also accompanied by an Environmental Statement (ES), which includes a Transport and Access Chapter in relation to the proposed development.
- 14.17. The proposed development is a transport-led scheme that involves the comprehensive redevelopment of Liverpool Street Station to deliver a transformational upgrade of the station. Overall, the station transformation represents a major improvement to the accessibility of the City of London, both in terms of capacity to accommodate future growth and in terms of inclusive access and quality of provision. Specifically, the proposed development provides step-free access from street level to all NR and TfL platforms.
- 14.18. This application refers to proposals for the comprehensive redevelopment of Liverpool Street Station and supporting Over Station Development (OSD), as set out earlier within this report.
- 14.19. As detailed above, the proposed development includes the construction of an office based OSD of 88,013sqm gross internal area (GIA), which will accommodate approximately 6,770 employees. The development will include retail land uses, totalling 11,077 sqm GIA, and will be supported by approximately 633 retail employees. It is noted that the proposed retail floorspace of 11,077 sqm represents an uplift of +1,943 sqm against the existing retail floorspace of 9,134sqm GIA at the station. It is also proposed that an auditorium with an ancillary terrace will be provided on the 18th floor of the OSD, with a capacity of 168 seats.

14.23. The applicant has clarified and confirmed that manual boarding ramps will continue to be used for certain London Overground services at concourse level and for the Central line platform train interface. However, the proposal will deliver step-free access from street to platform for all services, which is considered acceptable and is supported.

14.24. Source: DAS Figure 8.208: Illustrative plan indicating 2040 Connectivity vision, p.93



- 14.25. With respect to upgraded lift provision at the station, the applicant has agreed in principle to increase all London Underground (LU) passenger lifts to 17-person minimums, subject to structural constraints. It is recommended that the detailed design of the proposed lifts should be secured via a pre-commencement condition, to be discharged in consultation with TfL.
- 14.26. The proposed development includes improved bus passenger waiting areas with real-time bus information and associated repositioning of the bus stops to improve the interchange with buses at the bus station located on Sun Street Passage. The improved bus stops on Sun Street Passage will be configured as two active stops and two passive stops to allow flexibility for future operations.
- 14.27. The development proposals, as submitted, are described in detail in the TA (see para. 1.1.22, page 16). The proposed bus station improvements include lifts, wayfinding and gentle slopes through the Station concourse in order to improve provision for bus passengers. The proposal also includes two new waiting areas, upgraded bus stop positions and modified kerb lines to improve accessibility to the buses.
- 14.28. In relation to these bus proposals, Section 6 of the submitted Transport Addendum (November 2025), referred to above, provides an updated proposal for the bus terminus on Sun Street Passage. These proposals reflect discussions between the applicant and TfL following submission of the planning application. The updated proposals are included at Appendix A of the Transport Addendum (see Drawing No. 60737645-ACM-00-XX-SK-TRN-100) and are reproduced in this report for information. These proposals have been subject to swept path analysis, with drawing output also included for both a Standard Bus and an Electric Bus in Appendix A.



- 14.29. TfL supports the proposals in strategic transport terms and welcomes the improvements to bus interchange at the station. TfL emphasises the importance of achieving Pathway Stage 2 (option selection) 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 to inform the section 106 (s106) to give effect to a Developer Agreement (DA) with London Buses Ltd and London Underground Ltd. to deliver those works to the transport interchange.
- 14.30. At time of writing this report, it is noted that the TfL Stage 2 Gate meeting is scheduled for 5th February 2026 and TfL is currently reviewing the Options Report.
- 14.31. TfL anticipates that significant further modelling, surveys and design work will be required for Stage 3 onwards for all proposed bus (and London Underground) improvements. It is therefore recommended that no demolition or commencement to occur unless and until TfL Pathway Stage 2 has been achieved. TfL Engineering has been engaged in design workshops and full technical engineering assurance for these proposals will occur at Pathway Stage 3 onwards. It is recommended that this is secured via the Development Agreement and Section 106.

- 14.32. With respect to the proposed bus station layout, TfL is satisfied in principle at this stage that sufficient space is proposed along Sun Street and in all new bus waiting areas, and operational bus impacts (in relation to the proposed pit lane arrangements during construction) have been clarified.
- 14.33. Secure cycle parking for station users and station staff in a new cycle hub within the station is proposed, alongside new cycle parking external to the station (with potential to provide a total of up to 732 cycle parking spaces). It is proposed there will be 1,281 cycle parking spaces provided for staff of the OSD within the site, of which 5% is to include provision for non-standard cycles is provided. Cycle provision is considered in further detail in the report below.
- 14.34. The proposed development does not involve any significant changes to the existing taxi rank facility on Liverpool Street, to the south of the station.
- 14.35. The submitted TA describes the site and its surroundings, including the existing pedestrian baseline, in chapter 3. Pedestrians can access the station from the A10 Bishopsgate (at two locations); Hope Square (at the junction of Old Broad Street and Liverpool Street); Sun Street Passage and via Broadgate Plaza to the lower concourse level. The applicant, through the TA, recognises that existing permeability is poor, particularly north-south permeability, with no direct access from Exchange Square (para. 3.4.1). It also states that existing walkways at the upper concourse level are also narrow, which combined with crowding in the station, limits east-west permeability.
- 14.36. The proposed development includes the creation of new station entrances from Hope Square and Bishopsgate Square, in addition to the creation of new upper concourses and associated new public access from Exchange Square, including new walkways. The new Bishopsgate and Hope Square entrances will create sloping surfaces into the station that are step-free.
- 14.37. The TA Report, and the subsequent Transport Addendum, set out the findings of extensive modelling work undertaken to inform the planning application. The scope of this technical work is outlined for information. Liverpool Street Station is predicted to experience significant growth in passenger numbers through growth planned in the City and beyond. This growth is included in both the 'Do Minimum' (without station upgrade) and 'Do Something' (with station upgrade) scenarios considered below.

- 14.38. The modelling work reported in the TA is based on 2024 (Base Year) and 2041 (Future Year) assessment years, with the focus on the weekday AM (07:00 – 10:00) and PM (16:00 – 19:00) peak periods. The 2024 Base Year reflects the existing situation and is informed by detailed site surveys carried out in 2024. Specifically, passenger count surveys were conducted at Liverpool Street Station in March 2024 to determine the 2024 base year demand for station modelling.
- 14.39. NR has undertaken dynamic station modelling of Liverpool Street Station to assess the pedestrian flow within both the current and proposed station layouts. This technical work has used LEGION, a pedestrian simulation tool specifically designed for the microsimulation of pedestrians' complex interaction with a given environment.
- 14.40. The 2041 demand forecasts have been taken from TfL's Railplan 8.2 model and NR's EDGE model. Railplan is a London-centric strategic public transport assignment model developed by TfL to estimate trips to, through and from London. For this scheme, TfL supplied NR with two model runs for both the AM and PM peak periods identified above. For information, EDGE refers to the Department for Transport's (DfT) Exogenous Demand Growth Estimator, which generates forecasts for station-to-station flows. A further 35% uplift has been applied to the aforementioned Railplan / EDGE forecasts and tested to represent further long-term growth, as assumed by the planning application, i.e. forecast 'Good Growth' in the City, as set out in the emerging City Plan 2040.
- 14.41. The NR model extent is shown in Figure 5.1 of the submitted TA, which is reproduced below for information. The results of the modelling work have informed the proposed design of the station presented in the planning application.

Figure 5-1: Model Extent (NR Station)



14.42. The modelling outputs have been assessed against NR's Station Capacity Design Manual (SCDM) for normal operation and John Fruin's Level of Service (LoS) criteria. The LoS is an industry standard criterion which divides the level of service into six letter grades from 'A' to 'F', with 'A' being the highest standard representing free circulation and 'F' being the worst standard representing a complete breakdown in passenger flow. These assessment criteria are shown in Figure 5.6 and Table 5.6 of the submitted TA, which are reproduced below for information.

Figure 5-6: Fruin Level of Service

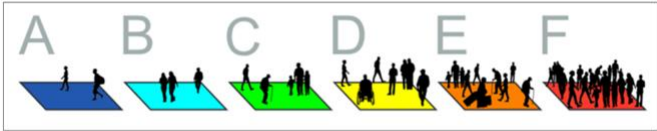


Table 5.6: Fruin's Level of Service (LoS)

LoS	Definition
A	Free circulation
B	Uni-directional flows and free circulation with only minor conflicts
C	Slightly restricted circulation, with difficulty passing others. Reverse and cross-flows with difficulty
D	Restricted circulation for most. Reverse and cross-flows with significant difficulty.
E	Restricted circulation for all. Intermittent stoppages and serious difficulty for reverse and cross-flows.
F	Complete breakdown of flow with frequent stoppages.

14.43. The results of the station modelling work are presented in detail in Section 5.6 of the TA Report (p. 122). The model results are presented in cumulative mean density maps over 15-minute intervals. For example, Figures 5.37 and 5.38 of the submitted TA (reproduced below) show the difference in NR station operation at the lower concourse level between the 'Do Minimum' and 'Do Something' scenarios for the weekday AM peak assessment period for information.

Figure 5-37: Cumulative Mean Densities (Walkway) - Lower Concourse - Do Minimum AM 2041+35%

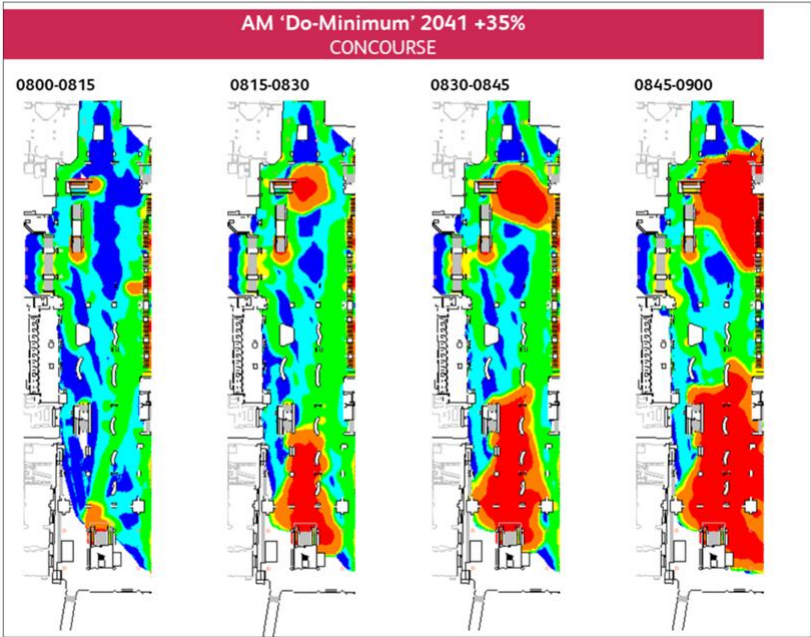
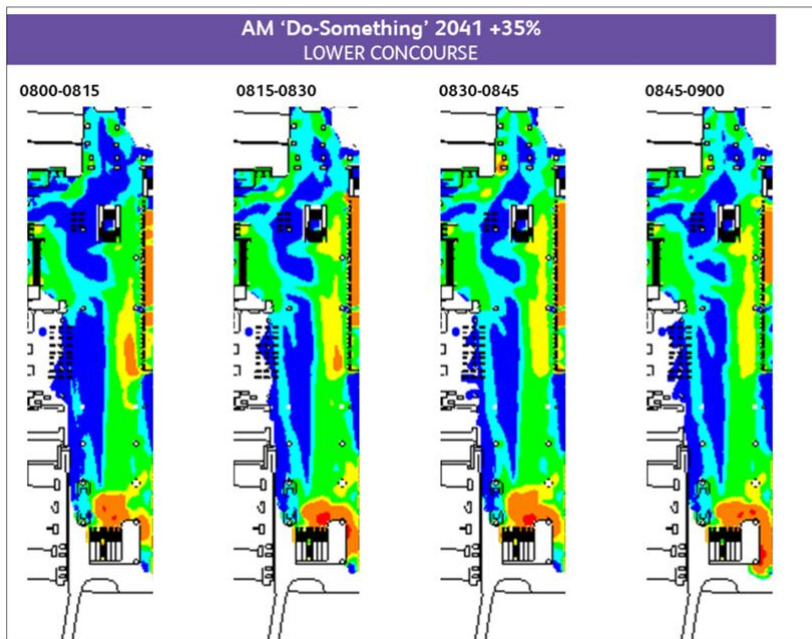


Figure 5-38: Cumulative Mean Densities (Walkway) - Lower Concourse - Do Something AM 2041+35%



14.44. The TA concludes that the proposed redevelopment of Liverpool Street Station successfully addresses the challenges that the station is predicted to face under the Do Minimum scenario (para. 5.6.78, p.145). This is the case as the proposed development significantly increases capacity in the identified critical areas, including (5.6.70):

- 6 additional escalators, providing a 77% increase in overall vertical circulation capacity;
- Increasing the number of ticket gates in both gateline arrays and extending the run-off distance between the gateline and buffer stops;
- The creation of an additional 19% of lower concourse space, including 30% in the most attractive areas; and
- A twelve-fold increase in lift capacity and the creation of a step-free station.

14.45. The proposed station upgrade mitigates queueing pressures, improves pedestrian flow and reduces congestion, improving the experience for all station users.

14.46. The TA Report, and the subsequent Transport Addendum, also set out the findings of extensive external pedestrian modelling work of the public realm surrounding Liverpool Street Station. This is considered in the report below, under Pedestrian Comfort Levels (PCLs).

- 14.47. This development has been assessed to comply with several policies, including national and local policies such as the Draft City Plan, the London Plan (2021) and its associated standards, and the City of London Local Plan, The City of London Local Plan 2015 and the Planning for Sustainability, Supplementary Planning Document, February 2025, City of London. The City of London is also in the process of producing an update to the City Plan. The City Plan 2040 aims to set out the corporations' priorities for development up until 2040 and will include various updates to planning policies. This will replace the City of London Local Plan 2015 once it is adopted.
- 14.48. Funding through S106 and S278 will be allocated to transport projects, supporting the Liverpool Street Area Healthy Streets Plan and ensuring the delivery of critical infrastructure improvements that promote sustainable development. These contributions will enhance connectivity by improving access to key destinations and promoting safer travel through pedestrian-friendly designs and road safety measures.

Trip Generation – Person Trips

- 14.49. The TA presents a staff trip generation assessment in Section 5.3 of the submitted report, which focusses on the identified weekday AM (08:30 – 09:30) and PM (17:30 – 18:30) peak hours. This assessment encompasses the OSD staff, the station retail staff (for the additional retail floorspace proposed, i.e. net uplift) and the auditorium visitors. The assessment assumes that peak hour customer trips generated by the additional retail floorspace will be linked or pass-by trips, i.e. not new trips on the local transport network, and this is considered acceptable.
- 14.50. Trip generation figures for the OSD have been calculated using weekday person trip rates extracted from the TRICS database combined with local 2011 Journey to Work Census mode split data. The 2011 Census mode split data have been used instead of the 2021 Census data, as the latter are considered unreliable due to the impact of the Covid-19 pandemic on journey-to-work mode share data. This is considered acceptable. Adjustments were made to the mode share, as it is proposed to be car-free once operational, and due to the site's central London location. Again, this is considered acceptable and this assessment approach is agreed.

14.51. The trip generation results for the proposed OSD are presented in Table 5.19 of the submitted TA, which is reproduced below for information. This table shows that the proposed OSD generates a total of 3,224 and 2,875 two-way person trips in the AM and PM peak hours respectively. Table 5.19 also shows that the proposed OSD generates a total of 6,033 two-way person trips across the total 12-hour (07:00 – 19:00) daily time period.

Table 5.19: Office Trip Generation

Trip Type	AM Peak			PM Peak			Daily Total		
	In	Out	Total	In	Out	Total	In	Out	Total
Staff	3,011	60	3,071	55	2,738	2,793	5,745	5,745	11,491
Visitor	151	3	154	3	137	140	287	287	575
Total	3,161	63	3,224	57	2,875	2,932	6,033	6,033	12,066

14.52. The trip generation results for the proposed additional retail floorspace within the station, i.e., the net increase in staff trips, are presented in Table 5.26 of the submitted TA, which is reproduced below for information.

Table 5.26: Retail Trip Generation - Net Increase

Trip Type	AM Peak			PM Peak			Daily Total		
	In	Out	Total	In	Out	Total	In	Out	Total
Staff	58	1	59	1	53	54	111	111	222

14.53. Table 5.26 above confirms that the net increase in retail staff trips is comparatively low, relative to the total pedestrian flows moving through the station.

14.54. The trip generation results for the proposed (168-person capacity) auditorium space within the OSD, are presented in Table 5.28 of the submitted TA, which is reproduced below for information. The applicant states that arrivals at events at the auditorium will typically be outside the network peak. Nonetheless, to present a reasonable worst-case scenario 50% of trips associated with the auditorium are assumed to arrive during the peak hour. Furthermore, the auditorium may not be utilised every day at this time. This has been considered a reasonable assumption. Table 5.28 below shows that the proposed auditorium generates a total of 84 two-way person trips in both the AM and PM peak hours.

Table 5.28: Auditorium Trip Generation

Trip Type	AM Peak			PM Peak			Daily Total		
	In	Out	Total	In	Out	Total	In	Out	Total
Visitors	84	0	84	0	84	84	168	168	336

14.55. **Table 1** below outlines the overall peak-hour trip generation by mode of transport (as reported in Tables 5.30 and 5.31 of the submitted TA, p.109). The trip generation includes the OSD, auditorium, and the net increase in Station retail use as set out in the original TA submitted by the applicant.

Table 1: Modal split and trip generation for the development during the AM and PM peak hours

Mode	AM Peak			Two-way	PM Peak		
	Arrivals	Departures			Arrivals	Departures	Two-way
Underground, metro, light rail or tram	1,108	22		1,130	20	1,011	1,030
Train	1,620	32		1,652	29	1,477	1,506
Bus, minibus or coach	215	4		219	4	196	200
Taxi	17	0		17	0	15	15
Motorcycle, scooter or moped	45	1		46	1	41	42
Driver in a car or van	0	0		0	0	0	0
Passenger in a car or van	0	0		0	0	0	0
Bicycle	145	3		148	3	133	135
On foot	152	3		155	3	139	141
Other	0	0		0	0	0	0
Total	3,303	64		3,367	59	3,011	3,070

- 14.56. The overall trip generation results summarised in Table 1 show that the proposed development generates a total of 3,367 and 3,070 two-way person trips in the AM and PM peak hours respectively. Table 5.30 of the submitted TA shows that, overall, the proposed development generates a total of 6,312 two-way person trips across the total 12-hour (07:00 – 19:00) daily time period.
- 14.57. The OSD trip generation assessment reported in the submitted TA has been based on the application of an 85% staff attendance factor, plus a 5% allowance for visitors. The City of London requested that a sensitivity test should be undertaken for a higher level of occupation. This was set out in Table 11-1 of the Transport Addendum and has been reproduced in **Table 2**, which presents the findings of an office attendance sensitivity test, which assumes a 95% occupancy plus 5% visitors.

Table 2: Net Change in trip generation associated with 95% staff +5% visitor occupancy test (during the AM and PM peak hours)

	Modal (Percentage)	Split	Two-Way Generation Peak	Trip AM	Two-Way Generation Peak	Trip PM
Underground, metro, light rail or tram	34%		127		116	
Train	49%		186		169	
Bus, minibus or coach	7%		25		22	
Taxi	1%		2		2	
Motorcycle, scooter or moped	1%		5		5	
Driver in a car or van	0%		0		0	
Passenger in a car or van	0%		0		0	
Bicycle	4%		17		15	
On foot	5%		17		16	
Other	0%		0		0	
Total	100%		379		345	

14.58. As noted above, with the attendance sensitivity test, the proposed development is predicted to generate a total of 3,367 two-way trips during the AM peak and 3,070 two-way trips during the PM peak, assuming an 85% occupancy rate. The higher office occupancy sensitivity test is anticipated to generate an additional 379 two-way trips during the AM peak and a further 345 two-way trips during the PM peak. Therefore, the scheme could generate a total of 3,746 two-way trips in the AM peak and 3,415 two-way trips in the PM peak and is a reasonable conclusion. With respect to trip generation, TfL has confirmed that the disaggregation, data and retail assumptions have been further clarified by the applicant satisfactorily, subject to agreement and future provision of the various other planning obligations and further modelling requested elsewhere.

Highway Network - Trip Generation

14.59. The submitted TA considers the impact of the proposed development on the local highway network (5.11, p.161). The results are summarised in Table 5.71 of the submitted TA, reproduced below for information.

Table 5.71: Impact of Proposed Development on Local Highway Network

Location	Baseline AADT Flow		Operational Traffic		Impact	
	All traffic	HGVs	All traffic	HGVs	All traffic	HGVs
2 A10 Bishopsgate, north of Folgate Street	11,459	2,571	124	80	1.1%	3.1%
7 Primrose Street	5,151	283	150	97	2.9%	34.4%
12 A10 Bishopsgate, north of Artillery Lane	8,044	2,469	26	17	0.3%	0.7%
13 Liverpool Street	5,791	59	46	0	0.8%	0.0%
15 Wormwood Street	17,853	1,657	26	6	0.1%	0.4%
16 Camomile Street	19,858	1,841	29	7	0.1%	0.4%
17 A10 Bishopsgate, south of Wormwood Street	11,724	2,462	17	4	0.1%	0.2%
18 Old Broad Street	2,133	513	0	0	0.0%	0.0%
21 London Wall	10,837	1,474	26	6	0.2%	0.4%
29 Bishopsgate, south of Liverpool Street	11,049	3,498	72	17	0.7%	0.5%

14.60. The submitted TA concludes that the predicted impact on the majority of local highways is less than 1%, with the exception of the A10 Bishopsgate and Primrose Street. The TA acknowledges that the only road that has an impact exceeding 5% is Primrose Street, a CoL managed route. The submitted TA notes that the identified trips on Primrose Street are related to the additional delivery and servicing requirements generated by the OSD and the net increase in station retail space.

14.61. Servicing and delivery trip generation matters are considered further in the report below.

- 14.62. The submitted TA considers the impact of the proposed development on the taxi services operating on the local highway network (5.10, p.160). The assessment identifies a total of +15 and +14 additional two-way taxi movements (pick up and drop off) generated by the proposed development in the AM and PM peak hours respectively, with a total increase of +64 daily two-way taxi trips. The TA concludes that the predicted increase in taxi demand could be accommodated by the existing taxi rank on Liverpool Street and that no capacity increase would be required (para. 5.10.2). These assessment findings are accepted.
- 14.63. Overall, the proposal is not anticipated to result in any severe highway traffic impacts during its operation, and is considered compliant with London Plan Policies T1 and T4, Local Plan Core Strategic Policy CS16 and Development Management Policy DM 16.1. The proposals also comply with the emerging City Plan 2040 policies S9 and VT1.
- 14.64. The applicant has indicated in the planning documents and during pre- and post-application consultations that the development's highways and transportation impacts are limited to the OSD, as station capacity improvements are driven by anticipated passenger growth. This position is generally accepted. The City of London's primary concern regarding increased passenger numbers relates to safety on local streets, which are City assets. Safety considerations focus on both the construction phase and the completed station, where faster passenger egress could overwhelm existing footways and bus stop waiting areas. These issues are addressed in subsequent sections of this report.
- 14.65. Note that construction traffic impact is addressed in a separate section of this report.

Bus Trip Generation

- 14.66. The site has several bus stops within walking distance, including the bus terminus on Sun Street Passage. There are seven bus stops nearby on Bishopsgate, which are served by approximately 29 local bus services. The assessment reported in the submitted TA has been informed by passenger boarding and alighting surveys which were carried out at the bus stops in the vicinity of Liverpool Street Station in October 2024. The local bus stops are shown in Figure 5.54 of the submitted TA, reproduced below for information.

Figure 5-54: Bus stops in the vicinity of Liverpool Street Station



Source: <https://content.tfl.gov.uk/bus-route-maps/liverpool-street-a4-100514.pdf>

- 14.67. The impact on bus services has been assessed in the submitted TA (Section 5.9, p.157) by uplifting the 2024 base year demand to 2041 and then distributing the bus trips amongst the local bus stops. At an 85% occupancy rate, this is anticipated to result in a 2.6 passenger increase in the AM peak and a 2.5 passenger increase in the PM peak on each bus service, due to the OSD and retail trip destination. The submitted TA concludes that, overall, the forecast increases in bus trips with the proposed development are considered to represent a negligible impact on future bus capacity (para. 5.9.13).
- 14.68. Using the attendance sensitivity test of 95%+ 5% visitors, as discussed above, increases to 2.9 additional passengers per bus service. Pedestrian modelling has also been undertaken, which is discussed in the Pedestrian Comfort Level (PCL) section of the report.
- 14.69. Overall, the proposal is not anticipated to result in any severe highway impacts during its operation and is considered compliant with London Plan Policies T1 and T4, Local Plan Core Strategic Policy CS16 and Development Management Policy DM 16.1. The proposals comply with the emerging City Plan 2040 policies S9 and VT1.

Travel Plan

- 14.70. The planning application includes a Framework Travel Plan (TP), which has been prepared for the proposed OSD, encompassing both employees and visitors to the site.

- 14.71. A Travel Plan is a strategic document designed to manage and promote sustainable travel for people accessing a particular site, such as a workplace, school, or development. Its primary aim is to reduce reliance on single-occupancy car journeys (more applicable to locations outside of the City of London), while encouraging alternatives such as walking, cycling, and public transport. It typically includes an assessment of current travel patterns, sets targets for reducing car use and increasing sustainable travel, and outlines specific measures such as cycle parking, showers, flexible working arrangements, car-sharing schemes, and public transport incentives. It also incorporates monitoring and review processes to ensure that the plan's objectives are achieved. Overall, a Travel Plan provides a practical framework for promoting greener, healthier, and more efficient travel to and from a site.
- 14.72. In the City of London, Travel Plan objectives align with broader transport and sustainability goals, including prioritising walking and cycling, reducing motor traffic and congestion, improving air quality and public health, enhancing street safety, and making efficient use of limited street space to support a cleaner, healthier, and more accessible urban environment. These objectives help ensure that travel planning contributes to the City's vision of safe, inclusive, and environmentally friendly streets, and promotes active and sustainable modes of travel as the preferred choice for journeys to, from, and within the Square Mile.
- 14.73. The submission includes a Framework TP prepared for the OSD at Liverpool Street Station, aimed at promoting sustainable travel and reducing reliance on private vehicles. Accompanying the planning application for the redevelopment project, the Travel Plan focuses on initiatives to increase active travel, such as walking and cycling, and to encourage the use of public transport. It applies to employees, visitors, and other users of the OSD and station facilities. Key components of the plan include management and implementation, with responsibilities assigned to a Travel Plan Coordinator (TPC); targets and monitoring, involving the setting of initial goals and the establishment of a review programme to track progress and adapt measures as needed; and integration with other plans, including the Delivery and Servicing Plan (DSP) and BREEAM requirements, to ensure a comprehensive approach to sustainability. The submitted Framework TP recognises the need for targets to be SMART, i.e., Specific, Measurable, Achievable and Realistic and Time-bound (para. 5.3.1).

- 14.74. It aims to provide travel information to all users of the development, with the goal of increasing the proportion of employees cycling to work by 50% (para. 5.3.2). These targets are to be achieved through several measures, including the encouragement of walking and cycling. Cycling will be promoted through the provision of cycle parking, showers, lockers, changing facilities, cycle repair and maintenance facilities and the promotion of a Bicycle User Group (BUG), supported by a Cycle Promotion Plan.
- 14.75. With respect to monitoring, the Framework TP confirms that an initial baseline travel survey will be undertaken once occupation of the office development reaches 50%.
- 14.76. It is considered that the targets within the Travel Plan are acceptable and should be monitored for a period of time and secured as an obligation as part of the S106 Agreement.
- 14.77. It is therefore recommended that a Travel Plan (including a Cycle Promotion Plan) is secured by a Section 106 obligation.

Taxis

- 14.78. There is a taxi rank on the western end of Liverpool Street with space for a total of ten taxis. The front of the rank is on the north side of Liverpool Street, accommodating three taxis, and it extends along the south side to the entrance of the Arcade. Taxis U-turn on Liverpool Street to pick up passengers on the north side of the street. It is noted that the space between Platforms 10 and 11 was historically used as the station taxi rank, where the proposed development's enhanced service yard is proposed. The proposed development includes the retention of the existing taxi rank and this matter was specifically discussed and agreed in principle at the preapplication stage between CoL, TfL and the applicant. It is noted that the Liverpool Streets Area Healthy Streets Plan (LSHSP) includes a proposal to review the taxi rank, in the context of exploring the potential to increase pedestrian priority on Liverpool Street (5.4). This review mechanism is reflected in the scope of the Section 278 highway works for Liverpool Street. The Detailed DCLP, to be secured via condition, will ensure that the turning taxis on Liverpool Street are managed and safe operation of the taxi rank is maintained (including the use of a traffic marshal).

Trip Generation – Servicing and Delivery

Servicing and Delivery Proposals

- 14.79. Policy DM 16.5 of the adopted Local Plan (2015) stipulates that developments should accommodate on-site servicing, and that such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit a site in forward gear (4). Strategic Policy S9: Transport and Servicing of the emerging City Plan 2040 concerns minimising road danger and congestion, and reducing vehicle emissions, by, 'Minimising the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside of peak hours, the adoption of area-wide solutions, freight consolidation and promoting deliveries by foot or bicycle' (d). Policy VT2: Freight and Servicing of this draft plan requires major commercial development to provide for freight consolidation; to provide on-site servicing bays within buildings (wherever practicable); to undertake delivery and servicing outside of peak pedestrian hours; support last mile deliveries made on foot, cycle or zero emission vehicle and seek opportunities to support deliveries by rail freight (2, 3, 4 & 5). Policy VT2 stipulates no deliveries between 7am-10am, 12pm-2pm and 4pm-7pm on weekdays to avoid pedestrian peak hours (4).
- 14.80. Chapter 6 of the submitted TA presents an Outline Delivery and Servicing Management Plan (DSMP) for the proposed development, which places a particular emphasis on delivery consolidation as a measure to maximise the efficiency of deliveries to the site (para. 6.1.2). The emphasis of the emerging DSP is welcomed and supported. The consideration of servicing and delivery matters pertaining to the application was informed by a site walkabout focussed on the back-of-house (BoH) servicing yard and related station areas, which took place on Tuesday 14th October 2025.
- 14.81. In terms of the existing situation, Liverpool Street Station has an existing servicing yard located between platforms 10 and 11, accessed via Primrose Street to the north of the site. The existing access from Primrose Street is gated, and all delivery and servicing vehicles are required to book in advance. Under the existing site management system, each vehicle is logged in and out.

14.82. The service road passes underneath Exchange Square and then ramps down to the lower concourse level within the station. There is a 4.2m height restriction in place as the service road passes below Exchange Square. This service road also has three service bays for NR operations, used by maintenance vehicles (in the case of planned or reactive works on the network), as well as by British Transport Police response vehicles etc.. The existing service yard is shown in Figure 6.1 of the submitted TA, which is reproduced below for information.

Figure 6-1: Existing Service Yard

View looking north to Primrose Street



View looking south to service yard



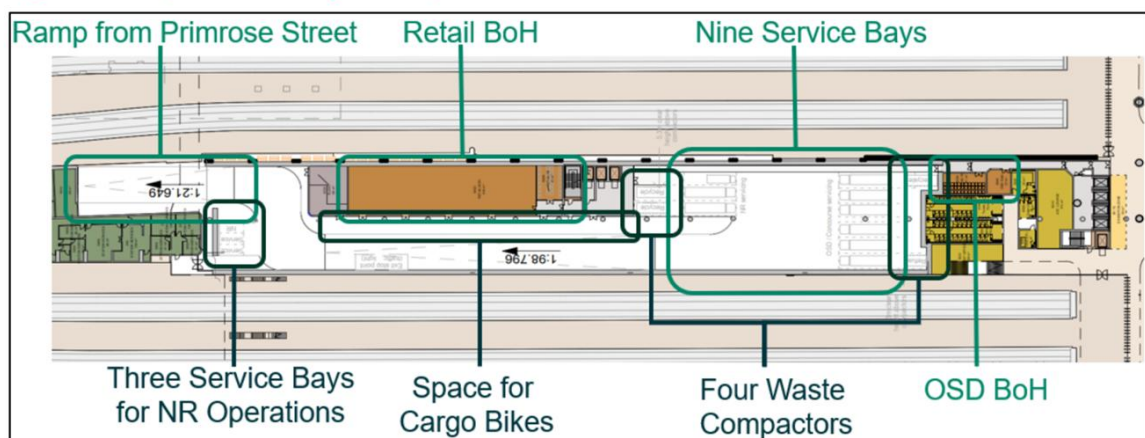
14.83. There is also a NR servicing bay located at the southern end of Pindar Street, accessed via Appold Street. Vehicles are required to reverse into this service bay, which has a height restriction of 4.11m, and then exit onto Primrose Street.

14.84. The submitted TA confirms that currently, to minimise impacts on the local highway, no timed slots are made available between 6am to 10am and 4pm to 7pm. The station's service yard currently operates outside of these stated hours, including overnight. It is noted that the station currently logs servicing and deliveries on both Saturdays and Sundays.

14.85. The aim of the servicing strategy for the proposed development, as set out in the emerging DSMP, is to accommodate the servicing needs of the station retail and enhanced station as well as the OSD from the existing NR service yard. This ensures that delivery and servicing traffic is separated from pedestrians and other activities on Liverpool Street and Bishopsgate. The principle of this servicing strategy is supported.

- 14.86. The existing service area between NR platforms 10 and 11 will be retained and reconfigured to enhance capacity. This will include a new retail BoH storage facility which will allow deliveries to be unloaded into a temporary store, rather than having them be moved directly to retail units, thereby improving efficiency of operation. There will also be a smaller OSD BoH area which will include goods lifts directly from the service area to the BoH areas within the OSD.
- 14.87. The proposed service yard is shown in Figure 6.2 of the submitted TA, which is reproduced below for information.

Figure 6-2: Proposed Servicing Yard Layout



- 14.88. The submitted TA states that vehicle access via Primrose Street to the service area located between platforms 10 and 11 will be retained, with a ramp leading down to the lower concourse level within the station. It is expected that this route is kept clear to ensure vehicles are not impeded on entry and back up onto Primrose Street. The security checkpoint (with vehicle control barriers restricting access) will remain in place, and all deliveries will adhere to specified delivery hours and have dedicated delivery time slots.
- 14.89. TfL has confirmed that the applicant has provided TfL with long-term demand and viability analysis in relation to the replacement of space between platforms 10 and 11 with servicing and retail. TfL supports the servicing and retail consolidation in principle and has no further comments to make on this point.

- 14.90. The reconfigured service area, shown below, will include a total of nine bays for service vehicles, with four waste compactors and bin storage facilities. In addition to the provision for deliveries and vans, a space has been identified within the service yard where cargo bikes can be accommodated, adjacent to the retail BoH area with walkways providing access to the OSD goods lifts. Three service bays will also be provided for NR operational vehicles, as shown in Figure 6.2.
- 14.91. CoL concerns were previously raised regarding the safety of cyclists using the servicing yard and their interaction with servicing vehicles; however, it is noted that walkways providing access to the OSD goods lifts will be installed. The applicant anticipates cargo bike deliveries to occur outside of the times when the service yard is expected to be at its busiest.
- 14.92. As part of the proposed development, the security and fire protection of the service area will be improved. Fire containment walls around the service area are proposed and these will mean that the NR fire and security protocols will allow electric vehicles to utilise the service area (including electric cargo bikes). This enhanced fire protection as part of the proposed development is welcomed and supported.
- 14.93. The submitted TA includes swept path analysis for the servicing bays, which is included at TA Appendix A5. This testing has been carried out using a 7.5 Tonne Rigid Vehicle and a 13/18 Tonne Rigid Vehicle (with an overall length of 10.0m) (specified FTA Design Vehicles). These vehicle sizes are unchanged from the existing situation, and no further information is required with respect to service vehicle size at the site.
- 14.94. The submitted TA confirms that the existing booking system would continue to be used to control delivery and servicing traffic, with bookings and the operation of the service area managed through a full or detailed DSMP (para. 6.4.9). The applicant has confirmed that, in line with CoL policy, “in delivery and servicing vehicles will not be booked to arrive between 07:00 and 10:00, 12:00 and 14:00 or 16:00 and 19:00 in order to minimise traffic impacts and night-time deliveries will be prioritised where possible”. This equates to 15 hours a day available for booking time slots, of which there would be four hours between 10am and 4pm (taking into account lunchtime restrictions).

- 14.95. If planning permission is granted, a detailed Delivery and Servicing Management Plan (DSMP) will be secured through the Section 106 Agreement. The DSMP is anticipated to set out the number/type of service vehicles; prescribe delivery timings; detail measures to be implemented to reduce deliveries over a five-year time period and identify monitoring and review proposals. The submitted TA includes information on the proposed DSMP Implementation Programme (Table 6.2) for information (p.170).
- 14.96. Furthermore, it will be established via obligation that all delivery trips will take place outside the periods of 06:00 – 10:00, 12:00 – 14:00 and 16:00 – 19:00 for both weekdays, Saturdays and Sundays (consistent with the hours of CoL peak restrictions).

Service Vehicle Trip Generation – Station Retail

- 14.97. The submitted TA considers delivery and servicing trip generation for the proposed development’s (Class E) retail use for the station (section 5.5). This assessment was informed by NR’s provision of twelve months of delivery and servicing vehicle log data for the main service yard, covering the period from October 2023 to October 2024. These site-specific data have been used to determine average daily delivery and servicing trip generation, average dwell time and proportion of cars / Light Goods Vehicles (LGVs), Medium Goods Vehicles (MGVs) and Heavy Goods Vehicles (HGVs).
- 14.98. The submitted TA identifies the station’s existing average weekday delivery and servicing trip generation, shown in Table 5.39 and reproduced below for information.

Table 5.39: Existing Station Delivery and Servicing Trip Generation

	10am to 4pm	7pm to 6am	Total
Cars/LGVs	2	5	7
MGVs	1	4	5
HGVs	2	5	7
TOTAL	5	14	19

- 14.99. The submitted TA also identifies the station’s predicted average weekday delivery and servicing trip generation as a result of the proposed station (Class E) retail use, shown in Table 5.40 and reproduced below for information.

Table 5.40: Station Class E Retail Delivery and Servicing Trip Generation – Primrose Street

	10am to 4pm*	7pm to 6am	Total
Cars/LGVs	4	10	14
MGVs	3	7	10
HGVs	4	10	14
TOTAL	11	27	38

*Excluding 12pm – 2pm lunchtime peak.

14.100. This assessment identifies a net increase of +19 (one-way) service vehicle trips (i.e. an uplift from 19 to 38 trips) associated with the proposed additional station retail use at the site.

Service Vehicle Trip Generation – OSD

14.101. The submitted TA considers delivery and servicing trip generation for the proposed OSD (para. 5.5.13). This assessment is based on CoL's Loading Bay Ready Reckoner tool, which is a spreadsheet-based tool used to estimate the required number of loading or servicing bays for various land-use developments and is considered appropriate.

14.102. The applicant has confirmed that the servicing strategy for the proposed OSD is to use an off-site consolidation centre to reduce the number of servicing-related trips required to the OSD. This approach is welcomed and supported. For the purposes of the assessment, the submitted TA has used a trip rate of 0.2 vehicles per day per 100 sqm gross external area (GEA) (i.e. as per the Ready Reckoner) with a 50% consolidation factor. This assessment approach is considered acceptable.

14.103. The service vehicle trip generation assessment assumes that the split between cars/LGVs, MGVs and HGVs is 35% / 25% / 40%, similar to the existing vehicle split (para. 5.5.19). This assumption is considered appropriate.

14.104. Based on these stated factors, the OSD is predicted to generate a daily total of 91 (one-way) service vehicle trips (i.e., 91 arrivals and 91 departures, or a total of 182 two-way service vehicle trips). This is shown by vehicle type and time period in Table 5.43 of the submitted TA, reproduced below for information.

Table 5.43: OSD Delivery and Servicing Trip Generation

Vehicle type	10am to 4pm	7pm to 6am	Total
Cars/LGVs	10	22	32
MGVs	7	16	23
HGVs	11	26	37
TOTAL	27	64	91

14.105. The proposed development, i.e. both the station and the OSD combined, is predicted to generate a total of 7 service vehicle trips per day in relation to waste collection (as identified in Table 5.44 of the submitted TA).

Service Vehicle Trip Generation – Combined Station Retail & OSD

14.106. The submitted TA identifies the total service trip generation associated with the proposed development, i.e. the combined station retail and OSD, at the main service yard accessed via Primrose Street, including waste collection vehicles. This is set out in Table 5.46, which is reproduced below for information. This comprises a daily total of 136 (one-way) service vehicle trips, of which 43% comprise HGV trips.

Table 5.46: Combined Station and OSD Delivery and Servicing Trip Generation – Primrose Street

Vehicle type	10am to 4pm	7pm to 6am	Total
Cars/LGVs	14	32	46
MGVs	10	23	33
HGVs	17	41	58
TOTAL	40	96	136

14.107. On the basis of the technical information provided in the submitted TA, a service vehicle cap of 136 (one-way) service vehicle trips per day is proposed. This includes facilities management (FM) and refuse collection and excludes cargo / pedal bikes and emergency vehicles. It is proposed that this service vehicle cap is secured via obligation.

14.108. The submitted TA concludes, with respect to servicing, that the nine loading bays proposed builds-in some capacity resilience to accommodate service vehicles for long periods, if required (e.g. for maintenance, repairs). It also notes that the access road from Primrose Street to the loading bays is approximately 200m long, and this space provides additional resilience by enabling vehicles to queue off the public highway, in case of an unexpected event such as a vehicle breakdown.

14.109. The applicant recognises that cargo bikes are increasingly being used in the City, helping to remove a significant number of vehicle movements from the local highway network. As detailed above, cargo bikes are permitted to be used during the City's peak hour restrictions. The applicant has confirmed in the submitted TA that use of the HGV loading bays will be monitored and, if the use of cargo bike deliveries reduces the demand for loading bays, then it may be possible to re-allocate one of the loading bays for cargo bikes only. It is recommended that this monitoring requirement is built into the DSMP monitoring strategy.

14.110. Overall, the proposed development is considered compliant with London Plan Policy T7 and Local Plan Core Strategic Policy CS16 and Development Management Policy DM 16.1. The proposals also comply with the emerging City Plan 2040 policies S9 and VT2.

Pedestrian Comfort Levels (Pedestrian Footway Assessment)

14.111. Pedestrian Comfort Level (PCL) is a measure used to assess how comfortable and safe a pedestrian environment is, particularly in terms of space and flow. It is commonly used to evaluate footway conditions and ensure they meet the needs of pedestrians.

14.112. Detailed PCL assessment work has been undertaken to determine the existing and proposed pedestrian footway crowding in the vicinity of the proposed development. The TfL guidance 'Pedestrian Comfort Level Guidance v2' (2019) has PCL levels that range from A to E, representing differing levels of suitability for various areas of pedestrian movement, and are categorised as:

- comfortable,
- acceptable,
- at risk, and;
- Unacceptable/uncomfortable.

14.113. A PCL level of C is "at risk" and PCL levels of D or E are unacceptable and could require highway works such as widening of the footways or crossings.

- 14.114. As observed above, the submitted TA (and subsequent Transport Addendum) report the findings of extensive modelling work undertaken to inform the planning application. The scope of this technical with respect to the internal station modelling of Liverpool Street Station has been considered in the report above. It is recognised that the station is predicted to experience significant growth in passenger numbers through growth planned in the City and beyond. This growth is included in both the 'Do Minimum' (DM) (without station upgrade) and 'Do Something' (DS) (with station upgrade) scenarios already considered.
- 14.115. In addition to the internal station modelling, the submitted TA (along with the Transport Addendum) set out the findings of extensive external pedestrian modelling work of the public realm surrounding Liverpool Street Station. This is considered under this PCL assessment section of the report.
- 14.116. As part of the modelling process, there is a parallel Pedestrian Model Auditing Process (PMAP) involving both the applicant and TfL, which is ongoing process which will continue throughout the construction phase. The Model Auditing Process (MAP) provides a structured approach to model development and defined standards for model quality, together with a protocol for stakeholder engagement, model submission and acceptance. PMAP is specifically considered in Section 7 of TfL's Model Auditing Process (MAP) Version 4.0, dated September 2023.
- 14.117. For the purposes of this report, TfL has confirmed that the street-level LEGION modelling is at MAP Stage 5, with final outstanding work being addressed through engagement between TfL auditors and NR's LEGION modelling team. It is anticipated that this work will be completed prior to Committee and a further update from TfL is anticipated shortly.
- 14.118. The modelling work reported in the TA is based on the 2024 (Base Year) and 2041 (Future Year) assessment years, with the focus on the weekday AM (07:00 – 10:00) and PM (16:00 – 19:00) peak periods. The 2024 Base Year reflects the existing situation and is informed by detailed site surveys carried out in October 2024.
- 14.119. AECOM, on behalf of the applicant, has undertaken pedestrian modelling of the external area surrounding Liverpool Street Station to assess pedestrian flows with the current and proposed layouts. This technical work has been carried out using LEGION 2023 software (version 23.00.00.34).

14.120. The modelling was based on pedestrian and bus boarding/alighting surveys conducted on the 1st and 2nd of October 2024. The 12-hour results are shown in Table 5.8, extracted from the submitted TA and reproduced below.

Table 5.8: Pedestrian Flows from Surveys (12 hour period)

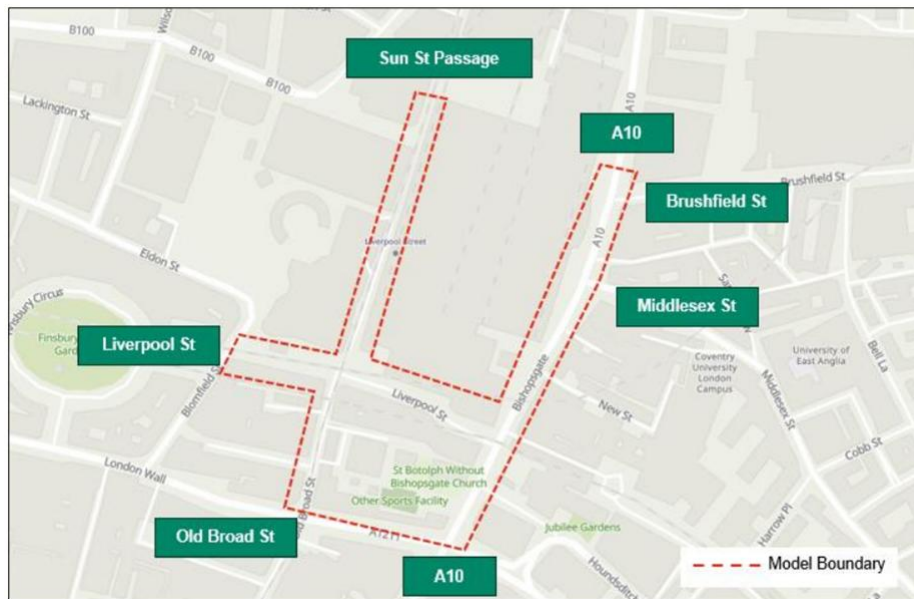
Date	Pedestrian Movements		Bus Boarding and Alighting	
	AM	PM	AM	PM
01 October 2024	351,450	403,891	5,049	5,692
02 October 2024	381,294	498,751	4,821	5,599

14.121. While bus boarding/alighting demand was marginally higher on 1st October, the data from 2nd October shows a significant increase in overall pedestrian activity. The count data from 2nd October was therefore used. An additional pedestrian count on Old Broad Street was undertaken on the 9th and 10th of October 2024. Data were collected between 07:00 and 19:00 at 15-minute intervals.

14.122. Station entry and exit counts collected in March 2024, as part of the station modelling exercise, were compared with equivalent counts collected in October 2024. In addition, NR provided data from Liverpool Street Station’s internal pedestrian model, TfL’s Liverpool Street Station London Underground pedestrian model, and data from site visits conducted on the 27th and 28th of October 2024 at other locations to supplement the model.

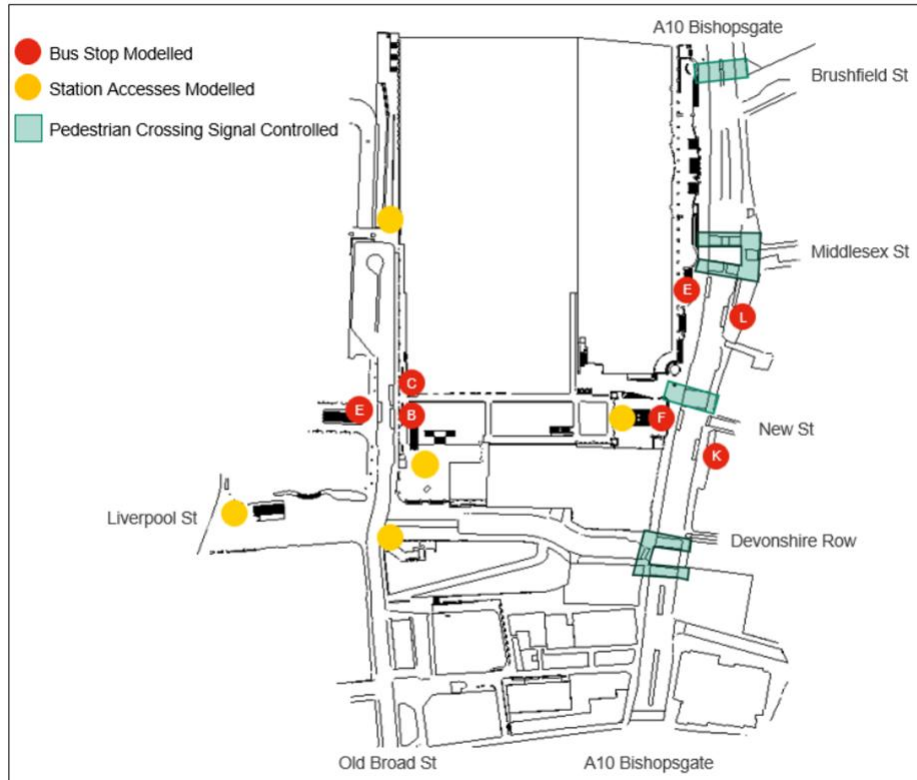
14.123. The model extent is illustrated in Figure 5.7 of the submitted TA, reproduced below for information. Figure 5.7 shows that the pedestrian modelling of the external public realm extends from Blomfield Street to the west; Bishopsgate to the east; Exchange Square to the north and to the north of London Wall / Wormwood Street to the south.

Figure 5-7: Model Extent



14.124. The model incorporated bus stops, station entry and exit points, as well as signalised and non-signalised pedestrian crossings. The model layout is shown in Figure 5.8 of the submitted TA, reproduced below for information.

Figure 5-8: Model layout



14.125. Similar to the internal station modelling, the submitted TA reports the modelling of three scenarios: Base, Do Minimum and Do Something. These three scenarios are summarised in Table 5.9 of the submitted TA, reproduced below for information.

Table 5.9: Public Realm Modelled Scenarios

Scenario	Layout	Demand	Purpose
Base	Existing	2024	Base 2024 (AM and PM)
Do-Minimum	Existing	2041	Do-Minimum 2041 (AM and PM)
Do-Something	Proposed	2041	Do-Something 2041 (AM and PM)

14.126. To assess the end state of the scheme, a 2041 forecast scenario included a 30% growth factor from Railplan plus a further 35% contingency from NR, resulting in an overall growth factor of 1.755 (or 75.5%), which was applied to the 2024 base year (para. 5.2.41). This is similar to the assessment assumptions for the internal station modelling work considered above, which represent long-term growth in the City and beyond.

14.127. As explained in the report above, the OSD trip generation assessment reported in the submitted TA has been based on the application of an 85% staff attendance factor, plus a 5% allowance for visitors. CoL requested that a sensitivity test should be undertaken for a higher level of occupation. This was set out in Table 11-1 of the Transport Addendum and has been reproduced in Table 2 above, which presents the findings of an office attendance sensitivity test, which assumes a 95% occupancy plus 5% visitors.

14.128. The external public realm pedestrian modelling reported in the original submitted TA is based on the trip generation related to both the OSD and the uplift in station retail floorspace (using the 85% attendance factor for office staff). This trip generation identified within the original TA and included in the model is shown in Table 5.10, reproduced below for information.

Table 5.10: Trips Generated by OSD and Retail Element of Proposed Development

Mode	Modal Split	AM Peak Period (07:30-10:30)			PM Peak Period (16:00-19:00)		
		Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way
Underground, metro, light rail or tram	33.6%	2,118	41	2,159	40	2,032	2,071
Train	49.1%	3,096	60	3,156	58	2,970	3,027
Bus, minibus or coach	6.5%	410	8	418	8	394	401
Taxi	0.5%	32	1	33	1	31	31
Motorcycle, scooter or moped	1.4%	86	2	88	2	83	85
Driving a car or van	0.0%	0	0	0	0	0	0
Passenger in a car or van	0.0%	0	0	0	0	0	0
Bicycle	4.4%	278	5	283	5	266	272
On Foot	4.6%	290	6	296	5	278	284
Other	0.0%	0	0	0	0	0	0
Total	100%	6,310	123	6,433	118	6,053	6,171

14.129. As explained in the Transport Addendum, in the submitted TA it was noted that in order to allow the 2041 Legion model to run, a degree of footpath (or footway) widening had to be included in the future Do-Minimum and Do-Something scenarios, as the future baseline crowding levels were too high for Legion to compute. This widening was, “incorporated purely as a modelling tool in order to obtain results for the rest of the pedestrian network”. In addition to targeted footpath widening, the models also incorporated Route Guides and Drift Zones to improve pedestrian flow and congestion.

14.130. The model specifically incorporates a 1.0-metre widening of Old Broad Street in the 2041 future assessment years, as specified in the CoL’s LSAHSP. This widening is illustrated in Figure 5-10 of the submitted TA, reproduced below for information. As noted above, the model also incorporated “Route Guides” and “Drift Zones”, tools to improve pedestrian flow and reduce footway blockages caused by narrow walkways or tight corners, within the 2041 Do-Minimum and Do-Something scenarios and applied specifically to Old Broad Street and the A10 Bishopsgate. This is shown in Figure 5.11 of the submitted TA, reproduced below. (para. 5.2.46).

Figure 5-10: Footpath Widening on Old Broad Street Assumed in 2041 Model

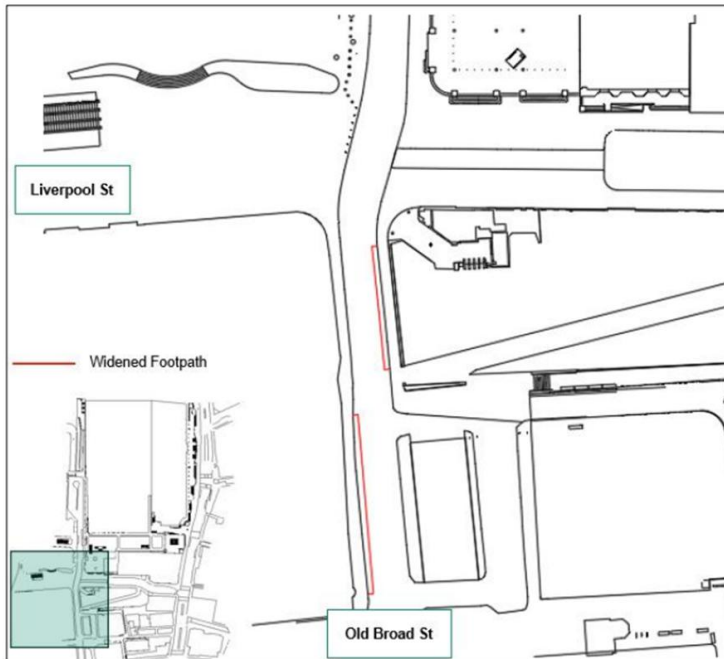
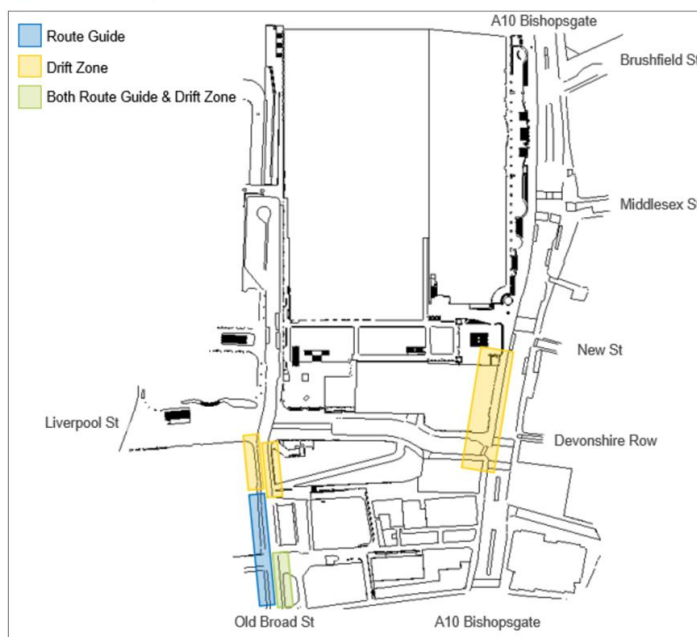


Figure 5-11: Model Objects included to Facilitate Model Run



14.131. The submitted TA presents the model outputs in detail and includes various PCL metrics, such as the range of persons per square meter per minute (psmpm). The corresponding density levels are shown in extracted Table 5.11 of the submitted TA. It is noted that the detailed pedestrian modelling report is included in full at Appendix A2 of the submitted TA for information. The TA observes that PCL should be given particular consideration, as it provides, “a more direct measure of pedestrian experience in constrained footway environments” (para. 5.7.16).

Table 5.11: Density Levels for PCL Categories

PCL+-	Description	Min ppmpm	Max ppmpm
A+	Comfortable for all areas	0	3
A	Comfortable for all areas	3	6
A-	Comfortable for all areas	6	9
B+	Recommended minimum for all areas	9	12
B	Recommended minimum for all areas	12	15
B-	Recommended minimum for all areas	15	18
C+	Increasingly uncomfortable	18	21
C	Increasingly uncomfortable	21	24
C-	Increasingly uncomfortable	24	27
D	Very uncomfortable	27	35
E	Very uncomfortable	35	∞

14.132. The external pedestrian modelling results of the public realm are set out in full in section 5.7 of the submitted TA. The modelled PCLs are shown in Table 5.51 of the submitted TA, reproduced below for information. This table shows the 2024 Base scenario for both AM and PM peak periods, as well as the AM and PM peaks for the 2041 Do-Minimum (DM) and Do-Something (DS) scenarios. In summary, these results show the following:

Existing Performance (2024 Base Models)

- Old Broad Street, the eastern section of Liverpool Street, and southern section of the A10 Bishopsgate are very busy and show low pedestrian comfort levels (PCL C or D). This is primarily due to high pedestrian demand combined with narrow footways.

Future Performance (2041 Do-Minimum & Do-Something Models)

- Footways on Liverpool Street, Old Broad Street and A10 Bishopsgate are at a PCL of D or E and are “very uncomfortable”.
- The largest change in PCL is between 2024 Base and 2041 Do-Minimum scenarios due to an increased station demand. There is minimal difference between the 2041 Do-Minimum and 2041 Do-Something scenarios. The main differences occur near Liverpool Street close to the OSD entrance.

Table 5.51: PCL Results



14.133. The submitted TA concludes that, “the results of the assessment indicate that compared to current conditions, there will be extensive crowding on footways in the area surrounding the Station in the future DM scenario. As a result of the planned growth in employment and housing in the area, pedestrian flows are predicted to increase significantly, resulting in the section of footway on Bishopsgate, Liverpool Street and Old Broad Street experiencing major congestion and crowding” (para. 5.7.22).

14.134. The submitted TA also notes that, “the DS external pedestrian assessment does not take account of potential reductions in footfall on routes surrounding the station that could be caused by reassignment of pedestrian flows to use routes through the station. The new and enhanced routes through the station therefore offer potential alternative routes through the upper concourse level of the station which could result in improvements to the LoS results shown for the DS scenario” (para. 5.7.24).

14.135. The applicant has undertaken additional pedestrian modelling work following submission of the planning application, which is reported in the Transport Addendum referred to above. This supplementary assessment work is summarised below for information.

Old Broad Street PCL Assessment

14.136. The applicant references the consented scheme for 55 Old Broad Street (approved in December 2024) (application ref: 23/00469/FULEIA) and the associated Section 278 works to widen the eastern footway of Old Broad Street. These highway works on Old Broad Street are shown in Figures 2.1 and 2.2, reproduced below for information.

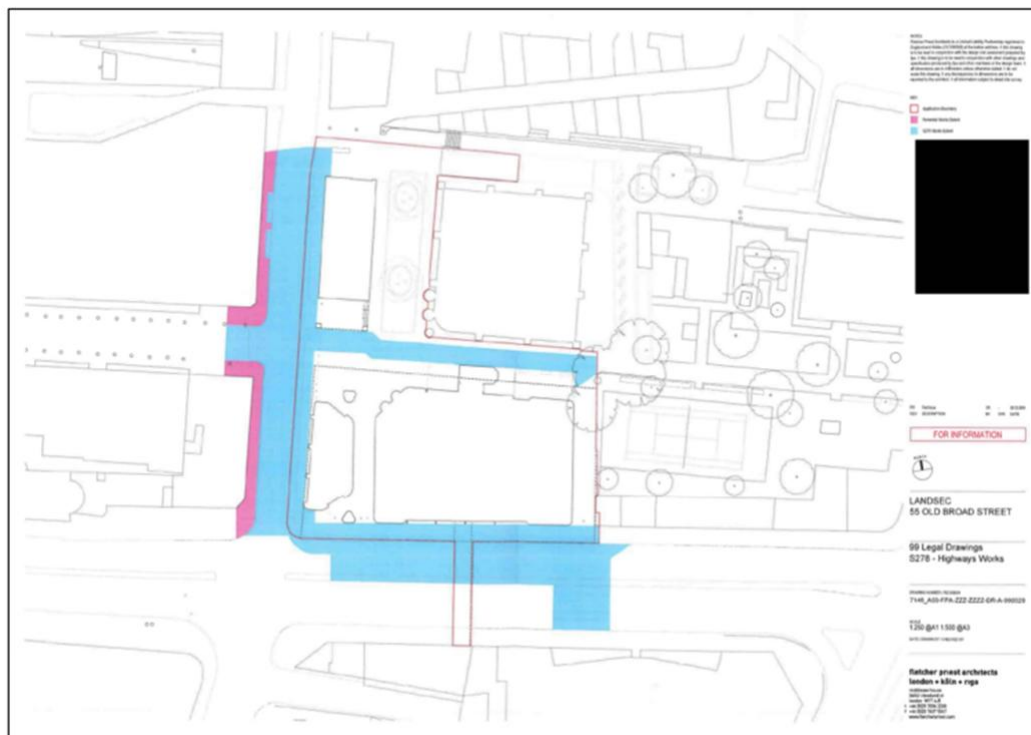
14.137. The footway widening is proposed to extend from London Wall to a point just south of The Arcade. The proposals also include partial on-footway loading bays, which reduce the available footway space to 1.5 metres during delivery times. However, this reduction in effective width for pedestrians has not been assessed, as the loading bays are considered more likely to be provided on the carriageway.

14.138. The carriageway width at this location will also be reduced to between 6.75 metres and 7.5 metres while maintaining two-way operation for buses.

14.139. PCLs at this location have been assessed in the 2041 scenarios, both with and without the widening, along separate links. This assessment was carried out with and without the additional 35% background growth, with the scenario including this growth considered the more appropriate for evaluation.

14.140. The results are presented in Figure 2.3 and Tables 2.1 and 2.2 of the submitted Transport Addendum and these are reproduced below. These results indicate that the impact of development flows on PCLs along Old Broad Street is minimal, except for Link 3, where the rating deteriorates from D without development to E with the proposed development. In general, PCL values remain unchanged following the proposed widening in both the With and Without Development scenarios, aside from this exception.

Figure 2-1 – S278 Extents Associated with Application Ref 23/00469/FULEIA, Extracted from Schedule 8 of the Signed s106 Agreement



[illegible]

The map shows the River Sever flowing through the center of the study area. Six sampling sites are marked with green numbers 1 through 6. Sites 1, 2, and 3 are located on the left bank (west) of the river, while sites 4, 5, and 6 are on the right bank (east). The river is labeled 'River Sever' in the center. Surrounding roads include 'Broad St Ave' at the top, 'New Street' on the left, 'London Road' at the bottom left, and 'Water' at the bottom. A dashed red line outlines a specific area on the left bank. A yellow line runs parallel to the river on the right bank. A green line runs diagonally across the top right. A small orange box labeled 'Plot 1' is visible on the right bank near the top.

Table 2-1 – Comparison of Old Broad Street PCLs 2041+35% with Development

Link Section	AM Peak		PM Peak	
	Without Widening	With Widening	Without Widening	With Widening
1	E	E	E	E
2	E	C-	E	C-
3	E	E	E	E
4	C-	C	D	C
5	C-	C-	E	E
6	E	E	E	E

Prepared for: Network Rail Infrastructure Ltd

AECOM

Table 2-3 – Comparison of Old Broad Street PCLs 2041+35% with Widening

Link Section	AM Peak		PM Peak	
	Without Development	With Development	Without Development	With Development
1	E	E	E	E
2	C-	C-	C-	C-
3	E	E	D	E
4	C	C	C	C
5	C-	C-	E	E
6	E	E	E	E

14.141. The applicant has carried out additional sensitivity tests to consider the potential for, and implications of, significant volumes of OSD staff walking to and from the site via stations other than Liverpool Street Station. As part of this additional work, the applicant has undertaken a sensitivity test on pedestrian volumes on Old Broad Street and Liverpool Street (towards Moorgate).

14.142. A PCL assessment has been carried out with additional pedestrians assigned to Old Broad Street (10% OSD LUL demand assigned to Bank / Cannon Street) and Liverpool Street (10% OSD LUL demand and 10% Rail demand assigned to Moorgate). The results are presented in Tables 3.5 and 3.6 of the Transport Addendum, extracted below for information.

Table 3-5 – Comparison of Old Broad Street PCLs 2041+35% with Development

Link Section	AM Peak		PM Peak	
	2041 With Development	2041 Sensitivity Test	2041 With Development	2041 Sensitivity Test
1	E	E	E	E
2	C-	C-	C-	C-
3	E	E	E	E
4	C	C	C	C
5	C-	C-	E	E
6	E	E	E	E

Table 3-6 – Comparison of Liverpool Street West PCLs 2041+35% with Development

Link Section	AM Peak		PM Peak	
	2041 With Development	2041 Sensitivity Test	2041 With Development	2041 Sensitivity Test
16	B	B	B	B

14.143. Overall, this sensitivity test does not indicate that the redistribution of rail and underground trips to Bank / Cannon Street and Moorgate stations would change the overall conclusions of the assessments presented in the submitted TA. The results includes that the PCL values across the assessed links on Old Broad Street and Liverpool Street generally remain unchanged in 2041 With Development scenarios, with no variation in PCL banding levels.

- 14.144. Following submission of the planning application, further discussions have taken place between the applicant and TfL, as well as CoL, in relation to the full strategic modelling of the proposed OSD, including MoTiON (Mode of Travel in London).. TfL anticipates the need for further discussion to take place, with this process secured via a pre-occupation condition to detail the projected implications on public transport at a more micro level to enable detailed longer term service planning, which can be inputted into the Travel Plan process. There has been significant pre application engagement with the applicant regarding the transport modelling for the proposed development. Extensive technical work (including LEGION pedestrian modelling work) is presented in the submitted Transport Assessment (TA) and accompanying addendum information. Whilst officers are satisfied that the significant environmental impacts of the development are understood (as is any necessary mitigation), it is acknowledged that the applicant is committed to undertaking further detailed modelling of the transport impacts prior to occupation. This will allow for longer term service management and planning at a more micro level as well as the bespoke tailoring of the Travel Plans. It is concluded that the transport impacts of the proposed development are sufficiently understood at this stage. Furthermore, the concerns identified through the model auditing process to date can be appropriately mitigated through the s278 agreement and Travel Plan.
- 14.145. Based on the information above, along with a substantial Section 278 package of works, secured from the proposed development towards highways works, the surrounding highways will be considered holistically in partnership with TFL, to create a safe pedestrian environment as part of the Liverpool Street Area Healthy Streets Plan and a detailed design project. The proposals are not yet fully formed and will be subject to further consideration at the time, including input from key stakeholders such as local businesses, residents, and transport authorities to ensure the design reflects community needs and priorities.
- 14.146. Overall, the application is considered compliant with Local Plan Core Strategic Policy CS16 and Development Management Policies DM 16.1 and DM 16.2. The proposals also comply with the emerging City Plan 2040 policies S9 and S10, as well as Policy AT1. It aligns with the current transport strategy objectives by supporting the creation of a high-quality public realm that is inclusive, accessible, and enhances the experience of walking, cycling, and wheeling.
- 14.147. Complementing this, Policy CS16 focuses on improving public transport, streets, and walkways by enhancing the public realm to support pedestrian movement and safety, including the development of new pedestrian routes.

Active Travel Zone Assessment

14.148. As noted in the report above, the planning application is supported by a Healthy Streets TA, prepared by AECOM. The TA includes an Active Travel Zone (ATZ) Assessment. The extent of the ATZ assessment, and the associated routes, are shown in Figure 4.2 and Figure 4.3 of the submitted TA, reproduced below for information.

Figure 4-2: Neighbourhood Scale ATZ

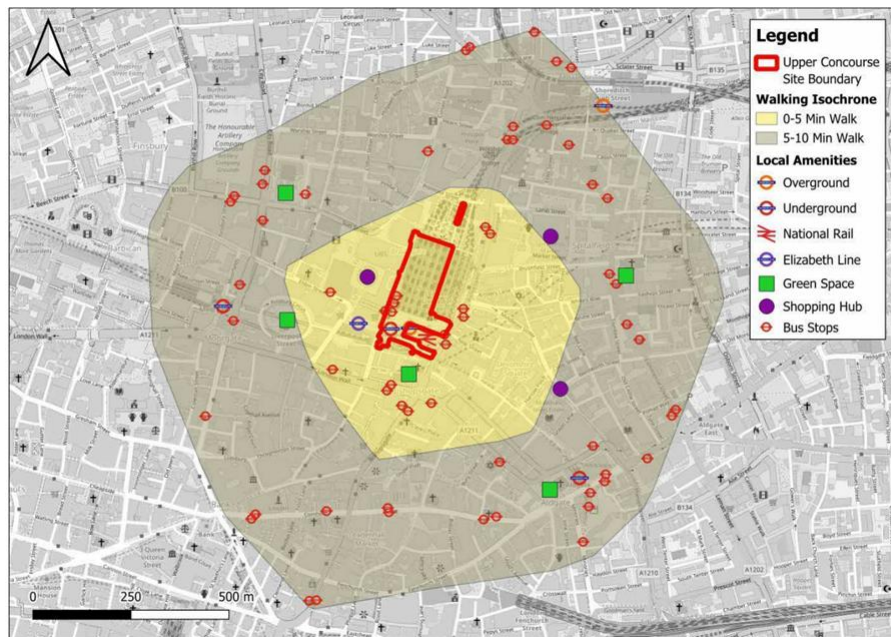
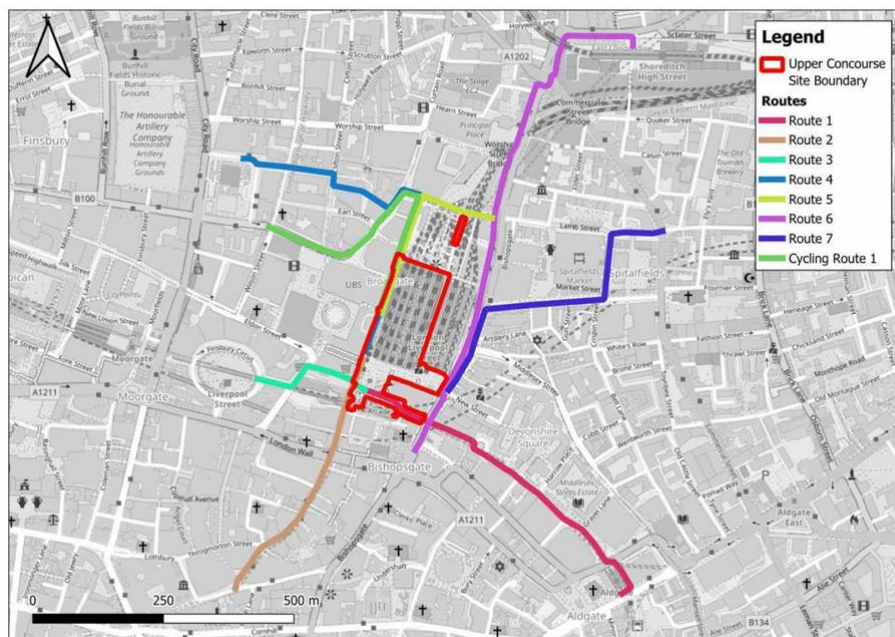


Figure 4-3: Key Destinations and Routes



14.149. The ATZ assessment includes seven pedestrian routes and one cycle route, as illustrated above. An extension was also added to Route 3, as detailed in section 4 of the Transport Addendum (see Figure 4.2).

14.150. The extent of the ATZ assessment has been considered specifically with reference to the proposed OSD, considering that this is a new feature. The scope and assessment was agreed at pre-application stage.

14.151. The submitted TA states in relation to the ATZ assessment, “this equates to trips on the local walking and cycling networks generated by staff and visitors of the OSD, plus some staff from the uplift in Class E use within the station. Therefore the routes most likely to be used for these trips have been assessed. The routes also cover the relevant parts of the Liverpool Heathy Street Area Healthy Streets Plan. The ATZ assessment identifies locations of interest for staff of the OSD element of the Proposed Development and the walking and cycling routes which would typically be used to access key destinations from the Site” (paras. 4.1.3 & 4.5.2).

14.152. The ATZ encompassed the following assessed routes and identified potential areas for improvement:

- Route 1 – to Aldgate (worst section - Cutler Street).
- Route 2 –to Threadneedle Street (worst section - Old Broad Street).
- Route 4 – to Finsbury Square.
- Route 6 – to Shoreditch High Street (Worst section - A10 / Great Eastern Street / Commercial Street junction and the A10 / A1209 junction).
- Route 7 – to Commercial Street/Lamb Street/Hanbury Street (worst section A10/ Brushfield Street junction).
- Cycle Route 1 – Cycle Superhighway 1 (Pindar Street).

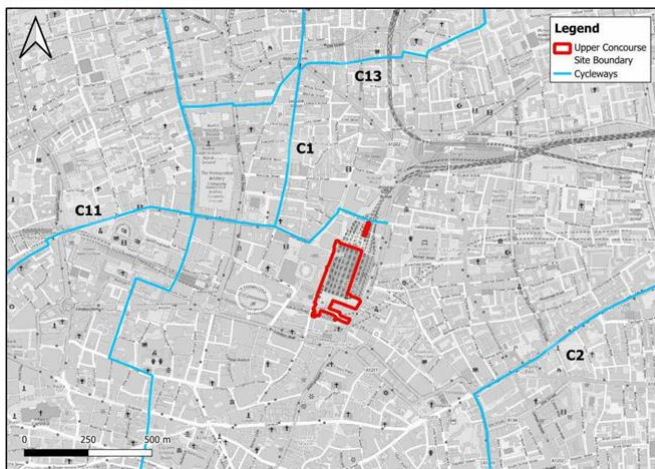
14.153. It is noted that Route 1 includes Liverpool Street, whilst Route 2 includes Old Broad Street.

14.154. The ATZ assessment provides a comprehensive review of pedestrian and cycle connectivity for the proposed development, focusing on routes most likely to be used by staff and visitors. By identifying key links and highlighting sections requiring improvement, such as Cutler Street, Old Broad Street, and critical junctions along the A10. The assessment ensures alignment with the Healthy Streets Plan and supports enhanced accessibility and safety for active travel modes. These findings will inform targeted interventions to promote sustainable transport and improve the overall user experience within the local network. Delivery of these interventions will be funded through a combination of funding sources, ensuring a collaborative approach to improving infrastructure and supporting active travel. Furthermore, these measures will contribute to the successful delivery of the Liverpool Street Area Healthy Streets Plan, reinforcing the commitment to creating a safer, healthier, and more accessible environment for all users.

Cycle Parking

14.155. The site is well located in relation to the local cycle network. Figure 3.5 of the submitted TA shows the site relative to the nearest cycle routes, these being Cycleway 1, Cycleway 2, Cycleway 11 and Cycleway 14, as reproduced below for information.

Figure 3-5: Local Cycle Network

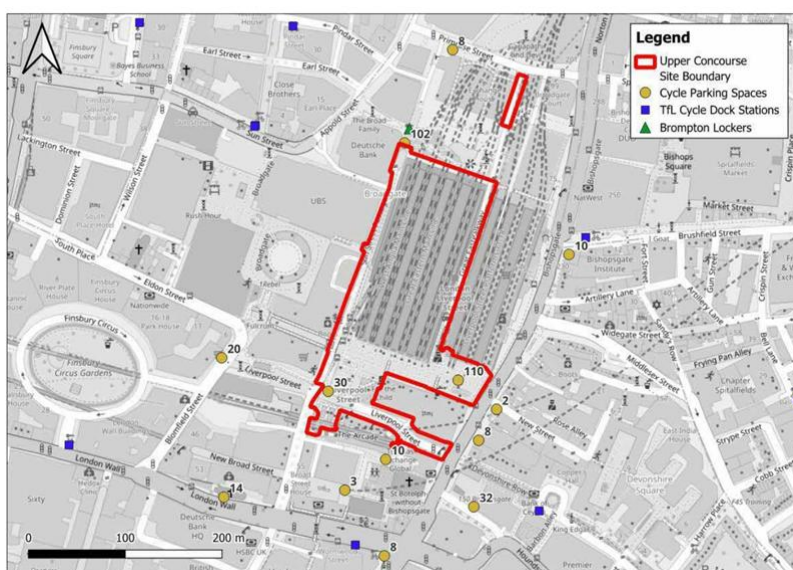


14.156. Existing cycle parking at the site is provided outside both the Liverpool Street and Bishopsgate entrances to the station. Cycle parking is also currently provided in Sun Street Passage, to the north-west of the station. In total, there are 242 existing cycle parking spaces directly adjacent to the station entrances. In addition, there are also twelve Brompton cycle hire lockers available on Sun Street Passage. The existing cycle parking provision is shown in Figure 3.8 of the submitted TA, reproduced below for information (note: Figure 3.8: the corrected figure for the number of Brompton Lockers on Sun Street Passage is 12). It is noted that these existing Brompton cycle lockers will be retained by the proposed development.

14.157. Appendix A3 of the submitted TA Report, which includes a Technical Note reporting the findings of cycle parking occupancy survey (February 2025), includes a photographic record of existing cycle parking provision at the station (Figures 1.1 to 1.5).

14.158. The closest TfL Cycle Hire docking stations to the site are located on Brushfield Street, Devonshire Square and Wormwood Street, as shown in Figure 3.7 of the submitted TA.

Figure 3-8: Existing Parking Provision



14.159. Cycle parking provision for the proposed development is considered below, dealing with the proposed station cycle hub, the OSD and short-stay cycle parking in turn. Overall, the London Plan (2021) Policy T5 Cycling requires cycling provision to be provided in line with the minimum guidance as set out in the plan and designed and laid out in accordance with guidance in the London Cycling Design Standards (LCDS). It also highlights that development should cater for larger cycles, including adapted cycles.

Station Cycle Hub

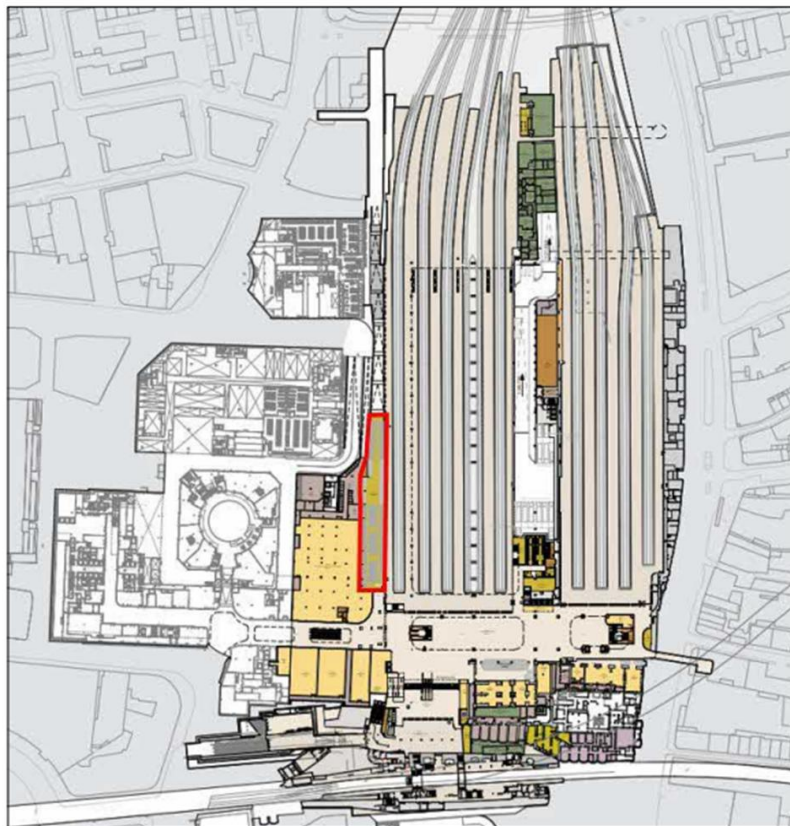
14.160. With respect to cycle parking standards for stations (*Sui generis*), Table 10.2 of the London Plan requires these to be considered on a case-by-case basis through liaison with TfL. The Healthy Streets Plan for the Liverpool Street area, referred to in the report above, proposes enhanced cycle parking facilities within the station in the form of a prominent and visible cycle hub (p.9). The proposed development delivers this proposal, and this is welcomed and supported.

14.161. The proposed development includes the provision of a new cycle hub at the station's lower concourse level, replacing the existing cycle parking at the Bishopsgate entrance, to provide a step-change in cycle parking quantity and quality. The cycle hub location is outlined in red, as shown in Figure 3.10 of the submitted TA, reproduced below for information. It is noted that the existing double-stack cycle parking outside the station's Bishopsgate entrance will be removed and replaced by the proposed cycle hub.

14.162. The station cycle hub will provide a maximum of 732 cycle parking spaces to serve both the station staff and station retail staff, as well as provide long-stay provision for station users. These spaces are expected to comprise 75% double stackers; 20% Sheffield stands (standard spacing) and 5% Sheffield stands at wider spacing for non-standard cycles.

14.163. The applicant has confirmed expectation that the detail of this long-stay cycle parking area will be secured by a pre-commencement planning condition in the submitted TA Report (para. 3.4.36). The detailed design will be secured by a planning condition.

Figure 3-10: Station Cycle Storage Location



14.164. The proposed station cycle hub will be accessed from Primrose Street via the tunnel under Exchange Square, linking to ramps in Sun Street Passage, and supported by a pedestrian-only connection directly into the lower concourse for cyclists who have parked their bikes. Access between the cycle hub and the lower concourse level is shown in **Figure 1**, which is extracted from the submitted Design and Access Statement (DAS) (Figure 9.215). **Figure 2**, which is also extracted from the DAS, shows provides additional information in relation to access to the proposed cycle hub for information.

14.165. As noted above, access to the station cycle hub will be from Primrose Street to the north of the site, via the tunnel under Exchange Square, linking to reconfigured ramps in Sun Street Passage. Currently, the section of road between the Exchange Square tunnel and Primrose Street is one-way travelling northbound. It is therefore proposed to introduce a contraflow cycle lane on Pindar Street to facilitate southbound access for cyclists towards the cycle hub, supported by appropriate wayfinding. This contra-flow arrangement is shown in Figure 3.11 of the submitted TA (with the full drawing included at Appendix A 4 of the TA) and is reproduced in Figure 3 below for information. This proposed access arrangement has been subject to a Stage 1 Road Safety Audit (RSA) process. This cycle infrastructure will be secured via a Section 278 Agreement with CoL.

Figure 1: Proposed Station Cycle Hub Location (Platform-level)

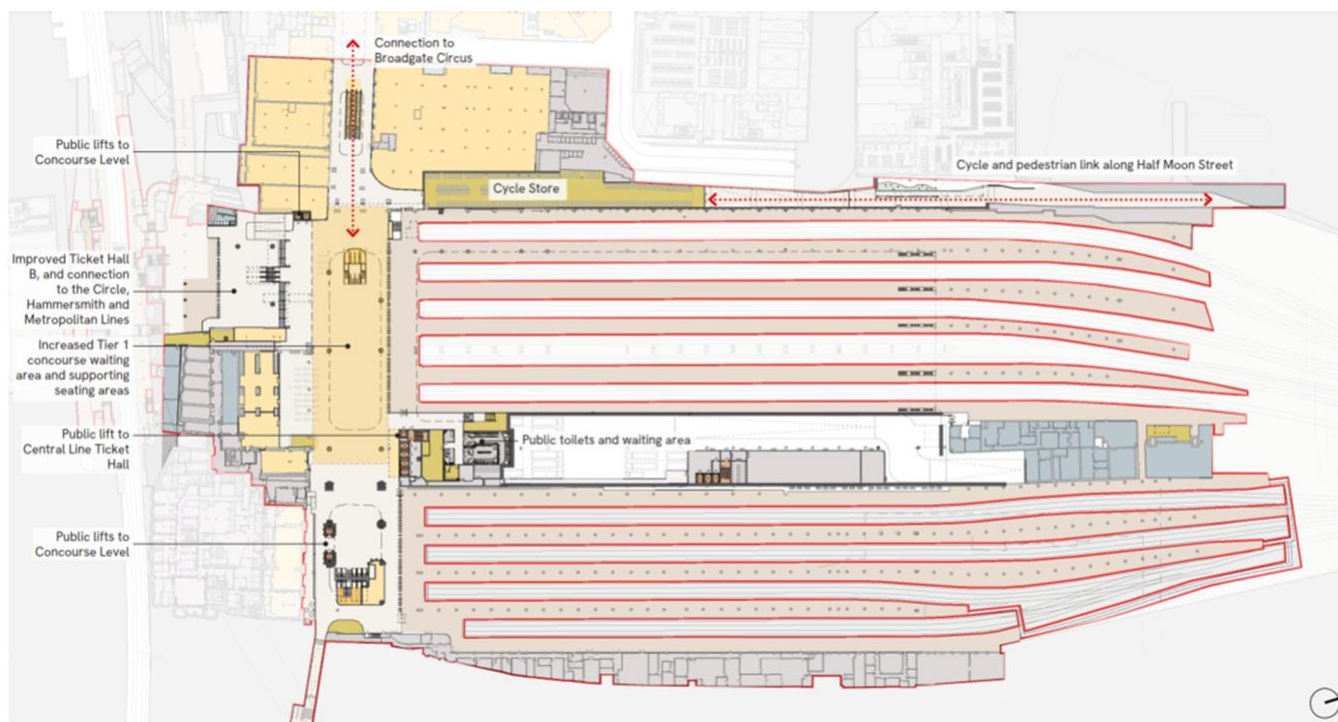


Fig.9.215. Proposed Platform Level

Source: DAS Figure 9.215

Figure 2: Proposed Station Cycle Hub (Lower Concourse Access)

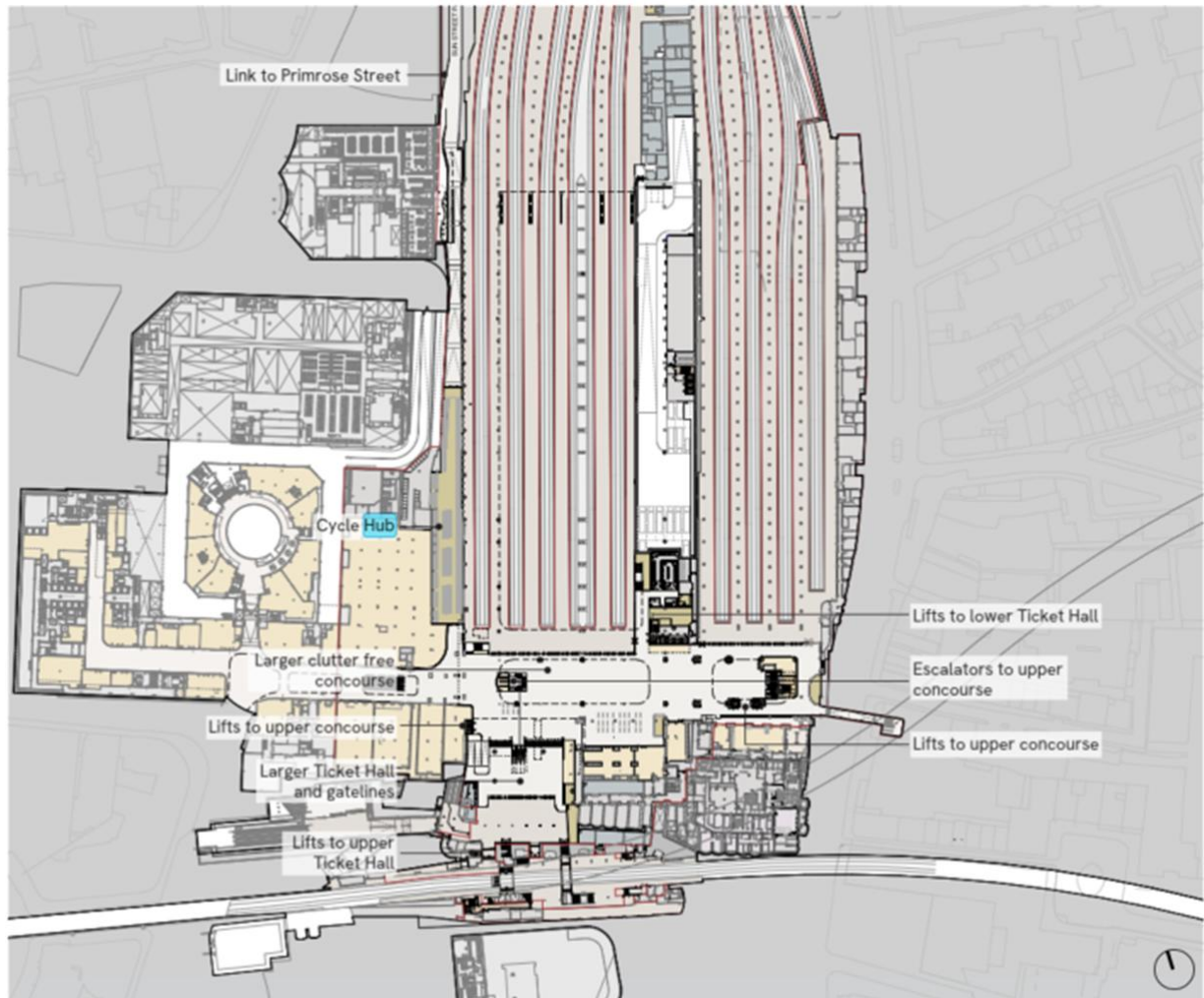
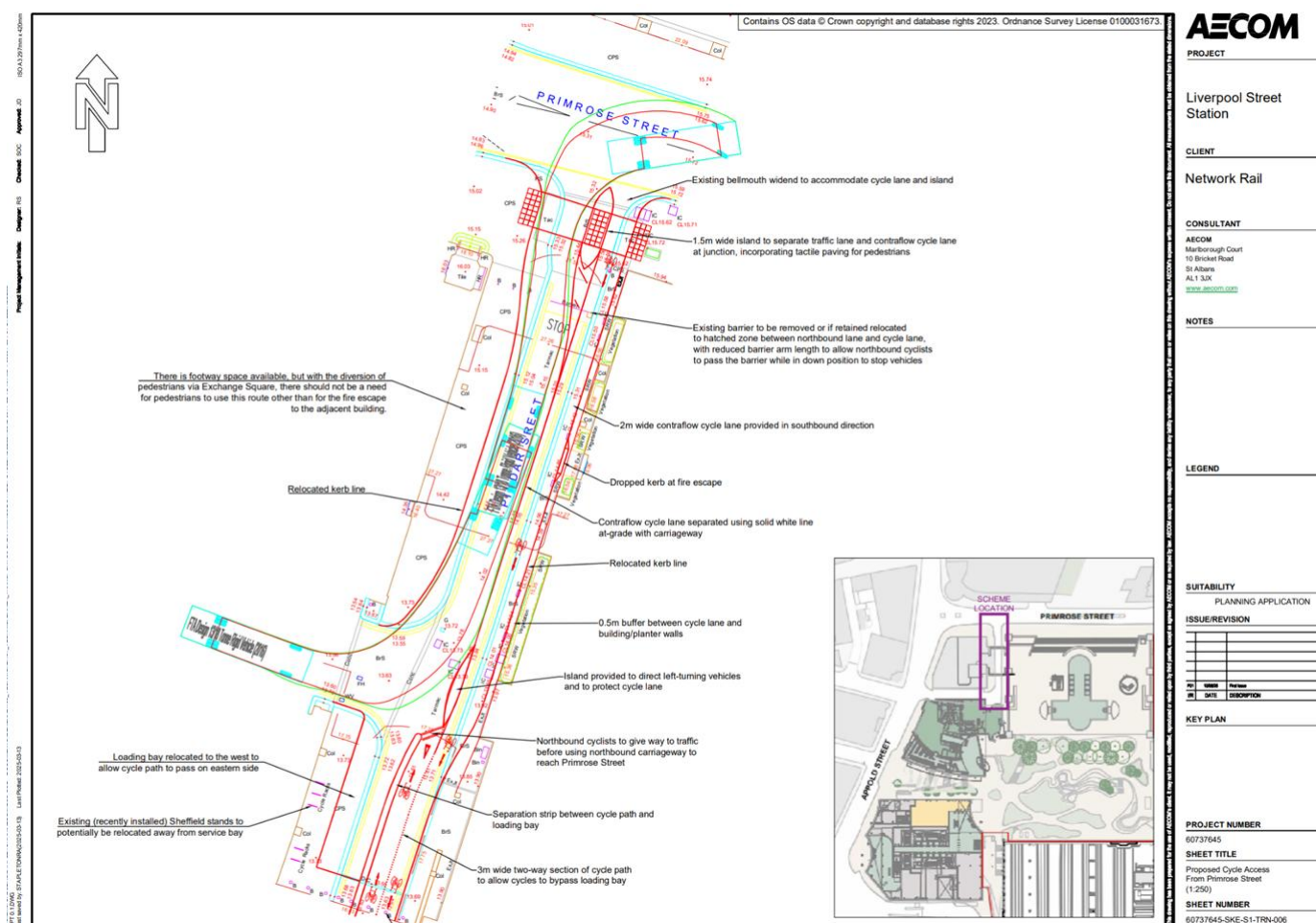


Fig.9.223. Access to lower concourse.

Source: DAS Fig.9.223

Figure 3: Proposed Cycle Access from Primrose Street



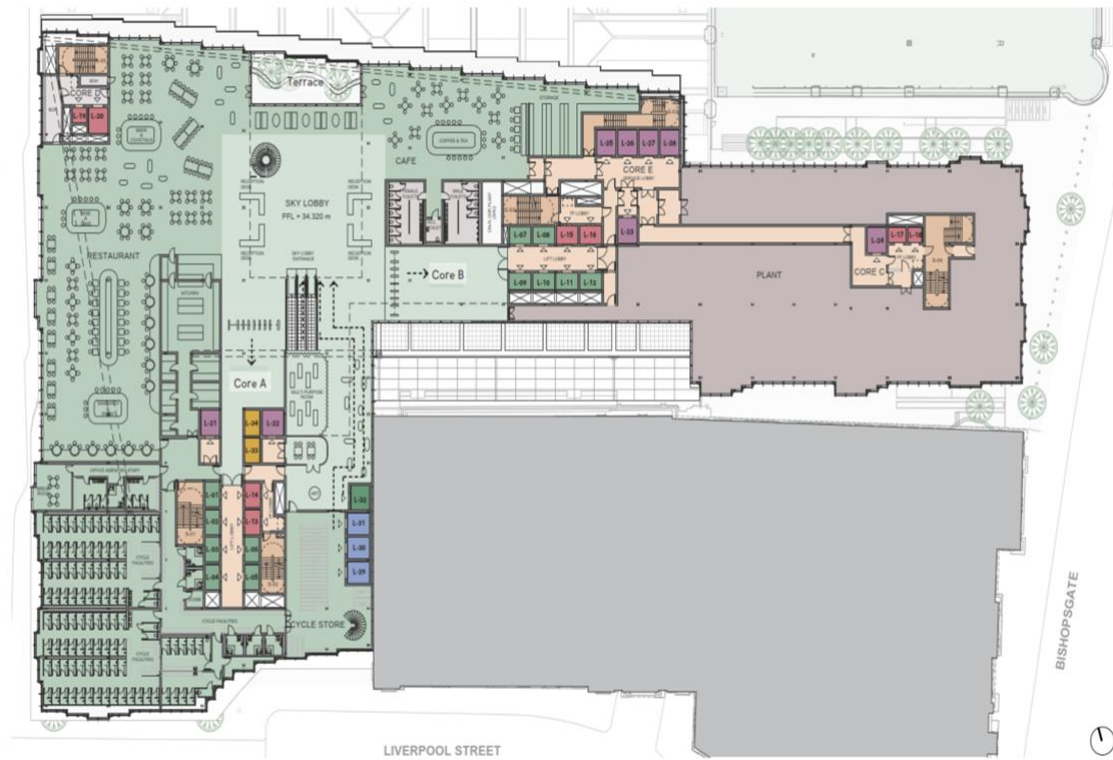
14.166. TfL has commented that access to the proposed new station cycle hub via Primrose Street is confirmed. TfL has noted that detailed wayfinding and signage, including linkages from the A10 and Cycleway 1, remain to be finalised and should be secured in the s106 agreement (referencing an interchange-wide Wayfinding Strategy). TfL input and sign off is required at all stages of design and implementation.

14.167. TfL has confirmed that the highway works proposed for the A10/Primrose Street/Spital Square junction (essential for cycle hub access) have been agreed in principle. It is recommended that the applicant enter into a s278 agreement with TfL regarding these essential highway works, commensurate with the scale of the OSD commercial floorspace proposed and similar developments consented by CoL recently nearby.

OSD Cycle Provision

- 14.168. London Plan cycle parking standards in relation to the proposed commercial office OSD are identified in Table 3.3 of the submitted TA, which is reproduced below for information. This identifies a minimum provision of 1,217 long-stay and 28 short-stay cycle parking spaces for the OSD.
- 14.169. It is proposed to provide a total of 1,253 long-stay cycle parking spaces for the OSD, accessible from (Liverpool Street) street-level via a total of three dedicated cycle lifts. This level of provision is compliant with the London Plan cycle parking standards.
- 14.170. The OSD cycle parking is proposed to be located on levels 04-06. The external door of the lobby will have a minimum clear width of 2 metres, and the cycle lifts will be a minimum of 1.2 metres x 2.3 metres, with a minimum door opening of 1 metre. The submitted TA confirms that any door to the cycle parking within the OSD will be automated or operated with a push button or pressure pad (para. 3.4.46).
- 14.171. As a general point regarding the OSD cycle provision, the submitted TA states that all cycle parking will be divided into the following types: 75% will be double stackers, 20% will be Sheffield stands (standard spacing), and 5% will be wider spacing for non-standard cycles. Non-standard cycle parking bays are stated to be provided and located near the wheelchair-accessible sanitary facilities and cycle lift cores. Generally, it is also stated that cycle parking will be located near cycle lockers and showers (para. 3.4.41).
- 14.172. The OSD cycle parking locations are illustrated in **Figure 4** which shows the parking provision on level 04; in **Figure 5** which shows the parking provision on level 05 and in **Figure 6** which shows the parking provision on level 06. All these figures were extracted from the submitted DAS supporting the planning application.

Figure 4 – Plan of Level 04 illustrating the cycle parking provision for the OSD



Source: DAS Fig.18.456. Illustrative plan of level 04

Figure 5 – Plan of Level 06 illustrating the cycle parking provision for the OSD



Source: DAS Fig.18.459. Illustrative plan of level 05

Figure 6 – Plan of Level 05 illustrating the cycle parking provision for the OSD



Fig.18.461. Illustrative Plan Level 06

Source: DAS Fig.18.461. Illustrative Plan Level 06

14.173. It is noted that the long-stay cycle parking provided within the OSD is not directly linked to the auditorium, on the basis that those cycling to the OSD to access the auditorium and its events will utilise the proposed station cycle hub. It is considered that there is sufficient capacity within this station cycle store to accommodate this specific demand.

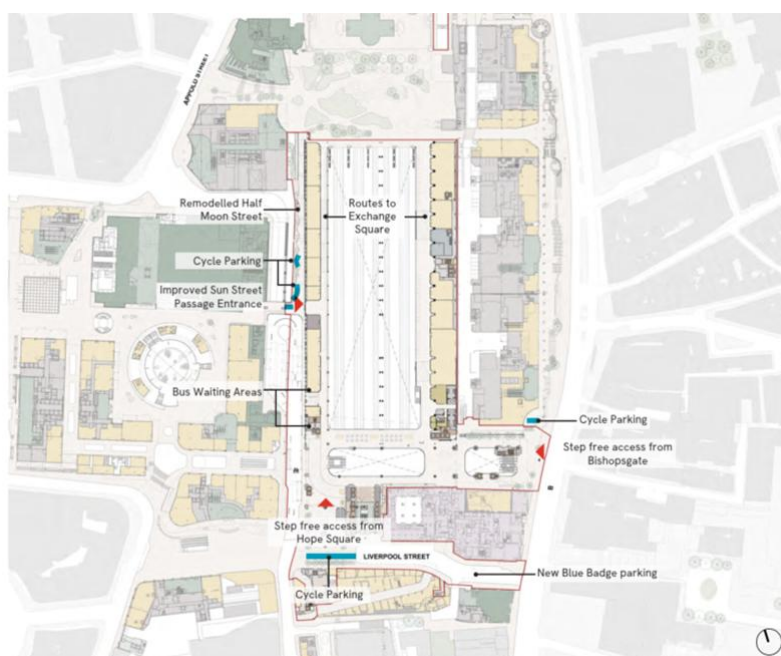
Short-stay Cycle Provision (Station & Office OSD)

14.174. The proposed development includes the provision of a total of 48 short-stay cycle parking spaces, comprising Sheffield stands, to meet the short-stay cycle parking requirement for both the station retail (20 spaces) and the OSD (28 spaces, as per Table 3.3 above). The submitted TA notes that this provision will be split between Liverpool Street, Sun Street Passage and Bishopsgate (para. 3.4.38). This will be subject to detailed design delivered as part of the S278 works.

14.175. The short-stay cycle parking locations are illustrated in **Figure 7**; in **Figure 8** which shows information on parking capacity and in **Figure 9** which shows additional proposed layout details. All these figures were extracted from the submitted DAS supporting the planning application.

14.176. The submitted TA confirms that the existing on-street cycle parking (30 spaces) on Liverpool Street will be retained, and the Brompton cycle hire lockers on Sun Street Passage (12 spaces) will also remain (para. 3.4.39). However, the Liverpool Street Area Healthy Streets Plan seeks to rationalize cycle parking provision in the station's surroundings to enhance the public realm. This involves auditing existing facilities, removing surplus or poorly located racks that contribute to street clutter, and reallocating space for greening and pedestrian improvements. In parallel, new, well-designed cycle parking facilities are being delivered as part of the proposals, ensuring secure, accessible, and integrated provision that aligns with improved street layouts and supports sustainable travel.

Figure 7 – Short-stay Cycle Parking Locations



Source: DAS

Figure 8 - Proposed Cycle Parking Locations & Capacity

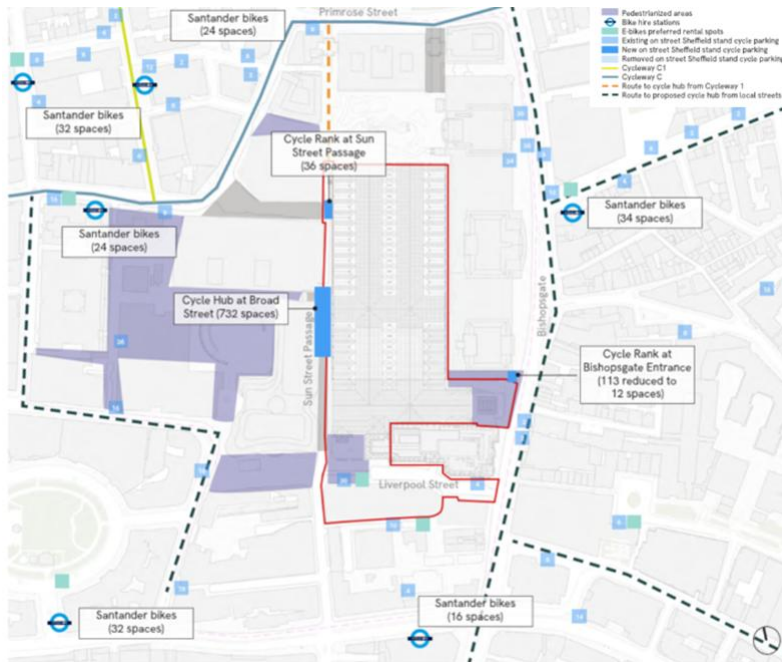


Fig.16.429. Illustrative plan of proposed cycle routes and parking

Source: DAS

Figure 9 – Short Stay Cycle Parking Layout

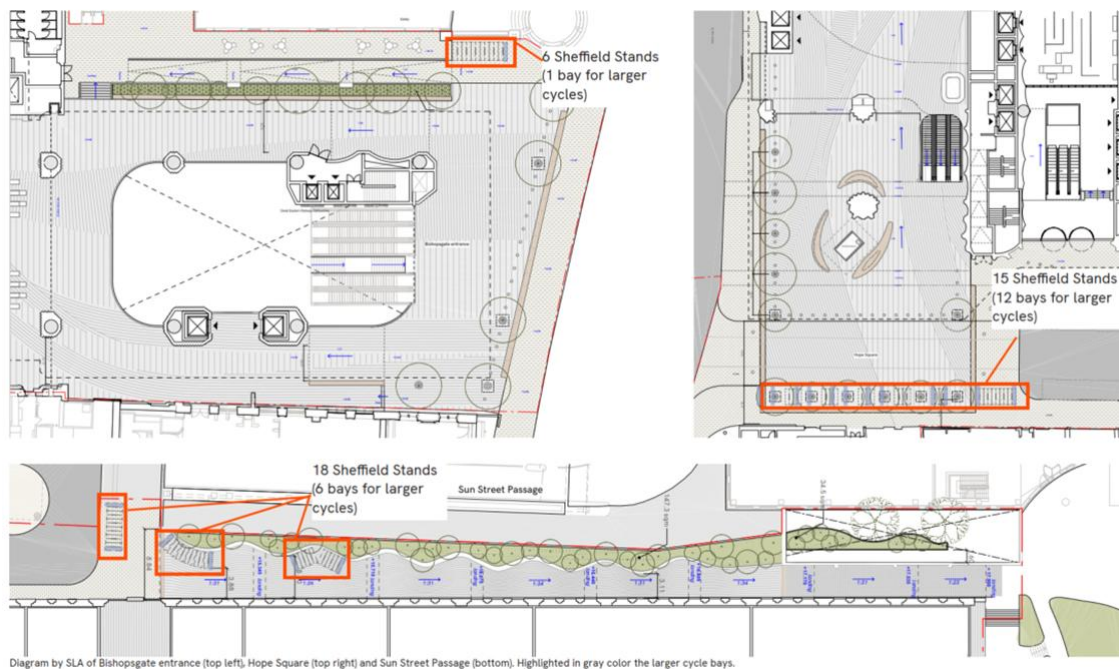


Diagram by SLA of Bishopsgate entrance (top left), Hope Square (top right) and Sun Street Passage (bottom). Highlighted in grey color the larger cycle bays.

Source: DAS. Diagram by SLA of Bishopsgate entrance (top left), Hope Square (top right) and Sun Street Passage (bottom). The larger cycle bays are highlighted in grey.

14.177. Cycle parking facilities are to be designed using TfL's LCDS guidance, as per London Plan Policy T5. This accords with the emerging City Plan 2040 Policy AT3. The detailed design of the site's cycle infrastructure in accordance with the LCDS will be secured by condition.

Cycle Hire Provision

14.178. The applicant has discussed and agreed the provision of a Section 106 contribution towards the provision of an additional 50-dock Santander cycle hire station in the immediate vicinity of the station, which is expected to be located within the pedestrianised area of Liverpool Street, to the west of Sun Street Passage / Old Broad Street.

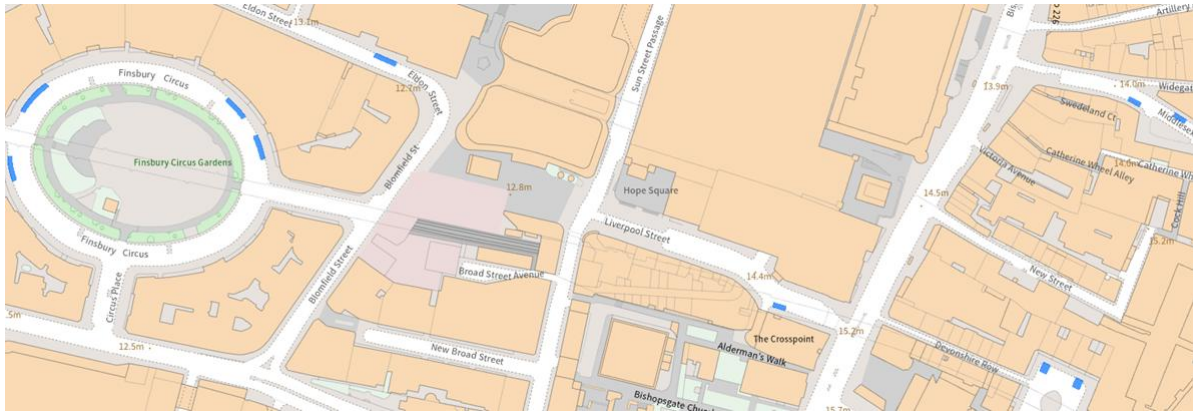
14.179. To conclude, the proposed cycle parking numbers are compliant with the London Plan standards and Local Plan Policy DM 16.3 and DM 16.4. End of trip facilities and cycle store are to be designed with LCDS standards, as per London Plan Policy T5. This accords with the emerging City Plan 2040 Policy AT3. The applicant would be responsible for promoting the use of both the long-stay and short-stay cycle parking spaces and as such would be required by Section 106 obligation to produce a Travel Plan (with Cycle Promotion Plan). It would need to be submitted to the City for approval in line with the London Plan Policy T4.

Car Parking (Blue Badge)

14.180. The City Plan 2040 and the City of London Local Plan (2015) require that development in the City be car-free, except for designated blue badge spaces. Policy T6 of the London Plan 2021 further stipulates that car parking should be limited in accordance with existing and anticipated public transport accessibility and connectivity.

14.181. Policy T6.5 specifically addresses non-residential parking, requiring all proposals to provide an appropriate number of blue badge parking spaces, including at least one off-street disabled persons' parking bay, even where no general parking is proposed.

14.182. There is no existing car parking specifically allocated to the station, however, there are five on-street pay-by-phone car parking spaces on the north side of Liverpool Street. There are also two parking bays allocated for doctors (north side) and one disabled parking bay (south side) on Liverpool Street, to the south of the station. Blue badge spaces in the station's vicinity are shown in the CityMaps extract below for information.



Source: CoL CityMaps December 2025

- 14.183. It is proposed that the proposed development, i.e. both the upgraded station and the OSD, will be car-free, with no on-site, off-street disabled persons' car parking proposed. It is acknowledged that the station entrances are too congested and unsuitable for such a space. It is noted that the applicant explored options for the provision of a dedicated off-street blue badge space within the service yard accessed via Primrose Street. However, this was not considered feasible owing to safety concerns, security issues and goods lift provision and associated access constraints.
- 14.184. The City acknowledges these limitations and, through the Section 278 works, will review existing parking arrangements on Liverpool Street to consider the potential for additional disabled parking spaces.
- 14.185. Overall, it is recognised that the proposed development will enhance step-free access, increase lift capacity, and improve station wayfinding, thereby reducing barriers for mobility-impaired users.
- 14.186. Existing blue badge on-street spaces are available nearby on Eldon Street, Finsbury Circus, and Devonshire Square. Additionally, the taxi rank will provide accessible transport options for users accessing the OSD and Liverpool Street Station.
- 14.187. A comprehensive Travel Plan will further support accessibility and sustainable travel. Measures may include promoting public transport, cycling, and walking; managing and monitoring demand for disabled parking; and providing guidance on accessible routes to and from the station. This will help ensure that all users, including those with mobility impairments, can travel safely and efficiently while minimizing reliance on private cars.

14.188. Overall, the proposal is considered compliant with London Plan Policy T6 and Local Plan Core Strategic Policy CS16. Whilst the principle of no on-site, off-street disabled persons' parking for is accepted in principle, the proposed development does not comply with Development Management Policy DM 16.5 and emerging City Plan Policy 2040 Policy VT3 as a result of this absence of provision.

Refuse Management /Waste Strategy

14.189. Policy DM17.1 in the City of London Local Plan (2015) requires the provision of waste facilities in the design of buildings, wherever feasible, to allow for the separate storage and collection of recyclable materials, including compostable materials.

14.190. Policy SI7 in the London Plan 2021 outlines the need to promote a more circular economy to improve resource efficiency and drive innovation. It encourages waste minimisation and prevention through the reuse of materials. The proposed development will adopt circular economic principles through waste reduction, including reducing single-use plastics, encouraging recycling, sustainable sourcing and community engagement to raise awareness about circular economy practices.

14.191. The waste management arrangements for the proposed development is outlined in section 6.5 of the submitted TA, in addition to the Outline Operational Waste Management Plan (OWMP), which supports the planning application. The proposed development will be provided with three-stream waste segregation, namely:

- Mixed dry recycling (MDR);
- Refuse; and,
- Food waste.

14.192. The waste management infrastructure will be installed within the site's service yard, as detailed in the report above. The lower ground level service yard will include portable compactors for MDR, a portable compactor for refuse and 240L wheeled bins for food waste, stored in dedicated rooms. It is proposed that there will be a total of 4 No. compactors provided in the service yard. There will also be separate food waste bin stores for the station retail and the OSD uses respectively.

14.193. As discussed in the report above, the proposed development, i.e. both the station and the OSD combined, is predicted to generate a total of 7 HGV service vehicle trips per day in relation to waste collection (as identified in Table 5.44 of the submitted TA). The collection of waste will be undertaken daily (twice per day if necessary) via a private waste management company (or companies), which will access the service yard via the vehicle ramp on Level B1 (Lower Concourse) via Primrose Street. It is also stated that rail will be used for waste removal where possible. All tenants would have access to the waste storage.

14.194. It is anticipated that a detailed Waste Management Plan will be secured via condition.

14.195. Overall, the proposal is in accordance with Local Plan policy DM17.1 which requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.

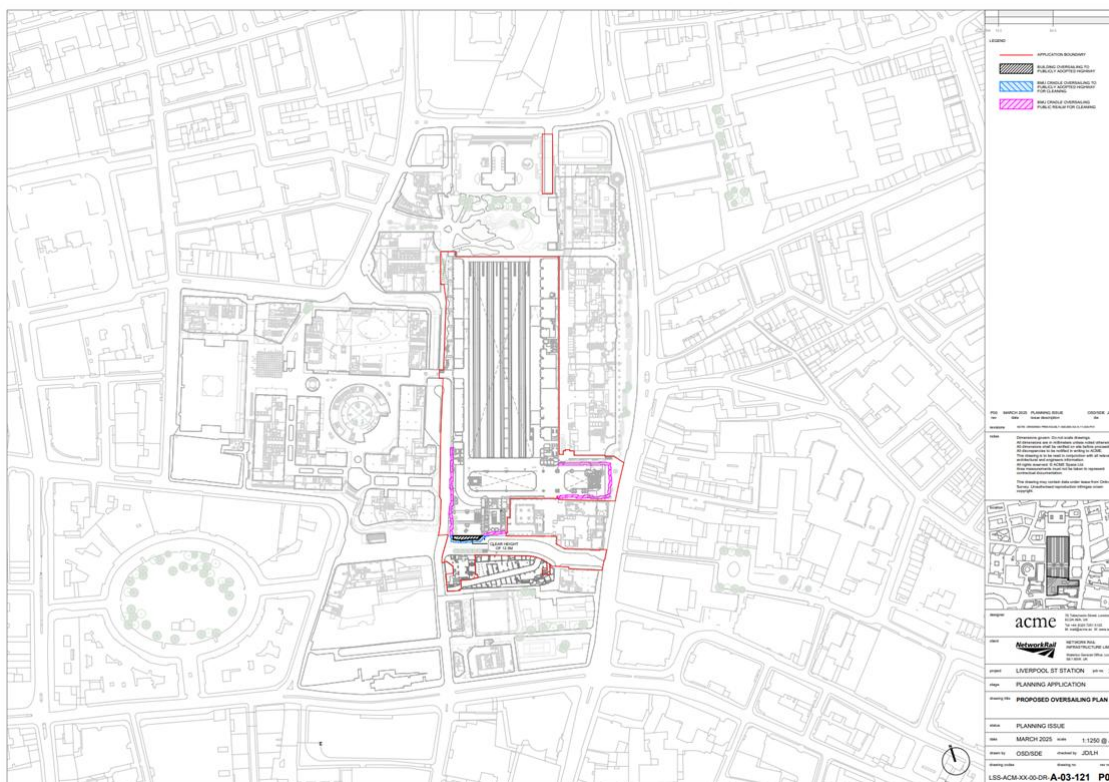
Oversailing/Undersailing

14.196. Structures that permanently oversail the public highway must be licensed by the local authority, typically in accordance with Sections 177 and 179 of the Highways Act 1980.

14.197. Temporary oversails are subject to temporary licenses, as required

14.198. The Proposed Oversailing Plan (Drawing No. A-03-121 P00) outlines the proposed oversailing in front of Liverpool Street, where the building encroaches on the public highway. The oversailing plan indicates that this is for:

- The proposed Building Maintenance Unit (BMU) cradle oversailing to the publicly adopted highway for cleaning (temporary);
- The BMU cradle oversailing the public realm for cleaning (temporary); and
- Building oversailing to a publicly adopted highway (permanent).



14.199. The submitted information has been reviewed and it is acknowledged that there is adequate clearance height and, as such, the proposals are generally acceptable in principle.

Highway Boundary – Stopping Up and Adoption

14.200. As the highway authority, the City of London has the power to stop up areas designated as highway land by making orders known as 'stopping up' orders. The term 'stopping up' means that once such an order is made, the highway land ceases to be a maintainable highway at public expense and is extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent.

14.201. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorising the stopping up or diversion of a highway if it is satisfied that it is necessary to do so to enable development to be carried out. That process would be carried out under separate procedures from the considerations of the applications currently before you.

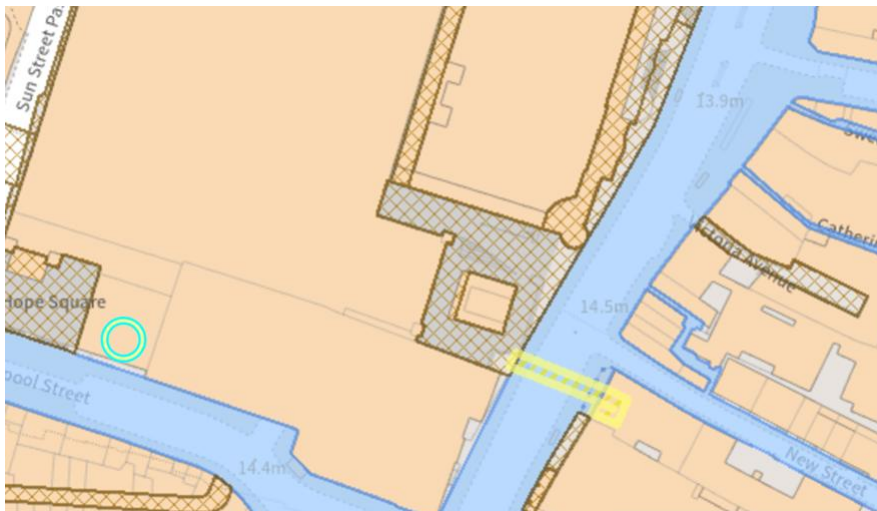
14.202. Areas of privately owned land can alternatively be 'offered up' for adoption as public highway, for instance, for the creation of a new 'estate road' to be adopted and maintained by the local authority.

14.203. There would be no stopping up or adoption of the highway as a result of the proposed development. Any requirement to do so will necessitate the implementation of the appropriate processes within the detailed design process once this application has been approved.

City Walkways

14.204. A city walkway declared under section 6 of the City of London (Various Powers) Act 1967 is a space where the public may walk and pass through on foot, subject to restrictions under this Act and the reasonable needs of the building's owner or occupier. It is not deemed a highway, street, road, footpath, or open space, except as provided in sections 13 and 19. A walkway may be at, above, or below ground level and include public circulation areas, but not private premises or land forming part of a highway.

14.205. The existing City Walkways (Passage under Bishopsgate) located within the A10, as seen below and extracted from the City's GIS and TA, is proposed to remain. Consideration to its use and safety during the construction phase, will be considered.





Construction Logistics

Overview

- 14.206. London Plan Policy T7, on deliveries, servicing and construction, indicates that developments must address their impacts during the construction phase and following the occupation after the site is operational.
- 14.207. Policy D16.1 of the Local Plan, supporting paragraph 3.16.11 and the emerging City Plan 2040 Policy VT1, state that Construction Logistics Plans (CLP) will be required for all major developments, or refurbishments and for any developments that would have a significant impact on the transport network during construction.
- 14.208. Construction matters are considered (in summary) in section 7 of the submitted TA. The planning application is also accompanied by an Outline CLP (OCLP) (dated March 2025), which is also prepared by AECOM. The OCLP has been prepared in accordance with TfL's Construction Logistics Planning Guidance (2021). It is noted that construction matters are also considered in the Transport Addendum referred to in the report above, specifically sections 7, 8 and 9.

14.209. Table 7.1 of the OCLP provides an indicative summary programme, and this is reproduced below for information. This indicates an overall construction programme of some eight years duration, extending from 2029 to 2036 inclusive. It is noted that an indicative Overall Master Project Programme is included at Appendix A of the OCLP for information.

Table 7.1: Indicative Summary Programme

Stage	Start	Finish
Demolition	Q4 2029	Q3 2032
Construction	Q1 2029	Q1 2036
Completion (year of opening)	-	Q3 2036

14.210. It is anticipated that a Detailed Demolition and Construction Logistics Plan (DCLP) will be prepared by the Main Contractor post-decision. This DCLP will be informed by further modelling work, the scope of which will be agreed in advance with both TfL and CoL.

14.211. In terms of demolition, the proposed development involves the demolition of:

- 50 Liverpool Street and associated structure beneath to facilitate the necessary upgrades to Ticket Hall B within the station.
- Around 61% of the 1990s station roof to provide a new station roof and office OSD above.
- Replacement of the existing station lower concourse slab and upper concourse for improved retail.
- Existing brickwork station entrances at Bishopsgate and Liverpool Street/Hope Square.

14.212. Throughout the redevelopment, Liverpool Street Station will remain operational. As such, the phasing of the demolition and construction activities has been focussed on targeting minimal disruption to passengers and station operations as much as possible.

14.213. The applicant has provided assurances to TfL that access to all bus and coach services in the local area will be maintained throughout construction. It is recommended that this requirement is secured via the Detailed DCLP and associated Section 106 monitoring.

14.214. It is anticipated that, as part of this process, vehicular tracking for 12m electric buses and operational interfaces with pit lanes and hoardings will be reviewed through the DCLP, with further technical engagement with TfL Buses required.

14.215. To support the maintenance of bus and coach services throughout construction, it is recommended that appropriate protection of all current stops and stands in the bus station and on the A10 Bishopsgate throughout is secured via obligation, with temporary stop/stand re-provision secured to TfL's full satisfaction.

14.216. The construction methodology presented in the OCLP includes the need to divert station rail services and take two platforms out of service through 'service thinning' to assist with the pedestrian flow modelling whilst construction works are in progress (para. 3.2.1).

14.217. The OCLP provides various outline plans of the station layout during the following phases:

- Enabling works;
- Phase 1;
- Phase 2A;
- Phase 2B;
- Phase 3; and
- Phase 4 – OSD.

14.218. The OCLP identifies a range of measures to minimise construction impacts, which are set out in Table 5.1, which is reproduced below for information.

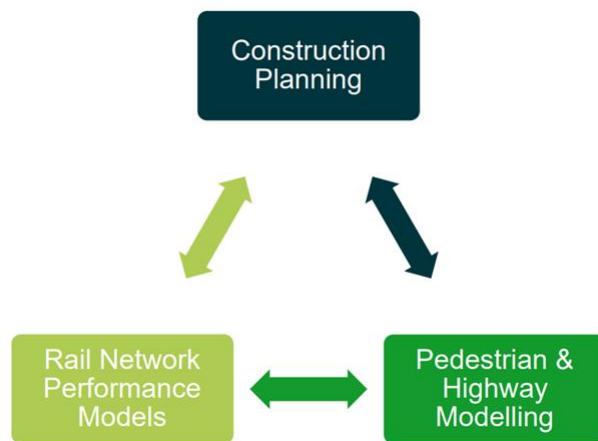
Table 5-1: Strategies to Reduce Impacts – Higher Impact Site

Planned Measures Checklist	Committed	Proposed	Considered
Measures Influencing Construction Vehicles and Deliveries			
Safety and Environmental Standards and Programmes	X		
Adherence to Designated Routes	X		
Delivery Scheduling		X	
Re-timing for out-of-peak Deliveries		X	
Re-timing for out-of-hour Deliveries		X	
Storage and Holding Areas		X	
Logistics and Consolidation Centres		X	
Vehicle Choice		X	
Measures to Encourage Sustainable Freight			
Freight by Water*			X
Freight by Rail		X	
Material Procurement Measures			
DfMA and Off-Site Manufacture			X
Re-use of Material on Site			X
Smart Procurement		X	
Other Measures			
Collaboration with Other Construction Sites in the Area		X	
Implement a Staff Travel Plan		X	

* Not viable given the location of the Site

- 14.219. The OCLP references the requirement to comply with the Freight Operators Recognition Scheme (FORS), the Construction Logistics and Community Safety (CLOCS) and the Direct Vision Standards (DVS2020) (para. 5.2.1.).
- 14.220. The OCLP considers freight by rail (section 5.3, p.47), recognising the potential for rail freight deliveries for bulk material movement associated with demolition, piling and excavations and the movement of certain building materials. The OCLP states that the details of, “the quantities and management of the transport of materials by rail will be set out in the Detailed CLP to be secured by planning condition” (para. 5.3.4).
- 14.221. If planning permission is granted, the submission of a Detailed DCLP will be secured via condition and this should specifically consider freight by rail during the demolition and construction period. The OCLP specifically states that to, “inform the finalisation of the construction phasing and strategy, additional modelling will be undertaken which will be reported in the Detailed CLP (or as appended modelling reports) to demonstrate how the construction period effects will be managed. This will include assessment or modelling of the internal station operation, bus impacts and consideration of the need for external pedestrian and/or highway modelling.” (para. 7.2.2). The applicant’s commitment to undertake further detailed assessment and modelling work in relation to the proposed phased demolition and construction works will be fully reflected in the wording of the relevant condition.
- 14.222. The Transport Addendum submitted by the applicant provides clarification on the requirements for detailed transport modelling of the proposed development’s construction impacts (Section 8). The applicant re-states the commitment to undertaking extensive transport modelling of the proposed development and will use the modelling in an iterative loop to minimise unavoidable impacts during the extensive construction phase. This iterative process is illustrated in Figure 8.2, which is reproduced below for information. These extensive modelling works will occur prior to commencement and monitoring of the outcomes will continue through the construction phases.

Figure 8-2 – Iterative Loop Between Work Streams During Development of Construction Solutions



14.223. At this stage the applicant has identified service reductions at the station should only be required during the morning and evening peak periods (7-10am and 4-7pm), however platform alterations will be required for all operational hours to facilitate up to two platforms being out of service at any one time during construction.

14.224. It is acknowledged that the assessment and planning for service reduction and re-platforming at Liverpool Street Station during the construction period requires extensive consultation and timetable 're-work' at a national level, with all industry partners (including TfL), due to the complex inter-relationships of lines and train paths on the rail network.

14.225. TfL has confirmed that clarification of temporary rail service thinning proposals have been provided at a headline level. TfL notes that detailed timetables and consultation pathways should be confirmed via DCLP conditions and s106 obligations, with modelling to evidence knock-on effects on London Overground, LU, and Elizabeth line services across the London-wide transport network.

14.226. Given the complexity of the works, the applicant proposes to establish an Event Steering Group (ESG) with Industry partners; alongside publishing the works as a major event in the timetable calendar to ensure cross industry / network wide considerations with other major timetable changes and programmes of works.

14.227. Both the service reduction and platform alterations will affect the throughput of the station in terms of the numbers of passengers that are accommodated and the locations from which the passengers are moving to and from during the various phases of the construction period. The pedestrian flows external to the station will be affected and therefore further modelling will be undertaken, as shown in Figure 8.2 above.

14.228. Figure 8.1 of the submitted Transport Addendum provides an indicative high-level programme of the proposed timetable planning, detailed modelling and construction planning process for information. It is noted this overall programme starts some 31 months prior to the commencement of the works. As confirmed by the applicant the “culmination of this work will be enshrined in the Detailed Construction and Logistics Plan (DCLP) which will be required as a Planning Condition to be approved prior to commencement of the works”.

14.229. At the same time that the ESG group (referred to above) is set up, a Modelling Governance and Oversight Group [or CLP Governance and Oversight Group] will be formed which is intended ensure that key stakeholders are actively involved in a collaborative approach to delivering the proposed development. This will include, but not limited to, representatives from various parts of TfL and the CoL representing all modes of transport and other planning and environmental considerations.

14.230. This stakeholder group will also include the Cluster Group to ensure that the construction planning is developed with due regard for other developments taking place concurrently in the area and looking for opportunities for benefits through collaboration. The engagement will also ensure that detailed modelling can consider the cumulative impacts of developments under construction.

14.231. The submitted OCLP specifically considers local community engagement, including both neighbouring residents, businesses and education establishments (paras. 5.5.4 – 5.5.9). Identified measures include the appointment of a community liaison manager, community meetings and the development of a complaints register.

Vehicle Routing & Site Access

14.232. Section 4 of the OCLP considers construction vehicle routing and site access. The OCLP states that there are two proposed routes for the removal and delivery of materials, which are:

- Old Broad Street → Bishopsgate → (A1211) London Wall.
- Great Eastern Road → Bishopsgate → Primrose Street → station service tunnel.

14.233. Figure 4.1 of the submitted OCLP indicates the construction vehicle access route (shown in red) and an egress route (shown in green) from the west via Farringdon Road (A201) for all works to Zone 4; this is reproduced below for information.

14.234. Figure 4.2 of the submitted OCLP below indicates the vehicle access route (shown in red) and an egress route (shown in green) from the north via the Great Eastern Road for all works to within the station, excluding Zone 4 and the OSD; this is reproduced below for information.

14.235. The OCLP identifies indicative pit lane locations on Bishopsgate, Liverpool Street and Sun Street Passage. These are shown in Figures 4.3, 4.4 and 4.5 of the OCLP and are reproduced below for information.

Figure 4-1: Access/Egress Routes from Western TLRN

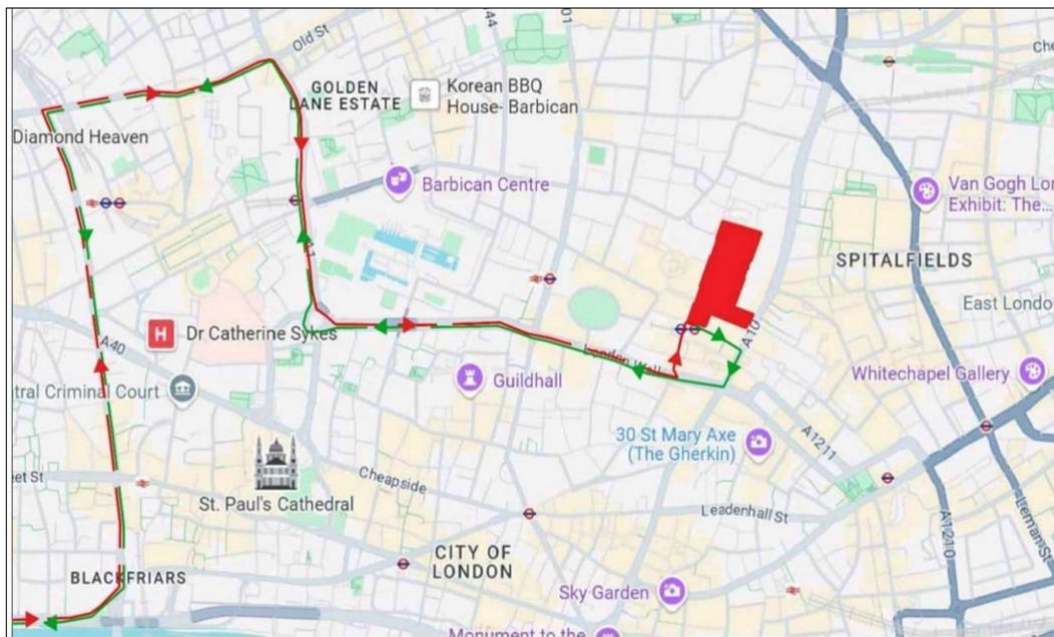


Figure 4-2: Access/Egress Routes from Northern TLRN

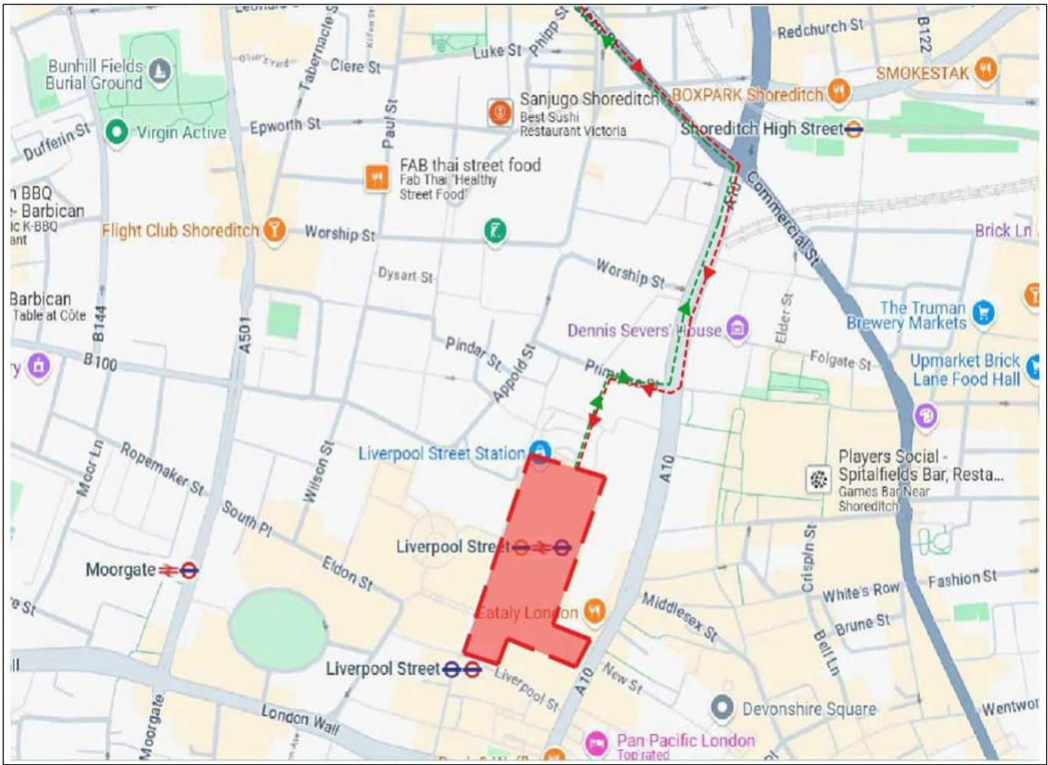
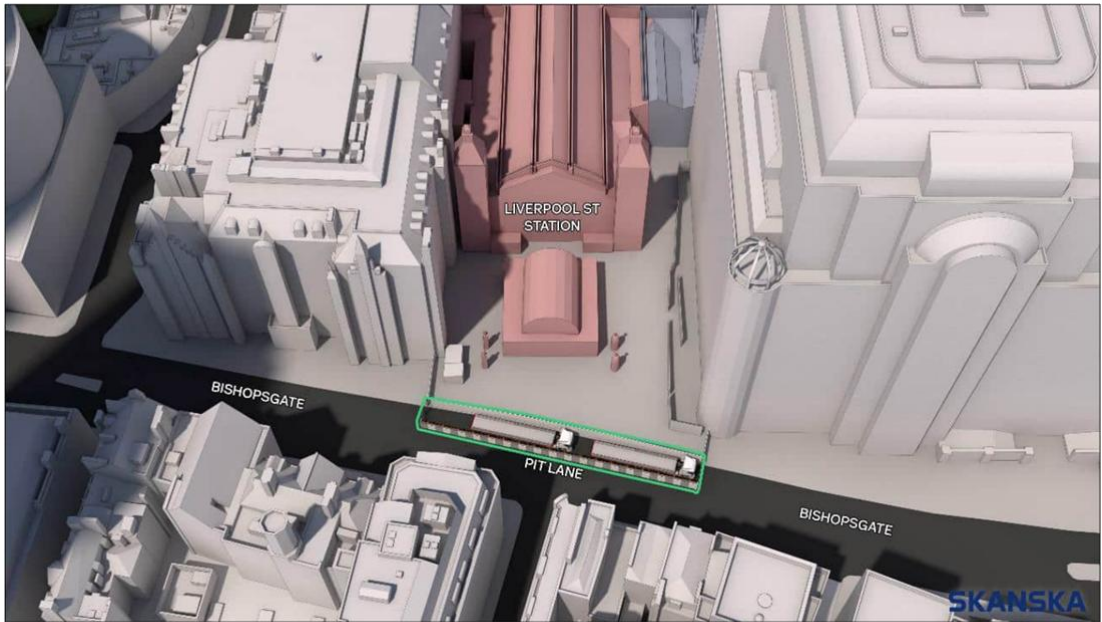
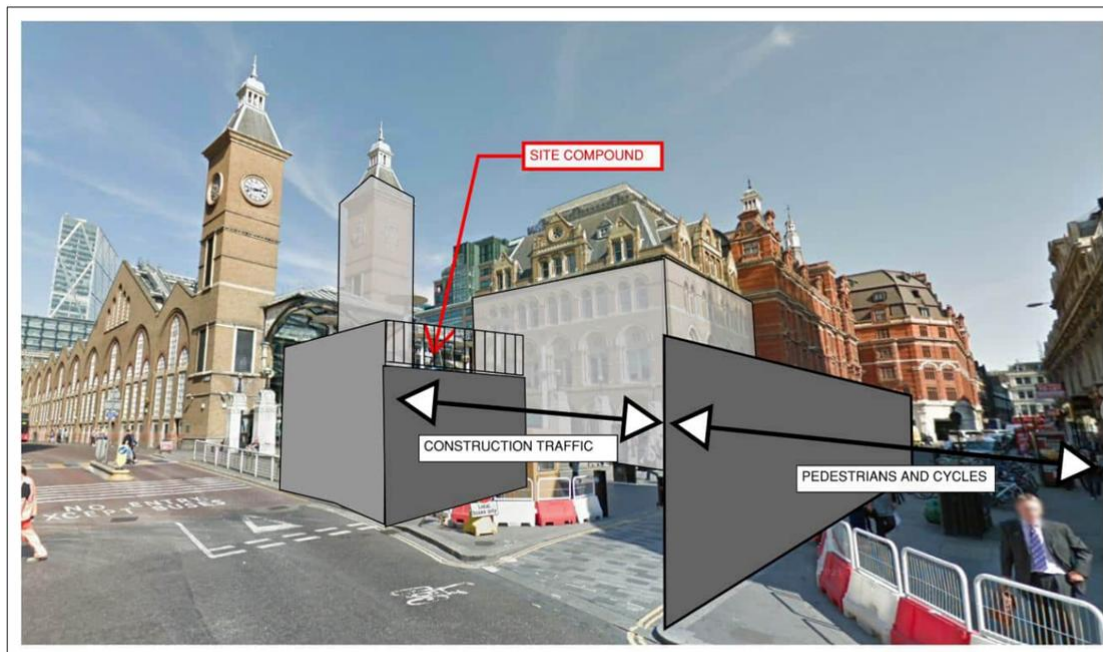


Figure 4-3: Indicative Pit Lane on Bishopsgate



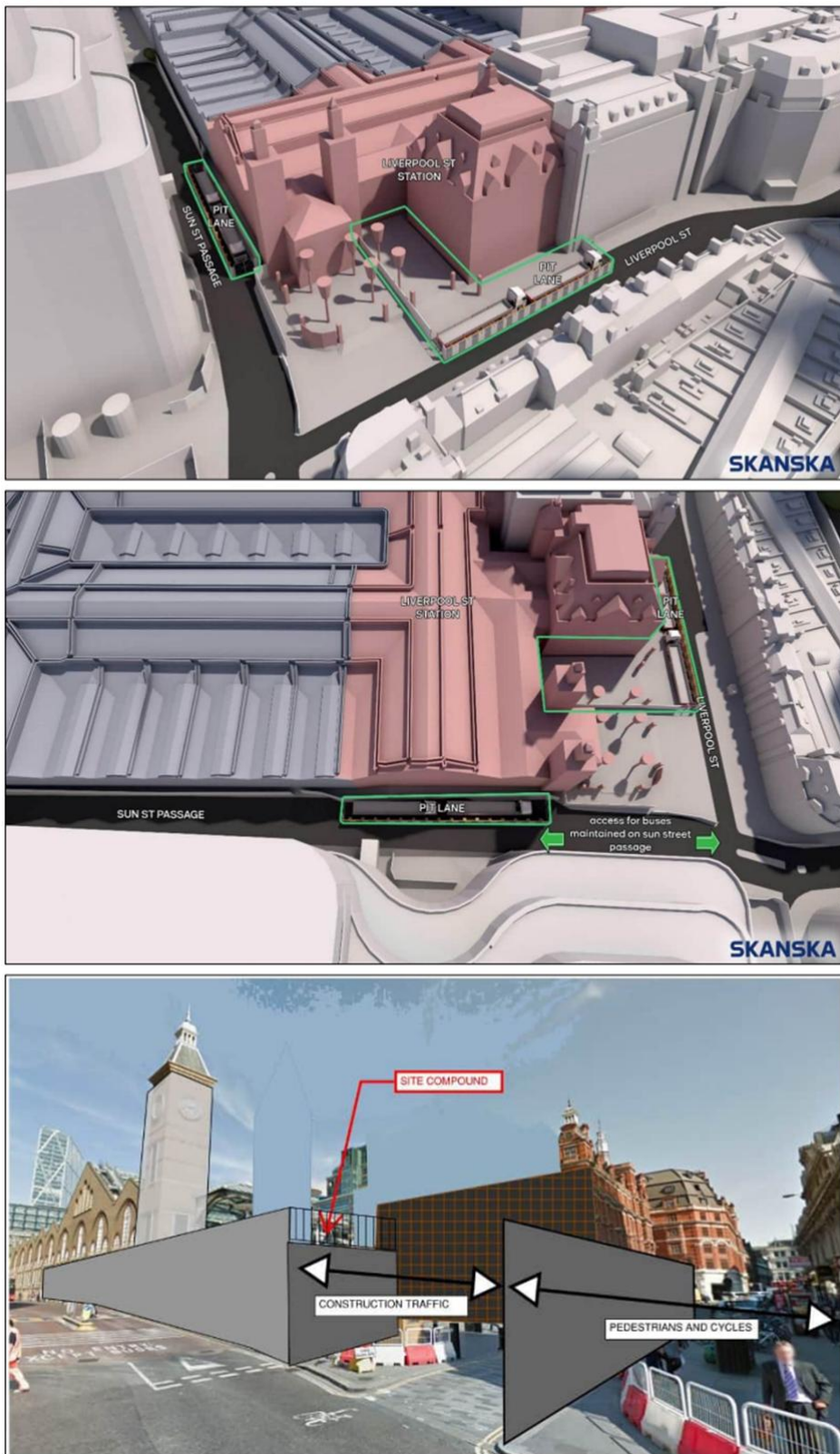
Source: Skanska

Figure 4-4: Indicative Pit Lane on Liverpool Street



Source: Skanska

Figure 4-5: Indicative Extended Pit Lane on Liverpool Street



Source: Skanska

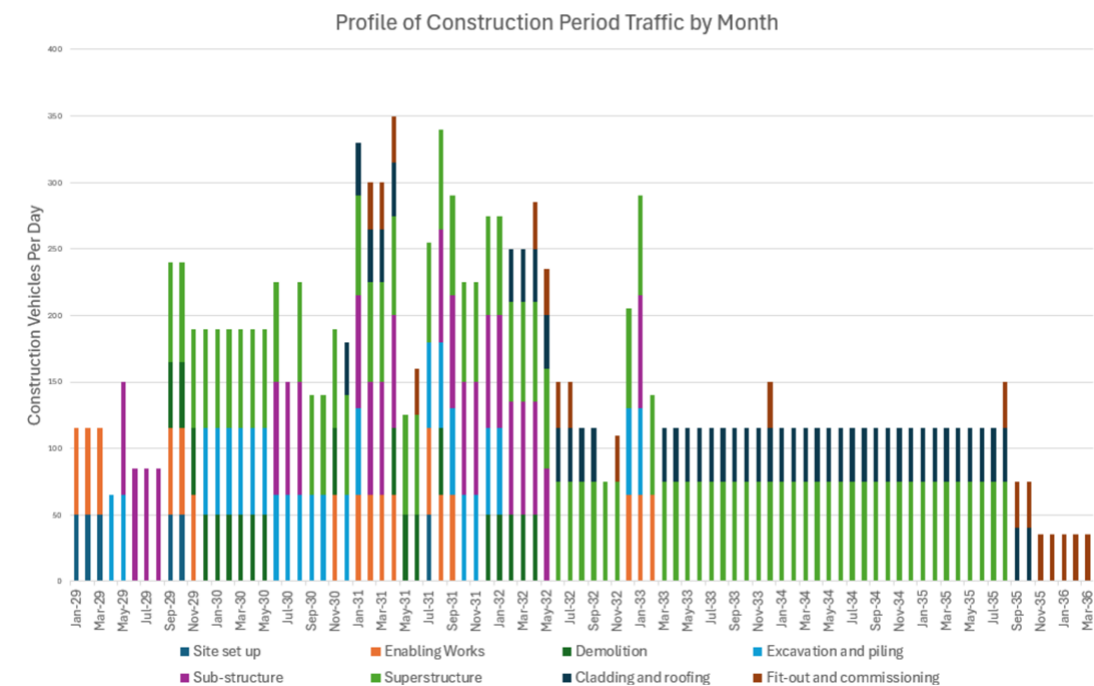
- 14.236. The applicant has confirmed that holding areas will be provided along the access road to the station service area (accessed from Primrose Street) and within the bus loop at Sun Street Passage. It has also been confirmed that a strategy for buses is being developed in consultation with TfL. It is stated that six bus stands will be retained in the Sun Street Passage bus loop and bus stops will be relocated to manage pedestrian movements and ensure the pit lane can operate efficiently and safely.
- 14.237. A marshal will be provided at the entrance to Liverpool Street to monitor the taxi rank and direct its usage, waving taxis on when the taxi rank is at full capacity. The locations of any holding areas located further away from the site will be identified if required as part of the Detailed DCLP.
- 14.238. The Transport Addendum submitted by the applicant provides further details of bus operations in relation to pit lane proposals during the construction period (Section 7). This additional work sets out the proposed options for altering bus stop provision at Sun Street Passage and Bishopsgate during the construction phases, with the aim of maintaining bus service provision and minimising impacts.
- 14.239. TfL notes that design development of construction access arrangements, including Sun Street Passage and A10 Bishopsgate pit lanes, is ongoing. These will be required to be addressed in the Detailed DCLP and linked to s278 works. TfL highlights that operational nuance should include distinct bus diversion arrangements for periods when the Hope Square entrance is closed versus open, to avoid forcing passengers onto narrow footways.
- 14.240. It is recognised that further work will be required to establish the extent to which construction materials can be brought to the site by rail. The movement of construction materials by rail could reduce the need/duration of the pit lane provision, but it is currently assumed that each pit lane will be required for periods of at least several years.
- 14.241. As noted by TfL, the applicant has advised that further commitment to rail freight transport of construction materials, including waste, will be dependent upon national operator consultation processes to re-time and reduce certain services (service thinning), but that the exact affected platforms, lines and operators are currently unconfirmed (except for a proposal to remove Elizabeth line services from the upper concourse during construction, which TfL does not currently support).

14.242. It is therefore recommended that a pre-commencement condition should be applied to secure a Construction Materials Strategy to be discharged in consultation with TfL. This condition should specify the aforementioned strategy will be required to optioneer and demonstrate how rail freight will be maximise across construction in accordance with London Plan Policy T7 (part J).

Forecast Vehicle Movements

14.243. The OCLP sets out a preliminary forecast of vehicle movements for the various elements / stages of the demolition and construction works (section 6.2, pp. 50-52). This information is shown in Figure 6.1 of the OCLP, reproduced below for information. It is noted that this preliminary construction traffic generation profile does not include a reduction in service vehicle activity during the construction works, which is likely to result in net traffic generation lower than the one presented in Figure 6.1.

Figure 6-1: Preliminary Estimate of Daily Construction Traffic Volumes

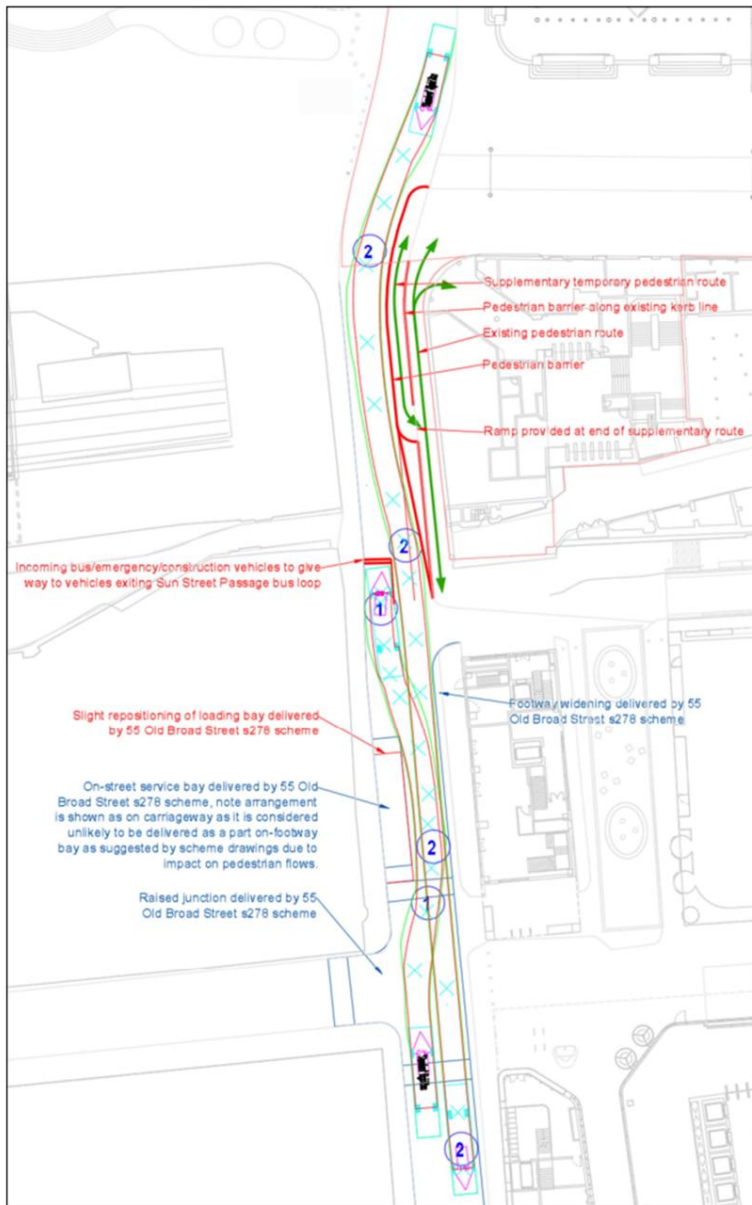


Pedestrian Routes during Construction

14.244. The applicant has committed to provide marshalling of pit lane entry and exit points, including the interface between the Liverpool Street pit lane as well as marshalling of HGVs along Old Broad Street, in post-application meetings and the OCLP.

- 14.245. The OCLP describes how walking routes will be clearly marked within the site's hoarding. Additionally, all vehicles entering/leaving the site will be guided by a banksman. It has also been committed that the banksman will help ensure that pedestrians and cyclists on the highway and footway are adequately warned of the arrival/exit of construction vehicles and that they will be held in a safe location.
- 14.246. All subcontractors should meet the conditions outlined in CLOCS by verifying they are FORS registered and that all delivery routes are adhered to. Furthermore, the OCLP states that it will ensure all HGVs exceeding 12 tonnes comply with the safety standards of DVS 2020.
- 14.247. Additionally, the emergency gate on Liverpool Street will remain available for emergency access.
- 14.248. The Transport Addendum submitted by the applicant considers the need for temporary footway widening on Old Broad Street during the construction period (Section 2). It is recognised that during construction of the proposed development there will be greater numbers of vehicles along this link as a result of the construction traffic. It is therefore proposed that consideration is given to temporary footway widening on the eastern footway through the temporary provision of footway space in the carriageway. This could be achieved by providing a temporary barrier along the existing kerbline and a second 2m footway formed on the carriageway through localised narrowing for traffic formed by a second line of barriers.
- 14.249. The temporary footway widening will reduce traffic on Old Broad Street to a single lane. The bus and construction traffic would be managed through a give and take priority arrangement, with priority defaulting to the southbound traffic, subject to discussions with CoL. At peak times this would be supplemented with marshalling. This proposed arrangement is shown in Figure 2.4 of the Transport Addendum, which is reproduced below for information.

Figure 2-4 – Indicative Potential Scheme for Temporary Construction Period Widening of Northernmost Section of Old Broad Street



Pedestrian Modelling during Construction

14.250. The Transport Addendum submitted by the applicant reports the findings of an initial static pedestrian assessment of the construction phases (Section 9). This initial static pedestrian assessment has been carried out prior to determination to highlight the areas in relation to the site where detailed modelling will need to be carried out at a later stage for the purposes of the Detailed DCLP (as per Figure 8.2 reproduced above).

14.251. The initial work reported in the Transport Addendum focusses on the Liverpool Street and Bishopsgate construction pit lanes/hoardings and their impact on pedestrian flow. This work encompasses four stated scenarios:

1. Scenario 1: The closure of the Bishopsgate Station Entrance.
2. Scenario 2: Pit lane at the Liverpool Street Entrance.
3. Scenarios 1 and 2 in combination.
4. Scenario 3: Pit lanes at Bishopsgate and Liverpool Street with both entrances open (OSD construction).

14.252. It is noted that in each of the above scenarios the Broadgate station entrance will remain open to pedestrians.

14.253. The purpose of the initial analysis reported in Section 9 of the submitted Transport Addendum is to demonstrate that the proposed construction could occur with both the TfL and NR stations at Liverpool Street Station remaining operational. The applicant acknowledges that this is a high-level study and that further detailed analysis will be required in due course. This detailed analysis will need to explore the impact of other variables, notably:

- The impact of service thinning at the station;
- Travel demand management;
- Passenger choices regarding mode switching, choosing an alternative route/station and travelling at different times.

14.254. As noted above, and subject to planning, it is anticipated that there would be an extensive programme of proposed timetabling planning, detailed modelling and construction planning prior to commencement of the works, that would directly inform the Detailed DCLP, which will be secured via condition.

Other Commitments in the OCLP

14.255. The submitted OCLP commits to developing an Emergency Fire / Accident Plan with the local fire brigade/emergency agencies, details of which are outlined in the OCLP.

14.256. Other commitments are made within the OCLP, including but not limited to:

- Dust control processes.
- Adherence to dedicated construction vehicle route.
- Delivery scheduling process.
- Out of hours deliveries.
- Use of logistics and consolidation centres.

14.257. The OCLP also states that deliveries by rail will also be investigated in the Detailed DCLP.

14.258. The exact construction hours will be agreed as part of the Detailed DCLP submission. The OCLP proposes that the hours of work are 0800 - 2000 hrs (Monday to Friday), 0900 - 1400 hrs (Saturday), with only strategic station and TfL moves to take place on Sunday, Bank or Public Holiday working with prior approval and for specific works (i.e., tower crane installation, hoarding line shifts, etc.). It also proposes that work will take place between 00:30 and 03:30 for occasional hoarding and equipment shifts across the lower concourse. The applicant has stated that the number of construction-related vehicles expected is not sufficient to warrant off-peak modelling of highway capacity. This needs to be reviewed in detail in development of the Detailed DCLP.

14.259. It has also been stated that the provision of cycle parking and installation of spaces will be phased to ensure that demand is met. This is to ensure that if spaces are required to be temporarily relocated during either the construction of the station, the OSD, or the new cycle parking, they will be relocated to ensure suitable cycle parking is always available.

14.260. Monitoring will be agreed in the Detailed DCLP , including the number of vehicle movements and safety. The contractor would take ownership of this plan, reviewing and updating it as conditions change.

Construction stage related planning conditions

14.261. NR will commit to establishing a Heads of Terms (HoTs) with TfL and the City of London, as a planning obligation to provide ongoing modelling once the following can be commenced:

- The design matured appropriately through the Network Rail PACE and TfL Pathway processes;
- The development partner is appointed;
- The appropriate timetable assessment work is progressed with industry partners; and
- Relevant train-by-train passenger loading can be established.

14.262. A HoTs is expected to form part of the planning decision setting out commitments made by the applicant, NR with the CoL and TfL covering future traffic and transport modelling and a number of other matters. TfL requires applicants to enter into S278 Agreements to secure enabling highway works as part of the construction phase, however in collaboration with CoL, the below will be considered:

- A survey reviewing the condition of the site prior to construction works;
- Bus stop locations and improvement works along Bishopsgate;
- Construction pit lane, pedestrian crossing provision and marshalling to take place on Bishopsgate. This also includes HGV routing details.
- Construction pit lane, cycle parking provision and marshalling to take place on Liverpool Street. It also includes the works associated with Hope Square (such as paving and tree planting). This also includes marshalling relating to both pedestrians and HGVs on Old Broad Street, Taxis at the Taxi Rank on Liverpool Street and pedestrian control.
- Providing a temporary bus stop on Finsbury Circus during construction.
- Providing cycle access from Primrose Street to the tunnel under Exchange Square.

14.263. The draft terms also outline details related to Sun Street Passage. This area is not part of the public highway and, therefore, is not subject to a Section 278 agreement (not public highway). Nonetheless, it has been suggested that six bus stands should be retained during construction, and that boarding bus stops for routes 153 and 344 should be relocated during this period. It has also been proposed that a temporary construction pit lane be provided and then removed upon completion before reinstating the alighting bus stop.

14.264. The Detailed DCLP, produced entirely in accordance with TfL's CLP guidance, will be secured as a pre-commencement condition in consultation with TfL. Special consideration should be given to ensure the safety of vulnerable road users in the surrounding area, and construction vehicle movements should be carefully planned and routed to avoid congested areas and outside peak hours. This assessment must be developed in consultation with the Network Rail Built Environment Accessibility Panel (BEAP).

14.265. During the detailed timetable process, an audit and approval process will take place to facilitate an iterative loop of pedestrian and highway modelling, assisting in the management of subsequent construction phases and the development and implementation of management and mitigation strategies, as described in the report above.

14.266. Other construction stage related planning conditions include:

- An Event Steering Group (ESG), as referred to in the report above, with industry partners 12–18 months before the Network Code Milestone to review timetable scenarios. The ESG will commence near construction start to use the most accurate data and, with the Detailed DCLP, will guide construction principles, address freight, and assess rail delivery options.
- A Modelling Governance and Oversight Group (or CLP Governance and Oversight Group), also referred to above, will include TfL, CoL, and the Bishopsgate cluster of developments under a Cluster Group. The Cluster Group will enable collaboration with nearby developments and assess cumulative impacts. Meetings are expected quarterly early in the programme, then monthly. The City of London will need to attend all meetings to ensure the cluster group mitigates scheme impacts.
- Cumulative impacts will be addressed through individual Construction Environmental Management Plans (CEMPs), supported by CoL and the Cluster Group. These plans should inform the Detailed DCLP, which may consolidate deliveries or use off-site consolidation centres. Vehicle Holding Areas (VHAs) must be managed to minimise disruption, with proposed locations at the station service access road (Primrose Street) and Sun Street Passage bus loop. Timing and management will be agreed with CoL post-determination. The identification of VHAs and consolidation centres will be set out in the Detailed CLP. The requirement to identify their feasibility will be confirmed in the Section 106 agreement to mitigate the schemes impact during construction.

14.267. The Detailed DCLP will ensure that demolition and construction works do not adversely impact public safety or the transport network, in accordance with London Plan Policy T3 and the following Local Plan policies: DM15.6 and DM16.1. These details are required before the commencement of demolition and construction works to minimize the impact on the transport network from the outset.

14.268. The Detailed DCLP must align with Transport for London's Construction Logistics Plan Guidance and any other relevant legislation. It will also be subject to City of London approval before demolition and construction can commence. The DCLP should outline, among other things, how public liaison and coordination with other nearby construction sites will be managed.

14.269. The appointed contractor will be required to join construction cluster groups—groups formed by nearby construction sites that hold regular meetings attended by City of London highways officers to ensure coordination.

14.270. Commencement of works will be subject to the appropriate legislation under the London Permitting Scheme, which falls under the Traffic Management Act 2004. Construction works for the development must be coordinated with nearby sites, and proposed construction plans may need to be reviewed for coordination.

14.271. If planning permission is granted, the submission of a detailed DCLP should be secured via condition to ensure the construction and demolition of the site comply Local Plan Core Strategic Policy CS16 and Policy DM 16.1, as well as the emerging City Plan 2040 Policy VT1. The CLP would provide a mechanism to manage and mitigate the impacts the proposed development would have on the local area. The detailed DCLP would need to be approved by the City of London prior to the commencement of works on site, should planning permission be granted.

14.272. Due to the duration of construction and its various phasing, it is recommended that a Construction and Liaison and Monitoring Section 106 contribution is secured prior to commencement of development, to cover the reasonable and proper costs of resourcing a Construction Liaison Panel (CLP), with stakeholder engagement and monitoring compliance secured with planning obligations. This is to facilitate coordination between the applicant / developer, TfL, NR and other affected parties during the lengthy construction period.

14.273. TfL has confirmed that detailed assessment of LU infrastructure and capacity impacts during construction are required, particularly for Ticket Hall B. This will require use of TfL's Railplan model and will inform financial mitigation for revenue loss and additional operating expenditure. TfL requires all such impacts to be covered by the applicant through the s106 and other legal agreements.

City – Section 278 Agreement

14.274. Section 278 refers to a legal agreement under Section 278 of the Highways Act 1980. It allows a developer to fund improvements or alterations to the existing public highway as part of a development project.

14.275. The Section 278 (s278) highway works are being undertaken following the completion of the development's construction to ensure that the surrounding public highway is delivered to the required standards and integrates safely with the finished site. Completing the works at this stage allows for accurate tie-in with the final site levels and enables the necessary changes to the highway to suit the new site layout. It also reduces the safety risks that would arise from carrying out highway works alongside active construction activities. Additionally, these works will need to tie in with other planned works in the area to ensure a coordinated and consistent approach to the wider highway network.

14.276. The scope of the S278 works includes, but is not limited to, as per the agreed drawing number 60737645-ACM-00-XX-SK-278-004.

Liverpool Street

- Reinstatement of the highways upon completion of construction works, in standard materials
- Reinstatement of road markings, upon the completion of construction works
- Reinstatement of street furniture (if applicable), upon the completion of construction works
- Reviewing of the current on-street parking arrangements and associated traffic orders, to explore the possibility of introducing additional disabled bays, as per the proposals

Old Broad Street

- Reinstatement of the highways upon completion of construction works, in standard materials
- Reinstatement of road markings, upon the completion of construction works
- Reinstatement of street furniture, upon the completion of construction works

Primrose Street

- Provision of a cycle route to create a link between Primrose Street and the new cycle parking facilities located within Exchange Square

TfL – Section 278 Agreement

14.277. The applicant will be required to enter into both Temporary and Permanent section 278 (s278) Agreements with TfL prior to any demolition or commencement of works.

14.278. It is recommended that the section 106 agreement should secure the multi-phase s278 works (temporary and permanent) with separate plans per phase, governance and funding for monitoring. This will be supported by close collaboration between TfL and the applicant, facilitated by an obligation for TfL and the applicant to share information and coordinate design, modelling, Road Safety Audits (RSAs), technical assurance, and approvals. This is to ensure mitigation of future impacts on buses, coaches, taxis, pedestrian comfort levels (PCLs), and cycling infrastructure. In line with Healthy Streets and the Mayor's Vision Zero target to eliminate all deaths and serious injuries from London's transport system by 2041, works are to be secured via s278 with TfL concerning temporary pit lane provision on the A10, incorporating space to switch bus stop cages, provision of a protected pedestrian walkway and suspend/reinstate the pedestrian crossing, with permanent provision for cycle improvements at the A10/Primrose Street junction. This would include undertaking highway modelling to TfL standards, informing the design process; auditing and approval by TfL as the highway authority for the A10; and designed, assessed and implemented with costs to be met by the developer.

14.279. With specific reference to construction phasing, including pit lane arrangements adjacent to the bus station on Sun Street Passage, it is recommended that this will be managed through the Detailed DCLP and multi-stage s278, with explicit protection of bus station access, infrastructure and on-going operations. This is required to be set out in the s106 Heads of Terms (HoT), and also the Asset Protection, Development and s278 agreements.

14.280. TfL has confirmed that the RSAs, noted above, must follow TfL's standard S2251 A1 (formerly SQA-170) and it is recommended that this is secured via a pre-commencement condition.

14.281. It is also recommended that a Construction and Liaison and Monitoring Section 106 contribution is secured prior to commencement of development, to cover the reasonable and proper costs of resourcing a Construction Liaison Panel (CLP), with stakeholder engagement and monitoring compliance secured with planning obligations. This is to facilitate coordination between the applicant / developer, TfL, NR and other affected parties during the lengthy construction period.

Section 106 Agreement Contribution – Liverpool Street Area Healthy Streets Plan

14.282. The Liverpool Street Area Healthy Streets Plan (adopted May 2024) sets out a framework to transform the streets around Liverpool Street Station into cleaner, safer, and more people-focused spaces. It aims to prioritise walking, wheeling, and cycling; improve accessibility for all users; reduce motor-traffic dominance; enhance air quality and noise conditions; and create better public-realm spaces with widened pavements, improved crossings, greenery, and seating. The Plan also seeks to improve the efficiency of deliveries and servicing, strengthen connections between the station and surrounding districts, and ensure the area adapts to major redevelopment and changing travel patterns. Delivery is proposed through a series of future projects tied to available funding and development opportunities.

14.283. Among the proposals, the areas around Liverpool Street Station are intended to create a more pedestrian-friendly, accessible, and attractive urban environment. Around Liverpool Street, this includes wider pavements, traffic calming, decluttering, and added greenery and seating, prioritising walking, cycling, and smooth transport interchange while retaining limited vehicle access. Old Broad Street will see similar improvements, with raised crossings, reorganised loading, timed traffic restrictions, and enhanced street frontages to boost pedestrian comfort and connectivity. Primrose Street will receive more modest upgrades, focusing on greening, seating, and improved cycle and scooter facilities, contributing to a safer and more bike-friendly environment within the wider area renewal.

14.284. The Plan covers a broad area that requires interventions which will benefit from contributions associated with various incoming developments. This application will play a positive role in delivering these proposals, with funding secured as part of the S106 Agreement, helping to create a safer, more accessible, and vibrant public realm for everyone.

14.285. In addition to the S106 contribution, the applicant will ensure that the roads are reinstated using an updated palette of materials following the construction works.

Conclusion

14.286. The proposals are designed to improve passenger flow, reduce congestion within the station, and enhance multimodal connectivity by integrating pedestrian, cycling, and public transport access and improve accessibility, thereby ensuring a seamless travel experience for thousands of daily users. These improvements will also make a significant contribution to the Liverpool Street Area Healthy Streets Plan.

14.287. The proposals include targeted enhancements to the surrounding transport infrastructure, improving safety, accessibility, and overall efficiency of movement for all users. By prioritising sustainable transport options and strengthening connections with bus and rail services, the development aligns with broader City transport strategies and policies that encourage walking, cycling, and public transport use.

14.288. The application complies with relevant planning policies, including London Plan Policies T1, T3, T4, T5, T6, T6.5, T7 and SI7 , Local Plan Policies CS16, DM15.6, DM16.1, DM16.2, DM16.3, DM16.4, DM16.5 and DM17.1, and emerging City Plan 2040 policies S9 and VT1, VT2, VT3, AT1 and AT3, demonstrating that it is both appropriate and beneficial and is therefore considered acceptable in transport and highways terms.

15. Environmental Impacts on the Surrounding Area

15.1. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of the Building Research Establishment's guidelines. Draft City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, and to avoid unacceptable wind, loss of daylight and sunlight, and thermal comfort impacts at street level.

15.2. London Plan policy D6D provides that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. London Plan policy D8G requires consideration to be given to the local microclimate created by buildings and the impact of service entrances and facades on the public realm. Addressing environmental impacts in terms of wind, daylight, sunlight, penetration and temperature conditions around tall buildings is also a requirement of London Plan policy D9C(3)(a).

Wind Microclimate

- 15.3. Details of Wind and Microclimate have been submitted under Environmental Statement (ES) Chapter 15: Wind Microclimate, and Appendix 15-1: Pedestrian Level Wind Microclimate Assessment prepared by AECOM, dated March 2025, and Appendix 15-2: Computational Fluid Dynamics (CFD) Wind Assessment Report, prepared by GIA, dated 13th March 2025, has been submitted as part of the application.
- 15.4. Wind tunnel testing has taken place to assess the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
- 15.5. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
- 15.6. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
- 15.7. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
- 15.8. Because the proposed building is over 50m AOD, both Computational Fluid Dynamics (CFD) and Wind Tunnel Testing have been undertaken by independent experts.

- 15.9. The wind tunnel and CFD results broadly give the same assessment results. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.
- 15.10. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation and architectural features.
- 15.11. The City of London Lawson criteria define the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe.
- 15.12. There are four criteria for determining the sensitivity of a receptor:
- High: seating areas, entrances, and terraces
 - Moderate: thoroughfares
 - Low: high pedestrian traffic thoroughfares
 - Negligible: roads and areas of no pedestrian access
- 15.13. There are also four criteria for determining the magnitude of change/impact to a receptor:
- Large: safety exceedance
 - Medium: two categories above the criteria
 - Small: one category above the criteria
 - Negligible: within suitable criteria
- 15.14. The City of London Lawson Comfort Criteria are as follows:
- Frequent sitting
 - Occasional sitting
 - Standing
 - Walking
 - Uncomfortable

15.15. Assessments have been carried out for both the windiest and the summer season. It is noted that certain areas are more likely to be more frequently used in the summer, this includes amenity areas, public outdoor seating areas and elevated public spaces. It is noted that if an area is classified as suitable for occasional sitting in the summer, the windier conditions that occur during the winter season usually mean that the area would be classified as suitable for standing in the windiest season, unless additional shelter was provided. This is considered to be tolerable on the basis that such an area would be most frequently used for sitting during the summer months. At other times of the year, the expectation of usability is lower due to other factors such as temperature and precipitation.

15.16. The applicant has undertaken the following six configurations in both the CFD and Wind Tunnel Test, at a scaled height of 1.5m above ground level:

- Configuration 1: Existing Site with Existing Surrounding Buildings;
- Configuration 2: Existing Site with Cumulative Surrounding Buildings;
- Configuration 3: Proposed Development with Existing Surrounding Buildings;
- Configuration 4: Proposed Development with Existing Surrounding Buildings and Existing and Proposed Landscaping;
- Configuration 5: Proposed Development with Cumulative Surrounding Buildings;
- Configuration 6: Proposed Development with Cumulative Surrounding Buildings and Existing and Proposed Landscaping.

15.17. The following consented cumulative schemes identified within the 400m radius of the Site were assessed in the CFD model:

- 155 Bishopsgate (Planning Reference: 24/00616/FULL);
- Finsbury Circus (Planning Reference: 21/00683/FULL);
- Winchester House (Planning Reference: 23/01270/FULMAJ);
- Development House (Planning Reference: 2022/1680);
- 81 Newgate (Planning Reference: 20/00311/ FULMAJ);
- 1-27 The Arcade (Planning Reference: 22/00443/FULL);
- 4 Christopher Street (Planning Reference: 2021/0116);
- 55 Bishopsgate (Planning Reference: 22/00981/FULEIA);
- 85 Gracechurch Street (Planning Reference: 22/01155/EIA);
- Leadenhall Court (Planning Reference: 6/00859/FULEIA);
- 100, 106 & 107 Leadenhall Street (Planning Reference: 22/00790/FULEIA);
- 55 Old Broad Street (Planning Reference: 23/00469/FULEIA); and
- New Liverpool House 15 - 17 Eldon Street London (Planning Reference: 21/00282/ FULMAJ).

15.18. The following non-consented cumulative schemes identified within the 400m radius of the Site were assessed in the CFD model:

- Bury Street (Planning Reference: 24/00021/ FULEIA and 24/00011/LBC);
- 99 Bishopsgate (Planning Reference: 24/00836/FULEIA); and
- 1 Undershaft (Planning Reference: 23/01423/ FULEIA).

Configuration 1: Existing Site with Existing Surrounding Buildings

15.19. The assessment of baseline conditions including the existing Site with existing surrounding buildings is referred to as Configuration 1. Wind conditions for Configuration 1 are summarised as below for the windiest and the summer season at ground level, and for off-Site elevated level terraces and balconies.

Pedestrian Comfort

15.20. The existing site conditions are generally suitable for frequent sitting, occasional sitting and standing around the Site, with mainly frequent sitting, occasional sitting or standing to the west and south and occasional sitting, standing or walking to the east.

15.21. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds and frequency associated with this period of the year, with mostly a mixture of frequent sitting and occasional sitting use wind conditions at the existing Site and in the nearby surrounding area. Elevated off-Site locations would have a mix of occasional sitting to standing use conditions during the summer season.

Thoroughfares and Crossings

15.22. The wind tunnel testing demonstrates all thoroughfares and pedestrian crossings are suitable for walking or calmer during the winter. This satisfies the target condition.

Entrances

15.23. The wind tunnel testing demonstrates conditions for all principal on-site entrances are suitable for either frequent sitting, occasional sitting or standing in the winter. This satisfies the target condition.

15.24. Conditions for all principal off-site entrances (outside site boundary, e.g. entrances to station from across the street) are suitable for either frequent sitting, occasional sitting or standing in the winter. This satisfies the target condition.

Bus Stops & Railway Platforms

- 15.25. The wind tunnel testing demonstrates the bus stops on the western side of Bishopsgate and the south eastern bus stop are suitable for a mix of frequent sitting, occasional sitting and standing during the winter. This satisfies the target condition.
- 15.26. The bus stop on the north eastern side of Bishopsgate is suitable for standing during the winter. This satisfies the target condition.
- 15.27. The Railway platforms are suitable for frequent sitting in all seasons and one category calmer than target conditions.

Amenity Spaces (Seating - Ground)

- 15.28. The seating south of 100 Liverpool Street (marked "S1" on results figures) is suitable for a mix of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target condition and suitable.
- 15.29. The seating at One Bishopsgate Plaza is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target condition and suitable.
- 15.30. The seating at south east of the site is suitable for frequent sitting in summer. This is one category calmer than the target condition.

Amenity Spaces (On-site Outdoor Dining - Ground)

- 15.31. The outdoor dining area located within the site, is suitable for frequent sitting in summer. This satisfies the target condition.
- 15.32. The outdoor dining area located within the site, is suitable for frequent sitting in summer. This satisfies the target condition.

Amenity Spaces (Off-site Outdoor Dining - Ground)

- 15.33. The outdoor dining area for the Railway Tavern is suitable for occasional sitting in summer. This is one category windier than the target condition.

- 15.34. The outdoor dining area for the Pret A Manger is suitable for occasional sitting in summer. This is one category windier than the target condition.
- 15.35. The outdoor dining area for the Patty & Bun is suitable for occasional sitting in summer. This is one category windier than the target condition.
- 15.36. The outdoor dining area for the Eataly is suitable for frequent sitting in summer. This satisfies the target condition.

Amenity Spaces (Off-Site Terraces and Balconies)

- 15.37. The conditions on the terraces at 100 Broadgate is suitable for a mixture of occasional sitting and standing in summer. This ranges between being suitable and one category windier than the target conditions.
- 15.38. The conditions on the terraces at 135 Bishopsgate are suitable for a mixture of frequent sitting, occasional sitting and standing in summer. This ranges between being one category calmer, suitable and one category windier than the target conditions.
- 15.39. The conditions on the terraces at 34-37 Liverpool Street are suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target conditions and suitable.
- 15.40. The conditions on the terraces at 80 Houndsditch are suitable for a mixture of occasional sitting and standing in summer. This ranges between being suitable and one category windier than the target conditions.

Strong Winds

- 15.41. There are no instances of strong winds around the site or in the nearby surrounding area.

Comparison with CFD results

- 15.42. Conditions for Configuration 1 range between suitable for frequent sitting, occasional sitting, standing and walking around the Site. There are no instances of strong winds. There is good general agreement between the CFD and wind tunnel results for Configuration 1.

- 15.43. The CFD and wind tunnel results show a good overall agreement in terms of wind conditions, with conditions ranging between suitable for frequent sitting, occasional sitting and standing and with the same distribution of conditions being shown by both methods (windier on Bishopsgate to the east and calmer conditions on Liverpool Street to the south and Sun Street Passage to the west). Where there are differences between the methods they are at most one category, and do not impact the suitability of conditions for any receptor.

Configuration 2: Existing Site with Cumulative Surrounding Buildings

- 15.44. For the assessment of future baseline conditions, this included the Existing Site with cumulative surrounding buildings, prior to the introduction of the Proposed Development. Wind conditions for Configuration 2 are summarised as below for the windiest and the summer season at ground level, and for off-Site elevated level terraces and balconies.

Pedestrian comfort

- 15.45. Overall, the wind conditions around the Existing Site in the context of cumulative surrounds would remain similar to that in Configuration 1. Wind conditions during the windiest season would be suitable for frequent sitting to standing use with one instance of walking conditions within Bishopsgate to the north-east of the Site.
- 15.46. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds and frequency associated with this period of the year, with mostly a mixture of frequent sitting and occasional sitting use with isolated standing use wind conditions at the Existing Site and in the nearby surrounding area.
- 15.47. Elevated off-site locations would have a mix of frequent sitting to standing use conditions during the summer season (one category calmer than in Configuration 1).

Thoroughfares and Crossings

- 15.48. All thoroughfares and pedestrian crossings are suitable for walking or calmer during the winter. This satisfies the target condition.

Entrances

- 15.49. Conditions for all principal on-site entrances (marked “E” in results figures) are suitable for either frequent sitting, occasional sitting or standing in the winter. This satisfies the target condition.

- 15.50. Conditions for all principal off-site entrances (marked “O” in results figures) are suitable for either frequent sitting, occasional sitting or standing in the winter. This satisfies the target condition.

Bus Stops & Railway Platforms

- 15.51. All bus stops on Bishopsgate are suitable for a mix of frequent sitting, occasional sitting and standing during the winter. This satisfies the target condition.
- 15.52. The Railway platforms are suitable for frequent sitting in all seasons and one category calmer than target conditions.

Amenity Spaces (Seating - Ground)

- 15.53. The seating south of 100 Liverpool Street is suitable for occasional sitting in summer. This satisfies the target condition.
- 15.54. The seating at One Bishopsgate Plaza is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target condition and suitable.
- 15.55. The seating at south east of the site is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target condition and suitable.

Amenity Spaces (On-site Outdoor Dining - Ground)

- 15.56. The outdoor dining area located within the site, is suitable for frequent sitting in summer. This satisfies the target condition.
- 15.57. The outdoor dining area located within the site, is suitable for frequent sitting in summer. This satisfies the target condition.

Amenity Spaces (Off-site Outdoor Dining - Ground)

- 15.58. The outdoor dining area for the Railway Tavern is suitable for occasional sitting in summer. This is one category windier than the target condition.

- 15.59. The outdoor dining area for the Pret A Manger is suitable for occasional sitting in summer. This is one category windier than the target condition.
- 15.60. The outdoor dining area for the Patty & Bun is suitable for occasional sitting in summer. This is one category windier than the target condition.
- 15.61. The outdoor dining area for the Eataly is suitable for frequent sitting in summer. This satisfies the target condition.

Amenity Spaces (Off-Site Terraces and Balconies)

- 15.62. The conditions on the terraces at 100 Broadgate is suitable for a mixture of occasional sitting, standing and walking in summer. This ranges between being suitable and one or two categories windier than the target conditions.
- 15.63. The conditions on the terraces at 135 Bishopsgate are suitable for a mixture of frequent sitting, occasional sitting and standing in summer. This ranges between being one category calmer, suitable and one category windier than the target conditions.
- 15.64. The conditions on the terraces at 34-37 Liverpool Street are suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target conditions and suitable.
- 15.65. The conditions on the terraces at 80 Houndsditch are suitable for a mixture of occasional sitting and standing in summer. This ranges between being suitable and one category windier than the target conditions.

Strong Winds

- 15.66. No strong winds exceeding 15m/s for more than 1.9 hours per annum are expected to occur in this Configuration.

Comparison with CFD results

- 15.67. Conditions for Configuration 2 range between suitable for frequent sitting, occasional sitting, standing and walking around the Site. There are no instances of strong winds. There is good general agreement between the CFD and wind tunnel results for Configuration 2.

- 15.68. As for the baseline conditions (Configuration 1), the CFD and wind tunnel results for Configuration 2 show a good overall agreement in terms of wind conditions, with conditions ranging between suitable for frequent sitting, occasional sitting and standing and with the same distribution of conditions being shown by both methods (windier on Bishopsgate to the east and calmer conditions on Liverpool Street to the south and Sun Street Passage to the west). Where there are differences between the methods they are at most one category, and do not impact the suitability of conditions for any receptor.

Configuration 3: Proposed Development with Existing Surrounding Buildings

- 15.69. The discussion of wind conditions for Configuration 3 is based on the results presented once the proposed development is complete and operational.

Pedestrian Comfort

- 15.70. During the windiest season, wind conditions on-site and in the nearby surrounding area would be a mix of frequent sitting to standing use with isolated walking use conditions to the south-east of the Site. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds and frequency associated with this period of the year, with frequent and occasional sitting with isolated standing use conditions to the west and east of the Site.

Thoroughfares and Crossings

- 15.71. All thoroughfares and pedestrian crossings are suitable for standing or calmer during the winter. This satisfies the target condition.

Entrances

- 15.72. The entrances to the Proposed Development are suitable for frequent sitting, occasional sitting or standing in all seasons. This satisfies the target condition in each case, and ranges between one category calmer and one category windier than the baseline.
- 15.73. Conditions for all other principal off-site entrances are suitable for either frequent sitting, occasional sitting or standing in the winter. This satisfies the target condition in each case, and ranges between one category calmer and one category windier than the baseline.

Bus Stops & Railway Platforms

- 15.74. The bus stops on Bishopsgate are suitable for frequent sitting or occasional sitting during the winter. This is one or two categories calmer than the target condition, and is either consistent with the baseline conditions or one or two categories calmer.
- 15.75. The Railway platforms are suitable for frequent sitting in all seasons and one category calmer than target conditions.

Amenity Spaces (Seating - Ground)

- 15.76. The seating within the Southern Public Space on Site is suitable for frequent sitting in summer. This is one category calmer than the target condition and is either consistent with the baseline conditions or one category calmer.
- 15.77. The seating at One Bishopsgate Plaza is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target condition and suitable and is consistent with the baseline conditions.
- 15.78. The seating at within the site is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target condition and suitable.
- 15.79. The seating at within the site is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target condition and suitable.
- 15.80. The seating at south east of the site is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target condition and suitable and is consistent with the baseline conditions.

Amenity Spaces (Mixed-use Amenity)

- 15.81. The on-site mixed use amenity is suitable for frequent sitting in summer. This is one category calmer than the target conditions.

Amenity Spaces (On-site Outdoor Dining - Ground)

- 15.82. The outdoor dining area located within the site, is suitable for frequent sitting in summer. This satisfies the target condition and is consistent with the baseline conditions.
- 15.83. The outdoor dining area located within the site, marked "D6" on results figures, is suitable for frequent sitting in summer. This satisfies the target condition and is consistent with the baseline conditions.

Amenity Spaces (Off-site Outdoor Dining - Ground)

- 15.84. The outdoor dining area for the Railway Tavern is suitable for frequent sitting in summer. This satisfies the target conditions and is consistent with the baseline.
- 15.85. The outdoor dining area for the Pret A Manger is suitable for occasional sitting in summer. This is one category windier than the target conditions and is consistent with the baseline.
- 15.86. The outdoor dining area for the Patty & Bun is suitable for occasional sitting in summer. This is one category windier than the target conditions and is consistent with the baseline.
- 15.87. The outdoor dining area for the Eataly is suitable for frequent sitting in summer. This satisfies the target condition and is consistent with the baseline conditions.

Amenity Spaces (On-Site Terraces and Balconies)

- 15.88. Terrace conditions range between frequent sitting occasional sitting and standing in summer. The seating locations suitable for standing in summer, is one category windier than target.
- 15.89. The outdoor dining area is suitable for a mixture of occasional sitting and standing in summer. This is one or two categories windier than the target condition.
- 15.90. These bench seating, and outdoor dining locations also include shrub planting which would grow up to 2-4m in height, providing further beneficial shelter against the wind. The locations would receive beneficial shelter from the addition of the proposed landscaping, and moveable screens, and would be suitable for their intended use, as discussed in Configuration 4. These locations would therefore represent a Negligible (Not Significant) effect with the proposed landscaping in place.
- 15.91. Balcony conditions are frequent sitting in summer. This satisfies the target condition.

Amenity Spaces (Off-Site Terraces and Balconies)

- 15.92. The conditions on the terraces at 100 Broadgate is suitable for a mixture of frequent sitting, occasional sitting and standing in summer. With a reduction in the region of standing. This ranges between being one category calmer, suitable and one category windier than the target conditions.
- 15.93. This is either calmer than or consistent with the baseline. The conditions on the terraces at 135 Bishopsgate are suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target conditions and satisfying the target conditions and is either consistent with the baseline or one category calmer.
- 15.94. The conditions on the terraces at 34-37 Liverpool Street are suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target conditions and suitable and is consistent with the baseline.
- 15.95. The conditions on the terraces at 80 Houndsditch are suitable for a mixture of occasional sitting and standing in summer. This ranges between being suitable and one category windier than the target conditions and is consistent with the baseline.

Strong Winds

- 15.96. There would be no on-site areas with instances of strong winds exceeding the safety threshold at ground level. Therefore, no wind mitigation measures would be required.
- 15.97. There will be one location at the elevated office terrace (probe location 151), which would have instance of strong wind exceeding the safety threshold without the proposed landscape plan. Inclusion of proposed landscaping scheme (as discussed in Configuration 4) would provide beneficial shelter to this space and eliminate the occurrence of strong winds, providing a safe environment for occupant use.
- 15.98. There would be no off-site areas with instances of strong winds exceeding the safety threshold. Therefore, no wind mitigation measures would be required.

Comparison with CFD results

- 15.99. Conditions for Configuration 3 range between suitable for frequent sitting, occasional sitting and standing around the Site. There are no instances of strong winds. There is good general agreement between the CFD and wind tunnel results for Configuration 3.

15.100. As for the baseline conditions (Configuration 1), the CFD and wind tunnel results for Configuration 3 show a good overall agreement in terms of wind conditions, with conditions ranging between suitable for frequent sitting, occasional sitting and standing and with the same distribution of conditions being shown by both methods (windier on Bishopsgate to the east and calmer conditions on Liverpool Street to the south and Sun Street Passage to the west). Where there are differences between the methods they are at most one category, and do not impact the suitability of conditions for any receptor.

15.101. The ground level CFD and wind tunnel results generally agree regarding the suitability of conditions. Ground level conditions are generally either calmer than the baseline conditions, suitable for the intended use or consistent with the baseline conditions.

15.102. On-site terrace level conditions are typically windier in CFD results but of the same order as the wind tunnel results and would obtain beneficial shelter from the addition of amended landscaping.

15.103. Off-site terrace level CFD and wind tunnel results generally agree regarding the suitability of the conditions.

Configuration 4: Proposed Development with Existing Surrounding Buildings and Existing and Proposed Landscaping

15.104. The wind tunnel testing in this configuration demonstrates wind conditions at all receptors that were suitable without mitigation remain suitable, therefore this section will focus on those receptors that were above target conditions.

Pedestrian Comfort

15.105. Conditions for the Proposed Development in existing surrounds and existing and proposed landscaping are of a similar order to the Proposed Development in existing surrounds, but significantly calmer at on-site terrace level.

15.106. During the windiest season, wind conditions on-site and in the nearby surrounding area would range from frequent sitting to walking use conditions. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds and frequency associated with this period of the year, with frequent sitting and occasional sitting use with isolated standing use conditions to the west and east of the Site.

15.107. With the inclusion of the existing and proposed landscape planting, wind conditions would be slightly calmer to the south of the Site than in Configuration 3. The Proposed Development would have widespread landscaping both at ground and elevated levels, which would provide sufficient shelter to most of the locations.

Thoroughfares

15.108. On-site thoroughfares would have wind conditions ranging from frequent sitting to standing use during the windiest season. Frequent sitting to standing use wind conditions would be suitable for the intended uses. On-site thoroughfares with frequent sitting, occasional sitting and standing use wind conditions would be one to three categories calmer than required and would represent a Moderate Beneficial (Not Significant) effect.

15.109. Off-site thoroughfares would have wind conditions ranging from frequent sitting to standing use with isolated walking use conditions during the windiest season. Frequent sitting to standing use wind conditions would be suitable for the intended uses. Wind conditions at off-site thoroughfares would be suitable in the baseline scenario and would become calmer as a result of the Proposed Development, representing a Negligible (Not Significant) effect.

Amenity Spaces (On-Site Terraces and Balconies)

15.110. Terrace conditions range between frequent sitting, occasional sitting and standing in summer. The seating locations on the terraces that are suitable for standing in summer are still one category windier than the target condition, although each location is marginal to the threshold, and these locations were found to be suitable for occasional sitting in the wind tunnel test, so this exceedance is not considered a significant one overall.

15.111. The outdoor dining area marked is suitable mainly for occasional sitting with a small region of standing in summer. This is now one category windier than the target condition.

15.112. It should be noted that this dining area would have a 2m tall moveable screen, which was not tested as part of the CFD due to its moveable nature, but could be deployed as part of the building management in order to make conditions suitable for frequent sitting in summer.

Strong Winds

15.113. The inclusion of the proposed landscaping scheme would be beneficial to eliminate the strong wind exceedances identified in Configuration 3. As such, there would be no on-site areas with instances of strong winds exceeding the safety threshold at probe locations. Therefore, no wind mitigation measures would be required.

15.114. There would be no off-site areas with instances of strong winds exceeding the safety threshold. Therefore, no wind mitigation measures would be required.

Comparison with CFD Results

15.115. Conditions for Configuration 4 range between suitable for frequent sitting, occasional sitting, and standing around the Site. There are no instances of strong winds. There is good general agreement between the CFD and wind tunnel results for Configuration 4.

15.116. As for the baseline conditions (Configuration 1), the CFD and wind tunnel results for configuration 4 show a good overall agreement in terms of wind conditions, with conditions ranging between suitable for frequent sitting, occasional sitting and standing and with the same distribution of conditions being shown by both methods (windier on Bishopsgate to the east and calmer conditions on Liverpool Street to the south and Sun Street Passage to the west). Where there are differences between the methods they are at most one category, and do not impact the suitability of conditions for any receptor.

15.117. The ground level CFD and wind tunnel results generally agree regarding the suitability of conditions. Ground level conditions are generally either calmer than the baseline, suitable for the intended use or consistent with the baseline.

15.118. On-site terrace level conditions are typically windier in the CFD results but of the same order as the wind tunnel results and would obtain beneficial shelter from the addition of amended landscaping. Off-site terrace level CFD and wind tunnel results generally agree regarding the suitability of the conditions.

Configuration 5: Proposed Development with Cumulative Surrounding Buildings

- 15.119. The discussion of wind conditions for Configuration 5 is based on the results presented for windiest and summer season respectively for ground level, and for off-Site and on-Site elevated levels during the summer season, once the proposed development is complete and operational with cumulative schemes as discussed above in this section.
- 15.120. The wind conditions without the Proposed Development in the context of the surrounding cumulative developments are discussed above in Configuration 2. Effects during the Demolition and Construction Phase have been assessed qualitatively using professional judgement. Wind conditions during the construction phase would be expected to gradually adjust from those of the baseline scenario (Configuration 1), to the wind conditions identified for the completed Proposed Development with cumulative surroundings in the operational phase (Configurations 5 and 6).
- 15.121. The wind environment during the Demolition and Construction Phase of the Proposed Development is likely to be variable and as such, all effects would be temporary.
- 15.122. The activity on-site during this time (i.e. construction phase activity) is less sensitive to wind conditions (due to protection from Site hoarding, and access to the Site being restricted to Site workers) than when the Proposed Development is complete and operational (which would include, e.g., new thoroughfare routes, building entrances and outdoor amenity spaces). In addition, appropriate health and safety measures would be implemented to ensure that construction workers are adequately protected.
- 15.123. Based on the above, during the Demolition and Construction phase, there is likely to be a direct, temporary, long-term, neutral effect which is considered to be Negligible (Not Significant).

Pedestrian Comfort

- 15.124. Conditions for the Proposed Development in cumulative surrounds are of a similar order to the future baseline conditions, but calmer to the east along Bishopsgate.
- 15.125. With the inclusion of the cumulative surrounding buildings there would not be any notable difference in the wind environment when compared to Configuration 3, Proposed Development with Existing Surrounding Buildings.

Thoroughfares and Crossings

- 15.126. All thoroughfares and pedestrian crossings are suitable for walking or calmer during the winter. This satisfies the target condition.

Entrances

- 15.127. The entrances to the Proposed Development are suitable for frequent sitting, occasional sitting or standing in all seasons. This is either suitable, or one to two categories calmer than the target condition and is consistent with the future baseline.
- 15.128. Conditions for all other principal off-site entrances are suitable for either frequent sitting, occasional sitting or standing in the winter. This satisfies the target condition and is consistent with the future baseline.

Bus Stops & Railway Platforms

- 15.129. The bus stops on Bishopsgate are suitable for frequent sitting or occasional sitting during the winter. This is one or two categories calmer than the target condition, and is either consistent with the future baseline conditions or one category calmer.
- 15.130. The Railway platforms are suitable for frequent sitting in all seasons and one category calmer than target conditions.

Amenity Spaces (Seating - Ground)

- 15.131. The seating within the Southern Public Space on Site is suitable for occasional sitting in summer. This satisfies the target condition and consistent with the future baseline.
- 15.132. The seating at One Bishopsgate Plaza is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target condition and suitable and is consistent with the future baseline.
- 15.133. The seating within the site is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target conditions and suitable.

15.134. The seating at within the site is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target conditions and suitable.

15.135. The seating at south east of the site is suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between suitable, and being one category windier than the target condition and is consistent with the future baseline.

Amenity Spaces (Mixed-use amenity)

15.136. The on-site mixed use amenity is suitable for frequent sitting in summer. This is one category calmer than the target conditions.

Amenity Spaces (On-site Outdoor Dining - Ground)

15.137. The outdoor dining area located within the site, is suitable for frequent sitting in summer. This satisfies the target condition and is consistent with the future baseline.

15.138. The outdoor dining area located within the site, is suitable for frequent sitting in summer. This satisfies the target condition and is consistent with the future baseline.

Amenity Spaces (Off-site Outdoor Dining - Ground)

15.139. The outdoor dining area for the Railway Tavern is suitable for occasional sitting in summer. This is one category windier than the target condition r and is consistent with the future baseline.

15.140. The outdoor dining area for the Pret A Manger is suitable for occasional sitting in summer. This is one category windier than the target condition, and is consistent with the future baseline.

15.141. The outdoor dining area for the Patty & Bun is suitable for occasional sitting in summer. This is one category windier than the target condition, and is consistent with the future baseline.

15.142. The outdoor dining area for the Eataly is suitable for frequent sitting in summer. This satisfies the target condition and is consistent with the future baseline.

Amenity Spaces (On-Site Terraces and Balconies)

- 15.143. On-site roof level bench style seating would have wind conditions ranging from frequent sitting to standing use during the summer season. Frequent sitting to occasional sitting use wind conditions would be suitable for the intended uses.
- 15.144. Off-site roof level bench style seating would have wind conditions ranging from frequent sitting to standing use during the summer season. Frequent sitting to occasional sitting use wind conditions would be suitable for the intended uses.
- 15.145. The outdoor dining area is suitable for a mixture of occasional sitting and standing in summer. This is one or two categories windier than the target condition. Balcony conditions are frequent sitting in summer. This satisfies the target condition.

Amenity Spaces (Off-Site Terraces and Balconies)

- 15.146. The conditions on the terraces at 100 Broadgate is suitable for a mixture of frequent sitting, occasional sitting and standing in summer. This ranges between being one category calmer, suitable and one category windier than the target conditions. This is either calmer or consistent with the future baseline.
- 15.147. The conditions on the terraces at 135 Bishopsgate are suitable for a mixture of frequent sitting, occasional sitting and standing in summer. This ranges between being one category calmer, suitable and one category windier than the target conditions and is either calmer or consistent with the future baseline.
- 15.148. The conditions on the terraces at 34-37 Liverpool Street are suitable for a mixture of frequent sitting and occasional sitting in summer. This ranges between being one category calmer than the target conditions and suitable and is consistent with the future baseline.
- 15.149. The conditions on the terraces at 80 Houndsditch are suitable for a mixture of occasional sitting and standing in summer. This ranges between being suitable and one category windier than the target conditions and is consistent with the future baseline.

Strong Winds

- 15.150. There are no instances of strong winds around the Proposed Development, on the proposed balconies and amenity terraces or in the nearby surrounding area.

Comparison with CFD results

- 15.151. Conditions for Configuration 5 range between suitable for frequent sitting, occasional sitting, standing and walking around the Site. There are no instances of strong winds. There is good general agreement between the CFD and wind tunnel results for Configuration 5.
- 15.152. As for the baseline conditions (Configuration 1), the CFD and wind tunnel results for Configuration 5 show a good overall agreement in terms of wind conditions, with conditions ranging between suitable for frequent sitting, occasional sitting and standing and with the same distribution of conditions being shown by both methods (windier on Bishopsgate to the east and calmer conditions on Liverpool Street to the south and Sun Street Passage to the west). Where there are differences between the methods they are at most one category, and do not impact the suitability of conditions for any receptor.
- 15.153. On-site terrace level conditions are typically windier in the CFD results but of the same order as the wind tunnel and would obtain beneficial shelter from the addition of amended landscaping.
- 15.154. Off-site terrace level CFD and wind tunnel results generally agree regarding the suitability of the conditions.

Configuration 6: Proposed Development with Cumulative Surrounding Buildings and Existing and Proposed Landscaping

- 15.155. The discussion of wind conditions for Configuration 6 is based on the results presented in Plate 15-22 and Plate 15-23 for windiest and summer season respectively for ground level. Plate 15-24 and Plate 15-25 presents results for off-Site and on-Site elevated levels during the summer season respectively.
- 15.156. Conditions at all receptors that were suitable without mitigation remain suitable, therefore this section will focus on those receptors that were above target conditions.

Pedestrian Comfort

- 15.157. Conditions for the Proposed Development in cumulative surrounds and existing and proposed landscaping are of a similar order to the Proposed Development in cumulative surrounds, but significantly calmer at terrace level.

15.158. During the windiest season, wind conditions on-site and in the nearby surrounding area would be mix of frequent sitting to standing use condition. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds and frequency associated with this period of the year, with frequent and occasional sitting with isolated standing use conditions to the west, south and east of the Site.

15.159. With the inclusion of the existing and proposed landscaping, wind conditions would be calmer and be suitable for the intended uses in comparison to Configuration 5 Proposed Development with Cumulative Surrounding Buildings.

Thoroughfares

15.160. On-site thoroughfares would have wind conditions ranging from frequent sitting to standing use during the windiest season. Frequent sitting to standing use wind conditions would be suitable for the intended uses.

15.161. Off-site thoroughfares would have wind conditions ranging from frequent sitting to standing use during the windiest season. Frequent sitting to standing use wind conditions would be suitable for the intended uses.

Entrances

15.162. On-site entrances would have wind conditions ranging from frequent sitting to standing use during the windiest season. Frequent sitting to standing use wind conditions would be suitable for the intended uses.

15.163. Off-site entrances would have wind conditions ranging from frequent sitting to standing use during the windiest season. Frequent sitting to standing use wind conditions would be suitable for the intended uses.

Amenity Spaces (On-Site Terraces and Balconies)

15.164. On-site roof level bench style seating would have wind conditions ranging from frequent sitting to occasional sitting use during the summer season and would be suitable for the intended uses.

- 15.165. Terrace conditions range between frequent sitting, occasional sitting and standing in summer. The seating locations are suitable for frequent sitting or occasional sitting in summer, and now satisfy the target condition.
- 15.166. The seating locations suitable for standing in summer are is still one category windier than the target condition. Each of these locations is marginal to the threshold, and were found to be suitable for occasional sitting in the wind tunnel test, so this exceedance is not considered a significant one overall. This would be suitable for the intended use with no spill out seating and would represent a Negligible (Not Significant) effect.
- 15.167. The outdoor dining area is suitable mainly for occasional sitting with a small region of standing in summer. This is now one category windier than the target condition.
- 15.168. Spill out seating would have occasional sitting during the summer season which would be one category windier than suitable for the intended use and would represent a Moderate Adverse (Significant) effect. However, a 2m tall movable screen will be in available for use as required while the spill out seating is in use. With this screen in place, this seating space would have suitable frequent sitting use conditions and would represent a Negligible (Not Significant) effect.
- 15.169. It should be noted that this 2m tall moveable screen in the dining area, is not tested as part of the CFD due to its moveable nature but could be deployed as part of the building management in order to make conditions suitable for frequent sitting in summer.

Strong Winds

- 15.170. There would be no on-site areas with instances of strong winds exceeding the safety threshold. Therefore, no wind mitigation measures would be required.
- 15.171. There would be no off-site areas with instances of strong winds exceeding the safety threshold. Therefore, no wind mitigation measures would be required.

Comparison with CFD Results

- 15.172. Conditions for Configuration 6 range between suitable for frequent sitting, occasional sitting, standing and walking around the Site. There are no instances of strong winds. There is good general agreement between the CFD and wind tunnel results for Configuration 6.

15.173. As for the baseline conditions (Configuration 1), the CFD and wind tunnel results for Configuration 6 show a good overall agreement in terms of wind conditions, with conditions ranging between suitable for frequent sitting, occasional sitting and standing and with the same distribution of conditions being shown by both methods (windier on Bishopsgate to the east and calmer conditions on Liverpool Street to the south and Sun Street Passage to the west). Where there are differences between the methods they are at most one category, and do not impact the suitability of conditions for any receptor.

15.174. On-site terrace level conditions are typically windier in the CFD results but of the same order as the wind tunnel and would obtain beneficial shelter from the addition of amended landscaping.

15.175. Off-site terrace level CFD and wind tunnel results generally agree regarding the suitability of the conditions.

Wind Microclimate Conclusion

15.176. The activity on-site during demolition and construction phase activity is less sensitive to wind conditions (due to protection from site hoarding, and access to the Site being restricted to site workers) than when the Proposed Development is complete and operational (which would include, e.g. new thoroughfare routes, building entrances and outdoor amenity spaces). Overall, the wind microclimate impact of the Proposed Development with proposed landscaping is considered to be acceptable.

15.177. With the implementation of the proposed landscaping design wind conditions in the majority of locations on-site and off-site would be suitable and safe for the intended uses. However, the occasional sitting use conditions would remain at a spill out seating area. This spill out seating is located in a private area, and wind conditions in this location would marginally exceed the required threshold. A 2m tall movable screen will be present, which can be deployed as needed while the spill out seating is in use. The screen would increase the localised shelter and with this screen in place the spill out seating would be expected to have wind conditions suitable for intended frequent sitting use.

15.178. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the Local Planning Authority, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the assessments.

15.179. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan 2040 policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Thermal Comfort Assessment

15.180. London Plan policy D8 and D9 and policies S8, S12 and S21 of the emerging City Plan 2040, indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sun penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space.

15.181. Strategic Policy S15 of the emerging City Plan 2040 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

15.182. In accordance with City of London Thermal Comfort Guidelines, an Outdoor Thermal Comfort Assessment prepared by GIA, dated 13th March 2025, has been submitted as part of the application. The analysis compared the conditions around the existing building (both with existing surrounds and with the consented cumulative schemes included) with those around the Proposed Development (with existing surrounds and consented and non-consented cumulative surrounds), and with the impact of landscaping.

15.183. The assessment methodology involves The wind assessment was performed using Computational Fluid Dynamics (CFD) modelling. The results from the CFD model were combined with a solar radiation model, tested using Radiance, to assess the impact of sun conditions on the radiative temperature experienced by pedestrians.

15.184. The wind speeds and mean radiant temperature were combined with the dry bulb temperature and relative humidity, to calculate the Universal Thermal Comfort Index (UTCI) across the climate dataset provided in the City of London thermal guidelines. The dataset used includes hourly conditions (temperature, humidity, solar radiation and wind speed/direction) for a 5 year period from 2015 to 2019 inclusive. The UTCI is a 6th order polynomial which calculates the apparent temperature felt by a person, accounting for wind chill, direct sunlight and humidity. UTCI values of between 0° and 32° are deemed an acceptable level of comfort.

15.185. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort are set out below and is used to define the categorization of a given location.

Usage Category	% of hours with Acceptable UTCI	Description	Colour (HTML Colour Code)
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green (#378c4b)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple (#c86ebe)
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan (#1effff)
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange (#fab92d)
Transient	<25% in winter OR <50% in any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).	Red (#de2d26)

15.186. Configurations similar to that of the Wind tunnel testing were carried out to assess the Thermal comfort levels around the site, with a list of cumulative schemes also remaining the same. These configurations are re-iterated as follows:

- Configuration 1: Existing Site with Existing Surrounding Buildings;
- Configuration 2: Existing Site with Cumulative Surrounding Buildings;
- Configuration 3: Proposed Development with Existing Surrounding Buildings;

- Configuration 4: Proposed Development with Existing Surrounding Buildings and Existing and Proposed Landscaping;
- Configuration 5: Proposed Development with Cumulative Surrounding Buildings;
- Configuration 6: Proposed Development with Cumulative Surrounding Buildings and Existing and Proposed Landscaping.

Outcome of the Analysis

15.187. The analysis compared the conditions around the existing building (both with existing surrounds and with the consented cumulative schemes included) with those around the Proposed Development (with existing surrounds and consented and non-consented cumulative surrounds), and with the impact of landscaping.

15.188. The Proposed Development would make conditions less comfortable on Liverpool Street to the south, but still meets target conditions. Conditions are made more comfortable along Bishopsgate, although the overall comfort levels in the surrounding area would not be fundamentally different from the baseline, this is therefore acceptable.

15.189. The Proposed Development would have a have a beneficial impact on bus stops along Bishopsgate, and Dining amenity spaces along Liverpool Street. The overall impact is beneficial.

15.190. The inclusion of cumulative schemes would generally make conditions less comfortable around the site, but either similar to the baseline or suitable for use.

15.191. Conditions within the Site both at aground and terrace levels are suitable for the intended use once the landscaping is included.

Thermal Comfort Conclusions

15.192. It is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan policy D8 and D9 and policies S8, S12 and S21 of the emerging City Plan 2040.

15.193. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant.

Daylight and Sunlight, and Overshadowing

Policy Context

- 15.194. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 15.195. Local Plan policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.
- 15.196. Emerging City Plan 2040 policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards of daylight and sunlight taking account of the BRE guidelines.
- 15.197. Paragraph 3.10.41 of the Local Plan 2015 indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the emerging City Plan 2040 states that the amenity of existing residents will (inter alia) be protected by , taking into account the cumulative effect of development proposals.

15.198. The BRE guidelines 'Site layout planning for daylight and sunlight- A guide to good practice' (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any non-domestic buildings where occupants have a reasonable expectation of natural light:

- Daylight: Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
- Sunlight: Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms

15.199. The BRE guidelines contemplate that they may be applied to non-domestic buildings where occupants have a reasonable expectation of daylight, which would normally include hotels.

Interpreting Results

15.200. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is proportionally a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-29.9% it is judged to be minor adverse, 30-39.9% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and onsite conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

15.201. Overshadowing of amenity spaces is measured using transient overshadowing and sunlight hours on ground. The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

Assessment

- 15.202. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the BRE Guidelines and considered having regard to Policy D6 of the London Plan, Policy DM10.7 of the Local Plan 2015 and Policies DE2, DE3 and DE7 of the emerging City Plan 2040, with this assessment comprising Chapter 10 of the submitted Environment Statement and the appendices related to Chapter 10. Part D of Policy D6 of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether daylight or sunlight levels may be adversely affected. Local Plan Policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The emerging City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context.
- 15.203. The supporting text for Policy DE7 of the emerging City Plan 2040 goes on to state that developers will be required to submit daylight and sunlight assessments and undertake radiance studies in support of their proposals.

Daylight and Sunlight – Existing Baseline

- 15.204. Section 10.6 of Chapter 10 of the submitted Environment Statement sets out the identified receptors and sensitivity of those receptors with regards to daylight and sunlight, as determined in the context of the BRE Guidelines. It confirms that all identified residential receptors are considered highly sensitive in the assessment undertaken. In total, twenty-two properties are identified as receptors with regards to daylight and sunlight, with the majority being residential or mixed-use buildings which include residential, alongside two religious buildings and a hotel.
- 15.205. This chapter then summarises that of 1,020 windows tested for VSC and therefore with regards to daylight impacts, 332 (32.5%) would meet the BRE Guidelines criteria. Moving to NSL, 425 rooms were assessed and 195 (45.9%) of those meet the relevant BRE Guidelines criteria.

15.206. Turning to sunlight, the same chapter states that for APSH 90 of the 247 windows tested meet the BRE Guidelines criteria.

15.207. The submitted assessment notes that these existing baseline levels are considered typical of a central London urban environment, while baseline obstructions are referenced in the full assessment for context and are not used to downgrade the significance of the effects of the proposed development.

Daylight and Sunlight – Proposed Development

15.208. The assessment within the Environment Statement sets out that in the scenario considering the proposed development on completion, fifteen of the twenty-two identified receptors would experience little to no impact with regards to VSC and NSL (a less than 20% alteration, as within the BRE Guidelines), and as such these buildings would experience a Negligible (Not Significant) effect. The remaining seven buildings are addressed below. Concerning sunlight, the assessment concludes that 17 existing buildings were assessed for sunlight, with 15 of these meeting the BRE criteria (a less than 20% alteration) and as such these buildings would experience a Negligible (Not Significant) effect. The remaining two buildings are 172 Bishopsgate and 174 Bishopsgate, with the assessment related to impacts to sunlight on these buildings referred to below.

Andaz Hotel – 40 Liverpool Street

15.209. The Andaz Hotel sits immediately adjacent to the Station, the Station Concourse, and is the closest receptor to the proposed development. The building is a commercial receptor and as such is not considered to be as sensitive when compared to impacts on residential uses. Nevertheless, the submitted Environment Statement has assessed the impacts of the proposed development on this neighbouring building. As noted within the consultation section of this report, Hyatt International as occupiers of the Andaz Hotel have objected on numerous grounds, one of which is a loss of daylight and sunlight.

15.210. The assessment has considered 168 windows and 123 rooms as informed by a survey undertaken by Plowman Craven, with windows facing south or to the east discounted from assessment given their orientation means they would not see a reduction in daylight or sunlight as a result of the proposed development.

- 15.211. For VSC, 31 of these windows (or 18.5%) would meet the BRE criteria, and are therefore considered to experience a Negligible effect. 24 of these windows sit below the height of existing structure on the proposed site and as such would see no change compared to the existing condition. Of the 137 remaining windows, four would see a VSC reduction between 20 and 29.9% and four windows would experience a VSC reduction between 30 and 39.9%, being considered to experience Minor and Moderate Adverse effects respectively. The remaining 129 windows experience reductions in excess of 40% and as such are considered to experience a Major Adverse effect.
- 15.212. The assessment goes on to provide context for these results, stating that these levels of light are not atypical within the existing building, noting those windows which would see no change as a result of their position below the existing structures at the Station and Station Concourse, and those windows which face onto central courtyards within the building.
- 15.213. Turning to NSL, 38 of the 123 rooms assessed (or 30.9%) would meet the BRE criteria and would be considered to experience a Negligible effect, with 34 of these rooms seeing no change given their current view onto the Concourse. Of the remaining 85, five rooms would see a reduction between 20 and 29.9% and one room would experience a VSC reduction between 30 and 39.9%, being considered to experience Minor and Moderate Adverse effects respectively. The remaining 79 rooms experience reductions in excess of 40% and as such considered to experience a Major Adverse effect. As above, the assessment notes existing NSL levels across this neighbouring site in the existing condition which are similar to those experienced in the proposed scenario.

- 15.214. While identified Major Adverse effects with regards to daylight would be experienced by this property, the Andaz Hotel is considered to be a commercial receptor with its users being temporary and transient in nature. Local Plan Policy DM10.7 and London Plan Policy D6 require protection of daylight and sunlight to dwellings and to housing respectively. Emerging policy DE7 requires those proposing development to demonstrate that the daylight and sunlight to nearby sensitive receptors, including hotels, is appropriate for their context and whether acceptable standards are provided taking account of the BRE Guidelines. During the pre-application process, this impact and the impact on light received at the Station Concourse was considered with the design amended to include a setback from the northern elevation of the Andaz Hotel. The impact of the proposed development is principally on the northern elevation of the Andaz Hotel, an elevation which features lower levels of daylight and sunlight as a result of its proximity to the existing Station and its Concourse, including obscuring of light by existing features at the Station's eastern entrance, and being an elevation which would naturally afford less daylight and sunlight to the site.
- 15.215. As a result, and as a matter of judgement, the impacts on this receptor are considered acceptable in the immediate context set out above, in the context of the site's location in a dense urban environment, and in the context of its use as a hotel with its future use not being unacceptably impacted by the loss of daylight and sunlight resulting from the proposed development.
- 15.216. With regards to sunlight, the submitted assessment confirms that this receptor would experience less than a 20% alteration in APSH or WPSH (Winter Probable Sun Hours), identified as a Negligible effect, and therefore considered to be acceptably impacted in terms of sunlight.

22-24 Wormwood Street

- 15.217. This receptor is in mixed-use, with a commercial ground floor use and residential use on the three floors above. All fifteen windows assessed for VSC would meet the BRE criteria, and 14 of the 15 rooms assessed for NSL would meet the BRE criteria. The remaining room would experience a loss of NSL between 20 and 29.9% which would be considered a Minor Adverse effect. In this context, the impact on this receptor is considered acceptable. With regards to sunlight, the submitted assessment confirms that this receptor would experience less than a 20% alteration in APSH or WPSH (Winter Probable Sun Hours), identified as a Negligible effect, and therefore considered to be acceptably impacts in terms of sunlight.

186-190 Bishopsgate

- 15.218. This property comprises commercial use on its ground floor level and residential use on the six upper floors. 42 windows serving 15 rooms were assessed for daylight, with all 42 windows meeting the VSC criteria and all but one room meeting the criteria for NSL. The remaining room would experience a loss of NSL between 20 and 29.9% which would be considered a Minor Adverse effect. In this context, the impact on this receptor is considered acceptable. With regards to sunlight, the submitted assessment confirms that this receptor would experience less than a 20% alteration in APSH or WPSH (Winter Probable Sun Hours), identified as a Negligible effect, and therefore considered to be acceptably impacted in terms of sunlight.

Church of St Botolph without Bishopsgate

- 15.219. This receptor is a religious building. 73 windows serving 10 rooms were assessed. 70 of 73 windows (or 95.9%) would meet the BRE criteria. The remaining three windows would experience a reduction between 20 and 29.9%, identified as a Minor Adverse effect, and the assessment notes that all windows experience VSC levels below 6.5% in the existing scenario, which is considered very low, with an absolute change of no more than 1.6% resulting from the proposed development. Turning to NSL, the assessment confirms that all rooms tested for NSL meet the BRE criteria, concluding that the overall effect is Negligible to Minor Adverse. Given the high levels of compliance and the context of the windows/rooms impacted as summarised above, this effect is considered acceptable. With regards to sunlight, the submitted assessment confirms that this receptor would experience less than a 20% alteration in APSH or WPSH (Winter Probable Sun Hours), identified as a Negligible effect, and therefore considered to be acceptably impacted in terms of sunlight.

15 Liverpool Street

- 15.220. This receptor is a mixed-use building with a pub/restaurant on its ground and first floor levels and residential use on its second and third floor levels. 13 windows and 10 rooms were assessed.

15.221. For VSC, two of the 13 windows meet the BRE criteria. Of the 11 remaining windows, four experience a reduction in VSC between 20 and 29.9% (considered a Minor Adverse effect), four between 30 and 39.9% (considered a Moderate Adverse effect) and three in excess of 40% (a Major Adverse effect). With regards to NSL, four of the 10 rooms would meet the BRE criteria. Of the six remaining, four would experience an NLS reduction between 20 and 29.9%, and two would experience a reduction in excess of 40%. In considering all impacts, including those which are in excess of 40% reductions and therefore Major Adverse effects, given the dense urban location and that the effected rooms are bedrooms and therefore considered less sensitive to daylight alterations as described in the BRE Guidelines, these impacts are considered acceptable. With regards to sunlight, the submitted assessment confirms that this receptor would experience less than a 20% alteration in APSH or WPSH (Winter Probable Sun Hours), identified as a Negligible effect, and therefore considered to be acceptably impacted in terms of sunlight.

172 Bishopsgate

15.222. This receptor is in mixed-use, with a commercial ground floor use and residential uses on the four upper floors. 17 windows serving eight rooms have been assessed. Nine of these windows would meet the BRE criteria. Of the remaining eight windows, one window would experience a 20.8% reduction (considered Minor Adverse), two would experience a Moderate Adverse effect with reductions between 30 and 39.9%, and the remaining five windows would experience a reduction in excess of 40% (considered a Major Adverse effect). The assessment notes that two of these five windows serve a Living/Kitchen/Diner room which when assessed against NSL would meet the BRE criteria. The three remaining windows would see losses of 41%, 50.5% and 52.7%, experiencing 8.9%, 10.9%, and 10.6% respectively as retained values. These retained values are considered acceptable, in the context of the City as a dense urban environment.

15.223. Turning to NSL, six of the eight rooms assessed would meet the BRE criteria and would be considered to experience a Negligible effect. The two remaining rooms experience reductions in excess of 40% and as such a Major Adverse effect. The assessment adds that these two rooms serve studio apartments, with greater depths than would be typical (estimated at c. 5.2m) and with reductions experienced at the back of these rooms. This is furthered in the NSL contour lines provided within the Technical Appendices to the Environment Statement, which demonstrates that these losses are experienced within the deeper parts these rooms while the NSL contour falls midway through the rooms in both instances, with an area adjacent to the existing windows retaining views of the sky.

- 15.224. This building would also experience a reduction in sunlight. A total of 14 windows were assessed for sunlight with ten windows meeting the BRE criteria for APSH and therefore experience a Negligible effect. The remaining windows would then experience a reduction between 20 and 29.9% and as such a Minor Adverse effect. These four windows would retain between 19% and 23% which the assessment notes is not far beneath the BRE Guidelines target value of 25%, and that all 15 windows would meet the BRE criteria for WPSH.
- 15.225. In this context, and the location of this receptor in a dense urban environment, the impacts are considered acceptable.

174 Bishopsgate

- 15.226. This receptor is in mixed-use with a commercial ground floor unit and residential uses on its upper floors. A total of 12 windows serving six rooms was assessed. For VSC, two windows would meet the BRE criteria, two would experience reductions in VSC between 30 and 39.9% and as such face a Moderate Adverse effect, and the remaining eight windows would experience reductions in excess of 40% and therefore face a Major Adverse effect.
- 15.227. Turning to NSL, two of the six rooms would meet the BRE criteria. One of the remaining rooms would be a bedroom experiencing a reduction between 30 and 39.9% a Moderate Adverse effect, which should then be considered in the context of the BRE Guidelines advice that bedrooms be considered less sensitive to losses of daylight. The three remaining rooms would experience reductions in excess of 40% and as such Major Adverse effects.

- 15.228. With regards to the retained VSC values at this property, existing windows range from having existing values between 22.5 to 15.7 (excluding the two windows experiencing an impact in line with the BRE Guidelines) with their retained values then ranging from 11.9 to 9.8. This represents an absolute greatest loss of 10.6% and a lowest loss of 5.9%, with the scale of losses generally increasing at each level of the property, as a result of the higher floors of the building having greater access to daylight in the existing condition. The NSL contours presented within the Environment Statement Technical Appendices further demonstrate that the loss of NSL is experienced in deeper parts of the floorplates, as would be expected, and that each impacted room would see its NSL contour fall so that an area adjacent to the windows of the room would not be impacted. Within the context of the City, a heavily urbanised context, and in this location close by to the Cluster and its range of taller buildings, this is considered acceptable
- 15.229. As summarised similarly above, these rooms are 8.2m deep and as such far in excess of a typical residential room. While the identified result is that this property would experience a Major Adverse effect, this is considered acceptable in the context of the impacts to bedrooms as less sensitive receptors to losses of daylight, the depth of the rooms experiencing reductions to NSL beyond BRE criteria, and the context of the impacted receptor as located within a dense urban environment.
- 15.230. With regards to sunlight, four windows were assessed with two of these meeting the BRE criteria for APSH and WPSH. The remaining two windows serve Living/Kitchen/Diner rooms, would see a loss between 30 and 39.9% which is considered a Moderate Adverse effect, and would meet the BRE criteria for WPSH. This is considered an acceptable impact, particularly in this dense urban environment.

Climate-Based Daylight Assessment

- 15.231. The assessment within this Chapter of the Environment Statement also makes reference to a stand-alone report, undertaking climate based daylight impact analysis (the Climate-Based Daylight Impact Report). This document sets out that its aim is to provide additional information as to the effects of the proposed development on 172 Bishopsgate, 174 Bishopsgate, 15 Liverpool Street, and the Andaz Hotel. Given the conclusions of the third-party review, as summarised below, that Median Daylight Factor is not recommended to be used in the assessment of existing buildings, and that this document concludes that the overall impacts are considered to be lesser than those reported within the Environment Statement, the assessment of officers as detailed within this report has been based on the findings reported within the Environment Statement and not the CBDM Assessment.

Daylight and Sunlight – Conclusion

- 15.232. In summary, the submitted daylight assessments demonstrate that of the 22 properties considered receptors:
- 15.233. Fifteen would experience Negligible effects;
- 15.234. Three would experience Minor Adverse effects (22-24 Wormwood Street, 186-190 Bishopsgate, and the Church of St Botolph without Bishopsgate); and
- 15.235. Four would experience Major Adverse effects (the Andaz Hotel, 15 Liverpool Street, 172 Bishopsgate, and 174 Bishopsgate).
- 15.236. In respect of sunlight, the assessment demonstrates that two properties would see adverse effects, 172 Bishopsgate experiencing a Minor Adverse effect, and 174 Bishopsgate experiencing a Moderate Adverse effect.

- 15.237. The Major, Moderate and Minor Adverse impacts on these properties in terms of daylight and sunlight are acknowledged and identified as Significant in line with the advice of the independent third-party review, with this review independently verifying the analysis and information submitted in support of this application. Concerning Local Plan Policy DM.10.7, it is considered that overall the impact on daylight and sunlight would not be to the extent that they would be reduced to unacceptable levels, given the retained values of VSC and related NSL for each room when considering the daylight and sunlight levels in the existing condition, the absolute loss experienced in each circumstance, and the dense urban context of the local environment, and while taking into account the BRE Guidelines. Turning to London Plan Policy D6 it is considered that the levels in the proposed condition would be appropriate for its context, which is one of a dense urban environment. With regard to emerging Policy DE7 of the City Plan, it is considered that for the reasons explored above that the development would result in levels of daylight and sunlight appropriate for its context and taking into account the BRE Guidelines.

Overshadowing – Existing Baseline

- 15.238. Section 10.6 of Chapter 10 of the submitted Environment Statement sets out those areas considered relevant for assessment with regards to overshadowing. These comprise thirty-seven areas surrounding the site, fourteen of these areas representing open spaces or amenity areas at neighbouring sites and with sites fifteen to thirty-seven representing the terraces at 1 Exchange.

Overshadowing – Proposed Development

- 15.239. Of the 37 amenity areas, 34 of these would not see a reduction greater than 20% to the area receiving at least two hours of sun on 21st March or retain at least two hours of sunlight across at least 50% of their total area and therefore experience an effect in line with the BRE criteria and which is identified as Negligible.
- 15.240. The three areas which remain all serve terraces at nearby commercial buildings. The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, nevertheless private commercial terraces have also been assessed.

- 15.241. The first is Area 9, identified as Terrace 2 of 100 Liverpool Street to the west. This area would retain two hours of sunlight on 21st March across 47.8% of its area, only marginally below the BRE Guidelines criteria of 50% of the area meeting this exposure. The submitted assessment further states that almost the whole area would receive 6+ hours of sunlight on 21st June, which while not a metric recommended within the BRE Guidelines does indicate that during the time of its greatest likely use, the summer months, this area would enjoy a good level of exposure to sunlight.
- 15.242. Area 11, the roof terrace at 135 Bishopsgate, would also be impacted, with the Sunlight Hours on Ground assessment demonstrating that this area would see a 100% loss in sunlight across its area on 21st March. While this chapter notes that it is not clear whether this space is used as an amenity terrace, aerial imagery shows furniture present which indicates that it is likely in use as an amenity space. The assessment also adds that the northerly part of this terrace would retain some sunlight exposure in the summer months.
- 15.243. Lastly, Area 13 (Eataly Upper Terrace) is identified as experience a reduction of 82.2% of the total areal receiving at least 2 hours sunlight on 21st March. The assessment notes that this area does not meet the BRE Guidelines recommendations in the existing circumstance as it does not experience 2 hours of sunlight across 50% or more of its area on 21st March.
- 15.244. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify different times of day and year when shadow would be cast over a surrounding area. The submitted assessment has included an assessment of transient overshadowing in relation to the areas identified above. This assessment sets out that:
- 15.245. On 21st March – from 08:00 to 10:00 shadows would pass over Areas 7 and 9, from 10:00 Area 11 begins to see shading which partially shades the area for the remainder of the day, from 12:00 to 15:00 Areas 12 and 13 see overshadowing from the proposal and shading is experienced by these areas in the existing circumstance for the remainder of the day.

- 15.246. On 21st June – from 06:00 Areas 7 and 9 would see some overshadowing which reduces through the morning until clearing at 13:00, at 08:00 Area 10 would become partially overshadowed which then clears by 11:00, from 11:00 Areas 11 and 12 become partially overshadowed, and from 15:00 Area 13 is in shade. Areas 11, 12 and 13 remain in shade for the rest of the day, resulting partially from the proposal and partially from existing buildings.
- 15.247. On 21st December – from 13:00 to 14:00 small shadows would be case on Area 1, with no other areas affected on this day.

Overshadowing – Conclusion

- 15.248. Acknowledging a Major Adverse effect to Area 13 and Area 11, and a Minor Adverse effect to Area 9, the impacts in terms of overshadowing are considered acceptable. This is given the vast majority of potentially impacted receptors would experience effects in line with the BRE Guidelines, while the three areas identified with reductions to sunlight beyond the BRE criteria must be considered within the context of their location within a dense urban environment and with regards to increases in massing proposed to meet the aims of the Development Plan and the priorities of the CAZ on delivery of office floorspace. For each area in turn, Area 9 would see only a minor reduction in Sunlight Hours on Ground while still experiencing a good level of sunlight exposure in the summer months, Area 11 would serve an office occupier as amenity space where its northerly section would see some sunlight during the summer months, and Area 13 experiences below the BRE Guidelines recommended levels of Sunlight Hours on Ground in the existing circumstance. In accordance with London Plan Policy D6(D), it is considered that overshadowing has been minimised, and the is in accordance with emerging City Plan 2040 Policy S12(8). As such, the overshadowing impacts of the proposed development are considered acceptable.

Solar Glare

- 15.249. Glare is discomfort or impairment of vision caused by excessive or large contrast in illuminance within the observer's field of view and can occur when sunlight is reflected from a glazed façade. There are two categories of glare: distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high illuminance source within a low luminance scene which impairs vision).

- 15.250. For discomfort glare, the key issue is the total duration for which the sun can be reflected to the sensitive location. Duration of less than 50 hours per year are unlikely to cause a serious problem, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is use. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.
- 15.251. A total of 25 road locations have been identified within the Environment Statement. At 18 of these locations, the proposed development was found to be not visible within 30 degrees of the driver's line of sight and as such incurring no impacts. At two locations a Negligible effect was identified due to reflections occurring beyond 30 degrees of a road users' line of sight. At four locations a Minor Adverse effect was identified, with reflections between 5 and 10 degrees, across a short period of time and a small area, would occur.
- 15.252. The remaining viewpoint at Ropemaker Street, identified at as RM1, potential reflections within 10 degrees of a road users' line of sight were identified. These reflections would occur from 18:00 in the summer months, and from the top portions of the development. The reflections would be partially broken up by the solid elements of the proposed façade, meaning they would not occur over prolonged periods of time, and these reflections would also occur above the visor line of any driver. As such, this is considered a Minor Adverse effect.
- 15.253. As such, and as further controlled into the future vis S106 obligation, the impact of the proposed development in terms of Solar Glare is considered acceptable.

Light Spill

- 15.254. Local Plan policy DM15.7 and emerging City Plan 2040 policy DE8, requires that development incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

- 15.255. Chapter 10 of the Environment Statement, and its Appendices, include a full Light Trespass Assessment. This assessment suggests that 172 Bishopsgate, 174 Bishopsgate and 1a New Street would potentially experience limited lux levels of light trespass reaching their windows, however these are measured at being well within the ILP (Institute of Lighting Professionals) Guidance concerning pre-curfew and post-curfew light trespass. An above ILP Guidance post-curfew impact is identified to the north elevation of the Andaz Hotel. Information has been submitted as related to light spill, light trespass, and future lighting strategy. As this would typically be advanced in the detailed design stages of any development, these details would be reserved by condition.
- 15.256. A condition has been included which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate and minimise the impact of any internal and external lighting on light pollution and residential amenity, and upon the Andaz Hotel. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour, and associated management measures to reduce the impact on light pollution and amenity in line with the City's Lighting SPD. Subject to the imposition of the condition, the proposed development would comply with Local Plan policy DM15.7 and emerging City Plan 2040 DE8 and has been designed to avoid light spill.

Cumulative Effects

- 15.257. Chapter 10 of the Environment Statement also includes a cumulative assessment of the proposed development's impacts when considered alongside development in the wider area being brought forwards. The methodology chosen for the cumulative assessment includes a tier system where Tier 1 of the cumulative scenario includes consented development identified as potentially resulting in cumulative impacts, and with a wider area being used to identify such consented development where relevant to overshadowing impacts, and with Tier 2 including both consented schemes and schemes submitted for planning which have the potential to result in a cumulative impact.
- 15.258. With regards to overshadowing, this has included future potential for overshadowing at the yet-to-be-completed sensitive receptors which are the terraces proposed at 155 Bishopsgate, 1 Appold Street and 1 Exchange Square. A future baseline scenario is also considered for the Church buildings identified as sensitive receptors, with the Environment Statement setting out that this has been included to demonstrate that these sensitive receptors are chiefly impacted by consented schemes rather than the proposed development.

- 15.259. With regards to daylight, in the Tier 1 scenario five receptors would see additional cumulative impacts as set out below:
- 15.260. 22-24 Wormwood Street – Five further windows would see a Minor Adverse impact for VSC, and one additional room a Minor Adverse impact for NSL. The overall effect would remain as Minor Adverse.
- 15.261. 186-190 Bishopsgate – One additional window would see a Minor Adverse effect for VSC, with the NSL impacts remaining unchanged, remaining a Minor Adverse effect overall.
- 15.262. 172 Bishopsgate – Two windows identified as experiencing a Moderate Adverse Impact for VSC would experience a Major Adverse effect, experiencing losses of 44% and 44.7%, with NSL impacts remaining unchanged and the overall effect remaining a Moderate Adverse effect.
- 15.263. City Gates Church – One window would see a Minor Adverse effect for VSC with NSL impacts remaining unchanged. The overall effect therefore becomes Minor Adverse, identified as Negligible in the non-cumulative scenario.
- 15.264. Church of St Botolph without Bishopsgate – Overall compliance with VSC would go from a rate of 95.9% to 53.4%, and one room would see a Minor Adverse effect in terms of NSL. This is identified as changing the overall effect from Minor Adverse to Moderate Adverse.
- 15.265. Sunlight impacts in the Tier 1 cumulative scenario then see four neighbouring properties experiencing additional impacts as below:
- 15.266. 172 Bishopsgate – One additional window would see a Moderate Adverse effect in terms of APSH, and four additional windows a Major Adverse effect in terms of WPSH, with the assessment concluding the effect remains Minor Adverse.

- 15.267. 174 Bishopsgate – Two windows which would experience a Moderate Adverse effect in terms of APSH would experience a Major Adverse effect, and for WPSH two additional windows would see a Major Adverse effect, with the overall effect altering from Negligible to Minor, to Minor Adverse.
- 15.268. City Gates Church – All three windows assessed as meeting the BRE criteria without cumulative development would experience Moderate Adverse effects for APSH and Major Adverse effects for WPSH. This alters the overall effect from Negligible to Major Adverse.
- 15.269. Church of St Botolph without Bishopsgate – All windows assessed in the non-cumulative scenario meet the BRE criteria, while in the Tier 1 scenario one window would experience a Minor Adverse effect, four would experience a Moderate Adverse effect and fifteen a Major Adverse effect in terms of APSH. For WPSH, an additional three windows would face a Moderate Adverse effect and a further four a Major Adverse effect. This alters the effect overall to Moderate Adverse.
- 15.270. No additional overshadowing impacts are identified in the Tier 1 cumulative scenario.
- 15.271. Further impacts are then identified in the Tier 2 cumulative scenario. With regards to daylight these are as follows:
- 15.272. Andaz Hotel – VSC impacts remain unchanged, while one room identified as experiencing a Minor Adverse effect would experience a Moderate Adverse effect. This room, a sixth-floor bedroom, experiences a 27.2% reduction in NSL in the non-cumulative raising to a 36.6% reduction in the Tier 2 scenario, with the overall effect remaining unchanged at Major Adverse.
- 15.273. 22-24 Wormwood Street – Five windows would see a Minor Adverse effect for VSC and one additional room would experience a Minor Adverse effect for NSL, with the overall effect remaining a Minor Adverse effect.

- 15.274. 194-200 Bishops Gate – Meeting all BRE criteria in the proposed-only scenario for VSC and NSL, one room would experience a 21.1% reduction in NSL in the cumulative scenario, compared to a BRE criteria compliant maximum reduction of 20%. This would change from being a Negligible effect to a Minor Adverse effect.
- 15.275. 186-190 Bishopsgate – Three windows would experience a Minor Adverse effect with the NSL impacts remaining unchanged, remaining overall a Minor Adverse effect.
- 15.276. 15 Liverpool Street – For VSC one window experiencing a Moderate Adverse effect in the proposed scenario would experience a Major Adverse effect in the Tier 2 scenario, changing from experiencing a VSC reduction of 38.2% to a 40.9%. NSL impacts would remain the same. Given the small numerical absolute change in VSC, the overall effect would remain Moderate Adverse.
- 15.277. 16 New Street – All windows and rooms meet VSC and NSL BRE criteria in the proposed scenario, with one room experiencing a Minor Adverse effect in the Tier 2 scenario. This room would face a 223.8% loss in NSL, against a BRE Guidelines appropriate maximum loss of 20%. The overall effect would alter from Negligible to Minor Adverse.
- 15.278. 172 Bishopsgate – One additional window would experience a Minor Adverse effect for VSC, and seven windows identified as experiencing Moderate Adverse effects would face Major Adverse effects in the Tier 2 scenario. For NSL, one additional room would experience a Minor Adverse effect. The assessment concludes that in the context of impacts within the proposed development scenario, this would not alter the overall effect beyond an identified Moderate Adverse effect.
- 15.279. City Gates Church – All windows and rooms meet the BRE criteria in the proposed scenario, while in the Tier 2 scenario two windows would experience a Minor Adverse effect, and one window would experience a Moderate Adverse effect. For NSL, one room would see a Moderate Adverse effect. This would change the overall effect to Moderate Adverse.

- 15.280. Church of St Botolph without Bishopsgate – Overall compliance with the BRE criteria for VSC would change from 95.9% in the proposed scenario, to 45.2% in the Tier 2 cumulative scenario. For NSL, three rooms would see a Minor Adverse effect and one additional room would see a Major Adverse effect in the cumulative scenario. This would change the overall effect to Moderate Adverse.
- 15.281. For sunlight, six properties would face additional impacts as summarised below:
- 15.282. 15 Liverpool Street – One window would face a Minor Adverse effect for APSH, with the same window then meeting the BRE criteria for WPSH. The overall effect would then change from Negligible to Minor Adverse.
- 15.283. 172 Bishopsgate – For APSH three windows experiencing Minor Adverse effects in the proposed scenario would experience Moderate to Major effects in the Tier 2 scenario, and one additional window would face a Moderate Adverse effect. For WPSH five windows would experience a Major Adverse effect with overall compliance reducing from 71.4% to 64.3%. The overall effect then changed from Minor Adverse to Moderate to Major Adverse.
- 15.284. 174 Bishopsgate – For APSH, two windows experiencing a Moderate Adverse effect would see a Major Adverse effect, and two windows a Major Adverse effect in WPSH. This would change the overall effect from Minor Adverse to Moderate Adverse.
- 15.285. 186-190 Bishopsgate – One window would experience a Moderate Adverse effect and one window a Major Adverse effect for WPSH. This would alter the overall effect from Negligible to Minor Adverse, identified as Minor Adverse given overall compliance with WPSH criteria would be 92.9%.
- 15.286. City Gates Church – All three windows tested would experience a Major Adverse effect for APSH and WPSH, changing the overall effect from Negligible to Major Adverse.
- 15.287. Church of St Botolph without Bishopsgate – Two windows would experience a Moderate Adverse and 20 windows a Major Adverse effect for APSH. For WPSH, three windows would experience a Moderate Adverse effect and 10 windows a Major Adverse effect. This would alter the overall effect from Negligible to Major Adverse.

15.288. With regards to the Tier 2 scenario and overshadowing, the terraces at Areas 11 and 12 would continue to see Major Adverse effects, the terrace at Area 9 would see a Major Adverse effect, and Area 10 – the square to the south of 100 Liverpool Street – would see a 35.4% change which is identified as Moderate Adverse.

15.289. In conclusion, and as set out within the submitted assessments, the most substantial cumulative impacts demonstrate that part of the future baseline scenario would see reductions to the daylight and sunlight available to these receptors as resulting from consented development and from submitted development. In the case of the Tier 2 scenario, this has also included submitted and not yet consented developments which would be considered on their own basis as part of the decision-making processes for those applications. The Major, Moderate and Minor Adverse impacts identified are acknowledged and considered Significant. Taking into consideration this context, and the context set out in the concluding sections related to daylight, sunlight, and overshadowing above, it is not considered that the daylight and sunlight reductions in the cumulative scenarios tested would warrant refusal of the application on those grounds. In the cumulative scenario, the development would not reduce daylight and sunlight notably to an unacceptable level, in accordance with Policy DM10.7 of the Local Plan, would retain daylight and sunlight levels appropriate for their context in accordance with London Plan Policy D6, and would provide levels of daylight and sunlight appropriate for the context and result in an acceptable standard, taking account of the BRE Guidelines, in accordance with Policy DE7 of the emerging City Plan 2040. Further, these properties are considered to still have acceptable living standards in accordance with part c of paragraph 130(c) of the NPPF.

Third Party Review

15.290. The Building Research Establishment (BRE) Group were commissioned to undertake an independent review of daylight, sunlight, overshadowing, solar glare and light trespass assessment in terms of their scope, method of assessment and criteria used, and conclusions reached. This review confirmed that the documentation generally correctly used the appropriate methodology including the latest edition of the BRE Guidelines and the latest guidance from the Institute of Lighting Professionals.

15.291. The BRE review identified several points of further clarification or amendment to methodology, which GIA as advisors for applicant responded to via letter in September 2025. The BRE reviewed this response in December 2025.

15.292. Substantively, the review concluded that;

- Any adverse impacts including minor adverse impacts should be considered significant;
- The Local Planning Authority should be content with the extent of impact on future sites which could come forwards for residential development;
- Median Daylight Illuminance results for five buildings within the Climate-Based Daylight Assessment should be considered with care given it is not a recommended method of assessment for existing buildings; and
- A full Lighting Impact Assessment should be required via condition, taking into account internal and external lighting proposed, and that such an approach is appropriate to follow as details reserved via condition to be progressed at detailed design stage.

15.293. The assessment within this report has been undertaken within the context of the conclusions of this review.

Air Quality

15.294. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the emerging City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof of the height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by Policy SI1 of the London Plan.

- 15.295. The Environmental Statement at Chapter 6 and 'Appendix: Air Quality' includes an assessment of the likely impact of the proposed development on air quality as a result of demolition, construction and operational phases of development. Due to the scale and nature of the application, in addition to an Air Quality Neutral Assessment an Air Quality Positive Statement has also been submitted. With regards to the latter, an "Air Quality Positive Matrix" forms a part of this Statement, which then sets out potential measures for achieving Air Quality Positivity as well as measures already taken, including the ways in which the building design aids in increasing dispersal, or avoiding concentrating, of pollutants in accordance with London Plan Policy D9 3b-c.

Transport Related Emissions

- 15.296. The Proposed Development will be car-free with the exception of delivery and servicing vehicles and one disabled badge holder parking space. The Proposed Development will not have any residential element.
- 15.297. The Mayor of London's Air Quality Neutral Guidance states that developments that are defined as 'car-free' may include provision for disabled and accessible parking, and can be assumed to meet the Transport Emissions Benchmark (TEB) providing that "*maximum parking standards set out in policies T6 and T6.1 to T6.5 of the London Plan are not exceeded*". Air Quality Neutral guidance specifically excludes taxi, delivery and servicing vehicle trips from comparison against benchmarks as these are not covered by the Air Quality Neutral assessment.
- 15.298. The Proposed Development meets the criteria outlined in the Air Quality Neutral Guidance and in accordance with London Plan policies is be considered 'car-free', and therefore a full calculation against Transport Emissions Benchmarks is not required for the Proposed Development. Therefore, following the simplified procedure outlined in the Air Quality Neutral Guidance, the Proposed Development is considered to be Air Quality Neutral for Transport Related Emissions.

Building Related Emissions

- 15.299. It is anticipated that heating and cooling for the Over Station Development (OSD) will be provided by air source heat pumps (ASHPs) and heat recovery which will contribute to energy recycling between heating and cooling, with associated benefits for energy efficiency.

- 15.300. The Mayor of London Air Quality Neutral Guidance (2023) states that developments can be assumed to meet the Building Emissions Benchmark if *“the new heating system is a heat pump or other zero emission heat source...”* The Air Quality Neutral Guidance additionally states that *“backup plant installed for emergency and life safety power supply, such as diesel generators, may be excluded from the calculation of predicted building emissions.”*
- 15.301. The impact of emissions from the emergency generator within the OSD on local air quality was assessed. Annual mean NO₂, PM₁₀ and PM_{2.5} concentrations are predicted to be well below the applicable AQO at all modelled receptors and across the modelled grid of ground-level receptors based on the generator operating for a total of 8.33 hours per year. The impact of the generator emissions on annual pollutant concentrations is considered ‘Negligible’, and in accordance with the IAQM/EPUK significance criteria applied in this assessment and is considered to be ‘not significant’ based on the EA screening criteria

Mitigation and Monitoring

- 15.302. During construction dust emissions would increase and would require control through the implementation of good practice mitigation measures in the Construction Method Statements to be approved under conditions attached to the planning permission. This includes construction site management liaising with the management teams for other high-risk construction sites in the local area to ensure that dust impacts are kept to a minimum. Assuming that all cumulative developments under construction at the same time in the vicinity of the Proposed Development operate to the same standard, no cumulative air quality effects are anticipated.
- 15.303. In terms of Demolition and Construction Phase road traffic emissions, the assessment has considered a worst-case scenario for traffic generation which included traffic from cumulative developments in the baseline scenario, and is therefore inherently a cumulative assessment. Impacts at all modelled receptors have been deemed negligible in accordance with EPUK and IAQM criteria [Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK), (2017). Land-Use Planning & Development Control: Planning for Air Quality].

- 15.304. Whilst there is a possibility of increased congestion as a result of the combined impact of construction phase traffic generation from cumulative developments in the area, it would be expected that liaison between construction site teams in the area would be undertaken to ensure that congestion due to HGV traffic is kept to a minimum. It is therefore highly unlikely that, in combination with other schemes, significant adverse air quality impacts would occur.
- 15.305. Emissions from the proposed emergency generator for the OSD are negligible due to the limited maintenance testing regime and since the generator would only be used for life-safety purposes. The short-term emissions from generators will not be affected by cumulative developments.

Conclusions

- 15.306. The Proposed Development can be considered air quality neutral for both transport and building related emissions in line with the Air Quality Neutral Guidance.
- 15.307. The City's Air Quality Officer has no objections to the proposals and has recommended that, in line with the submitted Air Quality Positive Assessment, that this is subject to conditions in relation to Emergency Power Supply, combustion flues, , and Non-Road Mobile Machinery, all of which have been attached as a part of this recommendation.
- 15.308. Subject to the imposition of these conditions, the proposed development would accord with Local Plan Policy CS15, Policy DE1 of the emerging City Plan 2040, and Policy SI1 of the London Plan which all seek to improve air quality.

Noise and Vibration

- 15.309. Local Plan policy DM15.7 and London Plan Policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.

- 15.310. Chapter 12 of the Environment Statement addresses noise and vibration impacts of the development, covering noise and vibration impacts during construction and demolition as well as noise and vibration impacts during operation of the proposed development. This chapter concludes that a Noise and Vibration Management Plan would be implemented during demolition and construction phases, alongside compliance monitoring, including a Trigger Action Plan which sets its 'Red Alert Levels' below the SOAEL (or Significant Observed Adverse Effect Level) and which this chapter concludes ensures the residual effects would not be significant. The same chapter concludes that during operation that proposed building services plant would be designed to meet the relevant requirement of British Standard BS 4142, which may require the installation of acoustic mitigation. These matters would be secured via condition, requiring adherence to typical noise and vibration limits during construction and demolition, and adherence to the same during operational phase.
- 15.311. As set out in Table 12.9 of the relevant chapter of the Environment Statement, noise monitoring was undertaken to determine the existing baseline levels of noise currently experienced, with paragraph 12.7.24 of the same chapter setting the expected noise limit to be applied to all operational plant at 10db below this existing baseline level. In doing so, the proposals would accord with the Noise Strategy 2016-2026 of the City of London, and would ensure that the proposals would not result in noise 'creep'. This limit of 10db below existing levels would be relaxed by 10db in the case of operation of emergency generators, with the Environment Statement confirming that the testing of such generators would only occur between 08:00 and 18:00.
- 15.312. During determination of the application, Trium acting as third-party reviewer of the submitted Environment Statement recommended that a condition be used to control noise and vibration during the construction and deconstruction phases, on the basis that nearby residential receptors and the Andaz Hotel may experience adverse noise and vibration events across the construction period. Such a condition forms a part of this recommendation, with these details being required as part of the conditions requiring submission of deconstruction and construction management plans, and a scheme of protective works, forming the requirement to submit for approval a monitoring and testing regimen that must be used through the construction and deconstruction period, which would also include proposals for mitigation where noise and vibration levels are deemed to be unacceptably adverse.

15.313. With regards to the operations of the Station and their impact on surrounding sensitive receptors, this was also raised during the course of the application with further information provided by the applicant, noting that the proposed changes to retail and food and beverage units would redistribute these uses across the station, being screened from any residential receptor in the case of the units running parallel to the platforms, and in the case of the concourse area would be placed within an existing area with a high base level of noise in the existing condition.

15.314. In the context of the above, the submission sufficiently considers the noise and vibration impacts of development on the environment. Subject to a series of conditions to mitigate noise and vibration during deconstruction and construction and operational phases of development, the proposed development would comply with Policies D13 and D14 of the London Plan and policy DM15.7 of the local plan and Policy HL3 and HS3 of the emerging City Plan 2040.

Amenity

15.315. Local Plan Policy DM21.3 and emerging City Plan 2040 policy HS3 requires all new development to identify potential impacts on residential amenity and set out measures to mitigate those impacts. Proposals should be designed to avoid overlooking and protect privacy. It is highlighted that the current Local Plan and emerging City Plan assess residential amenity and not the amenity of commercial occupiers. Policy D3 of the London Plan requires all new development proposals to deliver appropriate outlook, privacy and amenity.

15.316. Local Plan Policy DM10.3 and Policy DE4 of the emerging City Plan 2040 requires new terraces and elevated public spaces to be designed such that there would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity.

15.317. Consideration has been given to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential properties.

- 15.318. In the representations made by the Hyatt, as occupiers of the former Great Eastern Hotel, they have made objections on the grounds that there would be a loss of outlook or increased sense of enclosure as a result of the proposed development. The proposed Over Station Development would be immediately adjacent to the northern elevation of the Great Eastern Hotel, changing the outlook and sense of enclosure for the majority of rooms with an aperture on this elevation of the Hotel.
- 15.319. Whilst it is not the function of the planning system to protect private rights as private rights, or simply because they are private rights, case law makes it clear that the converse is not correct either and that the fact that there is, absent a covenant, no private right to a view over another's land, does not mean that it is irrelevant in planning considerations either (*Watton V Cornwall Council* [2023] EWCH 2436 (Admin)). Whilst that case considered residential amenity it is noted that the Court found that it was for the local planning authority to consider if there is a public interest in the protection of a view or outlook currently enjoyed by an occupier. When considering the impact of the proposal on views, officers do not consider it necessary in the public interest to protect the view from a single property in this circumstance.
- 15.320. In considering the impact on increased sense of enclosure, and loss of outlook, officers note that the existing elevation faces north and onto various elements of the Train Station, some of which provide an interesting outlook, but which necessarily varies across the elevation. The proposals are also designed with a set back between the two buildings, a setback which also affords natural light onto the concourse, and therefore some sense of openness beyond complete enclosure. Officers consider that the proposals would not unduly compromise the business function of the hotel, by virtue of the transient nature of its residents, and that there are a variety of amenities provided by the premises, which is excellently located in terms of public transport, which mean its function as a hotel is not fundamentally compromised by the proposed development. In conclusion, the proposed development has been carefully assessed against relevant policies, including Policy D6(d) of the London Plan, Local Plan Policy DM10.7, and emerging Policy DE7 of the City Plan 2040.

Noise

15.321. A detailed assessment of the impact of the scheme in terms of noise and disturbance is set out in the Noise, Disturbance and Vibration section of this report. To minimise the impact of noise and disturbance on residents, conditions or S106 obligations are recommended to cover:

- Noise levels from operational plant
- A Scheme of Protective Works to manage dust and noise from the construction of the development
- A Roof Terrace Management Plan which would limit the impact of any use of the community space after office hours
- Control of noise levels from the terraces including limitations to loud music and promoted events
- Hours of operation of the terraces and retail units

Overlooking

15.322. The proposed building features a number of roof terraces and balconies for use by the building tenants, including a large public roof terrace at the 18th floor level, and a number of smaller balconies. The 2.5m screen around the 18th floor terrace would also assist in reducing the impact from noise from the terrace to nearby properties. Control over the hours of use of the terraces is also secured through condition, limiting the hours that the 18th floor public roof terrace, and office terraces and balconies could be accessed to between 8am and 8pm. With regards to overlooking specifically, the terrace is considered to be at a level which would not give rise to any undue increase in overlooking, and particularly given the relative distance between this space and any nearby receptor. Turning to the office balconies, while these are lower down the building they are still, at their lowest, of a significant height which would reduce any opportunities for overlooking or loss of privacy, an impact lessened still by the control over the hours of use of these terraces as referenced above.

15.323. Overall, Officers consider there would be no materially harmful overlooking from the terraces or balconies to nearby residential properties with the planting in place and with hours of use of the terrace heavily limited.

Lighting

- 15.324. Policy DE8 of the emerging City Plan 2040 requires that new development should be designed in ways that consider the impacts of internal and external lighting and should include measures to reduce energy consumption, avoid spillage beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals, relevant open spaces and community uses.
- 15.325. The potential light pollution impacts arising from the proposed development have been assessed and are set out within the Light Spill section within this report. The proposal has been designed to minimise light pollution, and the detailed design of the proposed Lighting Strategy would be secured via condition.
- 15.326. A condition has been included which requires the submission of a lighting strategy to be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. These would be provided and assessed as part of the relevant condition in order to mitigate the scheme's impact, particularly on residents.

Conclusions

- 15.327. It is therefore considered that the proposed development is not considered to cause an undue overbearing impact to nearby residential properties. Representations have been received in respect of the development resulting in an uncomfortable sense of enclosure, for the reasons set out in this paragraph, the proposed development is not considered to an unacceptable harm by way of increased sense of enclosure or loss of privacy which would sustain a reason for refusal, in the context set out above. The proposals have been designed to avoid overlooking and seek to protect privacy. As such, it would comply with Local Plan policy DM21.3 and CS5 and policy HS3 of the emerging City Plan 2040.
- 15.328. Subject to conditions it is considered that the proposal would comply with residential amenity related policies: Local Plan policy DM21.3 and CS5 and emerging City Plan 2040 policy DE4, DE8, HS3 and S23.

- 15.329. Local Plan policy DM15.8 and emerging City Plan 2040 Policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

Contaminated Land

- 15.330. Policy S1 of the emerging Draft City Plan expects developers to address land contamination.
- 15.331. The application is accompanied by a Preliminary Risk Assessment (PRA) prepared by AECOM, dated March 2025, which assesses the impact on ground conditions associated with the proposed development, including potential effect on human health, surface and groundwater, sensitive ecosystems and species, and property. The PRA identifies potential contaminant linkages which require further investigation through intrusive methods.
- 15.332. The City's Environmental Health Officer requested conditions that require a detailed site investigation be completed prior to commencement of development to identify potential for contamination, an investigation and risk assessment prior to construction, and, if this finds the potential for contamination, that intrusive investigations are required to provide information to support a suitable remediation strategy and mitigation measures.
- 15.333. Thus, overall, subject to condition the proposals are in accordance with Policy DM15.8 of the Local Plan, and Policies S1 and HL4 of the emerging City Plan 2040.

16. Sustainability

Circular Economy

- 16.1. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 as well as emerging City Plan 2040 Strategic Policy S8 and Policy DE1 set out the City's support for circular economy principles. In particular, Policy CS15 of the Local Plan 2015 (part 3) sets an overarching strategic policy aim of avoiding demolition through the reuse of existing buildings or their main structures. The policy does not expressly require the avoidance of demolition in all instances and does not set out a process for considering the merits of different approaches to individual sites. Policy DM 17.2 of the Local Plan 2015 seeks new development to be designed to minimise the impact of deconstruction and construction waste on the environment through the reuse of existing structures.
- 16.2. In 2023, the City Corporation adopted the Carbon Options Guidance Planning Advice Note (including an updated version in 2025), which sets out an optioneering process for considering the carbon impacts of different approaches to development. The emerging City Plan 2040 Strategic Policy S8 seeks development that takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options. The Planning for Sustainability SPD, adopted in February 2025, contains further guidance about how applicants are expected to address the GLA's Circular Economy guidance and the Whole Life-Cycle Assessment guidance, and how to fulfil the current and emerging Development Plan Policies on circular economy and whole life-cycle carbon emissions.
- 16.3. To address these policies, the application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site. A pre-redevelopment and pre-demolition audit have been undertaken for that purpose, as well as a reuse and materials audit, using the City of London Corporation's pre-deconstruction audit template.
- 16.4. The existing station was constructed in 1874. The basement vaults (assumed to be original) and lower sections of London Underground vent towers comprise solid masonry brickwork. The station is formed of steel frames, concrete floors and areas of glass partitioning. Walkways around and above the station concourse are assumed to be built in concrete, supported by steel trusses. The facades comprise solid brickwork.

- 16.5. In 1985-91, approximately 48% of the original roof was demolished and rebuilt in facsimile Victorian style. The roof comprises of large steel trusses with ornate haunches at the column heads. The principal trusses support secondary lattice truss beams that support the windows. The principal trusses are supported by (mock cast iron) steel compound columns, and in some places supported by the station masonry superstructure.
- 16.6. The site also includes an office building at No 50 Liverpool Street (50LS), rebuilt in 1985-91 in facsimile Victorian style, which forms part of the southern boundary of the station to the west of one of the main station entrances. The basement of this site contains the ticket hall for the Underground access from the lower concourse of the station hall. The building is constructed with steel framing and brickwork facades.
- 16.7. The primary structure of the station including the listed Victorian structure and trainshed roof has been assessed to be in a good condition, however requiring some refurbishment. The existing ground conditions are heavily constrained with existing assets – various tunnels containing underground lines and for historic Royal Mail services.
- 16.8. A ground movement assessment will be undertaken at the detailed and technical design stages of the project and movement limits and tolerances agreed between the applicant and the owners of nearby buried assets and neighbouring buildings. A condition to that effect is recommended.
- 16.9. The constraints of the existing station include:
- Lack of capacity, concourse congestion and overcrowding. Passenger travel demands are expected to increase by 35% by 2041.
 - Lack of accessibility. Opportunity to improve presence, permeability and step-free access and legibility between the station and underground services.
 - The structural columns supporting 50LS are located within Ticket Hall B. The number of columns impact pedestrian flow and visibility from the concourse to the ticket hall and Underground.
 - Lack of operational space for Network Rail resulting in servicing issues.
 - Lack of cycle parking.
 - Fire safety deficiencies.

Pre-redevelopment audit optioneering

- 16.10. The carbon optioneering report includes an options assessment that details how different development options would influence the potential of retention, reuse and carbon impacts of different materials. Whole life-cycle carbon impacts of the options are set out in the whole life-cycle carbon emissions section of this report which includes an options evaluation with regard to opportunities for wider sustainability benefits and other planning benefits in order to address the economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2024, chapter 2, paragraph 8.
- 16.11. Following the GLA Circular Economy decision tree, 7 options were initially considered, of which the following 3 were discounted:
- Option A: Minor refurbishment only. Discounted due to lack of opportunity to safeguard the future of the station.
 - Option D: Major refurbishment with new concourse and OSD over the listed station roof to the north. Discounted due to logistical and heritage constraints.
 - Option F: Major refurbishment, new concourse and OSD over the Metropolitan Arcade. Discounted due to lack of structural and commercial viability.
- 16.12. The following options were taken forward for detailed assessment and carbon optioneering:
- Option B: Major refurbishment of station with new concourse, retention of 50LS. 100% substructure retention. 100% superstructure retention.
 - Option C: Major refurbishment of station, demolition and replacement of 50LS with new Underground ticket hall, extended concourses and vertical circulation. 85% substructure retention. 90% superstructure retention.
 - Option E: Major refurbishment of station with new concourse, retention of 50LS with new Underground ticket hall intervention and new OSD over station. 98% substructure retention. 98% superstructure retention.
 - Option G: Major refurbishment of station with new concourse, full demolition of 50LS for new station facilities and OSD access, and new OSD over the station concourse 85% substructure retention. 90% superstructure retention.

- 16.13. The optioneering assessment demonstrates that option B would retain the building's structure and facades. Option B proposes the lowest level of intervention, the highest levels of retention and fewer new materials, however, it would not facilitate the level of station enhancement needed to futureproof the station.
- 16.14. Option C would result in some demolition of substructure and superstructure as 50LS would be demolished in order to facilitate the required improvements to the ticket hall and vertical accessibility of the new concourses. The demolition materials of 50LS can be reused within the applicant's portfolio or recycled as set out in the pre-redevelopment audit.
- 16.15. Option E would result in higher retention levels due to the retention and adaptation of 50LS, however it would require large quantities of new materials for the OSD, and while the OSD can be designed with integrated circular economy principles for new build, the required structure to cantilever an OSD over 50LS to achieve the new floorspace needed to deliver the station enhancement would be inefficient and carbon intensive.
- 16.16. Option G has the same retention levels as Option C but it would be able to deliver a more efficiently designed OSD and greater opportunities for enhancements to the station concourses and accessibility. The transfer structure requirement would be reduced compared to Option E, however, overall, the new material demand would be similar to Option E.
- 16.17. The optioneering confirms that overall demolition levels are low across the options. The retention of 50LS would result in a lower level of demolition but, in the option that can provide all required station enhancement works this would cause carbon and material relevant interventions through the need for the adaptation of 50LS, providing a new substantial circulation core elsewhere on site and a substantial transfer structure for the OSD over 50LS.
- 16.18. The explored optioneering is considered to comply with the GLA's Circular Economy Statement Guidance and the Corporation's Carbon Options Guidance Planning Advice Note that provides the tool for maximising retrofit and reuse as set out in the Planning for Sustainability Supplementary Planning Guidance. The assessment of the carbon intensity of the options and their evaluation in the round is set out in the whole life-cycle carbon emissions section of this report.

The application proposal

- 16.19. The submitted Circular Economy Statement describes the strategic approach, including the incorporation of circularity principles and actions into the proposed development, in accordance with the GLA Circular Economy Guidance.
- 16.20. Following the assessment of site specific conditions in accordance with the Circular Economy decision tree and the assessment of options, Liverpool Street Station is proposed to be largely retained and refurbished, and 50LS is proposed to be demolished to deliver a reconfigured Ticket Hall B, however, above ground the location of 50LS will be used to create the new office entrance and core to access the Over Station Development (OSD) and a separate core to access the proposed public roof garden. The OSD is a new build component, supported by a transfer structure, which shares part of the substructure with the station. Wherever elements and components are not being retained in-situ, disassembly and reuse is targeted in the first instance before traditional demolition and recycling.
- 16.21. It is estimated that approx. 85% of the substructure, approx. 90% of the superstructure and approx. 25% of the superstructure formed by the external walls of the station hall and concourses levels can be retained (all by mass). Approximately 17% of the total station roof area is proposed to be demolished, to facilitate delivery of the OSD, which is equivalent to approximately 38.5% of the 1980s roof area. The rationale for the level of demolition of the station hall is set out in the design and heritage section of this report.
- 16.22. The key materials from demolition and deconstruction have been identified as concrete, bricks, structural steel, stone and glass. The opportunities for the potential reuse of existing materials are as follows, subject to further assessment:
- The 1980s primary roof structure (trusses, purlins etc), and parts of the secondary steel framing;
 - The modern roof framing to the retail at ground level that form the walkways around the concourse;
 - The modern steel framing to the various trackside buildings at concourse level;
 - The modern steel framing to the Bishopsgate entrance canopy to the concourse;
 - The modern steel frame, roof timber and tiles of 50LS;
 - The existing bricks of the 4 vent towers, 50LS and the station elevations at the Bishopsgate entrance;

- The ceramic tiles in the new station operations rooms;
- The concrete from the various floors marked for demolition can be recycled as hardcore (for site use or exported elsewhere).

16.23. The design of the new development incorporates measures addressing circularity principles, and details of these are requested by condition, including the confirmation of best practice approaches at RIBA stage 4, such as:

Longevity:

- Permanent and robust structural, façade and servicing materials.

Flexibility and Adaptability:

- Floor to floor heights to achieve 2.85m (levels 06-09) and 3m (levels 10-17) clearance heights that support adaptability including variations to accommodate various office models and to support any future change of use, such as hotel or education uses, subject to regulatory requirements such as fire safety. Studies of suitable floorspace arrangements for residential apartments, student accommodation, hotels, education and healthcare use, including the insertion of atria in areas of higher floorspace depths, have been undertaken.
- Design of the typical office floorplate, including location of cores, allows for sub-division to accommodate up to four separate tenants.
- Standardised grid allows for use of standard fit-out systems, including modular elements.
- The roof terrace and long stay bike storage spaces have been designed to allow conversion at a later stage.

Disassembly, recoverability and reusability:

- Structure to be made of steel frame and composite steel/concrete slabs or cross laminated timber slabs (feasibility of the latter to be assessed at detailed design stage) to enable bolted connections and easy disassembly.
- Independent façade structure with mechanical fixings to enable demountability of elemental replacements. Facade panels with a standard bay width of 1.5m to fit into goods lifts, to support potential for reuse or reconfiguration in the future, either within the proposed development or another building.

- Façades designed with a capped system that allows access to gaskets for inspection and individual replacement of gaskets and glazing. Aim to use a manufacturer offering a cradle to cradle certified design.
- The glass units are restrained within the frames using pressure plates, and can be removed to allow for straightforward replacement at the end of service life. A glass replacement strategy would be developed for all façade types, internally or externally.
- Closed loop recycling feasible for solar coated glass.
- Investigation into the use of lime mortar for areas of proposed brickwork, to facilitate future disassembly and reuse.
- Use of a dry-laid tile product in the proposed station, which could be installed without adhesive/mortar and individually replaced and re-laid.
- Modular and localised plant systems to offer tenant flexibility and ease of maintenance and replacement.

Designing out waste:

- Reuse of existing heritage elements from the existing station within the new station development, including elements of the existing trainshed roof and reclaimed brickwork, where feasible.
- Reuse of existing glass from the station roof to repair retained areas of the historic trainshed roof, where feasible.
- Reuse and reinstallation of existing equipment (e.g. ticket machines, barriers, CCTV, information screens) used in the station.
- Reuse of strip-out material from existing Network Rail offices.
- Where direct reuse is not possible, closed loop recycling opportunities have been identified.
- Optimised column grid in the OSD to reduce material use, and an opportunity to source donor steel from existing buildings in the Network Rail portfolio, local buildings (50LS), or material exchange platforms.
- Opportunity to source other structural and station fit-out materials (carpet tiles, suspended ceilings, sanitary ware) for the operational offices from the Network Rail portfolio.
- Use of low carbon materials and materials with high recycled content, for example specification of recovered raised access flooring would be targeted.
- Pre-fabrication of façade system and structural steel work to optimise material use and construction efficiency.

- Development of a tenant fit out guide for the OSD to promote Circular Economy principles and waste reduction.

16.24. The Circular Economy Statement includes Circular Economy targets that align to London Plan policy SI 7:

- 95% demolition waste to be diverted from landfill for reuse, recycling or recovery.
- 95% of excavation waste to be diverted from landfill for beneficial use.
- 95% of construction material waste to be diverted from landfill for reuse, recycling or recovery.
- 65% of municipal waste to be recycled by 2030.
- 20% of building material elements to be comprised of recycled or reused content.

16.25. An objection was submitted by Simon Sturgis of Targeting ZERO (on behalf of the LISSCA Campaign), mirrored by an objection from Hyatt for the Andaz Hotel, relating to, amongst other topics, the level of demolition and the Circular Economy approach outlined in the application with regard to the demonstrated standard approach to recycling and reuse of demolition materials and lack of further detail. The response to these objections is set out in the 2 following paragraphs.

16.26. The Circular Economy section of this report summarises the submitted approach to demolition material which is considered acceptable at this stage and in the context of an estimated 85% and 90% of retention of the existing substructure and superstructure respectively.

- 16.27. With regard to the proposed demolition, in particular of No 50LS, the retrofit first approach as set out in the emerging City Plan 2040 policy S8 and policy DE1, as well as the Local Plan core policy CS15(3) approach to achieve the adaptation to climate change by avoiding demolition have been applied. Retention options for 50LS have been assessed and evaluated, and have been found to be unable to facilitate the station enhancements for better integrated and larger ticket hall facilities, improved connectivity between rail and underground stations in the basement of No 50LS, permeability across the station as well as access to the new concourses, and in the options including an OSD, to the office floorspaces above the station and separately to the public roof garden. To achieve this, the replacement of 50LS would enable more efficient core design solutions compared to an adaptation of 50LS which would involve intrusive works to the substructure and superstructure of the building with significant embodied carbon impacts. The options assessment provides the rationale for the fact that demolition cannot fully be avoided, however that demolition has been restricted to a low overall percentage of the existing station building, and that the proposed circular economy approach intends to prioritise the reuse of the steel frame and brickwork of 50LS as well other brickwork, architectural relics, decorative metal and ironwork and other materials on site and on other sites in the applicant's portfolio, and further details will be requested by specific conditions to be confirmed at detailed design stage. Therefore, the requirements of both the emerging City Plan 2040 policies and the Local Plan core policy CS15(3) have been met.
- 16.28. A condition is recommended for an update to the Circular Economy Statement prior to the commencement of construction, and a post-completion update, to confirm that the aspirations can be achieved. The update of the Circular Economy Statement would require confirmation of opportunities for the reuse and recycling of interior fit-out and MEP items including the recording of quantities, details and specifications, in order to achieve best practice results.
- 16.29. The development proposal has identified reuse opportunities for existing materials and detailed how the proposed design addresses circular economy principles. The proposal includes circular economy targets that align to the GLA minimum targets. The proposal is compliant with London Plan policy SI7, Local Plan 2015 policies CS15, DM17.2, and emerging City Plan policies S8, DE1.

Operational energy strategy and carbon emissions

- 16.30. The Energy Statement outlines the operational energy strategy in line with the GLA Energy Assessment Guidance. The statement demonstrates that the proposed OSD has been designed to achieve an overall 13.8% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building (the 'Part L baseline'), while the station enhancement would result in 9.6% carbon savings compared to the existing station performance. Combined, the proposal would result in 13.2% carbon savings beyond the Part L baseline.
- 16.31. A passive design approach is adopted to achieve 12.9% 'Be Lean' savings beyond the Part L baseline in the OSD. The design of the OSD incorporates high efficiency lighting, solar glare control by manually operated blinds, energy efficient lifts, on floor ventilation system, heat recovery with high levels of insulation and a thermal energy store to reduce energy demand.
- 16.32. The proposed facade design comprises a mix of 67% of double-glazed curtain wall systems, 22% of opaque insulated panel systems and 11% of closed cavity double skin systems (CCF) to balance operational energy demand with embodied carbon, daylight penetration requirements and the building aesthetic and appearance in its heritage context. Vertical fins between each façade panel are proposed on the west, south and east facades to provide external solar shading in response to the building orientation and to optimise thermal performance. The CCF system is proposed on façades with peak solar exposure to limit solar gains and provide internal glare control. CCF comprises a single layer of glazing (outer leaf), a cavity with motorised blinds, and a double-glazed inner leaf.
- 16.33. The station enhancements are modelled to achieve 10.3% 'Be lean' savings beyond existing performance. The retail units would comprise curtain walling systems, incorporate standalone Variable Refrigerant Flow (VRF) systems for heating and cooling, and mechanical ventilation with heat recovery. Combined, the proposed development would achieve 12.5% carbon savings through 'Be Lean' measures.
- 16.34. There are currently no available or proposed district heating networks in the local area. The proposal includes space allowance at ground floor for a future connection to the network. It is anticipated that there will be an opportunity for connecting the station's heating and cooling demand once the existing systems will be in need of replacement.

- 16.35. A system of air source heat pumps (ASHP) is proposed to serve the OSD, located on deck levels 4 and 5 of the OSD, with separate air intake and extract facing the lightwell between the rear of the Great Eastern Hotel. These plant areas have glazed louvered facades with noise attenuation. Precedents of interstitial plant decks can be found in data centres, sports venues and other developments with constrained roof levels, and these become increasingly common in tall building types to break up long pipework runs. In addition, areas on the three main cores of the roof and the roof auditorium have been identified as an opportunity to incorporate photovoltaic (PV) panels, a total area of 365m², providing carbon savings of 8 tCO₂/year. The 'Be Green' savings for the OSD are 0.9%. The 'Be Green' stage for the station enhancements would not result in a carbon reduction, calculated as -1%, due to the Part L modelling assumed heating, ventilation and air-conditioning performance in the notional building model compared to the performance for the proposed building with high domestic water heating demand, and as no renewable technologies will be incorporated initially. Combined, the development would achieve 0.6% carbon savings through 'Be Green' measures.
- 16.36. The 'Be Lean', 'Be Clean' and 'Be Green' calculations are summarised in the table below to demonstrate a total 13.2% reduction in regulated carbon emissions compared to the baseline calculation.

Table: Operational energy reduction for the proposed development

Station enhancement (m ²)	6,138		
New build OSD (m ²)	81,844		
Proposed development (m ²)	87,932		
	Tonnes CO ₂ per annum	Stage reduction	Stage percentage reduction
Station enhancement			
Baseline (Part L 2021)	59.5	-	-
Be Lean: Demand reduction	53.4	6.1	10.3%
Be Clean: Decentralised energy	53.4	0	0%
Be Green: Low/zero carbon technologies	53.8	-0.4	-1%
Total reduction	-	5.7	9.6%
New build OSD			
Baseline (Part L 2021)	369.1	-	-
Be Lean: Demand reduction	321.6	47.5	12.9%
Be Clean: Decentralised energy	321.6	0	0%
Be Green: Low/zero carbon technologies	318.4	3.3	0.9%
Total reduction	-	50.8	13.8%
Proposed development			
Baseline (Part L 2021)	428.7	-	-
Be Lean: Demand reduction	375.0	53.6	12.5%
Be Clean: Decentralised energy	375.0	0	0%
Be Green: Low/zero carbon technologies	372.2	2.8	0.6%
Total reduction	-	56.5	13.2%

- 16.37. The energy strategy demonstrates that the proposed whole development would achieve a 13.2% reduction in regulated carbon emissions under Part L 2021. Overall, a fabric first and energy efficient systems approach has been demonstrated, reflecting the maximum achievable carbon performance within the development's constraints, opportunities and identified design principles. However, the proposal does not meet the GLA's 35% target for operational carbon reduction relative to Part L 2021. The GLA acknowledges that the 35% target will be initially challenging for non-domestic buildings as the baseline includes low carbon heating. But more importantly, it is considered that due to the proposed development's complexity of building types, forms and functionalities, the energy efficiency of the design cannot be reflected appropriately in the Building Regulations Part L methodology. Furthermore, limitations of the Part L methodology arise from comparing the building's regulated energy performance with a notional building performance rather than basing the operational carbon performance on the actual, modelled whole building energy use intensity (EUI). The proposed NABERS certification, as discussed below, requires more comprehensive energy modelling to rate the actual energy use of a building. The overall energy performance of the development is comparable with other complex commercial developments permitted in the City of London in recent years. As the energy statement demonstrates that the Mayor's net zero carbon target cannot be met on site, an offset payment will be made by the applicants as set out in the planning obligations of this report.
- 16.38. The proposed emergency power supply includes a diesel generator strictly for preservation of life and emergency use only, not for business continuity. Alternatives to a diesel generator will be further explored during design development, including for example a dual diversified electrical supply from different substations to enhance resilience. Details of the proposed emergency power supply are secured by condition.

Energy Use Intensity (EUI)

- 16.39. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m²(GIA)/year and a space heating demand of 15 kWh/m²(GIA)/year (regulated). The estimated EUI of the proposed OSD is 100.5 kWh/m²/year and for the space heating demand 3.47 kWh/m²/year. The estimated EUI is similar to the estimated EUI of other recently approved complex office developments in the City of London while the low space heating demand is due to the high-performance façade system and high efficiency heat recovery units. The station improvement works (without new MEP) would result in an EUI of 318.1 kWh/m²/year and a space heating demand of 26.6 kWh/m²/year. The high energy demand of the station enhancement is due to the high domestic hot water and fan loads required to service the retail units.
- 16.40. These figures are estimates at this stage as the operational energy performance – including unregulated energy use - is dependent on the level of occupancy and operation of the building.
- 16.41. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

- 16.42. According to the British Research Establishment (BRE), a BREEAM Outstanding rating broadly reflects building performance of “Less than the top 1% of UK new non-domestic buildings (innovator)”. This involves achieving a large number of highly challenging minimum standards and credit requirements, which exceed typical building performance across sustainability themes.
- 16.43. The OSD has been pre-assessed under BREEAM 2018 New Construction v6.1 - shell & core (office). The development is targeting an ‘outstanding’ rating with a weighted score of 85+% for the pre-assessment. The pre-assessment is on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution, Materials and Waste.

- 16.44. The station enhancement works target an 'excellent' rating for the retail, food and beverage spaces, however a pre-assessment has not yet been completed as the scope and number of assessments will be agreed with BRE at the detailed design stage. Submission of this pre-assessment is recommended to be secured by condition,
- 16.45. The BREEAM pre-assessment result complies with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. Post construction BREEAM assessments are required by condition.

NABERS UK

- 16.46. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation, aiming to bridge the performance gap between design and in-use performance through an early commitment to a design that can achieve the targeted performance. The proposed OSD is targeting a NABERS 5 stars (out of 6 possible) rating, and a detailed Design for Performance assessment will be carried out in future design stages. This is conditioned to be submitted prior to the commencement of development. The NABERS 5 star target complies with emerging City Plan 2040 policy DE1.

Whole life-cycle carbon emissions

- 16.47. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The emerging City Plan 2040 policy DE1 requires the submission of Whole Life-Cycle Carbon assessments for all major applications. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as their embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon carbon target.

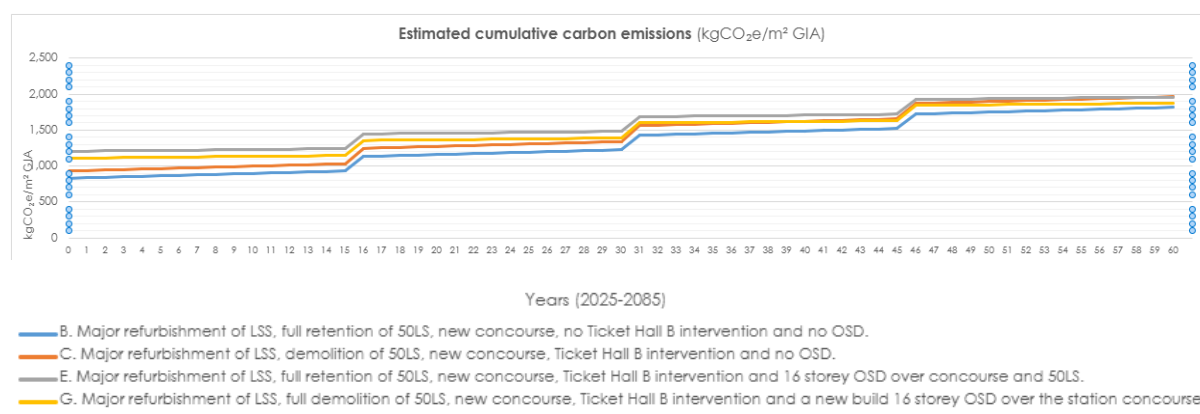
Carbon options

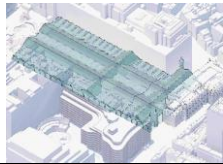
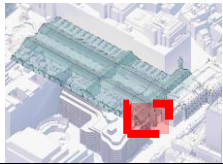
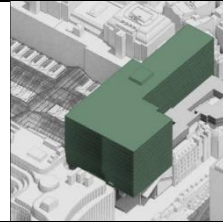
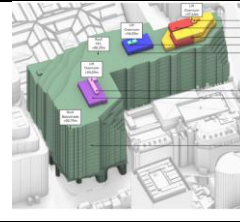
16.48. The GLA's Whole Life-Cycle Carbon Assessment guidance requires applicants for referable applications to confirm that options for retaining existing buildings have been fully explored. The emerging City Plan 2040 in policy DE1 requires all major development to implement a Retrofit First approach by undertaking an options assessment of in line with the City Corporation's Carbon Options Guidance Planning Advice Note, to establish the most sustainable and suitable approach for the site.

16.49. The carbon optioneering exercise undertaken for the site includes the following 4 options:

- Option B: Major refurbishment of station with new concourse, retention of 50LS. 100% substructure retention. 100% superstructure retention.
- Option C: Major refurbishment of station, demolition and replacement of 50LS with new Underground ticket hall, extended concourses and vertical circulation. 85% substructure retention. 90% superstructure retention.
- Option E: Major refurbishment of station with new concourse, retention of 50LS with new Underground ticket hall intervention and new OSD over station. 98% substructure retention. 98% superstructure retention.
- Option G: Major refurbishment of station with new concourse, full demolition of 50LS for new station facilities and OSD access, and new OSD over the station concourse. 85% substructure retention. 90% superstructure retention.

16.50. The following graph and table present the whole life-cycle carbon results of the options:



				
	Option B	Option C	Option E	Option G
Gross Internal area (GIA) m²	20,484	18,984	112,698	111,198
Increase in NIA (over existing)	0	-1,320	55,816	55,816
Substructure % retained (by mass)	100%	~85%	~98%	~85%
Superstructure % retained (by mass) <i>(frame, upper floors, roof, stairs, ramps)</i>	100%	~90%	~98%	~90%
Superstructure % retained (by area) <i>(external walls, windows, external doors)</i>	100%	~98%	~25%	~25%
Upfront Embodied Carbon (A1-A5) (kgCO₂e/m² GIA) <i>exc. sequestration</i>	828	926	1,201	1,106
In-use & End of Life Embodied Carbon (B-C) (kgCO₂e/m² GIA) <i>excl. B6 & B7</i>	587	628	610	620
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO₂e/m² GIA)	1,415	1,554	1,811	1,726
Fuel source	Electricity	Electricity	Electricity	Electricity
Whole Building Operational Energy Use (kWh/m² GIA per year)	318	318	115	115
Whole Building Operational Carbon for building lifetime (B6) (kgCO₂e/m² GIA)	405.7	405.7	146.1	146.1
Total WLC Intensity (incl. B6 & pre-demolition) (kgCO₂e/m² GIA) <i>B7 not considered</i>	1,820.7	1,965.1	1,961.1	1,876.6
Upfront Embodied carbon (A1-A5) (tCO₂e)	16,961	17,579	135,350	122,985
In-use embodied carbon (B-C) (tCO₂e)	12,024	11,922	68,746	68,943
Operational carbon for building lifetime (B6) (tCO₂e)	8,310	7,702	16,463	16,243
Total absolute WLC (incl. B6 and pre-demolition) (tCO₂e) <i>Module B7 not considered</i>	37,295	37,305	221,015	208,679

- 16.51. Option B presents the lightest intervention with full retention of the station substructure and superstructure and major refurbishment of the existing station. Without significant demolition, this option presents the lowest overall carbon impact with the lowest per square meter and absolute emissions in whole life-cycle carbon. However, the applicant does not consider that this option would deliver station improvements required for current and future operations.
- 16.52. Option C expands on the major refurbishment of the existing station (Option B) by including demolition of 50LS to redesign the Underground ticket hall and improve pedestrian flows. The works would include 85% retention of the substructure and 90% of the superstructure. Without the OSD intervention, this option presents the second lowest upfront carbon impact per square meter and absolute. However, it presents the highest whole life-cycle carbon figure per square meter, due to the limited operational carbon efficiency of the station and embodied carbon impacts of the 50LS replacement works. Due to the limited amount of new development overall, this option would still result in a significantly lower absolute whole life-cycle carbon emissions compared to the options with OSD intervention.
- 16.53. For both options B and C, commercial viability, and therefore deliverability, is presented as a key challenge.
- 16.54. For options E and G which both include an OSD, the complexity of the site presents several structural challenges, such as the need for a significant transfer deck over the station concourse area as the structural cores cannot extend to the ground due to the station. The largest impact on upfront embodied carbon is the transfer structure. The columns supporting the OSD must pass through the station concourse, designed around pedestrian flows and heritage assets, and the foundations are restricted by existing underground services such as Royal Mail tunnels, the Underground and associated Underground infrastructure. The ground constraints could pose a risk of further structural requirements and resulting embodied carbon to manage the transmission of loads whilst not exceeding ground movements limits on these assets.

- 16.55. Option E includes major refurbishment of the existing station, retention of 50LS and includes a sixteen storey OSD over the station concourse and cantilevered over 50LS. The works would include 98% retention of the substructure and 98% retention of the superstructure. This option demonstrates that the transfer structure required to cantilever the OSD over 50LS, to meet the floorspace requirements for commercial viability, would be carbon intensive and inefficient. Other complex structural works would be required to support the station enhancements, including a new transfer deck, reconstruction of an internal slab, and adjustment of internal stairs. The extent of structural works is reflected as Option E presents the highest upfront embodied carbon figures, per square meter and absolute. Additionally, it would be the highest absolute whole life-cycle carbon figure.
- 16.56. Option G includes the major refurbishment of the existing station, demolition of 50LS and its replacement with a new structure for an Underground ticket hall, extended concourses and vertical circulation, as well as a sixteen storey OSD over the station concourse. The development would include 85% retention of the substructure and 90% retention of the superstructure. Compared to Option E, Option G has lower upfront carbon and WLC emissions per square meter and absolute, because it doesn't include the cantilevered structure over 50LS.
- 16.57. Options B and C are the lowest in absolute whole life-cycle carbon emissions and could delay the high carbon investment of a redevelopment until a higher decarbonisation level of the national grid and until more energy efficient industry processes will reduce embodied carbon emissions closer to the net zero target. However, it is considered that these options would not be able to deliver the station upgrade including public realm, urban greening, biodiversity and climate resilience improvements for the wider area. High embodied carbon emissions in options E and G are associated with the site's complexity and the proposal to elevate the OSD above the existing station. When compared with Option B, Option G has approximately 5.6 times the total carbon due to the significant additional internal space created (almost 91,000m²). However, the conclusion of the optioneering report confirms that the only commercially viable option to deliver the station enhancements (in the context of the applicants' funding model) is through delivery of the OSD which is more carbon efficient in Option G compared to Option E.

- 16.58. The optioneering approach summarised in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on whole life-cycle carbon emissions and with the more detailed methodology set out in the City Corporation's Carbon Options Guidance to establish and evaluate the carbon impact of development options. A third-party review of the assessment confirms compliance with the City Corporation's Carbon Options Guidance.
- 16.59. An objection was submitted by Simon Sturgis of Targeting ZERO (on behalf of the LISSCA Campaign), mirrored by an objection from Hyatt for the Andaz Hotel, relating to, amongst other carbon topics, the optioneering assessment and the limitation to the range of options. The optioneering methodology in the Carbon Options Guidance requires applicants of major schemes to assess a limited number of options that present clearly discernible, feasible design approaches to achieve the development objectives. In addition to assessing 2 station enhancement options without the additional OSD (one without and one with the replacement of 50LS), the applicants have appraised 2 further options including an OSD with and without replacement of 50 LS, based on the need for economic viability in the context of Network Rail's funding model for the works (considered elsewhere in this report). Officers consider the range of options to be acceptable as they reflect the conditions and constraints of the site and enable an adequate evaluation of impacts on carbon, other sustainability issues and general planning matters.
- 16.60. Simon Sturgis further questions the need for a transfer structure of high carbon intensity on which the options including an OSD, and the application proposal, are based, suggesting that other more lightweight structural solutions would be lower in carbon impact. However, no evidence for the carbon impacts of such solutions was provided, and the given examples of neighbouring buildings facing Exchange Square span over the tracks only rather than over an existing trainshed roof covering two levels of concourses which is considered structurally more challenging. A lightweight option using CLT will be considered at detailed design stage, including the assessment of fire safety risks and associated treatment or encapsulation needs. This is part of the identified future carbon reduction opportunities included into the following whole life-cycle carbon emissions section relating to the application proposal of this report.

16.61. The retrofit first approach set out in policy DE1 Sustainable design of the emerging City Plan 2040, requires carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2024 stating in paragraph 161 that the planning system should support the transition to net zero by 2050 including by encouraging the reuse of existing resources such as the conversion of existing buildings, and in paragraph 164 that new development should be planned for in ways that help reduce greenhouse gas emissions. The policy is implemented through the City Corporation's comprehensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme including maximising the retention of existing structure. The undertaken optioneering process has demonstrated compliance with emerging City Plan policy DE1.

The application proposal:

16.62. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section.

16.63. The proposed OSD would require structural support from a transfer structure that spreads loads across columns and foundations in the existing train station and Underground rail infrastructure. The new columns are required to pass through the station concourse, which must be coordinated with pedestrian flows and heritage assets. Foundation positions are also restricted by existing Royal Mail tunnels, Underground tunnels and associated Underground infrastructure. Avoiding existing assets and impacting ground movements is considered a significant risk which could result in additional material and embodied carbon to the proposed substructure.

16.64. The foundation design is guided by the need to protect the below ground assets, using pile caps to coordinate the pile positions with the below ground asset locations. The design and piling strategy have been calculated based on a desk study review of expected soils and below ground assets on site as intrusive ground investigation works were not possible due to the live station environment and risks associated with this in advance of securing planning permissions. A risk therefore remains that additional works with further carbon impacts emerge as necessary during the detailed design development phases. However, innovative carbon reduction strategies have been identified as future opportunities to mitigate any unexpected, embodied carbon increases, and these are outlined in the following paragraph. A condition to mitigate a significant increase in embodied carbon emissions due to substructural works is recommended.

16.65. As this stage the development falls short of the GLA's Standard Benchmark for upfront (A1-A5) and embodied carbon (A-C) emissions. The whole life-cycle carbon assessment outlines opportunities to further reduce embodied carbon emissions, to help meeting the Standard Benchmark. The detailed design and construction phases for the proposed works are anticipated to last beyond standard timeframes, and the identified opportunities are expected to become more mainstream, even if at higher costs compared to using standard materials and structural design. These further opportunities will be considered during the detailed design stages and include:

- The use of cross laminated timber (CLT) slabs for the OSD could provide a substantially lower carbon alternative to the proposed composite steel and concrete slabs. The CLT alternative would require a lighter substructure and structural frames, and is a bio-based material option, therefore reducing embodied carbon. Associated fire safety and insurance risks will be assessed at future design stages as this opportunity is subject to changes in legislative and regulatory matters as well as availability and costs of insurance.
- Specification of lower carbon finishes, such as raised access flooring and suspended ceiling systems.
- Façade curtain walling manufactured using Hydro CIRCAL 100R (100% recycled content).
- Use of 'ORAE' glass that contains up to 64% recycled content.
- Glass units within curtain walling designed to be replaceable individually.
- Use of refrigerants with low global warming potential and leak detection.

- Exploration of whether the adoption of lightweight concrete, whilst more carbon intensive than normal weight concrete, would deliver an overall carbon saving through corresponding loading reductions in the vertical structure, transfer and foundations.

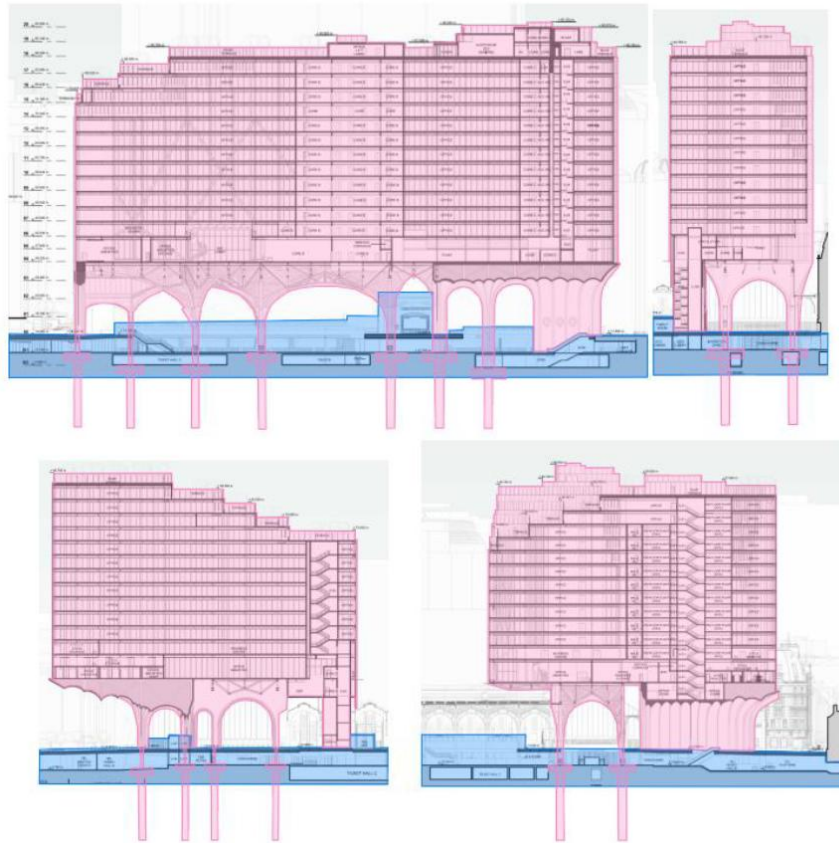
- 16.66. The GLA Guidance requires applicants to use the (original) methodology developed by RICS (Royal Institution of Chartered Surveyors). RICS have published the 2nd edition which has come into full effect on 1 July 2024, requiring to follow Version 2's requirements when completing a whole life-cycle carbon assessment. The GLA has indicated that it would not update its guidance to reflect these changes for now and continues to require Version 1 based calculations.
- 16.67. The assessment approach undertaken by the applicant's consultants is based on RICS 1st edition methodology as per the GLA's requirement set out in the Whole Life-cycle Carbon Assessment Guidance, however, to provide a more accurate assessment, the WLC modelling includes RICS 2nd edition assessment criteria relating to transport distances, service life and material end of life scenarios, alongside a 12.5% contingency on the structural quantities. The calculations incorporate both quantity and emissions contingencies, ensuring a robust and representative outcome. The resulting figures therefore are closely aligned to RICS 2nd edition results. The GLA benchmarks are based on assessors adopting the RICS 1st edition and therefore the combined approach adopted may make the development compare slightly less favourably against the GLA benchmarks. The GLA did not comment on this approach in their response to this WLCA, and this approach therefore is considered to be acceptable.
- 16.68. An accurate, separate allocation of whole life-cycle carbon quantities between the station enhancement works and the proposed OSD is not achievable as the new station roof forms the lowest floor slab of the OSD. The columns and station roof therefore have been allocated to the OSD structure while the station's substructure, concourse works, street facing walls and entrances were allocated to the station works. The WLC scope is visually represented below.

LSS WLC Quantities Allocation

- OSD
- Station

Notes:

- 1) OSD substructure shown indicatively.
- 2) All elements required by the OSD are considered wholly within the OSD assessment, even if they offer support to the station elements as well.



16.69. The table below shows baseline whole life-cycle carbon emissions per square meter (using the modelling approach as set out in the previous paragraphs) in relation to the GLA benchmarks at planning application stage:

Scope	Proposed OSD (offices)	Proposed station enhancements *	Proposed whole site	Benchmark	GLA benchmark (offices)
RICS components	kgCO2/m2	kgCO2/m2	kgCO2/m2	kgCO2/m2	
A1-A5	1,110	1,096	1,107	< 950	GLA standard
				< 600	GLA aspirational
B-C (excluding B6 & B7)	623	609	620	<450	GLA standard
				<370	GLA aspirational
A-C (excluding B6-B7)	1,695	1,704	1,697	< 1,400	GLA standard
				< 970	GLA aspirational
B6+B7	784	751	774		
A-C (including B6-B7)	2,479	2,455	2,471		

*There are currently no carbon benchmarks for rail infrastructure. The applicants have collected available data for other referable stations (Euston Station, Old Oak Common Station, Birmingham Interchange Station and Birmingham Curzon Street Station) which demonstrate that the upfront carbon intensity of the works for Liverpool Street Station is much lower than that of the other stations.

16.70. The proposed development would result in 274,755,750 kg CO2e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 86,066,917 kg CO2e (31% of the building's whole life-cycle carbon), and the embodied carbon emissions for 188,688,833 kg CO2e (69% of the building's whole life-cycle carbon). The high embodied carbon proportion reflects the complexity of an over-station-development in relation to its structural requirements as the OSD transfer structure required to span over the station roof alone would account for 21.25% of upfront embodied carbon emissions. As discussed elsewhere in this report, the principle of a complex OSD can only be considered acceptable in the context of the wider public and sustainability benefits the station upgrade would provide.

16.71. An objection was submitted by Simon Sturgis of Targeting ZERO (on behalf of the LISSCA Campaign), mirrored by an objection from Hyatt for the Andaz Hotel, relating to, amongst other carbon topics, the WLCA that he considers to be flawed in relation to:

- the methodology RICS version 1 used rather than the latest version 2.
- the lack of comparison against other than the GLA's benchmarks, such as the Net Zero Carbon Building Standard (NZCBS) or the LETI (London Energy Transformation Initiative) benchmarks.
- the lack of ambition to reducing carbon emissions generally, and specifically in the design of the façade system and structure of the OSD, therefore failing to achieve an office development of the highest quality as set out in emerging City Plan 2040 strategic policy S4.

16.72. With regard to using the RICS version 1 methodology and the addition of contingencies to calculate carbon emissions: the reason for this approach is set out in an earlier paragraph in the Whole life-cycle carbon section of this report, and the applied methodology is considered to be in line with policy requirements.

16.73. With regard to comparisons of the WLCA against industry benchmarks: The GLA guidance requires the comparison against its benchmarks which is provided in this report. There are currently no required targets for planning applications or requirements for comparisons against other benchmarks. The NPPF in paragraph 161 requires that "The planning system should support the transition to net zero by 2050", and the emerging City Plan 2040 in Strategic Policy S8 requires development that "minimises whole life-cycle carbon and contributes towards a net zero carbon City; and that "seeks opportunities to contribute to the wider sustainability of the City and (where relevant) neighbouring boroughs, especially where development would result in substantial carbon emissions". The required approach to address this policy is further detailed in the City Corporation's Planning for Sustainability SPD where upfront embodied carbon emissions exceed the GLA's Standard Benchmark. In those cases, 'wider environmental sustainability benefits' will be sought to mitigate high carbon impacts which are set out at the end of this section. The submission of details to this effect is requested and the details to be approved through conditions. This approach is considered to mitigate high embodied carbon impacts identified at planning stage to address the NPPF and the emerging City Plan 2040 policy.

- 16.74. With regard to the perceived lack of ambition to reduce carbon emissions generally and specifically: the submitted documents demonstrate that the embodied and operational carbon impacts are carefully balanced to respond to the site conditions affecting an OSD. The proposed building design commits to high BREEAM and NABERS UK ratings.
- 16.75. Specifically, despite the façades being fully glazed, the glazing system is designed to be recyclable and individually replaceable (rather than renewed via entire new façade modules). The aluminium framing system is designed for long-term durability that could exceed the RICS specified life span for curtain walling of 35 years, although for the WLC calculations the 35 year life span has been applied. The façade systems are optimised for a balance of reducing energy demand, solar gain, embodied carbon and impact of the weight of façade systems on the building's structure, waste as well as visual impacts on the surrounding heritage assets. Some of the carbon efficiency measures affecting the detailed design and material compositions can only be confirmed at detailed design stage and will be secured through conditions. The reasons for the structural requirements are set out in the optioneering section of this report, including an added contingency for any unexpected further structural requirements. A condition requiring more challenging and possibly costly structural solutions to reduce carbon intensity is recommended to offset any further carbon increases above the calculated structural carbon if they become necessary following intrusive ground investigation works and detailed design development.
- 16.76. A detailed whole life-cycle carbon assessment at RIBA stage 4 and a confirmation of the post construction results at RIBA stage 6 are required by conditions.
- 16.77. Wider environmental sustainability benefits in accordance with the emerging City Plan 2040 policy S8.6 and the guidance provided in chapter 4 of the Planning for Sustainability SPD, are sought when a proposed development is identified at planning stage as a high upfront embodied carbon impact development, with results in carbon upfront carbon intensity exceeding the GLA Standard benchmark. The proposed WLCA confirms such a high impact due to the atypical nature of its location above the trainshed with complex structural requirements and MEP solutions as well as constraints for operational efficiency.

16.78. The applicants justify the need for an OSD development on site to enable the station improvements and its future proofing as significant environmental benefits through improving sustainable modes of transport for the wider region. This reason cannot be used again to justify resulting high embodied carbon impacts of the proposed OSD. Therefore, further tangible measures that provide benefits beyond policy compliance or the site boundary, called 'wider environmental sustainability benefits', are sought to mitigate these impacts. In this case, these are:

- significantly futureproofing the station's internal and surrounding public realm and interface with neighbouring townscape against climate change impacts and for the comfortable use by the greatest range of people through a holistic approach of providing shade, shelter and restorative spaces, high quality amenity and green and cool spaces to protect the public from rising temperatures, flooding, wind tunnels and other adverse microclimatic conditions.
- contributing to testing innovative façade-integrated photovoltaic systems by providing an assessment of suitable photovoltaic panel designs that blend into the proposed façade design and incorporating and trialing a system into the OSD envelope for the duration of one or more years.

16.79. Overall, through the application of wider environmental sustainability benefits and specified requirements to reduce carbon emissions and waste, the development's proposed design is considered to be able to achieve the highest quality through detailed design development throughout the RIBA stages which can be confirmed at future detailed design and procurement stages of the development. Details are requested and will be submitted, assessed and agreed by the City Corporation through the attached conditions and obligations. The objections set out above therefore can be rejected.

16.80. The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's Whole life-cycle carbon assessment guidance, as confirmed by the 3rd party review. The submitted operational and embodied carbon strategy particularly describes the higher carbon impacts specific to the complexity of form and functionality of the proposals but also demonstrates the opportunities and proposed actions to reduce carbon emissions through mitigating best practice approaches and therefore meets the requirements of the London Plan Policy SI 2E, Minimising greenhouse gas emissions, the Local Plan Core Strategic Policy CS15 Sustainable Development and Climate Change and the emerging City Plan 2040 Policy DE1 Sustainable Design. By committing to the reduction of whole life-cycle carbon emissions through the submitted strategic approach and mitigating initiatives (including a carbon offset contribution), required to be confirmed at detailed design stage, the development would contribute to the transition to net zero by 2050 in accordance with NPPF (2024) paragraph 161.

Climate Change Resilience

16.81. NPPF Paragraph 159 requires new development to avoid increased vulnerability to the range of impacts arising from climate change. Policy DM15.5 Climate change resilience and adaptation of the Local Plan 2015 and Policy DE1 of the draft Local Plan 20240 require climate change adaptation measures to be incorporated into development and for developers to demonstrate how they will improve environmental performance and mitigate and adapt to climate change.

16.82. Various documents submitted in support of the proposed development relate to climate change resilience and adaptation, including the following:

- Design and Access Statement
- Climate Change Risk Assessment (Volume III, Technical Appendices to the ES)
- Flood Risk and Drainage Strategy
- Preliminary Ecology Report
- Thermal Comfort Assessment
- Health Impact Assessment

- 16.83. These documents are in addition to the chapters of the Environment Statement itself which includes information concerning climate change resilience, specifically within Chapter 9 (Climate Change).
- 16.84. This documentation includes references to and assessment of matters specific to climate change resilience, including risk analysis of mean temperatures, extreme weather events, drought, minimum, average and maximum summer and winter temperatures, and flooding. This information has been reviewed by the City of London Climate Change Resilience Officer, who confirmed that The proposed development is 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.

Urban Greening Factor and Biodiversity

- 16.85. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design and site. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Draft City Plan (2040) Policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context.
- 16.86. The proposed works include extensive greening across the terrace balconies apportioned to the office floorspace and across the facade of the Over Station Development, as well as at its elevated public roof space. Further greening is achieved at roof top level within the public and private garden spaces. Across the developable area of the site, excluding the rail tracks, bus route, station service zone and arcade, the development achieves an Urban Greening Factor of 0.32 in line with these policies. The proposals conflict with these policies where the area includes all land within the red line boundary, achieving a 0.19 in this regard.

- 16.87. Policy CS19 of the Local Plan 2015 seeks to protect the amenity value of trees retaining and planting more trees wherever practicable and policy DM19.2 states that developments should promote biodiversity and contribute to urban greening. Local Plan paragraph 3.19.17 states that “Where existing green infrastructure is disturbed, removed or damaged as a result of development, it must be replaced with good quality urban greening. There should be no net loss of green infrastructure. Existing trees should be replaced with trees of an equivalent size and quality.” The emerging City Plan 2040 seeks to increase the number of trees and their overall canopy cover through a number of measures including “Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed requiring their replacement with trees that can attain an equivalent value.”
- 16.88. The proposals would see the removal of two trees at Sun Street Passage, and their replacement with trees at Hope Square (twelve trees), Bishopsgate (fifteen trees), Sun Street Passage (thirty-seven new trees, and two retained trees). The scale of the replacement of these trees within the context of the removal of two trees is considered acceptable, and in line with the policies referenced above. The application also triggers the national requirement for Biodiversity Net Gain, as an identified habitat would be altered by the proposals. In line with national requirements, any permission granted would be subject to the Biodiversity Net Gain conditions. The proposals would not meet the emerging policy requirement within the draft City Plan that new development achieve three biodiversity units per hectare. In this unique circumstance, it is considered that the relative uplift in urban greening and biodiversity is acceptable given the site-specific spatial constraints inherent in developing a railway station.

Conclusion on Sustainability

- 16.89. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan and emerging City Plan 2040 policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

- 16.90. A carbon options study has been carried out based on a range of refurbishments and additional new build approaches to evaluate environmental impacts and the commercial feasibility to deliver the required station enhancements with the available funding model, demonstrating the complexity of the required works to make the station fully accessible and futureproof its operation. The proposed development would not meet the GLA's standard benchmark for upfront carbon. However, carbon savings to meet and reach beyond the GLA's benchmarks could be achievable by implementing significant and challenging carbon reduction initiatives to be assessed and confirmed at detailed design stages due to the complexity of the proposals. The proposed development would provide a significant improvement for the sustainable connectivity and accessibility of the City of London within the wider region and thus contributing to futureproofing the City of London against a range of environmental, social and economic sustainability challenges.
- 16.91. The proposed development would provide benefits relating to improving social and environmental sustainability through improvements of the public realm and microclimate around the station and as well as enhanced permeability through the station and integration into its context, incorporating urban greening and climate resilience measures on the ground and at roof level of the proposed OSD. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for reuse and designing the new build for longevity, adaptability and low maintenance. The energy use intensity of the proposed OSD has been optimised and future opportunities for the station's energy performance identified, including connecting the whole development into emerging heat networks.
- 16.92. A BREEAM outstanding" rating and a NABERS UK rating with a minimum of 5 stars are targeted to overcome the performance gap between design and in use energy and carbon efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, it would (taking account of the mitigation measures proposed) comply with London Plan Policies SI 2, SI 7, Local Plan Policies CS15 and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

17. Cultural Offer and Public Spaces

- 17.1. The provision of cultural offers within development proposals is of increasing importance. The City of London contains a significant concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors, and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.
- 17.2. Strategic Policy S25 of the City Plan 2040 states that in respect of the Liverpool Street area the City Corporation will improve the area by: "delivering a high quality public realm with additional publicly accessible open space and increased greenery alongside biodiversity improvements", and "providing a welcoming visitor experience with improved wayfinding and signposting that reflects the area's position as a key gateway to the City".
- 17.3. More broadly, CS11 of the Local Plan 2015 seeks to maintain and enhance the City's contribution to the London's world class-cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences in accordance with the City Corporation's Visitor Strategy by:
- Providing, supporting and further developing a wide range of cultural facilities.
 - Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.
 - Protecting existing cultural facilities where there is need.
 - Providing visitor information and raising awareness of the City's cultural and heritage assets.
 - Allowing hotel development where it supports the primary business or cultural role of the City.

- 17.4. Local Plan policies CS22 and DM22.1 support the provision of community services. It is advised that development of *“new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:*
- *Where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office us;*
 - *In locations which are convenient to the communities they serve;*
 - *In or near identified residential areas, providing their amenity is safeguarded;*
 - *As part of major mixed-use developments subject to an assessment of scale, character, location and the impact of the proposal on existing facilities and neighbouring uses.”*
- 17.5. The emerging City Plan 2040 under policy CV2 seeks opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and weekend and attract significant numbers of visitors into the City. Policy HL5 of the emerging City Plan 2040, expects the provision of new social and community facilities at flexible, multi-use spaces suitable for a range of uses. These spaces are considered to make a significant contribution to people’s mental, spiritual and physical well-being, sense of community, learning and education.
- 17.6. The applicant has submitted a Public Benefits Statement which outlines the applicant’s position as to the public benefits realised through the proposals. These include the improvement works to the Station itself, the landscaping and public realm proposed, and the public roof garden.
- 17.7. Relevant to the policies above, the roof garden of the proposal would open to the public, free of charge, as well as being used by future office tenants as amenity space. The space would be subdivided into two areas, a public garden and area with three areas defined by the applicant as the Destination Garden, the Relic Garden and the Viewpoint. The area would be substantially greened and would offer unique views across the City. It would feature relics from the Network Rail historic estate, and is designed to accommodate over 200 visitors at any one time, being access via two 26 person lifts directly from the upper concourse level of the station. This space is also served by toilet facilities at roof top level.
- 17.8. In addition to this area, the roof also features external amenity space for the office users. This space features a café and an auditorium, providing a competitive and high quality offering to attract future tenants.

17.9. The proposed use of the rooftop space is as follows:

- Monday - Public Roof Garden open, Office Roof Garden open (spaces divided)
- Tuesday - Public Roof Garden open, Office Roof Garden open
- Wednesday - Public Roof Garden open, Office Roof Garden open
- Thursday – Roof Garden unified, closed to the public
- Friday – Roof Garden unified, entirely open to the public
- Saturday – Roof Garden unified, entirely open to the public
- Sunday – Roof Garden unified, entirely open to the public

17.10. This split across the week ensures that there is three full days, across the weekend, of entirely public use of the space – both roof garden and café and auditorium – while retaining some use of the space for commercial purposes in the evenings, and offering a unique amenity for the future office users on Thursdays.

17.11. This public offer would form a compelling part of the tapestry of elevated public spaces now available in the City of London. Offering views across the historic train shed roof, as well as wider views to the east, south and west, a public roof garden in this location is a considerable public benefit, with comparable spaces at 20 Fenchurch Street and 120 Fenchurch Street each attracting over a million visitors in 2024.

17.12. The detailed design of these spaces would be secured via condition, and its ongoing management and provision to the public would be secured via s106 obligation – obligations which require the submission of a Public Roof Terrace and Auditorium Management Plan, which in turn covers details such as security arrangements, marketing of the Auditorium for public use, and its provision as free to use for the lifetime of the development.

17.13. The provision of this elevated public space is welcomed in the context of the relevant development plan policies outlined herein. Overall, the proposals would provide a robust cultural offer for the site that would act as a new destination for the City in line with the Destination City Agenda and the following policies of the Local Plan 2015: CS11, DM11.1 and CS5 and policies CV2 and S23 of the emerging City Plan 2040, and London Plan Policy D9 (D) which states that tall buildings should provide free to enter publicly-accessible areas.

18. Security

- 18.1. London Plan Policy D11 ('Safety, security and resilience to emergency') states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
- 18.2. Local Plan Policy CS3 ('Security and Safety') seeks to ensure that the City is secure from crime, disorder, and terrorism. Local Plan Policy DM3.2 (Security measures in new developments and around existing buildings) seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 (Crowded places) requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.
- 18.3. Strategic policy S2 of the emerging City Plan 2040 sets out how the City would work with the City of London Police, the National Protective Security Authority (NPSA) and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, by ensuring that development proposals design out crime, encourage a mix of uses and natural surveillance of streets and spaces.
- 18.4. Safety and security of a development is enhanced where there is adaptability within the space to manage changes in security needs. During the operational phase, areas within the public realm would be well-lit, with active frontages providing passive surveillance, in addition to the presence of building management personnel.
- 18.5. Security proposals to protect the building, its users, and new areas of public realm have been developed in consultation with the City of London Police (COLP), and British Transport Police (BTP) through the pre-application and application stage.

- 18.6. Where 'terrorism' has been identified to be a potential direct or indirect threat to the development, appropriate improvements to vehicle management, structural design, façade glazing systems, Hostile Vehicle Mitigation (HVM) strategies and lockdown incident management strategies would be applied as required. The proposals use a mix of physical interventions such as planters, landscaping, and bollards, and technological means such as the use of video surveillance systems (VSS), and access control measures, incorporated into the design of the built form alongside operational security measures to promote a safe and secure sense of wellbeing for users operating within, and reduce potential opportunities for crime and anti-social behaviour occurring around the site.
- 18.7. The proposed security measures are designed to limit access to areas beyond the public realm through the use of certified intrusion resistant doors and window schemes and building access controls with anti-tailgating features. The design of the public realm in (Hope Square, Bishopsgate, Sun Street Passage and Exchange Square) incorporates spatial features through landscaping and a reduction in areas of concealments and dead spaces, thereby improving natural surveillance across the site and reducing the overall potential of antisocial activity.
- 18.8. Given the site's critical national infrastructure status, UK terrorism threat levels were also considered. Vehicle-borne threats, including Vehicle Borne Improvised Explosive Devices (VBIEDs) and vehicle-as-a-weapon attacks, were identified as credible risks, highlighting the importance of Hostile Vehicle Mitigation (HVM) design. Key HVM design considerations include:
- Controlled access for authorised vehicles within the building curtilage (e.g., deliveries).
 - Emergency vehicle access plans (e.g., retractable bollards).
 - General vehicle access management (e.g., barriers, Automatic Number Plate Recognition (ANPR)).
 - Creation of stand-off areas with bollards.
 - Pedestrian area protection (e.g., vehicular access restriction, bollards).
 - Analysis of potential vehicle attack routes.

- 18.9. Robust physical security measures, aligned with Security in the Design of Operational Sites (SIDOS) guidance, will be designed into the project. Specification recommendations ensure the following elements can withstand attack, provide delay, and limit blast damage:
- Doors and turnstiles
 - Glazing
 - Balconies and balustrades
 - Walls and HVAC systems
- 18.10. Electronic security systems will deter and protect the site from crime and provide post-incident data. Extensive zoning defines public, private, and restricted areas, informing the electronic security design. Key electronic security measures include:
- Video Surveillance System (VSS) with coverage of high-risk/priority areas, featuring appropriate image quality specifications
 - Automated Access Control Systems (AACS) to restrict access, provide audit trails, and support dynamic lockdown procedures
 - Intruder Detection Systems (IDS) to enhance security in unoccupied spaces
 - Integration of all systems within a Security Control Room, utilising a Physical Security Information Management (PSIM) system for efficient alarm handling
- 18.11. The proposed servicing strategy would separate vehicle servicing access from areas of high pedestrian footfall or dwell spaces as far as possible, allowing the public realm to perform a variety of functions without being disturbed by the presence of large vehicles. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that would preserve safety and quality, without disturbance or inconvenience of the surrounding public realm, in accordance with London Plan (2021) Policies D3 (4) and D9.
- 18.12. Safety and security of a development is enhanced where there is a clear understanding of what space is to be used for, and where a sense of ownership is fostered. The development has been designed to be welcoming to both visitors and legitimate, authorised users, through active signposting, and clear demarcation of circulation across the public realm along New Union Street, Moorfields, City Point Plaza, and Moor Lane. They have been designed to be inclusive and have access features such as gentle gradients, suitable surfaces, rest points and good lighting.
- 18.13. Further details of Hostile Vehicle Mitigation (HVM) measures, informed by Explosion Consequences (ECA) and Vehicle Dynamics Assessments (VDA), are secured by condition, and a Public Realm Management Plan to be secured via s106 obligation would detail more specifically the measures to protect the building and its different user groups.

- 18.14. The proposal, subject to the above conditions would be in accordance with Local Plan Policies DM3.2 and DM3.3. The proposals are considered to be in accordance with City of London Local Plan (2015) Policy CS3, and Strategic policy S2 of the emerging City Plan 2040.

19. Suicide Prevention

- 19.1. Local Plan Policy CS3 requires that security and safety measures are of an appropriate high-quality design. Policy DM 3.2 of the adopted Local Plan 2015 ('Security measures in new developments and around existing buildings') aims to ensure that appropriate security measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm.
- 19.2. Policy DE4 (Terraces and Elevated Public Spaces) of the emerging City Plan 2040 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling.
- 19.3. The City Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrent capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.
- 19.4. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building Regulation K2 states the following:
- (A) Any stairs, ramps, floors and balconies and any roof to which people have access, and
 - (B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.

- 19.5. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS 6180: Barriers in and around buildings.
- 19.6. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advises a barrier height of at least 2.5 metres high, no toe or foot holds, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with Building Regulation standards and, where feasible and practical, consider providing a barrier in line with UKHSA guidance. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to adverse weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.
- 19.7. At Liverpool Street Station and the OSD, potential risk areas include the lower garden area, roof top garden, and railway concourses. Physical barriers, such as strategically designed balustrades, are crucial. Other deterrents such as prickly plants, good lighting, and crowd control measures including on site security and CCTV, are to be incorporated where appropriate. These risk areas have been defined and assessed in consultation with City of London as part of the pre-application consultation process, and solutions have been agreed and applied to the areas identified.

- 19.8. The balconies and terraces of office floors from Levels 04 to 17 would operate with restricted access to tenants only. The balustrades on all balconies from level 04 to 17, are at a height of 1.1m. The 18th floor roof terrace is surrounded by a 2.5m high screen along with low-growing dense planting to restrict access to the edge of the building. The balconies are arranged to be directly overlooked by the adjacent internal workspace, providing direct human surveillance to these areas. Further measures include suitable lighting and CCTV provision to further augment the opportunities for human intervention.
- 19.9. The applicant agrees to provide a Suicide Prevention Strategy and Management Plan for tenants that aim to reduce the risk of suicide. The Management Plan would include the following details: (i) Signposting to appropriate support services for those who intervene/witness a suicide or discover a body, (ii) Collect data to audit and mitigate risk factors, (iii) Conduct regular reviews of the suicide risk assessment and monitor performance, (iv) Implementation of suicide mitigation measures including adequate information, (v) training, and record keeping and maintenance, (vi) Support employee welfare including an Employee Assistance Programme. This is secured by condition along with details of balustrade height and design.
- 19.10. A combination of physical barriers, staff training, and surveillance are proposed to maximise the effectiveness of preventative measures, including measures that increase the potential for human intervention. In all instances the height of the proposed barriers and other measures are adequate, balustrades would exceed the minimum required by Building Regulations and seek to provide heights in line with the Suicide Prevention PAN, and as such would comply with the relevant development plan policies notably DM3.2. of the Local Plan (2015) and policies DE2 and DE4 of the draft City Plan 2040.

20. Health Impact Assessment

- 20.1. Local Plan policy... Policy HL9 of the emerging City Plan 2040 requires major development to submit a Healthy Impact Assessment (HIA) to assess potential health impacts resulting from proposed developments.

- 20.2. Policy GG3D of the London Plan states that “to improve Londoners’ health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help to reduce health inequalities, for example through the use of Health Impact Assessments”.
- 20.3. The application is accompanied by a Health Impact Assessment (HIA) ‘Appendix 13-1: Health Impact Assessment, prepared by AECOM, dated March 2025’, assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health effect.
- 20.4. The HIA has been based on the City of London’s Health Impact Assessment Guidance note (2021) and the London Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on wider determinants of health. The HIA concludes that the development overall has a beneficial impact on health and wellbeing for people on-Site and in the surrounding area. Beneficial effects include:
- Significant capacity and accessibility improvements at Liverpool Street Station – eight new lifts; wider stairs; step-free access; new accessible station facilities; new station seating; and a new indoor bus waiting area;
 - Expanded and improved public realm at Hope Square, Bishopsgate, Sun Street Passage and Exchange Square – providing opportunities for social interaction and relaxation;
 - A 1,910 sqm new public roof garden including recreation areas and playable space for children;
 - Biodiversity improvements – 157 trees to be planted; 213 sqm net additional street level green surface cover; 2,550 sqm softscape across the roof garden and office terraces;
 - Regular use of the new rooftop auditorium space by local community groups and schools;

- Measures that support active travel modes including walking and cycling – improved public realm; legibility and permeability through the Site and beyond; new cycle parking; and shower facilities (for office users);
- An average of 729 full-time equivalent (FTE) construction-related jobs per year – in the local economy and supply chain over the c.7-year construction period;
- Between 6,025-6,061 net additional jobs in the completed station and office development – including in the local economy and supply chain – in a sustainable, highly accessible area of London; and
- Approximately £130.8 million per year gross value added (GVA) expected to be generated in the local economy during the construction phase

- 20.5. The main potential adverse health impacts are associated with the demolition and construction phase of the Proposed Development and include planning potential noise and air quality impacts associated with dust. A detailed Construction and Environmental Management Plan (CEMP), or similar, will be produced and agreed with the Local Planning Authority prior to the commencement of construction works, setting out detailed measures to minimise adverse noise, vibration and air quality impacts. The necessary pre-construction assessments are secured by conditions.
- 20.6. The HIA proposes recommendations with the aim of ensuring the potential benefits of the proposed development are maximised, for example by continuing to engage with operational phase users and the local community to ensure changing needs are met and committing to local procurement, training and employment agreements.
- 20.7. Potential impacts identified would be mitigated as so far as possible by the requirements of relevant conditions and obligations within the S106 agreement.
- 20.8. Overall, it is considered that the development seeks to improve the health and address inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan Policy GG3 and emerging City Plan Policy HL9.

21. Fire Safety

- 21.1. Strategic Policy S2 (Safe and Secure City) of the emerging City Plan 2040 requires development proposals to meet the highest standards of fire safety. Major development proposals must submit a Fire Statement setting out how the development will address fire safety in the design, construction and operation of the building for all building users, including safe and dignified emergency evacuation. A Fire statement has been submitted outlining the fire safety strategy for the building. As confirmed by the GLA in their Stage 1 response, the submitted Fire Statement is in accordance with policies D5 and D12 of the London Plan. The Fire Statement is therefore adequate for the planning stage and further detail is secured by condition.

22. Assessment of Public Benefits and paragraph 215 NPPF balancing exercise

- 22.1. Under s66 (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 Corporation shall have special regard to the desirability of preserving the building/s or its/their settings or any features of special architectural or historic interest which they possess.
- 22.2. Under section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 when considering whether to grant planning permission the Corporation shall pay special attention the desirability of preserving or enhancing the character or appearance of a conservation area, in this case the Bishopsgate Conservation Area.
- 22.3. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paragraphs 212 and 213).

22.4. The proposal would cause a range of harms, all of which have been assessed to be of a level of less than substantial harm. These are as follows:

- Liverpool Street Station (grade II), high level of less than substantial harm (direct impact)
- Former Great Eastern Hotel (Grade II*) – moderate level of less than substantial harm (indirect setting impact)
- Bishopsgate Conservation Area – moderate level of less than substantial harm (direct and indirect setting impact)
- St Botolph Bishopsgate – low level of less than substantial harm (indirect setting impact)
- St Botolph Church Hall – low level of less than substantial harm (indirect setting impact)
- St Paul's Cathedral (grade I) – low level of less than substantial harm (indirect setting impact)
- St Mary-le-Bow (grade I) – slight level of less than substantial harm (indirect setting impact)
- St Augustine Watling Street (grade I) – low level of less than substantial harm (indirect setting impact)
- Christchurch Spitalfields (grade I) – slight level of less than substantial harm (indirect setting impact)

22.5. Whilst in each instance the harms are considered to be clearly and convincingly justified and minimised through good design, these instances of harm nevertheless remain.

22.6. The proposal would trigger paragraph 215 of the NPPF, which states 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

22.7. Within the statutory process and under NPPF policy the decision-maker must adopt a sensible approach to assessing likely harm to the significance of a listed building and weighing that harm against the benefits. The decision maker does not have to go about balancing harm against benefits in a particular way.

- 22.8. As the two statutory duties set out above are engaged, when carrying out the balancing exercise the Corporation must give considerable importance and weight to the desirability of preserving the settings of the listed buildings and to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 22.9. The National Planning Practice Guidance states that “public benefits...could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to the genuine public benefits”.
- 22.10. In accordance with NPPF para. 217 which states that *‘Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred’*. A series of pre-demolition planning conditions, and s106 obligations will be attached to ensure that the demolition of listed fabric will not occur outside of a works contract, through Grampian pre-commencement requirements requested by TfL to enter Asset Protection, Development Agreement (DA) and Temporary & Permanent s278 Agreements, and to secure the careful deconstruction of listed fabric, and storage of elements to be relocated on site.
- 22.11. The key social, environmental and economic public benefits of the proposal are considered to be as follows:

Economic Benefits:

- 22.12. Securing a strategic mixed-use development including c. 88,000m² of office floorspace in an eminently well-connected location, supporting the diversification, vitality and growth of the City of London as a 24/7 world class business destination, securing a significant contribution to the City of London economic base which is of UK-wide importance, including provision of circa 6,025 FTE positions, and increased spending in the locality, boosting local businesses.

- 22.13. Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with new active street frontages, through the provision of c. 11,000m² of high-quality retail floorspace within an identified Principal Shopping Centre. Occupiers on site and in the locale would benefit from the increase in footfall, particularly outside of peak commuting times, and the high-quality amenities provided by the proposed development as well as provide amenity space for the wellbeing of workers, residents and visitors.
- 22.14. The overall quality of the development, improved public realm and proposals offer would attract visitors, increase tourism, support and improve worker productivity.
- 22.15. Investment into the station to deliver enhancements, with multiplied effects through construction spend and source as partially secured through s106 obligations related to local procurement strategies, delivered for the use of the public free of charge and transformatively improving the Station, with an estimated construction cost of c. £395 million pounds excluding inflation for these elements of the proposed works.
- 22.16. Collectively, but primarily the investment into the station and its associated construction spend, then associated with the delivery of Grade A office floorspace and the resulting employment provision across the development, these benefits are attributed a **Substantial** level of weight.
- 22.17. **Environmental Benefits:**
- 22.18. It would deliver growth in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- 22.19. Improved station permeability across all elevations and entrances, including the provision of two new internal station routes connecting to the north of station and creating level access with Exchange Square; and improved vertical circulation with the station, with the provision of additional lifts and escalators between concourse levels.
- 22.20. Step free access to London TFL underground lines.
- 22.21. Step free access to all station entrances.

- 22.22. The scale and generosity of proposed station entrances, in addition to the clarity/decluttering of the public realm at their forecourts, enabling greater views into the heart of the station, and the public/civic character of entrances which make the legible in the streetscape.
- 22.23. Improvements to the bus station interface with station, and enhancement of bus waiting facilities within the upper concourse.
- 22.24. The redesign and relandscaping of Sun Street Passage to provide a step free connection between Station and Exchange Square, in addition to providing greater urban greening, and public seating;
- 22.25. A substantial relative uplift in urban greening, including significant increases in tree planting within the public realm at street level, at station entrances and along Sun Street Passage, providing a healthy, sustainable and biodiverse environment for all to access; including the incorporation of historic monuments and other uses which would benefit the wider area.
- 22.26. Removal of modern 1990s gallery level retail units, and the creation of new unobstructed views of the historic Station train sheds, and rear elevation of the Former Greate Eastern Hotel, enabling greater appreciation of the assets architectural and historic interest
- 22.27. Removal of discordant modern insertions at the lower concourse level, including the 2013 ticket hall, station reception building, as well as signage and staircases.
- 22.28. Repair and reinstatement of features achieved through the re-opening of windows in western trainshed walls, restoring original extent of glazing, the re-painting of station interior to historic colours, and the reinstatement of historic cartouches to Bishopsgate entrance;
- 22.29. Improved siting of the war memorial, London Society of East Anglians Memorial, and the Great Eastern Railway War Memorial
- 22.30. Improved siting of Kindertransport sculpture within Hope Square.
- 22.31. Improved interface action between station and northern elevation of hotel, better revealing architectural significance and extent of historic fabric at ground floor.

- 22.32. The provision of new viewing experiences from the public roof garden to the historic station train shed and views towards St Paul's Cathedral.
- 22.33. Re-siting and public display of historic station features and within the proposed public roof garden, restoring historic features to the site.
- 22.34. Improvements delivered to enhance passenger flow, reduce congestion within the station, and enhance multimodal connectivity by integrating pedestrian, cycling, and public transport access and improve accessibility, thereby ensuring a seamless travel experience for thousands of daily users. These improvements will also make a significant contribution to the Liverpool Street Area Healthy Streets Plan.
- 22.35. Collectively these benefits are attributed a **Substantial** level of weight.

Social Benefits:

- 22.36. The provision of a new c. 1,900sqm public Roof gardens with public toilet facilities
- 22.37. Cultural and programmable events in public roof garden
- 22.38. The proposals would enhance the inclusivity and accessibility of the station through the provision of accessible toilet facilities within the Station, in locations close to entrances and station platforms, as well as quiet seating areas and family room, customer and assistance travel lounges, baby change facilities, a Multi Faith space, a Quiet 'corner' and a mix of seating and rest points around the station.
- 22.39. The provision of four new Changing Places toilets: two at the station, one within the over-station development and one at its roof terrace level.
- 22.40. The provision of two Disabled Parking bays.
- 22.41. The provision of a new cycle hub, with new long-term storage for larger and adapted cycles.
- 22.42. Better visual connectivity to taxi drop-off and bus stops, with improved bus passenger waiting areas and access to information.

- 22.43. Enhancements to the siting and public understanding of station war memorials and sculptures.
- 22.44. The proposal would contribute towards affordable housing by making a contribution of £4,490,442.
- 22.45. Collectively these benefits are attributed a **Substantial** level of weight.

Non-Designated Heritage Assets

- 22.46. Harm has also been identified to a number of non-designated heritage assets, as follows:
- 50 Liverpool Street - total loss
 - Hope Square - total loss
 - Bishopsgate Churchyard - low level of harm (indirect setting impact)
- 22.47. NPPF para 216 states that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The harms identified would be outweighed by the benefits flowing from the development, as identified above.

Conclusion

- 22.48. When applying the policy in paragraph 215 of the NPPF, the above-mentioned public benefits are to be weighed against the less than substantial harm to the significance of designated heritage assets which has been identified in this report.
- 22.49. Great weight is to be given to the conservation of the designated heritage assets, and considerable importance and weight is to be given to the desirability of preserving the settings of the listed buildings and to the desirability of preserving or enhancing the character or appearance of the conservation area.

- 22.50. It is the view of officers that ascribing weight to the public benefits as set out above, including delivering accommodation for City type businesses thereby contributing to economic growth, and other social and environmental benefits, and giving great weight to the conservation of designated heritage assets and therefore to the less than substantial harm to their significance and considerable importance and weight to the desirability of preserving the listed building and its setting and to the desirability of preserving or enhancing the character or appearance of the Bishopsgate Conservation Area, the public benefits of the proposal outweigh the harm to significance of designated heritage assets as identified in this report. In addition those public benefits are considered to outweigh the harm to the significance of the non-designated heritage assets.
- 22.51. On that basis there is clear and convincing justification for the harm, and the presumption against granting planning permission is rebutted, the outcome of the paragraph 215 NPPF heritage balance falls in favour of the proposal, and policies D9C(1)(d) in the London Plan, and HE1(2) in the emerging City Plan 2040 are also complied with.

23. CIL and Planning Obligations

- 23.1. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. The proposal would also result in payment of the Community Infrastructure Levy (CIL).
- 23.2. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
- 23.3. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy Regulations 2010 (as amended).
- 23.4. CIL contributions and City of London planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring	Payment Terms
MCIL2 payable	£16,275,695.35	£15,624,667.54	£651,027.81	In accordance with the approved phasing condition

City CIL

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring	Payment Terms
City CIL	£6,803,550.00	£6,463,372.50	£340,177.50	In accordance with the approved phasing condition

S106 Planning Obligations

City Planning Obligations				
	Contribution (excl. indexation)	Available for allocation	Retained for monitoring	Payment Terms
Affordable Housing	£4,535,700.00	£4,490,343.00	£45,357.00	Upon implementation of the Over Station Development
Local, Training, Skills and Job Brokerage	£2,721,420.00	£2,694,205.20	£27,214.20	Upon implementation of the Over Station Development
Carbon Offset Contribution (<i>as designed</i>) <i>Not indexed</i>	£1,060,770.00	£1,060,770.00	£0.00	Upon completion of the development

Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£250,000.00	£250,000.00	£0.00	Upon commencement of the development
Security Measures Contribution	£907,1460.00	£898,068.60	£9,071.40	Upon implementation of the Over Station Development
S106 Monitoring Charge	£7,750	£0.00	£7,750	Upon commencement of the development
Total liability in accordance with the City of London's policies	£ 9,482,780.00	£9,393,387.40	£89,392.60	

23.5. The sums to be paid in CIL are to be taken into account as local finance considerations.

23.6. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations (*Highways Schedule of Condition Survey, site access, consents, licences etc*)
 - *Prior to first preparatory operations.*
- Local Procurement Strategy
 - First submission no later than 8 weeks prior to Commencement of Station works (demolition)
 - Second submission no later than 8 weeks prior to Implementation of Station works (construction)
 - Third submission no later than 8 weeks prior to implementation of Over Station Development (construction)
- Local Training, Skills and Job Brokerage (*Demolition / Construction*)
 - First submission no later than 6 weeks prior to first Preparatory Operation (demolition)
 - Second submission no later than 6 weeks prior to Implementation of the station works (construction)

- Third submission no later than 6 weeks prior to Implementation of the Over Station Development (construction)
- Delivery and Servicing Management Plan (*including Consolidation*),
 - In relation to the retail within the Station (not including Pindar Street servicing bay) - to include but not be limited to the following provisions:
 - No servicing within the hours of:
 - 0600 – 1000 Monday to Sunday
 - 1200 – 1400 Monday to Sunday
 - 1600 – 1900 Monday to Sunday
 - No servicing with goods vehicles greater than a length of 10 metres
 - No unconsolidated deliveries using goods vehicles
 - Details of pre-booking system to be used by all goods vehicles servicing the site
 - The use of cargo bike deliveries or on foot wherever possible
 - A maximum of 38 deliveries by service vehicles (38 arrivals and 38 departures) trips per day
 - Annual monitoring submissions for the first five years after approval of the Delivery and Servicing Management Plan
 - In relation to the Over Station Development - to include but not be limited to the following provisions:
 - No servicing within the hours of:
 - 0600 – 1000 Monday to Sunday
 - 1200 – 1400 Monday to Sunday
 - 1600 – 1900 Monday to Sunday
 - No servicing with goods vehicles greater than a width of 10 metres
 - No unconsolidated deliveries using goods vehicles
 - Details of pre-booking system to be used by all goods vehicles servicing the site
 - The use of cargo bike deliveries or on foot wherever possible
 - A maximum of 91 deliveries by service vehicles (91 arrivals and 91 departures) per day
 - Submission no later than 3 months prior to first Occupation of the Over Station Development.
 - Annual monitoring submissions for the first five years after approval of the Delivery and Servicing Management Plan
 - A maximum of 7 refuse collection trips (7 arrivals and 7 departures) per day for both the Station and Over Station Development
- Travel Plan (including Cycling Promotion Plan)
 - Submission no later than 3 months prior to Occupation of the Over Station Development.
- Cycle Promotion Plan
 - Submission of an interim plan upon completion of the Cycle Hub.
 - Submission of a full Cycle Promotion Plan no later than 6 months after Completion of the Cycle Hub
- Construction Monitoring Costs (City Environmental Health)
 - £53,820 upon commencement of the Station works

- £46,460 upon the anniversary of commencement of the development until practical completion of the Over Station Development.
- TfL Cycle Hire Contribution
 - £220,000 upon commencement of the Over Station Development
- Legible London Contribution – £58,000 (indexed)
 - To be paid upon implementation of the Over Station Development.
- Carbon Offsetting Document Submissions
 - Submission no later than 8 weeks prior to occupation of the Over Station Development
- 'Be Seen' Energy Performance Monitoring
 - Submission no later than 8 weeks prior to occupation of the over Station Development
- Utility Connection Requirements
 - Submission prior to implementation
 - To include all proposed new utility connections, communal entry chambers, proposed service providers and anticipated volume of units required.
 - To also include a draft programme for ordering and completion of service connections from the utility service providers.
- Provision of Changing Places, Accessible Public Toilets and associated management plan to include following provisions
 - Submission of Management Plan no later than 3 months prior to the anticipated opening of the first toilets.
 - Management plan to include commitments to the following:
 - Free of charge access to members of the public.
 - A Cleaning regime by the owner
 - Hours of operation to align with station opening hours
 - Maintenance and security arrangements by the owner
 - Toilets to be open as soon as practicable
- Section 278 Agreement (CoL)
 - Scope to include but is not limited to:

Liverpool Street

- Reinstatement of the highways upon completion of construction works, in standard materials to deliver a pedestrian priority area, as per the Liverpool Street Area Healthy Streets Plan
- Reinstatement of road markings, upon the completion of construction works
- Reinstatement of street furniture (if applicable), upon the completion of construction works
- Reviewing of the existing on-street cycle parking arrangements
- Reviewing the current on-street parking arrangements and traffic orders to explore the possibility of introducing additional disabled bays, in line with the proposals.

Old Broad Street

- Reinstatement of the highways upon completion of construction works, in standard materials to deliver a pedestrian priority area, as per the Liverpool Street Area Healthy Streets Plan
- Reinstatement of road markings, upon the completion of construction works
- Reinstatement of street furniture, upon the completion of construction works

Primrose Street

- Provision of a cycle access to create a link between Primrose Street and the new cycle parking facilities located within the Station
- Provision of cycle parking and scooter parking, subject to feasibility and detailed design.
- Section 278 Agreement (*Transport for London*), *indicative scope*:
 - Provision of Temporary pit lane and associated works on the A10 to accommodate construction works
 - Permanent provision for cycle improvements at the A10/Primrose Street junction
 - Highway modelling to TfL standards, informing the design process; auditing and approval by TfL as the highway authority for the A10;
 - To be designed, assessed and implemented with costs to be met by the developer.
- Provision of Public Route from Liverpool Street Station to Exchange Square (Specification, Public Access & Management Plan)
 - Management Plan to be submitted no later than 6 months prior to completion.
 - Management Plan to include details of typical maintenance schedule, security arrangements, etc.
 - To be open no later than completion for 24 hours a day save for force majeure, cleaning, maintenance, security, Network Rail operations.
- Provision of Public Roof Terrace and Auditorium (*Public Access & Management Plan*)
 - Roof terrace to be open free of charge to the public between the following hours
 - Mondays - Public access to 50% of the terrace between 10:00 and 18:00 or nautical dusk, whichever is earlier
 - Tuesdays - Public access to 50% of the terrace between 10:00 and 18:00 or nautical dusk, whichever is earlier
 - Wednesday - Public access to 50% of the terrace between 10:00 and 18:00 or nautical dusk, whichever is earlier
 - Friday – Public access to 100% of the terrace between 10:00 and 19:00 or nautical dusk, whichever is later
 - Saturday – Public access to 100% of the terrace between 10:00 and 19:00 or nautical dusk, whichever is later
 - Sunday – Public access to 100% of the terrace between 10:00 and 19:00 or nautical dusk, whichever is later
 - Management Plan must include details of:
 - Security arrangements
 - Marketing
 - Details of curation for publicly accessible events (as appropriate)
 - Adherence to best practice regarding suicide prevention measures
 - Visitor management arrangements

- Management Plan to be submitted no later than 6 months prior to occupation.
- Roof Terrace must be open upon first occupation of the over station development.
- Public Realm Space (*Public Access & Management Plan*)
 - Management Plan to be submitted no later than 6 months prior to completion.
 - Management Plan to include details of typical maintenance schedule, security arrangements, etc.
 - To be open no later than completion for 24 hours a day save for force majeure, cleaning, maintenance, security, Network Rail operations.
- Telecommunications Interference Survey
 - Submission of first survey no later than 8 weeks prior to commencement of the Station works
 - Survey must identify sensitive receptors within a reasonable distance of the development site.
 - Submission of second survey upon practical completion of the Over Station Development
 - To identify impacts caused by the development to television, radio and 4G/5G reception to sensitive receptors identified in the first survey.
 - Mitigation measures in the event of significant deterioration in the broadcast reception of identified sensitive receptors.
- Wind Audit
 - Upon request by the City of London within 5 years of practical completion.
- Solar Glare
 - Upon request by the City of London within 5 years of practical completion.
- Phasing of Development
 - Submission of a development programme
 - BNG – Habitat Management and Monitoring Plan, including monitoring fee
 - Developer Agreement and Asset Protection Agreement (TfL)
 - Retention of Project Architect
 - Retention of Accessibility Consultant and consultation with access steering group for the entirety of the development process

23.7. Officers request to be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement, the scope of which is listed above.

Monitoring and Administrative Costs

23.8. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

23.9. The applicant will pay the City of London's legal costs and the City Planning Obligations Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

23.10. Also recommended is the following informative:

Informative – 005B

Informative 005B - CIL

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sqm

Retail £165 sqm

Hotel £140 sqm

All other uses £80 per sqm

These rates are applied to "chargeable development" over 100sqm (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sqm for offices, £150 per sqm for Riverside Residential, £95 per sqm for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: <https://www.planningportal.co.uk/planning/policy-and-legislation/CIL/download-the-forms>)

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

24. Public Sector Equality Duty (section 149 of the Equality Act 2010)

- 24.1. In consideration of the proposed development, the Public Sector Equality Duty (PSED) requires the City of London to consider how the determination of the application would affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 24.2. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
- 24.3. It is the view of officers that a decision to grant permission would remove or minimise disadvantages suffered by persons who suffer from a disability including mobility impairment. In particular, the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability, whether you are pregnant, race, sex, sexual orientation and gender reassignment and marital status. This would be achieved through measures such as the extensive creation of step-free access across the application site, among other measures related to accessibility and inclusivity within the relevant section of the report above.
- 24.4. It is recognised that noise and disturbance during construction may have a disproportionate impact on certain groups. These points have been considered in the Transport and Accessibility sections of the report and conditions are recommended to mitigate the impacts so far as possible.

- 24.5. The applicant has supported their application with the submission of an Equalities Impact Statement. It highlights that the applicant, as a public body, has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED). It details an assessment of the positive and negative equalities impact of the proposal, and concludes with a summary of these impacts as well as how the applicant has demonstrated due regard to their PSED through the planning application stage.
- 24.6. It is noted that the Equality Act carries ongoing responsibilities which will continue once the development is complete. As part of considering the design of the building and the physical environment, the property management team for the building and public spaces will need to have suitable management policies and procedures to ensure the obligations of the Act are met once the building is in operation.

Human Rights Act 1998

- 24.7. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).
- 24.8. Insofar at the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential properties including by reason of loss of light or privacy. This report assesses above these impacts, in line with the relevant Local, London and emerging City Plan policies, as well as those of the NPPF. It is considered that the public benefits of the scheme, including the substantial improvements to Liverpool Street Station for all future users, alongside the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace and contributing to the City's primary business and professional services function, outweighs the adverse impacts on nearby properties and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.

- 24.9. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is also the view of officers that such interference is in the public interest and proportionate and strikes a balance between the competing interest of the land owners and community as a whole.

25. Conclusion and Overall Planning Balance

- 25.1. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF (and draft NPPF), the emerging City Plan, and considering all other material considerations. The determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 25.2. This application relates to the site at Liverpool Street Station, including Sun Street Passage to its west, Hope Square, 40 Liverpool Street and 50 Liverpool Street at its south, and Bishopsgate Plaza to its east. The site is partially located in the Bishopsgate Conservation Area, and impacts Liverpool Street Station as a Grade II listed building as well as 40 Liverpool Street – the former Great Eastern Hotel – as a Grade II* listed building.
- 25.3. The proposals, in summary, comprise the transformative and substantial upgrade to Liverpool Street Station and its interchanging modes of transport represented by the TfL lines it serves, alongside the erection of an Over Station Development intended to fund these improvement works. The proposal comprises these works, the Over Station Development as a high quality office development, as well as an improved retail offer within the Station, and an extraordinary new publicly accessible elevated space, featuring space for future office users through provision of an auditorium at the same level, which would then be free to use by the public on Friday, Saturday and Sunday.

25.4. The improvements to the Station and interchange include:

- Creation of fully accessible routes through the station from the upper concourse level
- Enhanced gatelines and circulation spaces, allowing for concourse capacity to be streamlined and increased
- Introduction of a Network Rail control centre, integrated within the station for improved operation
- Extension and upgrade to the Bishopsgate and Hope Square entrances responding to desire lines and passenger flow to improve movement and therefore capacity within the Station

25.5. These Station enhancements would be delivered alongside improvements to capacity and pedestrian flow within the station, modelled to accommodate projected increases in capacity up to the year 2040 and including a further 35% uplift in needed capacity to ensure the measures serve passengers past this date.

25.6. The proposed significant improvements to accessibility within the station include all primary entrances to the Station being upgraded to be step-free, including step-free access through TfL Ticket Hall B, a fully accessible route achieved from the lower concourse and upper concourse level to the platforms servicing the Central Line via TfL Ticket Hall C, four new passenger lifts within the Station - sized to accommodate wheelchair users and users with buggies/prams - two new passenger lifts at TfL Ticket Hall A providing step-free access to the Metropolitan, Hammersmith & City and Circle lines, one new passenger lift within Ticket Hall C at lower concourse level and one associated new passenger lift at basement level to provide step-free access to the Central line.

- 25.7. A substantial number of objections have been received against the proposals, including circa 2,100 from members of the public, as well as objections from amenity societies including the Victorian Society, the Georgian Group, the Twentieth Century Society and SAVE Britain's Heritage, among others, and an objection from the Surveyor to the Fabric of St. Paul's Cathedral. These objections related to the scale and massing of the Over Station Development, stating their position that the Over Station Development resulted in harm to a range of heritage assets by virtue of its bulk and dominance, as well as objecting to the partial demolition of the existing 1990's concourse roof and at times objecting to what they considered to be the unnecessary demolition of 50 Liverpool Street. A range of these same groups echoed the objections of the Surveyor to the Fabric of St. Paul's Cathedral, that the bulk and massing of the proposed Over Station Development would see it harm the ability to appreciate St Paul's Cathedral as a Strategically Important Landmark through eroding the legibility of part of it in strategic views. Historic England confirmed in their responses that they considered the proposals to result in a high level of harm in the range of less than substantial, while confirming that their comments did not form an objection.
- 25.8. Of local stakeholders, Hyatt International submitted objections to the proposal, as occupiers of 40 Liverpool Street (the Andaz, or former Great Eastern Hotel). Their objection included criticism of the sustainability of the proposed development, its necessity and its efficacy, whether the development could be financially viable, and ultimately the harm it would cause to the operation of the Andaz Hotel in terms of its proximity to existing bedrooms served by a window in the north elevation, noise and vibration impacts during construction and during operation, loss of daylight and sunlight, and increase in light spill.
- 25.9. The application was also subject to circa 1,100 letters of support, welcoming the improvements to the station in terms of accessibility and inclusivity, and improvements in passenger experience, capacity, wayfinding, and public realm. Additionally, matters related to the economic benefits of the proposal were subject of letters of support, as was the proposed sustainability and energy performance of the proposed, and the design quality of the proposed Over Station Development.

- 25.10. The proposed development would secure a significant increase of best-in-class, next-generation workspace, in an eminently sustainable location. The scheme complies with Policy E1, E2, GG2, GG4, SD4 and SD5 of the London Plan, CS1, CS5, DM1.2 and DM1.3 of the Local Plan 2015, as well as S4 and S25 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a considerable uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre
- 25.11. The proposal would expand and improve the retail offer at the Station when compared to the retail floorspace currently provided on site. The proposed units would be of an improved design and layout, with the existing retailing being poorly designed and inappropriately positioned within the Station. New retail uses would also be introduced at upper concourse level and span south from the concourse itself to the north along the trainshed walls and alongside the new routes from the upper concourse to Exchange Square. Additionally, this is achieved at a site lying within the Principal Shopping Centre, at the southern part of the site, and therefore being considered town centre development in the context of national and regional retailing policies and guidance. As such, the proposed retail uses comply with adopted Local Plan policies, London Plan policies, and the NPPF and emerging City Plan 2040.
- 25.12. In achieving these policy aims, the proposal would deliver an uplift of c. 86,000m² of best-in-class office space, and c. 2,000m² of improved retail floorspace.
- 25.13. The proposals would optimise the use of land, delivering high quality office space. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies relating to design, including, DM3.3, CS7, CS10, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8, DE2, DE3, DE4, S21, OS1, S14, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6.

- 25.14. A small part of the application site is within the Bishopsgate Conservation Area, an area identified as inappropriate for tall building development in Local Plan policy CS14 (2). As such, the proposals would conflict with that policy, and consequently with D9 B (3). Further, the proposal would cause harm to the Bishopsgate Conservation Area although, as set out above, the proposal has clear and convincing justification, alternatives have been explored, and there are clear public benefits which outweigh the harm. This would mean compliance with D9 C (d), but conflict with draft City Plan S12 8 (c).
- 25.15. The majority of the application site is located outside the Conservation Area and, in its entirety, falls outside the Eastern/City Cluster delineated in the 2015 Local Plan as suitable for tall building development. It is also outside the Tall Building Areas in the draft City plan 2040. While this could also represent conflict with D9 B (3), it is also noted that policy CS14 (3) allows for consideration of the suitability of other sites for tall buildings outside the Cluster, having regard to skyline, character and amenity and heritage impacts. These have been assessed above in the sections on D9 C and D. As set out above, the proposals would comply with all parts of D9 C and D except for part C1 (a) (i) in relation to long-range views, as a result of its impacts upon the skyline silhouettes of St Paul's Cathedral, St Augustine and St Mary-Le-Bow. 12.95. While not particularly conspicuous, these impacts would still lead to adverse effects on the viewing experiences in question and lead to non-compliance with C1 (a) (i) and with draft City Plan policies 8 (a) and 10 (b) on the same theme. The proposal would not otherwise have a particularly prominent skyline presence, being frequently masked by intervening development, but it would have an elegant and refined skyline presence in the limited instances where it is particularly visible (Hungerford Bridge).
- 25.16. In sum, the proposal would have both adverse and beneficial effects on the skyline as a whole; it would also lead to the heritage impacts detailed above; but it would have largely beneficial effects on the character and amenity of its surroundings. This question of the overall suitability of the site for a tall building, as borne out by the tests in Local Plan policy CS14 (3) – and hence D9 B (3) – is a considerably nuanced one. Ultimately, whilst recognising the harmful heritage impacts that would arise from the proposals, officers do not consider these to be individually, or in sum, of the order of magnitude to make the application site fundamentally inappropriate for a tall building. Rather, harm there would be, and when considered against the inherent constraints of the site and the ambition of the proposals, and when weighed against the benefits of the proposals, officers conclude that the site would be suitable for a tall building.

- 25.17. There would be some diminishment of the primacy of St Paul's Cathedral as the Strategically Important Landmark in LVMF River Prospects 15 B.1 and 15 B.2 and LVMF 17 B.1 and 17B.2, contrary to London Plan Policy HC4 (A), LVMF SPG and City of London Protected Views SPD.
- 25.18. The proposals would draw some conflict with City of London Local Plan policy CS13 (1 and 2), and emerging City Plan Policy S13 (1 and 2), in that it draws some conflict with LVMF river prospects views, adversely affecting views of St Paul's Cathedral from Waterloo Bridge and Hungerford Bridge, in addition to undermining the viewing experiences of St Mary Le Bow and St Augustine Watling, and to a lesser extent Christ Church Spitalfields.
- 25.19. The proposal would preserve the composition and characteristics of neighbouring borough views.
- 25.20. The proposals would be transformative in its impact to the station and surroundings, reflecting a new chapter within its complex, phased, history. While most of the assets affected are connected in some way to the history of the railway in the City, they reflect a spectrum of styles, uses, materials, scales and periods of construction. This has resulted in a wide range of impacts, commensurate to aggregate nature of the site and the nuanced, interrelated significances of the assets in question and reflective of the changed nature of several of their settings.
- 25.21. The proposals would preserve the significance and contribution of setting of all aforementioned heritage assets except that of the following:

Direct and Indirect setting impacts on designated heritage assets on or near the application site:

- Liverpool Street Station (grade II), high level of less than substantial harm (direct impact)
- Former Great Eastern Hotel (Grade II*) – moderate level of less than substantial harm (indirect setting impact)
- Bishopsgate Conservation Area – moderate level of less than substantial harm (direct and indirect setting impact)
- St Botolph Bishopsgate – low level of less than substantial harm (indirect setting impact)
- St Botolph Church Hall – low level of less than substantial harm (indirect setting impact)

Skyline impacts on designated heritage assets further away:

- St Paul's Cathedral (grade I) – low level of less than substantial harm (indirect setting impact)
- St Mary-le-Bow (grade I)– slight level of less than substantial harm (indirect setting impact)
- St Augustine Watling Street (grade I)– low level of less than substantial harm (indirect setting impact)
 - Christchurch Spitalfields (grade I) – slight level of less than substantial harm (indirect setting impact)

25.22. Additionally, two non-designated heritage assets (NDHAs) would be removed by the proposals: 50 Liverpool Street and Hope Square; and a low level of harm has been found to arise with respect of Bishopsgate Churchyard (NDHA) through indirect effects on its setting. There would be a further instance of harm caused through the impact of the proposals on the views of Christchurch Spitalfields from the Golden Gallery of St Paul's..

25.23. As such, the proposal would result in some conflict with Local Plan Policies CS12 (1 and 2), DM12.1 (1, 4), DM12.2 (1 and 2), DM12.3 (2), draft City Plan 2040 policies S11 (2), HE1 (1 and 6) and London Plan Policy HC1 (C), and with the objectives set out in Section 16, 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.

25.24. The proposals comply with policies CS 12 (3-5) DM12.1 (2-5) DM12.2 (3), DM12.3 (1), DM12.4 and DM12.5, Draft City Plan 2040 S11 (1,3-5), HE1 (2-5,7-9) and HE2, and London Plan Policy HC1 (A-B,D).

25.25. A range of heritage benefits have also been identified comprising:

25.26. Low level of benefit to Liverpool Street Station (Grade II), Former Great Eastern Hotel (Grade II*), The Great Eastern Railway War Memorial (Grade II), The London Society of East Anglians War Memorial (Grade II), and Kinder Transport Sculpture (NDHA).

25.27. The benefits and harms are considered as part of the paragraph 215 and 216 NPPF balancing exercise, reflected in the planning balance above.

25.28. Objections on heritage impacts have been received from St Paul's Cathedral, CAAC, The Victorian Society, Twentieth Century Society, Georgian Society, SPAB, LAMAS, HB&P and many others. Historic England and the GLA have also raised concerns with regards to heritage impacts. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

25.29. Giving considerable importance and weight to the desirability of preserving the significance of listed buildings and the desirability of preserving or enhancing the character or appearance of the conservation area, this harm would be outweighed by the heritage and public benefits of the scheme.

25.30. The public benefits include:

- Substantial and transformational upgrades and enhancements to Liverpool Street Station, specifically upgrading routes through the Station and improvements to its gatelines and concourse allowing for concourse capacity to be streamlined and increased, alongside the introduction of a Network Rail control centre integrated within the station for improved operation;
- The proposals would enhance the inclusivity and accessibility of the station through the provision of accessible toilet facilities within the Station, in locations close to entrances and station platforms, as well as quiet seating areas and family room, customer and assistance travel lounges, baby change facilities, a Multi Faith space, a Quiet 'corner' and a mix of seating and rest points around the station.
- The provision of four new Changing Places toilets: two at the station, one within the over-station development and one at its roof terrace level.
- The provision of a new public Roof gardens with public toilet facilities
- Cultural and programmable events in public roof gardenThe provision of a new cycle hub, with new long-term storage for larger and adapted cycles.
- Better visual connectivity to taxi drop-off and bus stops, with improved bus passenger waiting areas and access to information
- The provision of c. 88,000 sqm of grade A office floorspace, will contribute to office floorspace requirements for the City delivering an estimated net increase of approximately 4,500 FTE employees.
- The provision of some 2,600 sqm of new or improved external public realm across the site combined with a publicly accessible roof garden

- Delivery of growth in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- Improved station permeability across all elevations and entrances, including the provision of two new internal station routes connecting to the north of station and creating level access with Exchange Square; and improved vertical circulation with the station, with the provision of additional lifts and escalators between concourse levels;
- Step free access to London TFL underground lines;
- Step free access to all station entrances;
- The scale and generosity of proposed station entrances, in addition to the clarity/decluttering of the public realm at their forecourts, enabling greater views into the heart of the station, and the public/civic character of entrances which make the legible in the streetscape;
- Improvements to the bus station interface with station, and enhancement of bus waiting facilities within the upper concourse;
- The redesign and relandscaping of Sun Street Passage to provide a step free connection between Station and Exchange Square, in addition to providing greater urban greening, and public seating;
- The significant increase and extent of urban greening on the building and in the upgraded public spaces would provide a healthy, sustainable and biodiverse environment for all to access; including the incorporation of historic monuments and other uses which would benefit the wider area.
- An uplift in biodiversity and urban greening across the site, reaching an Urban Greening Factor of 0.32
- Removal of modern 1990s gallery level retail units, and the creation of new unobstructed views of the historic Station train sheds, and rear elevation of the Former Great Eastern Hotel, enabling greater appreciation of the assets architectural and historic interest
- Removal of discordant modern insertions at lower concourse level including 2013 ticket hall, station reception building, signage and staircases. Lower concourse, 2013 ticket hall, circulation clutter, signage,
- Re-opening of windows in western trainshed walls, restoring original extent of glazing
- Re-painting of station interior to historic colours;
- Reinstatement of historic cartouches to Bishopsgate entrance;
- Improved siting of 'Für das Kind' memorial,
- Improved siting of the war memorial, London Society of East Anglians Memorial
- Improved siting of the war memorials Great Eastern Railway War Memorial
- Improved siting of Kindertransport sculpture within Hope Square

- Improved interface action between station and northern elevation of hotel, better revealing architectural significance and extent of historic fabric at ground floor..
- The provision of new viewing experiences from the public roof garden to the historic station train shed and views towards St Paul's Cathedral.
- Re-siting and public display of historic station features and within the proposed public roof garden, restoring historic features to the site.

25.31. The proposals comply with the required initial steps of archaeology investigation Local Plan DM 12.4 Draft City Plan 2040 HE2 13, Policies HE1 and London Plan HC1 subject to archaeology conditions. Subject to conditions related to the contaminated land, the proposal would also comply with Policy DM15.8 of the Local Plan, and Policies S1 and HL4 of the emerging City Plan 2040. In positively addressing air quality matters, and considering in the design of the proposal the way in which new buildings can aid in the dispersal of pollutants, the proposal complies with Local Plan 2015 Policy CS15, Policy DE1 and HL2 of the emerging City Plan 2040 as well as Policy SI1 of the London Plan and London Plan Policy D9 3b-c. Solar glare has also been the subject of environmental information supporting the scheme, demonstrating one minor adverse impact which is considered acceptable given further details would be requested as a S106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if considered necessary), ensuring the proposal complies with London Plan Policy D9 C (1; g).

25.32. With regards to transport, the proposals are designed to improve passenger flow, reduce congestion within the station, and enhance multimodal connectivity by integrating pedestrian, cycling, and public transport access and improve accessibility, thereby ensuring a seamless travel experience for thousands of daily users. These improvements will also make a significant contribution to the Liverpool Street Area Healthy Streets Plan.

25.33. The proposals include targeted enhancements to the surrounding transport infrastructure, improving safety, accessibility, and overall efficiency of movement for all users. By prioritising sustainable transport options and strengthening connections with bus and rail services, the development aligns with broader City transport strategies and policies that encourage walking, cycling, and public transport use.

- 25.34. A carbon options study has been carried out based on a range of refurbishments and additional new build approaches to evaluate environmental impacts and the commercial feasibility to deliver the required station enhancements with the available funding model, demonstrating the complexity of the required works to make the station fully accessible and futureproof its operation. The proposed development would not meet the GLA's standard benchmark for upfront carbon. However, carbon savings to meet and reach beyond the GLA's benchmarks could be achievable by implementing significant and challenging carbon reduction initiatives to be assessed and confirmed at detailed design stages due to the complexity of the proposals. The proposed development would provide a significant improvement for the sustainable connectivity and accessibility of the City of London within the wider region and thus contributing to futureproofing the City of London against a range of environmental, social and economic sustainability challenges.
- 25.35. The proposed development would provide benefits relating to improving social and environmental sustainability through improvements of the public realm and microclimate around the station and as well as enhanced permeability through the station and integration into its context, incorporating urban greening and climate resilience measures on the ground and at roof level of the proposed OSD. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for reuse and designing the new build for longevity, adaptability and low maintenance. The energy use intensity of the proposed OSD has been optimised and future opportunities for the station's energy performance identified, including connecting the whole development into emerging heat networks.
- 25.36. A BREEAM outstanding" rating and a NABERS UK rating with a minimum of 5 stars are targeted to overcome the performance gap between design and in use energy and carbon efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, it would (taking account of the mitigation measures proposed) comply with London Plan Policies SI 2, SI 7, Local Plan Policies CS15 and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

25.37. The submitted daylight and sunlight assessment has included an assessment of the Andaz Hotel as a receptor, in accordance with emerging City Plan policy DE7, and the policy is complied with in respect to housing and for the purposes of the hotel, in summary, it is considered that the development would not result in unacceptable reductions in daylight and/or sunlight when considering the location of the hotel and the transient and temporary nature of its users. Turning to the potential for light spill, a condition has been included which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate and minimise the impact of any internal and external lighting on light pollution and residential amenity, and upon the Andaz Hotel. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour, and associated management measures to reduce the impact on light pollution and amenity in line with the City's Lighting SPD. Subject to the imposition of the condition, the proposed development would comply with Local Plan policy DM15.7 and emerging City Plan 2040 DE8 and has been designed to avoid light spill.

25.38. The Major, Moderate and Minor Adverse impacts with regards to daylight and sunlight and overshadowing as identified are acknowledged and considered significant. Taking into consideration this context, and the context set out in the sections related to daylight, sunlight, and overshadowing above, it is not considered that the daylight and sunlight reductions in the cumulative scenarios tested would warrant refusal of the application on those grounds. Concerning Local Plan Policy DM.10.7, it is considered that overall the impact on daylight and sunlight would not be to the extent that they would be reduced to unacceptable levels, given the retained values of VSC and related NSL for each room when considering the daylight and sunlight levels in the existing condition, the absolute loss experienced in each circumstance, and the dense urban context of the local environment, and while taking into account the BRE Guidelines. Turning to London Plan Policy D6 it is considered that the levels in the proposed condition would be appropriate for its context, which is one of a dense urban environment. With regard to emerging Policy DE7 of the City Plan, it is considered that for the reasons explored above that the development would result in levels of daylight and sunlight appropriate for its context and taking into account the BRE Guidelines, and these properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

- 25.39. The submission sufficiently considers the noise and vibration impacts of development on the environment. Subject to a series of conditions to mitigate noise and vibration during deconstruction and construction and operational phases of development, the proposed development would comply with Policies D13 and D14 of the London Plan and policy DM15.7 of the local plan and Policy HL3 and HS3 of the emerging City Plan 2040.
- 25.40. Activity on-site during demolition and construction phase activity is less sensitive to wind conditions (due to protection from site hoarding, and access to the Site being restricted to site workers) than when the Proposed Development is complete and operational (which would include, e.g. new thoroughfare routes, building entrances and outdoor amenity spaces). With the implementation of the proposed landscaping design wind conditions in the majority of locations on-site and off-site would be suitable and safe for the intended uses. However, the occasional sitting use conditions would remain at a spill out seating area. This spill out seating is located in a private area, and wind conditions in this location would marginally exceed the required threshold, while appropriate mitigation is proposed. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the Local Planning Authority, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the assessments. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan 2040 policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London. Overall, the wind microclimate impact of the Proposed Development with proposed landscaping is considered to be acceptable. Turning to thermal comfort, it is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan policy D8 and D9 and policies S8, S12 and S21 of the emerging City Plan 2040.

- 25.41. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design, culture, environmental and public realm related policies. As underpinned by the submitted Financial Viability Assessment, and verified through independent third party review, the scale of the Over Station Development is directly linked to the delivery of the amount of funding necessary to enhance the station to meet the operational needs of Network Rail and to deliver benefit to the public as daily users of the station, with those enhancements referred to above.
- 25.42. Any potential impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.
- 25.43. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
- 25.44. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, City Cluster and public realm would be complied with that notwithstanding the conflict with Local Plan Policy CS14 (2) with regards to tall buildings location, and Local Plan Policies CS12 (1 and 2), DM12.1 (1, 4), DM12.2 (1 and 2), DM12.3 (2), and London Plan Policy HC1(C), the proposals comply with the development plan when considered as a whole.

25.45. Other than the significant effect that the proposal will have to advance Local Plan Strategic Objective 1 to maintain the City's position as the world's leading international financial and business centre by providing c. 88,000 sq.m (GIA) of sustainable Grade A office floorspace, there are other benefits that would weigh in favour of the proposed development when assessed against the local and national planning policies, as set out below:

- Delivering a transformational change and upgrade to Liverpool Street Station, supporting existing and future users of the City of London, and as such enabling the City's ability to accommodate growth into the future;
- Securing a strategic high-quality mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the City which contributes to the Destination City objectives:
- Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function and growing number of working population and number of visitors, whilst enhancing a place which would be more interesting and vibrant with active street frontages;
- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys; and
- Securing a development that is environmentally responsible in that it would seek to promote active travel, provide biodiversity and urban greening, target BREEAM 'Excellent' and reduce waste.

25.46. Turning to other material considerations, it is considered that notwithstanding conflict with draft City Plan Policy S11(2), S12(8)(C), HE1(1 and 6), and with the objectives set out in Section 16, 66, and 72 of the Planning (Listed Building and Conservation Areas) Act 1990, and relevant NPPF policies with regards to heritage impacts, that the proposals comply with the emerging City Plan 2040 as a whole and that material considerations do not indicate that a decision should be made other than in accordance with the Development Plan.

25.47. In December 2025 the government published a draft National Planning Policy Framework for consultation, with this consultation continuing at the time of writing. Insofar as to the judgements made in the above, it is not considered that any change in the draft NPPF would materially alter the judgements made. This is taking into consideration those draft changes most relevant to the proposed development, including proposed amendments to the presumption in favour of sustainable development, the proposed amendments to the categories of harm assigned to impacts on designated heritage assets, or those proposed amendments concerning the Biodiversity Net Gain.

25.48. The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S.106 agreement.

25.49. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.

25.50. As discussed above, the paragraph 215 NPPF heritage balance (and the balance referred to at London Plan policy D9C(d)) is to be struck in favour of the scheme as the public benefits outweigh the less than substantial harm

25.51. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Conclusion on Listed Building Consent (Reference 25/00474/LBC) to Liverpool Street Station, Grade II

- 25.52. The proposal would result in a high level of less than substantial harm, failing to preserve the special architectural and historic interest and heritage significance of the listed building. The harms arising are outlined in detail within the design and heritage section of this report, primarily relating to the demolition of the southern concourse and roof. As a result of this harm the proposal would conflict with Local Plan Policies CS12 (1), DM12.1 (1), DM12.3 (2), draft City Plan 2040 policies S11 (2), HE1 (1) and London Plan Policy HC1(C), and with the objectives set out in Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
- 25.53. When addressing the balancing exercise, this harm has been afforded considerable importance and weight, and account taken of the importance of those heritage asset as a Grade II listed building in accordance with the advice given in paragraph 212 of the NPPF that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). The full heritage planning balance is considered under the assessment against paragraph 215 section of the report. It is considered that the high, less than substantial level of harm would be outweighed by the public benefits. When taking all matters into consideration including the development plan and the NPPF tests, subject to the recommendations of this report, it is recommended that listed building consent be granted.

Conclusion on Listed Building Consent (Reference 25/00479/LBC) to London Society of East Anglians (LSEA) War Memorial.

- 25.54. The proposal is considered to preserve the special architectural and historic interest and heritage significance of the listed building, the East Anglians War Memorial. The re-siting of this memorial is found to improve the ability to appreciate its significance, through a more sympathetic location and spacious surroundings, with heritage benefits arising. The proposal therefore accords with Local Plan Policies CS12, DM12.1, DM12.3, draft City Plan 2040 policies S11, HE1 and London Plan Policy HC1, and with the objectives set out in Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
- 25.55. When taking all matters into consideration including the development plan and the NPPF tests, subject to the recommendations of this report, it is recommended that listed building consent be granted.

Conclusion on Listed Building Consent (Reference 25/00475/LBC) – the Former Great Eastern Hotel.

- 25.56. The proposal is considered to preserve the special architectural and historic interest and heritage significance of the listed building, the Former Great Eastern Hotel. Officers note this relates to the direct impacts to the hotel. As identified within the report, as relates to direct impacts there are a range of benefits arising to the Hotel, ranging from the opening up of a through route along the northern elevation and more sensitive resolution to the interface between the concourse and this facade. The overall level of benefit to the Former Great Eastern Hotel is considered to be low.
- 25.57. The proposal therefore accords with Local Plan Policies CS12, DM12.1, DM12.3, draft City Plan 2040 policies S11, HE1 and London Plan Policy HC1, and with the objectives set out in Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
- 25.58. When taking all matters into consideration including the development plan and the NPPF tests, subject to the recommendations of this report, it is recommended that listed building consent be granted.

Conclusion on Listed Building Consent (Reference 25/00476/LBC) – Great Eastern War Memorial

- 25.59. The proposal is considered to preserve the special architectural and historic interest and heritage significance of the listed building, the Great Eastern War Memorial. The re-siting of this memorial is found to improve the ability to appreciate its significance, through a more sympathetic location and spacious surroundings, with heritage benefits arising. The proposal therefore accords with Local Plan Policies CS12, DM12.1, DM12.3, draft City Plan 2040 policies S11, HE1 and London Plan Policy HC1, and with the objectives set out in Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
- 25.60. When taking all matters into consideration including the development plan and the NPPF tests, subject to the recommendations of this report, it is recommended that listed building consent be granted.

Conclusion on Listed Building Consent (Reference 25/00477/LBC) – Police Call Box

- 25.61. The proposal is considered to preserve the special architectural and historic interest and heritage significance of the listed building, the Great Eastern War Memorial. The re-siting of this memorial is found to improve the ability to appreciate its significance, through a more sympathetic location and spacious surroundings, with heritage benefits arising. The proposal therefore accords with Local Plan Policies CS12, DM12.1, DM12.3, draft City Plan 2040 policies S11, HE1 and London Plan Policy HC1, and with the objectives set out in Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
- 25.62. When taking all matters into consideration including the development plan and the NPPF tests, subject to the recommendations of this report, it is recommended that listed building consent be granted.

Background Papers:

DOCUMENTS -

Application Documents - 25/00494/FULEIA

Covering Letter March 2025, prepared by Newmark;

Public Benefits Statement April 2025, prepared by Newmark;

Revised Arboricultural Impact Assessment Ref. P02 October 2025, prepared by AECOM;

External Lighting Design Strategy (Chapter 6.7 in ACME DAS) March 2025, prepared by SEAM;

Town Planning Statement April 2025 (including Draft Heads of Terms for Legal Agreement), prepared by Newmark;

Outline Construction Environment Management Plan March 2025 Ref. P01 prepared by AECOM;

Access and Inclusive Design Statement (Chapter 6.5 in ACME DAS) March and updated October 2025, prepared by MIMA;

Circular Economy Statement (including GLA Pro-Formas) Ref. P01 March 2025 prepared by AECOM;

Transport documentation prepared by AECOM comprising;

- Transport Assessment April 2025, P02.
- Construction Logistics Plan: the TA included a high-level summary of the Outline Construction Logistics Plan, the full Outline CLP was also a standalone submission document – March 2025, P01.
- Cycle Promotion Plan: A Cycle Promotion Plan has not been submitted, but a Framework Travel Plan for the OSD was submitted as a standalone document – March 2025, P01

Carbon Optioneering Spreadsheet Ref. P03 January 2026 prepared by AECOM;

Climate Based Daylight Modelling March 2025 prepared by GIA;

Design and Access Statement March 2025 Ref. P00 prepared by ACME;

Energy Statement March 2025 prepared by AECOM;

Equality Impact Assessment March 2025 Ref. P01, prepared by AECOM;

Financial Viability Assessment April 2025, prepared by JLL;

Flood Risk Assessment incl drainage and SUDs Assessment March 2025 Ref. P01, prepared by AECOM;

Needs Assessment March 2025, prepared by Network Rail;

Fire Statements (Concourse Ref. P02 and OSD Ref. P01) March 2025 prepared by AECOM;

Heritage Impact Assessment March 2025, prepared by Donald Insall Associates;

Outdoor Thermal Comfort Report March 2025 Ref.21927, prepared by GIA;

Operational Waste Management Plan March 2025 Ref. P01, prepared by AECOM;

Ecology Report and Biodiversity Net Gain Calculation November 2025, prepared by AECOM;

Re-development and pre-demolition audit March 2025 prepared by AECOM;

Security, Suicide Prevention and Threats Strategy March 2025, prepared by AECOM;

Site Waste Management Plan March 2025, prepared by AECOM;

Social Value Strategy March 2025, prepared by AECOM;

Statement of Community Involvement March 2025, prepared by Shared Voice;

Sustainability Statement (including BREEAM and Climate Resilience) March 2025 prepared by AECOM;

Urban Greening Factor Score October 2025, prepared by SLA;

Utility Statement March 2025, prepared by AECOM;

Ventilation and Extraction Statement March 2025, prepared by AECOM;

Whole Life Carbon Assessment (March 2025) and spreadsheet updated (January 2026) for GLA prepared by AECOM;

Wayfinding Strategy (Chapter 6.8 in ACME DAS) March 2025, prepared by AECOM;

Environmental Statement March 2025, prepared by AECOM; including:

- Volume 1, Chapter 1 (Introduction), prepared by AECOM;
- Volume 1, Chapter 2 (EIA Methodology), prepared by AECOM;
- Volume 1, Chapter 3 (Alternative and Design Evolution), prepared by AECOM and ACME;
- Volume 1, Chapter 4 (The Proposed Development), prepared by AECOM;
- Volume 1, Chapter 5 (Demolition and Construction), prepared by AECOM;
- Volume 1, Chapter 6 (Air Quality), prepared by AECOM;
- Volume 1, Chapter 7 (Archaeology), prepared by AECOM;
- Volume 1, Chapter 8 (Built Heritage), prepared by AECOM and DIA;
- Volume 1, Chapter 9 (Climate Change), prepared by AECOM;
- Volume 1, Chapter 10 (Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, prepared by GIA;
- Volume 1, Chapter 11 (Ground Conditions), prepared by AECOM;
- Volume 1, Chapter 12 (Noise and Vibration), prepared by AECOM;

- Volume 1, Chapter 13 (Socioeconomics), prepared by AECOM;
- Volume 1, Chapter 14 (Transport and Access), prepared by AECOM;
- Volume 1, Chapter 15 (Wind Microclimate), prepared by RWDI and AECOM;
- Volume 1, Chapter 16 (Effect Interactions) updated December 2025, prepared by AECOM;
- Volume 1, Chapter 17 (Summary of Mitigation), prepared by AECOM;
- Volume 1, Chapter 18 (Residual Effects and Conclusion), prepared by AECOM;
- Volume 2 (Townscape, Visual & Built Heritage Impact Assessment), prepared by DIA and AVR London;
- Volume 3 (Technical Appendices), prepared by AECOM, GIA and RWDI; and
- Volume 4 (Non-Technical Summary), prepared by AECOM.
- Townscape Visual Impact Assessment prepared by DIA and AVR;
- Appendices to the ES are listed in contents page.

Response to BRE Review Response dated 26 September 2025 prepared by GIA

Design and Access Statement Addendum October 2025 (Ref. P00) prepared by Acme & SLA

Design Clarifications October 2025 (Ref.P00) prepared by ACME and SLA

Accessibility Clarifications October 2025 (Ref. P00) prepared by ACME, Mima, SEAM, SLA and AECOM

EIA Statement of Conformity 17 October 2025 prepared by AECOM (including updated views 67, 68, 69 and 45 prepared by AVR London)

Technical Note on noise and vibration 4 December 2025 prepared by AECOM

Environmental Statement Response to Potential Regulation 25 Request and Further Information Report October 2025 prepared by AECOM

Response to Trium Comments on Technical Reports October 2025 prepared by AECOM

Response to Further Comments from Trium on the Health Impact Assessment 27 November 2025, prepared by AECOM

Updated Documents relating to the ES to address minor clarifications from Trium comprising:

- ES Volume I: Chapter 16 Effect Interactions;
- EIA Statement of Conformity Rev 1, 15 December 2025, prepared by AECOM;
- Technical Note on Noise and Vibration, 4 December 2025, prepared by AECOM;
- Response to Comments from Trium on the Preliminary Ecological Appraisal Addendum and the Revised Biodiversity Net Gain Assessment, 12 December 2025, prepared by AECOM

Sustainability Addendum (November 2025) and Carbon Optioneering Spreadsheet, January 2026 prepared by AECOM

Transport Statement Addendum, November 2025, Ref.P01 prepared by AECOM

LSS Energy Strategy Technical note, November, prepared by AECOM

Third-Party Reviews, on behalf of the Local Planning Authority:

Liverpool Street Station Development – Review of daylight, sunlight, overshadowing, solar glare and light trespass material, dated 29.08.2025, prepared by BRE

Liverpool Street Station Development – Additional review of daylight and sunlight material dated 22.12.2025, prepared by BRE

Liverpool Street Station EIA Review, September 2025, by Trium

Letter - Liverpool Street Station Ref: 25/00494/FULEIA – Technical Reports Review, dated 18.12.2025, prepared by Trium

Letter - Liverpool Street Station – EIA Review, dated 18.12.2025, prepared by Trium

3403 – Liverpool Street Station OSD – Carbon Optioneering Study Third Party Review, January 2026, prepared by HTS

LSS Optioneering Study Tracker, January 2026, prepared by HTS

3403 –Liverpool Street Station OSD – Whole Life Carbon Assessment Third Party Review, January 2026, prepared by HTS

LSS WLCA Review Tracker, January 2026, prepared by HTS

Review of Financial Viability Assessment: Liverpool Street Station, dated September 2025 , prepared by BNP Paribas

Application Documents - 25/00474/LBC (Liverpool Street Station)

Covering Letter, April 2025 prepared by Newmark;

Drawing Schedule, October 2025 prepared by ACME;

Design and Access Statement, prepared by ACME, October 2025

Heritage Impact Assessment, March 2025 and Environmental Statement Chapter 8, prepared by DIA and AECOM;

Town Planning Statement, April 2025 prepared by Newmark (formerly known as Gerald Eve); and

Volume 2 (Townscape, Visual & Built Heritage Impact Assessment), March 2025 prepared by DIA and AVR London.

Application Documents - 25/00475/LBC (Former Great Eastern Hotel)

Covering Letter, April 2025 prepared by Newmark;

Drawing Schedule, October 2025 prepared by ACME;

Design and Access Statement, April 2025 prepared by ACME;

Heritage Impact Assessment March 2025 and Environmental Statement Chapter 8, prepared by DIA and AECOM;

Town Planning Statement, April 2025 prepared by Newmark; and

Volume 2 (Townscape, Visual & Built Heritage Impact Assessment), March 2025 prepared by DIA and AVR London.

Application Documents - 25/00476/LBC (Great Eastern Railways War Memorial)

Covering Letter, April 2025 prepared by Newmark;

Drawing Schedule, October 2025 prepared by ACME;

Design and Access Statement, April 2025 prepared by ACME;

Heritage Impact Assessment, March 2025 prepared by DIA;

Town Planning Statement, April 2025 prepared by Newmark; and

Volume 2 (Townscape, Visual & Built Heritage Impact Assessment), March 2025 prepared by DIA and AVR London.

Application Documents - 25/00479/LBC (East Anglians War Memorial)

Covering Letter, April 2025 prepared by Newmark;

Drawing Schedule, October 2025 prepared by ACME;

Design and Access Statement, April 2025 prepared by ACME;

Heritage Impact Assessment, prepared by DIA;

Town Planning Statement, April 2025 prepared by Newmark; and

Volume 2 (Townscape, Visual & Built Heritage Impact Assessment), March 2025 prepared by DIA and AVR London.

Application Documents - 25/00477/LBC (Police Call Box, Hope square)

Covering Letter, April 2025 prepared by Newmark;

Drawing Schedule, October 2025 prepared by ACME;

Design and Access Statement, April 2025 prepared by ACME, October 2025 (Ref. P00);

Heritage Impact Assessment, March 2025, and Environmental Statement Chapter 8, prepared by DIA and AECOM;

Town Planning Statement, April 2025 prepared by Newmark (formerly known as Gerald Eve); and

Volume 2 (Townscape, Visual & Built Heritage Impact Assessment), March 2025
prepared by DIA and AVR London.

Consultation Responses

The following representations by Statutory Consultees have been received via email, or memo, addressed to officers for application ref: 25/00494/FULEIA (Liverpool Street Station works):

5 th June 2025	Active Travel England
5 th June 2025	Heathrow Safeguarding
5 th June 2025	NATS Safeguarding
5 th June 2025	Wandsworth Council
7 th June 2025	Health and Safety Executive
12 th June 2025	London City Airport
13 th June 2025	Transport For London
16 th June 2025	Transport For London
20 th June 2025	Harlow Council
23 rd June 2025	Natural England
24 th June 2025	Environment Agency
24 th June 2025	Port of London Authority
24 th June 2025	The Georgian Group
25 th June 2025	SAVE Britain's Heritage
26 th June 2025	Historic England
3 rd July 2025	Hammersmith and Fulham
3 rd July 2025	Thames Water
4 th July 2025	Council For British Archaeology
4 th July 2025	London Borough of Camden
4 th July 2025	London Borough of Tower Hamlets
4 th July 2025	Surveyor to the Fabric – St Paul's Cathedral
4 th July 2025	Twentieth Century Society
7 th July 2025	Greater London Authority
8 th July 2025	Historic Buildings and Places
14 th July 2025	Historic England

17 th July 2025	Royal Borough of Kensington and Chelsea
6 th August 2025	City of London Conservation Area Advisory Committee
6 th August 2025	Transport For London
6 th August 2025	Westminster City Council
29 th August 2025	SAVE Britain's Heritage
8 th December 2025	London City Airport
8 th December 2025	Wandsworth Council
9 th December 2025	Active Travel England
9 th December 2025	Crossrail
9 th December 2025	Health and Safety Executive
9 th December 2025	NATS Safeguarding
9 th December 2025	Thames Water
9 th December 2025	Twentieth Century Society
12 th December 2025	London Borough of Camden
12 th December 2025	Port of London Authority
15 th December 2025	Society for the Protection of Ancient Buildings
17 th December 2025	Historic England
19 th December 2025	SAVE Britain's Heritage
19 th December 2025	Theatre's Trust
19 th December 2025	Transport For London
24 th December 2025	London Borough of Tower Hamlets
7 th January 2026	The City of London Archaeological Trust
9 th January 2026	Crossrail Ltd
13 th January 2026	Historic England
14 th January 2026	Environment Agency
21 st January 2026	Surveyor to the Fabric – St Paul's Cathedral

The following representations have been made on the Listed Building Consents (LBC) [refs: 25/00474/LBC, 25/00476/LBC, 25/00475/LBC, 25/00479/LBC, 25/00477/LBC] –

LBC Reference 25/00474/LBC - Station Works

Victorian Society - 16th September

Society for the Protection of Ancient Buildings - 15th September

20th Century Society - 30th September 2025

SAVE Britain's Heritage - 25th June 2025

Historic England - 10th September 2025

LBC Reference 25/00475/LBC – The Former Great Eastern Hotel

Victorian Society - 16th September

20th Century Society - 30th September 2025

SAVE Britain's Heritage - 25th June 2025

Historic England - 10th September 2025

LBC Reference 25/00476/LBC – Great Eastern War Memorial

Victorian Society - 16th September

20th Century Society - 30th September 2025

SAVE Britain's Heritage - 25th June 2025

Historic England - 10th September 2025

LBC Reference 25/00479/LBC - London Society of East Anglians (LSEA) War Memorial

Victorian Society - 16th September

20th Century Society - 30th September 2025

SAVE Britain's Heritage - 25th June 2025

Historic England - 10th September 2025

LBC Reference 25/00477/LBC – Police Call Box

Victorian Society - 16th September

20th Century Society - 30th September 2025

SAVE Britain's Heritage - 25th June 2025

Historic England - 10th September 2025

Representations from the public have been received via by the public portal on application ref: 25/00494/FULEIA or via email addressed to officers, is available under separate cover.

Appendix A – Conditions Schedules

Conditions – 25/00494/FULEIA

1.	The development hereby permitted shall be begun before the expiration of five years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
2.	Prior to the commencement of any works, a phasing plan, outlining the various stages of demolition and construction, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved phasing plan, unless otherwise agreed in writing by the local planning authority. REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
3.	There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
4.	There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

5.	Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events): a. a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development. b. an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work. c. A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, to prevent pollution of the water environment, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
6.	Throughout the duration of the demolition and construction works the site shall be fitted with live noise, dust and vibration monitoring equipment. The numbers and locations of monitoring equipment shall be agreed with the City of London Pollution Control Team prior to installation. The City of London Pollution Control Team shall be provided with live access to all monitoring data throughout the works. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
7.	(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the plant is or may be in operation. (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report

	demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority. REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
8.	Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
9.	All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance. REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
10.	Drainage serving commercial kitchens within this development shall be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825- 2:2002 or other effective means of grease removal. The details of the grease separator shall be provided to the planning authority prior to the operation of the kitchen. The grease separator shall be retained and kept in serviceable condition so long as the commercial food use continues. REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8.
11.	No cooking shall take place within any commercial kitchen and/or Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) unit, hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission. REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
12.	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 S11.
13.	Prior to the commencement of development, excluding demolition, details of the emergency power supply shall be submitted to and approved in writing by the Local Planning Authority (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.
14.	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.
15.	As part of the Scheme of Protective Works (Demolition phase 1) a local NO2 monitoring strategy shall be submitted. This should define a baseline and quantify the impact of the construction phase of the proposed development. Both long-term and short-term NO2 objectives should be taken into account when designing the monitoring strategy, with due attention provided to nearby receptors and the diurnal nature of construction vehicle emissions. REASON: In accordance with the following policy of the Local Plan: DM15.6 to maintain local air quality and ensure that NO2 concentrations remain within relevant UK objectives during the construction phase in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.
16.	Before any construction work, including demolition begins, the proposed threshold levels for the entire site perimeter must be submitted to the Local Planning Authority for approval. The submission should, at a minimum, highlight the threshold levels at the highway boundary and the top of kerb and channel levels. Information should be submitted in PDF and AutoCad File. REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory ground levels in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement and should be submitted in Cad Format for analysis.
17.	Before any construction works including demolition are begun, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out. Details must be submitted to and approved in writing by the local planning authority. REASON: To ensure the satisfactory reinstatement of the highways, upon

	completion of construction work, in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement of any construction works to record the condition of the surrounding highways.
18.	No doors, gates or windows at ground floor level shall open over the public highway. REASON: In the interests of public safety and comply with the Section 153 of the Highways Act 1980.
19.	Prior to the commencement of any works, details of the facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to, and approved in writing by, the Local Planning Authority. The details shall be drafted in accordance with the Mayor of London's Construction Logistics Plan Guidance (April 2021) and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Construction Logistics Plan (CLP) shall include a detailed programme of works and phasing plans showing the sequence of demolition and construction activities, vehicle movements and proposed routing, delivery and servicing schedules, loading, unloading and storage arrangements, site access and egress controls, safety measures for vulnerable road users, traffic management drawings in accordance with Safety at Streetworks and Road Works – A Code of Practice, work-related road risk management, and emergency and contingency arrangements. This should also include details of timetables and consultation pathways as related to any proposed rail service thinning. No demolition or construction shall be carried out other than in accordance with the approved details, programme, phasing plans, and methods set out in the CLP. These documents shall be produced in consultation with Transport for London, and include where relevant further surveys, pedestrian micro-simulation and traffic modelling, analysis of Pedestrian Comfort Levels (PCL), independent external or TfL model auditing, RSAs and technical assurance. Prior to the submission of the Demolition and Construction Logistic Plans, the principal contractor is required to liaise with the highways authority to discuss the proposals for construction, via transport.planning@cityoflondon.gov.uk. REASON: To ensure that demolition and construction works do not adversely impact public safety and the transport network, in accordance with London Plan Policy T3 and Local Plan policies DM15.6 and DM16.1. These details are required prior to the commencement of demolition and construction works to minimize the impact on the transport network from the start of these activities.
20.	Except as may be approved in writing by the Local Planning Authority the loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto. REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
21.	Prior to the commencement of construction works (excluding demolition) for the proposed cycle parking facilities of the Station, details of the cycle parking and facilities for the Station shall be submitted and approved in writing by the Local Planning Authority. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details of the following shall be provided in drawing (at a scale of not less than 1:20): - Layout of long and short stay cycle parking. - The provision of cycle parking shall comprise a maximum of 732 long stay spaces and 20 short stay cycle parking spaces. - A minimum of 37 spaces (5%) shall accommodate larger/adapted cycles with suitable access and via step free route and associated end of trip facilities and the provision swept path demonstrating that there would be reasonable access for a larger or adapted cycle.

	d. Details of the changing facilities, showers and lockers shall be submitted and approved in writing by the Local Planning Authority. The cycle parking hereby approved shall be provided prior to the first use of the facilities within the proposed station and maintained throughout the life of the building for the use of occupiers and visitors, without charge to the end user, and must always remain ancillary to the use of the building and available throughout the life of the building. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy that makes provision for disabled people and encourages greater use of cycles by commuters, and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM10.8, DM16.1, DM 16.3, DM16.4 London Plan policy TS cycling and emerging City Plan policies AT2, AT3 and HL1.
22.	Prior to the commencement of works (excluding demolition) for the over station development (OSD), details of the cycle parking and facilities for the OSD shall be submitted and approved in writing by the Local Planning Authority. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details of the following shall be provided in drawing (at a scale of not less than 1:20): a. Layout of long and short stay cycle parking. b. The provision of cycle parking shall comprise of 1,253 long stay spaces and 28 short stay cycle parking spaces. c. A minimum of 63 spaces (5%) shall accommodate larger/adapted cycles with suitable access and via step free route and associated end of trip facilities and the provision swept path demonstrating that there would be reasonable access for a larger or adapted cycle. d. Details of the changing facilities, showers and lockers shall be submitted and approved in writing by the Local Planning Authority. The details hereby approved shall be provided prior to the occupation of the building and maintained throughout the life of the building for the use of occupiers and visitors, without charge to the end user, and must always remain ancillary to the use of the building and available throughout the life of the building. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy that makes provision for disabled people and encourages greater use of cycles by commuters, and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM10.8, DM16.1, DM 16.3, DM16.4 London Plan policy TS cycling and emerging City Plan policies AT2, AT3 and HL1.
23.	Changing facilities and showers shall be conveniently provided and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans. REASON: To make travel by bicycle more convenient to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
24.	Prior to the commencement of works (excluding demolition) refuse and recycling, storage and collection facilities shall: a. Be provided within the curtilage of the site to serve each part of the development in accordance with details that must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and b. Thereafter be maintained as approved throughout the lifetime of the development. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1, DM 16.5. These details are required prior to commencement in order that any changes to satisfy this condition are

	incorporated into the development before the design is too advanced to make changes.
25.	No part of the development, including any permanent or temporary structure such as balconies, canopies, building projections, scaffolding, or construction equipment, shall oversail or encroach upon the public highway unless and until a licence or other appropriate legal agreement has been entered into with the relevant Highway Authority under the Highways Act 1980 (or any statutory re-enactment or modification thereof). REASON: To ensure the safe and unobstructed use of the public highway and to comply with the requirements of the Highways Act 1980 in accordance with policies DM16.1 and DM16.2 of the Local Plan.
26.	An Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the over station development (OSD) (office building) hereby permitted. Within 6 months of first occupation a full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The offices in the building shall thereafter be operated in accordance with the approved Travel Plan for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: CS16, DM16.1
27.	Before any works thereby affected are begun, the development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any relevant construction works hereby permitted are begun. REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
28.	Prior to any works affecting Transport for London or London Underground Assets, the following, in consultation with TfL Infrastructure Protection, shall be submitted to and approved in writing by the local planning authority: - provide an overview of the overall development including both design on temporary and permanent works including superstructures, substructures and foundations; - provide demolition details; - accommodate the location of the existing London Underground structures; - before commencing any work on site, the implication and the need for upgrading of railway security must be agreed with TfL; - 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; - provide details on the use of tall plant/scaffolding for the demolition phase; - before operation of any equipment likely to emit electromagnetic radiation, an EMC assessment shall be submitted to LUL for their consideration and written approval; - 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. 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
29.	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). 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.
30.	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. 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
31.	No works shall be carried out until sufficient evidence to demonstrate 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, has 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. 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
32.	No works shall be carried out within TfL assets until evidence has been submitted to and approved in writing by the Local Planning Authority demonstrating that the proposed London Underground (LU) station works would 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.
33.	Before any construction works (excluding demolition) hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 4.5 l/s from each outfall and from no more than two distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 715 m3 : (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
34.	Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) A Lifetime Maintenance Plan for the SuDS system to include: - A full description of how the system would work, it's aims and objectives and the flow control arrangements; - A Maintenance Inspection Checklist/Log; - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
35.	The proposed Over Station Development (OSD) shall not 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.

36.	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.
37.	The proposed Over Station Development (OSD) shall not 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
38.	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.
39.	No below ground 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: 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. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
40.	Written schemes of investigation required by Condition in this decision notice, 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. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
41.	(a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. The audit shall include details of the reuse and recycling of deconstruction materials, demonstrating that as little waste as possible is generated. The audit shall include: • an inventory catalogue of metalwork and architectural elements that establishes direct reuse of repurposing opportunities. • a brickwork feasibility assessment to facilitate the use of reclaimed London stock bricks in the new entrance arches. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. (b) Prior to the commencement of the development and following completion of RIBA Stage 4, an update to the approved Circular Economy Statement, including a site waste management plan, that reaffirms the proposed strategy or demonstrates improvements to it, shall be submitted to and approved in writing by the Local Planning Authority. The Statement must be prepared in accordance with the GLA Circular Economy Guidance and demonstrate that the development is designed to meet the relevant targets set out in the guidance. The Statement shall include evidence of engagement with glass recycling facilities to determine closed-loop recycling pathways for existing glazing to be deconstructed, and glazing specified in the development. The end-of-life strategy of the statement should provide details about the approach to material passports as part of the BIM strategy, a draft glass replacement strategy developed for all façade types, and a draft tenant fit out guide for the OSD to promote Circular Economy principles and waste reduction. The development shall be carried out, and operated and managed throughout its life cycle, in accordance with the approved details. REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the London Plan; D3, SI 7, SI 8 - Local Plan 2015; CS 17, DM 17.2 – Emerging City Plan 2040 policies S8 and DE1.
42.	No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement. The Statement is to

	include actual waste arisings and final processing routes for all existing materials. The statement shall also be submitted to the GLA at: circulareconomystatements@london.gov.uk. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan, Policies CS15 and DM17.2 of the Local Plan (2015) and Policies DE1, S16, CE1 of emerging City Plan 2040
43.	Prior to the commencement of the development and following completion of RIBA Stage 4, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that embodied carbon emissions of the development are further reduced towards the GLA's Standard and Aspirational Benchmark set out in the GLA's Whole Life-Cycle Assessment Guidance. Any deviation from the GLA Benchmarks must be clearly reasoned and agreed with the Local Planning Authority. Any increase beyond planning stage upfront embodied carbon figures for the OSD due to substructural works shall be mitigated through some or all measures that: • increase the reused and recycled content of building elements and materials from the GLA requirement of 20% to 40% for the Over Station Development (OSD), • incorporate the use of cross laminated timber slabs with associated upfront embodied carbon savings of at least 50 kgCO2/m2, • pioneer an evolving measure (at the time of RIBA stage 4 of this project) designed to significantly reduce embodied carbon impacts and that would benefit from trialling and testing. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments. The development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development, that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance and that the development is sustainable in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan 2015 policies, DM15.2, DM 17.2 – emerging City Plan 2040: S8, DE1.
44.	Once the as-built design has been completed (upon commencement of RIBA Stage 6), a post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission and pre-commencement stages (RIBA Stage 2/3 and RIBA Stage 4), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received no later than three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk. REASON: To ensure that the development has maximised the reduction of carbon emissions in line with the application proposal and that the whole-life-cycle carbon emissions of the development, as-built, are calculated and reported, in accordance with Policy SI2 of the London, Local Plan 2015 policies, DM15.2, DM 17.2 and emerging City Plan 2040: S8, DE1.

45.	Prior to commencement of below ground works, a ground movement assessment must be submitted and approved in writing by the Local Planning Authority, and include: (a) Details of an intrusive site investigation to provide a detailed ground movement assessment that confirms the level of impact of the works on the adjacent below ground tunnels. (b) Details of engagement and agreements in principle with owners of third-party underground assets. (c) Should the analysis find that that the level of impact is greater than acceptable limits at any location, details of proposed foundation works to mitigate those impacts, such as sleeving of piled foundations. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development, that it maximises the reduction of carbon emissions in the substructure and that the development is sustainable in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan 2015 policies, DM15.2, DM 17.2 – emerging City Plan 2040: S8, DE1.
46.	Prior to the commencement of the Over Station Development, an assessment of the types and designs of the proposed glazed façade systems that provide the best balance between reducing embodied carbon, solar gain and operational carbon emissions, including ease of replacement of components and parts, and opportunities to incorporate passive ventilation should be undertaken for the different elevations of the building. The assessment shall include dynamic thermal modelling in accordance with CIBSE TM52 to demonstrate that passive measures, such as façade design and solar control, have been optimised prior to reliance on active cooling. The assessment is required to be submitted to and approved in writing by the Local Planning Authority. To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.
47.	The development shall be designed to allow for the future connection into a district heating network if this becomes available during the lifetime of the development. Prior to the commencement of the development, excluding demolition, details of the design measures required to facilitate future connection to an energy network shall be submitted to and approved in writing by the local planning authority, including: • a single point of connection to the district heating network • a space allocated for heat exchangers or other plant as required • a safe-guarded pipe route to the site boundary, and sufficient space in cross-section for primary district heating pipes where proposed routes are through utility corridors The development shall be implemented in accordance with the approved details and be retained as such for the lifetime of the development. REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the London Plan: SI3 - Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4. and emerging City Plan 2040 policy DE1.
48.	Prior to the commencement of the development, excluding demolition, a strategy for the creation of a sequence of restorative, well-being led and climate resilient routes and spaces through and around the site and links into the wider context shall be provided, to include specific details of measures and addressing the following considerations: 1. Maximising street level greening in both onsite and offsite public realm and OSD roof level greening to provide natural shade and connect green pockets.

	2. Designing for comfortable microclimatic conditions informed by the analysis of wind, pressure, humidity, and temperature. 3. Developing a comfort framework considering the needs of the greatest range of people at times of extreme weather in collaboration with the City Corporation. 4. Choosing appropriate materials for external surfaces, informed by their influence on (e.g. heat absorption, reflection, sensory processing), location (proximity to passersby) and resilience in (e.g. risk of deformation in high temperatures) microclimatic conditions. 5. The resilience and suitability of the proposed planting scheme, in particular relating to trees, proximity to scented or spiky leafed plants and year-round cover. 6. Opportunities to provide future restorative spaces within the development (e.g. areas of seclusion, rest points, lower lighting levels). 7. Opportunities to continue greening, amenity and comfort across the site boundaries via adjacent spaces and terraces that help create green links, cool routes and biodiversity corridors for the greatest range of people and important species (such as wild bees). The introduced measures shall be continuously monitored to determine their impact and success. The strategy with relevant plans and details shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To demonstrate that the development performs well against a broad range of accessibility and inclusivity, sustainability and climate resilience criteria, in accordance with London Plan D5 and the following policies of the Local Plan: CS15, DM 10.8, DM15.1, and of emerging City Plan 2040: S8, DE1, HL1.
49.	Prior to the commencement of development, excluding demolition, an assessment of suitable photovoltaic panel design to blend into the proposed façade design and to be installed on the eastern and western elevations shall be carried out and details of such a PV system for a trial of one or more years shall be submitted, to include confirmation of the proposed size, location and expected contribution to the building's energy demand of the photovoltaic panel installation. The assessment and details shall be approved in writing by the Local Planning Authority. REASON: To demonstrate the potential of maximising and integrating renewable energy technologies into the building envelope as a measure to provide wider environmental sustainability benefits in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2., Emerging City Plan 2040 policy S8, DE1.
50.	Prior to the commencement of the development, excluding demolition, a BREEAM a pre-assessment covering all areas/use classes (combined or individually assessed) for the station enhancements shall be submitted and approved by the LPA. The pre-assessment shall target rating of at least 'Excellent' (or such other target rating as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating). REASON: To demonstrate that the development performs well against a broad range of sustainability criteria including the reduction of carbon emissions and climate resilience, in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.
51.	Post construction BREEAM assessment(s) covering all areas/use classes, (combined or individually assessed) demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating), to include evidence of achieving the MAT 02 target on Environmental Product Declarations (EPDs), shall be submitted as soon as practicable after practical completion.

	REASON: To demonstrate that the development performs well against a broad range of sustainability criteria including the reduction of carbon emissions and climate resilience, in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.
52.	Prior to the commencement of the development, excluding demolition, a NABERS Design for Performance (DfP) target rating certificate and rating achievement plan, targeting a minimum NABERS 5 star rating, shall be submitted to and approved in writing by the LPA. The submitted details shall demonstrate how the design intent for energy performance will be maintained from design through to occupation and formal rating. The DfP Design Review certificate shall be provided within 3 months of commencement of work. REASON: To ensure that the development has maximised the reduction of operational carbon emissions and has a high operational energy efficiency in accordance with London Plan Policy SI2, Local Plan 2015 policy DM15.2 and emerging City Plan 2040 policy DE1.
53.	Within three months of completion of the NABERS rating period (as defined in section 8.1 of the Guide to Design for Performance), the NABERS certification and associated reports shall be submitted to the LPA. If a development does not achieve the 5-star target, a report shall set out the reasons why, and detail a strategy for how the development will achieve its target certification in the subsequent rating period. REASON: To ensure that the development has maximised the reduction of operational carbon emissions and has a high operational energy efficiency in accordance with London Plan Policy SI2, Local Plan 2015 policy DM15.2 and emerging City Plan 2040 policy DE1.
54.	Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, overheating, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. In The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.
55.	Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

	REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.
56.	Prior to the commencement of the Over Station Development, an updated Biodiversity Net Gain Assessment should be submitted to and approved to the Local Planning Authority if necessary to reflect any changes to landscaping proposals at detailed stage. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.
57.	Within 6 months of completion details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening.
58.	Prior to commencement of construction the applicant must instruct the services of a security engineer with competency in Explosion Consequence Analysis (ECA), the engineer must be a member of the Register of Security Engineers and Specialists (RSES). The ECA must consider the effects of blast from a Vehicle Borne Improvised Explosive Device (VBIED) at pre-determined stand-off distances, with results calculated for the effects of air-blast loading related to the structures of the over-station development (OSD) providing proportionate recommendation to mitigate integrity of the building(s) envelope and structural progressive collapse. The ECA must be submitted to British Transport Police (BTP) Counter Terrorism Securities Advisor (CTSA) via the City of London Corporation for approval. REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2.
59.	Prior to commencement of construction the applicant must instruct the services of a security engineer with competency in Hostile Vehicle Mitigation (HVM), the engineer must be a member of the Register of Security Engineers and Specialists (RSES). The engineer must complete a Vehicle Dynamics Assessment (VDA) to identify the appropriate specification of HVM along with any achievable stand-off. The VDA and specification must ensure the identified HVM is 'holistic' in nature in providing consistent mitigation across the whole site. The VDA must be submitted to British Transport Police (BTP) Counter Terrorism Securities Advisor (CTSA) via the City of London Corporation for approval. REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2.
60.	Prior to the commencement of construction works (excluding demolition) an updated Fire and Emergency Escape Strategy for all building users (including people with disabilities) including details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority (after consultation with the London Fire Brigade, Building Control Health and Safety Team) and the strategy shall remain in place thereafter. The development shall be carried out in accordance with the approved Fire and Emergency Escape Strategy details. This Fire Strategy should be produced in consultation with Transport for London and London Fire Brigade. REASON: To ensure that the development incorporates the necessary fire safety

	measures in accordance with policies D5 and D12 of the London Plan and Policies CS3, DM10.8 of the Local Plan.
61.	Before any construction works hereby permitted are begun details shall be submitted to and approved in writing by the local planning authority of: a project specific Inclusive Access Advisory Group to be recruited and retained for the first calendar year post completion. Details should include proposed recruitment, terms of reference, structures for reporting its findings and governance relating to recommended actions REASON: To ensure that disabled experience remains represented and informs the design and management of the station
62.	Before any construction works hereby permitted are begun details, including drawings at a scale of no less than 1:20 shall be submitted to and approved in writing by the local planning authority of: (i) the publicly accessible WC facilities and associated signage within the buildings hereby approved (ii) An inclusive Construction plan for the duration of the construction works to include information made available to the public, colour and decor of hoardings, protective footways, location of temporary dropped kerbs, resting points (iii) Cycle storage and associated end of trip facilities, signage, lighting and swept paths for station and over station development at a scale of no less than 1:20 (iv) The new stepped and step-free entrance routes from Exchange Square including path widths, planting, gradients, surfacing materials and signage (v) The fit out of the Assisted Travel Lounge and information points to include reception desk, lighting, floor surfaces, contrast, seating, signage and assistive technology, including hearing induction systems. (vi) Layout and inclusive design statement for the multi-use/auditorium space in the over-station development with drawings at a scale of no less than 1:20 to include information on inclusive seating options, place for BSL signer, assistance animal facilities and induction loop Notwithstanding the approved drawings details of the proposed station soffit materials shall be submitted to be accompanied by a report detailing how they represent design for neurodiversity REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.
63.	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a. An inclusive signage and wayfinding strategy, using maps, non-digital and digital formats highlighting and signposting destinations, inclusive and accessible routes and facilities, cycle parking, connections to bus and underground travel and any other relevant uses or historic sites shall be submitted to and approved in writing by the Local Planning Authority b. Notwithstanding the approved drawings, before works thereby affected are begun, full details of terrace and public realm layouts, surface materials, path widths, handrails, planters, seating, lighting, balustrades and any other infrastructure required, and demonstrating how a range of seating options, viewing and passing points will be delivered, including: - Details of the number, location and dimensions of wider aisle gates at all controlled points of entry for both station and over-station development - Details of planting and maintenance for areas of landscape including location of highly scented or spiky plants having regard for proximity to access routes and seating

	- An inclusive entrances strategy for the over-station development with details of controlled entry systems, entrance doors, thresholds, mats at a drawing scale no less than 1:20 (as relevant) - Details and specification for all lifting devices and escalators including doors, widths, control panels, floor surfaces, means of operation, internal car dimensions, and contrast - Details of new stairs including tread and riser dimensions, material surfaces, handrails, tactile paving and lighting at a drawing scale of no less than 1:20 - Details including surface materials and slip resistance, handrails, contrast, gradients and landings for the new access ramp in TfL Ticket Hall B at a drawing scale of no less than 1:20 c. An Inclusive Toilet Statement with details of Changing Places fit out, wheelchair accessible, and ambulant accessible toilets and baby changing facilities and location of animal spend facilities and material surfaces, colour, pattern and contrast at a scale of no less than 1:20. d. Details of Customer Assistance lounges, Quiet, family and multifaith prayer rooms at a drawing scale of no less than 1:20 including a range of options for seating assistance animals, temporary luggage storage and access to drinking water e. Details of /multi faith prayer room and associated ablution facilities at a drawing scale of no less than 1:20 f. An inclusive wayfinding strategy including, but not limited to tactile wayfinding across the station, and information available in more than one format g. Interpretation for all retained or new monuments and artworks including details of formats to facilitate access to the information for a range of people The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development. REASON: To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments in accordance with Local Plan DM10. 8 and London Plan Policy D5.
64.	The approved WC facilities shall be made available to the general public at all times of the station and over station development's operation (where open to the public) and be free of charge for the lifetime of the development. The signage informing the general public of the public toilet facilities onsite, shall be installed concurrently with first operation of the new station, and over-station development facilities REASON: To ensure the provision of public toilet facilities to meet the needs of the public in accordance with Policy DM22.2 of the Local Plan.
65.	Prior to occupation of the buildings the following details relating to the operation of the station and over station development shall be provided through Inclusive Access Management Plans which shall be submitted to and approved in writing by the Local Planning Authority. All building operations and management pursuant to this permission shall be carried out in accordance with the approved details, which should include: 1. Prior information content on inclusion and accessibility to go on the station and building operators' websites and made available in non-digital form, to be maintained and updated for the lifetime of the development in a range of formats including photos, a 'visual story' and an easy read version with information on: a. Travel distances in metres from key points of arrival, including from disabled persons' parking, bus stops and underground entrances, taxi ranks and setting down points b. location of dropped kerbs nearest to entry points into the station and over-station development and within a 50m vicinity to be provided in map form c. Identification of quieter routes into, and around the station during construction and peak periods d. location of accessible parking bays and associated protected access zones,

	passive EV charging and controlled entry points e. Inclusive facilities available on site, including dimensions and photos of (as relevant): Changing Places toilet, Family Room, Multi Faith space and associated ablution facilities, Quiet Space, wheelchair accessible toilets, f. Step-free entrance points into the development with distances in metres to station facilities, platform gatelines and lift access. g. Facilities for use of Changing Places and wheelchair accessible toilets including availability of hoist, and where to request Radar keys or additional bench paper (as relevant) h. Equipment loan or hire i. details of inclusive emergency procedures including: - procedures where there is not a separate firefighting and evacuation lift; - Staff training including quantum of assisting staff anticipated to be on the station concourse at any one time, frequency of training - Staff training including frequency, refresher updates, and with specific reference to where there is a requirement for training in the use of the Stair Climber Evacuation lift at the station and Personal Emergency Egress Plans (as relevant) for the over-station development - Details of an Inclusive Emergency Evacuation protocol, with details of stair lifts, refuge points, communication systems and relevant training j. information on any inclusive features which may be out of order or affected by construction or other factors (in addition to Network Rail station page) including relevant timescales and dates of fault reporting. REASON: To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments in accordance with Local Plan DM10. 8 and London Plan Policy D5.
66.	The terraces and balconies, excluding the rooftop amenity space, shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
67.	No live or recorded music that can be heard outside the premises shall be played. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
68.	No amplified or other music shall be played on the terraces, balconies or rooftop amenity space hereby permitted. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
69.	There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
70.	Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for the external terrace areas and other raised areas, along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building. The

	approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development. REASON: In the interests of safety in accordance with the following policies of the draft City Plan 2040: DE2 and DE5, and to ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2 DM10.1 and DM12.2.
71.	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a. Detailed drawings of a scale no less than 1:20, in plan, section and elevation of agreed typical bays for the Over station development (OSD) and station, including reference to materials, finishes, lighting, details of jointing, drip details, and any necessary expansion/movement joints; and ventilation panels; b. Notwithstanding the approved drawings, full details and 1:20 drawings in plan section and elevation, of the new ground and first-floor elevations, including but not limited to: all shopfronts, retail units; enclosed service route; all entrances and door design; OSD escalator surrounds; integrated signage, art panels, and information boards; ventilation panels; including details of their material specifications finishes and fixings; c. Particulars and samples of all the materials to be used on all external faces and the base of the OSD, including details of compliance with the approved Circular Economy Strategy, Townscape and visual impact assessment imagery; and inclusive access management plan; d. Particulars and samples of all the materials to be used on the new station concourses, station soffits and roof structure, service route tunnel exterior, retail units, cycle store and route, including details of compliance with the approved Circular Economy Strategy, and inclusive access management plan; e. Full details of all terraces, including all elevations, layouts, entrance design and location, fenestration, planters, seating, lighting, soffits, drainage, irrigation, balustrades and any other infrastructure required, demonstrating adequate microclimatic mitigation has been considered where necessary; f. Details of walls, railings, balustrades, ramps, gates, screens, handrails etc, bounding or within the site; g. Details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room; h. Details of the integration of M&E and building services into the external envelope, including but not limited to, details of external ducts, vents, louvres and extracts; i. Details of access to the roof for cleaning and maintenance, including details of mansafe equipment; j. Full details of the rooftops and their material coverings; k. No flues or mechanical ventilation shall be placed on top of the concourse units within the train sheds. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2 and emerging policies DE2, DE6 and HE1 of the Emerging City Plan 2040 and to support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.
72.	Before any works thereby affected are begun the following details relating to 'Upper concourse level retail and station operations units' shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved material:

	a. Typical details, in plan, section and elevation, of all station retail units, demonstrating the internal incorporation of ventilation features. b. No flues or mechanical ventilation shall be placed on top of the concourse units within the train sheds. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM12. 1 and emerging policies DE2, DE6 and HE1 of the Emerging City Plan 2040. For the avoidance of doubt, no flues or mechanical ventilation shall be placed on top of the concourse units within the train sheds.
73.	Before the works thereby affected are begun, 1:1 construction and mock-up sample panels of agreed sections of the brick entrance vaults shall be built, demonstrating the various material combinations of brick and the aesthetic properties of the arches, to be agreed and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
74.	Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a. Details of all soft landscaping, including the position, size and types of plants, specifying their seasonal interest, in addition and their contribution to biodiversity, local habitat, environmental resilience and inclusivity - demonstrating how unwelcome touch and scent can be avoided; b. Details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights, overall height, canopy size when installed and when mature; and details of tree pits/trenches and growing medium for soft and hard surfaces and their respective top and subsoil requirements as per British standards; c. Details of the incorporation of an animal spend area; d. Details of the method of irrigation and nutrient delivery systems for all soft landscaped areas, and details of SUDS infrastructure including whether the provision for harvesting rainwater run-off from surfaces to supplement irrigation is proposed, avoiding surface water contaminants which may damage planting; e. Notwithstanding the approved drawings, details of all furniture, including planters; seating including armrests, backrests and a range of seating heights; refuse bins; drinking water fountains, biodiversity habitat structures; f. Details of Hostile Vehicle Mitigation measures; g. Details of all hard landscaping materials, including paving details and samples, including path widths, in accordance with the City Public Realm Technical Manual; h. Details of the Landscape management and maintenance plan (LMMP) for all soft and hard landscaping, including ecological management, specialist tree management for existing and proposed trees, and street furniture for all proposed landscaping All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species

	to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the London Plan: G5, D8; City of London Local Plan 2015: DM3.2, DM10.1, DM10.3, DM10.5, DM10.8, DM12.2, DM15.5, DM19.2 and policies DE2, DE4, DE6, DE8, HE1, OS2 and OS3 of the emerging City Plan 2040.
75.	Before any works thereby affected are begun the following details, relating to the height restricted rooftop zone (from drawing Number: 1500-P06 titled 'Over Station Development landscape plan: roof level' and annotated area titled "Protected view corridor") of the roof garden shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: Details of the planting specification, hardscape features and urban furniture (such as umbrellas, awnings, boundary treatments, lighting installations), and management and maintenance strategy for the soft landscaping, to ensure the maximum 2m height capped landscaped zone across level 18 roof garden will be maintained, and not exceed the maximum height of 2m above finished floor level, and be retained as such in perpetuity. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.2, DM10.3, DM12.1, CS13 and policies DE2, DE3, DE4, DE8 and HE1 and S13 of the emerging City Plan 2040
76.	Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1.
77.	Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design in accordance with the adopted City of London Lighting Strategy SPD shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: - lighting layout/s; - details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure as well as impact on decorative soffits); - a lighting control methodology; - proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; - all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass - details of impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering; - details of how the lighting proposals will be inclusive for a range of people

	including options for testing sightlines and transitions. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15.
78.	Prior to the relevant part of the works commencing, the following information shall be submitted to and approved in writing by the Local Planning Authority pursuant to this permission shall be carried out in accordance with the approved materials: Updated dusk and nighttime AVR3 photography, following development of the approved lighting strategy under condition 77 of this permission, to demonstrate that illumination generated from the proposed development will not impact viewing experiences of St Pauls at night or alter the composition of the views as consented. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS13, and emerging City Plan 2040 Policy S13
79.	All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
80.	During the works, if hidden historic features are revealed they should be retained in-situ. Works shall be halted in the relevant area of the building and the Local Planning Authority should be notified immediately. Failure to do so may result in unauthorised works being carried out and an offence being committed. Particular regard must be given to the following area. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
81.	The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur or be necessary. REASON: To ensure the stability of the structure to be retained in accordance with the following policy of the Local Plan: DM12.3.
82.	Prior to the commencement of works a Structural Condition and Implementation Strategy, produced by a conservation-accredited engineer(s), shall be submitted to and approved in writing by the Local Planning Authority and the works undertaken in accordance with the approved details. This should include: - Details of opening up for structural investigation to understand and inform detailed structural designs. - Demonstrate structure is capable of receiving intended loads through investigation and testing - A structural design showing the impact of additional loading on historic roof trusses and fabric of the FEGH. REASON: to ensure the special interest of the listed building in accordance with CS 12, DM12.1, DM 12.3.
83.	Before any works thereby affected are begun, the following information shall be submitted to and approved in writing by the Local Planning Authority and be carried out in accordance with the approved details: Details of the signage, historic interpretation, siting, protection and maintenance of

	historic artifacts located within the roof garden. REASON: to ensure the special interest of the listed building, in accordance with CS 12, DM12.1, DM 12.3.
84.	Prior to occupation of the over-station development, MoTiON (Model of Travel in London) modelling shall be carried out in consultation with Transport for London (TfL), and the concluding assessments submitted to and approved in writing by the Local Planning Authority. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy in accordance with the following policy of the Local Plan: CS16, DM16.1
85.	Prior to commencement of construction works, details of lift size and design to those lifts serving London Underground services and areas shall be submitted to and approved in writing by the the Local Planning Authority and be carried out in accordance with the approved details. REASON: To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments in accordance with Local Plan DM10. 8 and London Plan Policy D5.
86.	Prior to occupation of the Over-station development, a wayfinding strategy shall be submitted to and approved in writing by the Local Planning Authority and be carried out in accordance with the approved details. Such a strategy should be worked up in consultation with Transport for London. REASON: To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments in accordance with Local Plan DM10. 8 and London Plan Policy D5.
87.	Prior to the commencement of construction works, a Rail Freight Construction Materials Strategy shall be submitted demonstrating maximised use of rail freight for construction materials and/or waste, to be approved in writing by the Local Planning Authority in consultation with Transport for London. REASON: In accordance with London Plan Policy T7 (j).
88.	No plant or telecommunications equipment shall be installed on the exterior of the buildings, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
89.	At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
90.	Self-closing mechanisms must be fitted on the doors before the Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
91.	No servicing of the premises shall be carried out between the hours of 06:00-10:00; 12:00-14:00; and 16:00-19:00. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

92.	Prior to the occupation of the proposed retail uses hereby permitted or the proposed Over Station Development, a detailed Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority, to have been drafted in line with the submitted Outline Operational Waste Management Plan. REASON: In accordance with Policy DM17.1 of the Local Plan.
93.	The areas shown on the approved drawings as Offices Class E(g)(i) and as set out in Condition 95 (Approved Drawings) of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020). REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
94.	The development shall provide (all figures GIA sqm and excluding plant): - Office (Class E(g)(i)) – 88,013m² - Flexible Retail/Food and Beverage (Class E (a/b), drinking establishments, and hot food takeaway use) – 11,077m² - Station Use (Sui Generis) – 10,992m² - Roof Garden (Sui Generis) – 3,820m² - Auditorium (Sui Generis) – 1,116m² REASON: To ensure the development is carried out in accordance with the approved plans.
95.	The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: - A-03-117 Proposed Location Plan - Level B3 - A-03-118 Proposed Location Plan - Level B2 - A-03-119 Proposed Location Plan - Level B1 (Lower Concourse) P01 - A-03-120 Proposed Location Plan - Level 00 (Upper Concourse) P01 - A-03-121 Proposed Oversailing Plan P01 - A-03-219 Andaz Proposed Location Plan - Level B1 P01 - A-03-220 Andaz Proposed Location Plan - Level 00 P01 - A-03-310 Ger War Memorial - Proposed Location Plan - Level 00 P01 - A-03-330 LSOEA War Memorial - Proposed Location Plan - Level 00 P01 - A-03-410 Police Box - Proposed Location Plan - Level 00 P01 - A-04-199 Demolition Site Plan - Level B1 P01 - A-04-200 Demolition Site Plan - Level 00 P01 - A-04-220 Demolition Site Plan - Level Roof - A-04-299 Proposed Site Plan - Level B1 (Lower Concourse) P01 - A-04-300 Proposed Site Plan - Level 00 (Upper Concourse) P01 - A-04-310 Proposed Site Plan - Level Typical Upper P01 - A-04-320 Proposed Site Plan - Level Roof P01 - A-04-520 Demolition Site Elevations - North & East P00 - A-04-521 Demolition Site Elevations - South & West P00 - A-04-540 Proposed Site Elevations - North & East P01 - A-04-541 Proposed Site Elevations - South & West P01 - A-06-089 Demolition Floor Plan - Level B1-B P01 - A-06-090 Demolition Floor Plan - Level 00-B P01 - A-06-097 Demolition Floor Plan - Level B3 P00 - A-06-098 Demolition Floor Plan - Level B2 P00 - A-06-099 Demolition Floor Plan - Level B1-A P01

	A-06-100 Demolition Floor Plan - Level 00-A P01 A-06-104 Demolition Floor Plan - Level Rf A-06-300 Demolition Section A-A P00 A-06-301 Demolition Section B-B P00 A-06-302 Demolition Section C-C P01 A-06-303 Demolition Section D-D P00 A-06-304 Demolition Section E-E P00 A-06-400 Demolition Elevation - North P00 A-06-401 Demolition Elevation - East P00 A-06-402 Demolition Elevation - South P00 A-06-403 Demolition Elevation - West P01 A-07-089 Proposed Floor Plan - Level B1-B (Lower Concourse) P01 A-07-090 Proposed Floor Plan - Level 00-B (Upper Concourse) P01 A-07-097 Proposed Floor Plan - Level B3 P00 A-07-098 Proposed Floor Plan - Level B2 P00 A-07-099 Proposed Floor Plan - Level B1-A (Lower Concourse) P01 A-07-100 Proposed Floor Plan - Level 00-A (Upper Concourse) P01 A-07-103 Proposed Floor Plan - Level 03 P01 A-07-104 Proposed Floor Plan - Level 04 P01 A-07-105 Proposed Floor Plan - Level 05 P01 A-07-106 Proposed Floor Plan - Level 06 P01 A-07-107 Proposed Floor Plan - Level 07 P01 A-07-108 Proposed Floor Plan - Level 08 P01 A-07-109 Proposed Floor Plan - Level 09 P01 A-07-110 Proposed Floor Plan - Level 10 P01 A-07-111 Proposed Floor Plan - Level 11 P01 A-07-112 Proposed Floor Plan - Level 12 P01 A-07-113 Proposed Floor Plan - Level 13 P01 A-07-114 Proposed Floor Plan - Level 14 P01 A-07-115 Proposed Floor Plan - Level 15 P01 A-07-116 Proposed Floor Plan - Level 16 P01 A-07-117 Proposed Floor Plan - Level 17 P01 A-07-118 Proposed Floor Plan - Level 18 P01 A-07-119 Proposed Floor Plan - Level 19 P01 A-07-120 Proposed Floor Plan - Level Rf P01 A-07-300 Proposed Section A-A P01 A-07-301 Proposed Section B-B P01 A-07-302 Proposed Section C-C P01 A-07-303 Proposed Section D-D A-07-304 Proposed Section E-E A-07-400 Proposed Elevation - North P01 A-07-401 Proposed Elevation - East A-07-402 Proposed Elevation - South A-07-403 Proposed Elevation - West P01 A-08-198 Andaz Existing-Level B2 A-08-199 Andaz Demolition - Level B1 A-08-200 Andaz, Memorilas & Police Box Demolition - Level 00 A-08-205 Andaz Demolition - Level Rf A-08-210 Andaz Demolition - North Elevation A-08-211 Andaz Demolition - East Elevation A-08-212 Andaz Demolition - South Elevation A-08-213 Andaz Demolition - West Elevation

	A-08-298 Andaz Proposed - Level B2 A-08-299 Andaz Proposed - Level B1 A-08-300 Andaz, Memorials & Police Box Proposed - Level 00 A-08-305 Andaz Proposed - Level Rf A-08-310 Andaz Proposed - North Elevation A-08-311 Andaz Proposed - East Elevation A-08-312 Andaz Proposed - South Elevation A-08-313 Andaz Proposed - West Elevation A-20-100 Station Interface Details 1 A-20-101 Station Interface Details 2 A-20-102 Station Interface Details 3 A-20-103 Station Interface Details 4 P01 A-20-104 Station Interface Details 5 A-20-120 Memorial Interfaces A-20-300 OSD Unfolded Elevation 01 P00 A-20-301 OSD Unfolded Elevation 02 P00 A-20-302 OSD Unfolded Elevation 03 P00 A-20-310 OSD Facade Type A1 P00 A-20-311 OSD Facade Type A3 P00 A-20-312 OSD Facade Type B2 P00 A-20-313 OSD Facade Type B3 P00 A-20-314 OSD Facade Type C1 P00 A-20-315 OSD Facade Type C2 P00 A-20-316 OSD Facade Type C2a P00 A-20-317 OSD Facade Type C3 P00 A-20-318 OSD Facade Type C4 P00 A-20-319 OSD Facade Type C6 P00 A-20-320 OSD Facade Type D1 P00 A-20-321 OSD Facade Type D3 P00 A-20-322 OSD Facade Type P1 P00 A-20-400 Sky Lobby Terrace Baystudy A-20-401 Office Facade Detail A-20-402 South Balconies A-20-403 OSD West Stepped Terraces A-20-404 OSD Level 18 Auditorium A-20-405 OSD L04 Mep Plant Screen A-20-406 OSD Roof Mep Plant Screen A-20-407 BMU Station Detail P00 A-24-100 Entrance A Hope Square A-24-200 Entrance B Bishopsgate Square A-24-300 Entrance C Exchange Square P01 A-24-400 Station Concourse Roof Rcp P00 A-61-010 Station Typical Details - Western Wall & Columns A-61-015 Station Typical Details Western Wall & Columns A-61-025 Station Typical Details Eastern Wall & Columns A-61-051 Station Typical Details - New Concourse To Andaz A-61-055 Station Typical Details - New Facade To Andaz Facade A-62-100 Station Roof Details - New Concourse Roof To Existing A-81-001 Summary Of Historical Relics For Proposed Reuse A-81-010 Police Call Box Summary

	LSS_1000 OSD Landscape Integration Plan P06 LSS_1100 OSD Landscape Plan – Ground Level P04 LSS_1200 OSD Landscape Plan – Hope Square P05 LSS_1300 OSD Landscape Plan – Bishopsgate Entrance P03 LSS_1400 OSD Landscape Plan – Sun St. Passage P05 LSS_1500 OSD Landscape Plan – Roof Level P06 LSS_5000 OSD Landscape Plan – Roof Level Details P02 LSS_5100 Hope Square Section P02 LSS_5200 Bishopsgate Square Section P01 REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

Recommended Conditions - 25/00474/LBC (Station Works)

1	The development hereby permitted shall be begun before the expiration of five years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
2	All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
3	No works of demolition, removal of fabric, or construction shall commence until the appointment of an appropriately qualified professionals specialising in restoration and reclamation of historic fabric, to supervise the hereby approved works. All documents thereafter requested via conditions of this permission must be prepared by a suitably qualified professional. REASON: To ensure that the Local Planning Authority may be satisfied with the proposed works in accordance with Policy DM 12.3 of the Local Plan.
4	During the works, if hidden historic features are revealed they should be retained in-situ. Works shall be halted in the relevant area of the building and the Local Planning Authority should be notified immediately. Failure to do so may result in unauthorised works being carried out and an offence being committed. Particular regard must be given to the following area. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
5	No cleaning of masonry, other than low pressure (20-100 psi) surface cleaning using a nebulous water spray, is authorised by this consent, unless otherwise agreed in writing by the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

6	Before work begins, any other cleaning proposals must be approved in writing and carried out strictly in accordance with those details. At the commencement of the cleaning, a test panel shall be undertaken in an inconspicuous position and the method recorded to the approval of the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
7	Before work begins, a method statement showing how the cleaning will conform to BS 8221-1:2012 (Code of practice for cleaning and surface repair of buildings. Cleaning of natural stone, brick, terracotta and concrete) must be agreed and approved in writing by the Local Planning Authority. Cleaning shall be implemented strictly in accordance with the method statements. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
8	No demolition, removal of fabric, or construction works shall commence until evidence has been submitted to the Local Planning Authority through a condition survey prepared undertaken by an appropriately qualified professional specialising in conservation work, to confirm the state of repair of the existing historic fabric within the site. The survey should - identify any damage - confirm all retained historic fabric will not be adversely affected by additional loading/and or fixings as a result of the proposals. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
9	No demolition, removal of fabric, or construction works shall commence until a construction methodology, including details of scaffolding and typical protection details between pole and the elevation, with reference to the Historic England "Scaffolding for Historic buildings checklist" has been submitted to and approved in writing by the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with policy DM12.3 of the Local Plan
10	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details: - Drawn details to 1:20 showing full elevation, plans and sections for any opening up and restoration works to Sun Street Passage within area of historic western trainshed wall. - Drawn details to 1:10, including existing and proposed, plans, sections and elevations of all replacement windows. - Drawn details to 1:20, including plans and sections indicating the tying in of fabric of the proposed western concourse extension into the trainshed wall, including any fixings specifications. - Drawn details to 1:20 including elevations plans and sections providing details of tying in of retained Derbyshire Roof with new roof over concourse and supporting structure to Over Station Development (OSD). - Drawn details to 1:20 including elevations plans and sections providing details of station service road encasement and interface with historic elevations. - Drawn details to 1:20 including elevations plans and sections providing details of intersection of proposed new concourse and station roof with the Former Great Eastern Hotel. - Drawn details to 1:20 including elevations plans and sections providing details of proposed alterations to the Metropolitan Arcade. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

11	Before any works thereby affected are begun, the position, type and method of installation of all new or relocated services and related fixtures (for the avoidance of doubt this includes communications and information technology servicing), relating to new retail units within the trainshed shall be specified and agreed in writing with the Local Planning Authority where ducts or other methods of concealment are proposed. The works shall be implemented only in accordance with such approval. Particular regard should be given to work affecting the following features or parts of the building: REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
12	No new plumbing, pipes, soil-stacks, flues, vents or ductwork shall be fixed on the external or internal faces of the building other than those shown on the drawings hereby approved. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
13	No new grilles, security alarms, lighting, security or other cameras or other fixtures shall be mounted on the external or internal faces of the building other than those shown on the drawings hereby approved. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
14	No demolition, removal of fabric, or construction works shall commence until a scheme identifying methodology for safe storage of historic fabric to be temporarily removed from site should be submitted to the local planning authority for approval. The methodology should include: - Fabric and fixings to be removed should be photographed and numbered in a catalogue identifying their quantity and original location. - Tools used to for the removal of fabric and fixings should be specified. - Confirmation of the location and precautions taken for their safe storage including security arrangements and weatherproofing. - Confirmation of the person or body specialising in this procedure appointed by the applicant; - Timetable for their reinstatement - Proposed tools, fixings and methodology for reinstatement. In respect of the above, particular regard should be given to the following items: - Glazing and trusses within Derbyshire Roof to be dismantled and re-instated. - Listed Police Box - Listed Great Eastern War Memorial - Listed London Society of Anglians Memorial - Kindertransport Statue - 'Fur Das Kind' Memorial - 1991 Re-opening Memorial - Great Eastern Railway Lettering - Great Eastern Railway Cartouches - 1990s service yard screen. - Stone Piers to Hope Square. The agreed measures shall be carried out in full. No such features shall be disturbed or removed temporarily or permanently except as indicated on the approved drawings or without the prior approval in writing of the Local Planning Authority. REASON: to ensure that precautions are taken to secure and protect the interior and exterior features during the building work, and the special interest of the listed building, in accordance with CS 12, DM12.1, DM 12.3.

	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: Particulars and samples of all the materials to be used on the new station concourses, station soffits and roof structure, sun street elevation, interfacing materials where they create junctions to historic fabric. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
15	No demolition, removal of fabric, or construction works shall commence until details are approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect the interior and exterior features of the listed fabric during the building work. The agreed measures shall be carried out in full. No such features shall be disturbed or removed temporarily or permanently except as indicated on the approved drawings or without the prior approval in writing of the Local Planning Authority. Particular regard should be given to the following item(s): - Station roof - Historic brickwork - Columns - Retained fabric from the demolished eastern trainshed extension. REASON: to ensure that precautions are taken to secure and protect the interior and exterior features during the building work, and the special interest of the listed building, in accordance with CS 12, DM12.1, DM 12.3.
16	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority : a. Particulars and samples of proposed paint scheme to be submitted, specifying chemical mix, final colour and any protective finishes. b. Methodology for the preparation and repair of existing metal work to be painted. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
17	The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars: A-03-117 Proposed Location Plan - Level B3 A-03-118 Proposed Location Plan - Level B2 A-03-119 Proposed Location Plan - Level B1 (Lower Concourse) P01 A-03-120 Proposed Location Plan - Level 00 (Upper Concourse) P01 A-03-121 Proposed Oversailing Plan P01 A-04-199 Demolition Site Plan - Level B1 P01 A-04-200 Demolition Site Plan - Level 00 P01 A-04-220 Demolition Site Plan - Level Roof A-04-299 Proposed Site Plan - Level B1 (Lower Concourse) P01 A-04-300 Proposed Site Plan - Level 00 (Upper Concourse) P01 A-04-310 Proposed Site Plan - Level Typical Upper P01 A-04-320 Proposed Site Plan - Level Roof P01 A-04-520 Demolition Site Elevations - North & East A-04-521 Demolition Site Elevations - South & West A-04-540 Proposed Site Elevations - North & East P01 A-04-541 Proposed Site Elevations - South & West P01 A-06-089 Demolition Floor Plan - Level B1-B P01 A-06-090 Demolition Floor Plan - Level 00-B P01 A-06-097 Demolition Floor Plan - Level B3

	A-06-098 Demolition Floor Plan - Level B2 A-06-099 Demolition Floor Plan - Level B1-A P01 A-06-100 Demolition Floor Plan - Level 00-A A-06-104 Demolition Floor Plan - Level Rf A-06-300 Demolition Section A-A A-06-301 Demolition Section B-B A-06-302 Demolition Section C-C P01 A-06-303 Demolition Section D-D A-06-304 Demolition Section E-E A-06-400 Demolition Elevation - North A-06-401 Demolition Elevation - East A-06-402 Demolition Elevation - South A-06-403 Demolition Elevation - West P01 A-07-089 Proposed Floor Plan - Level B1-B (Lower Concourse) P01 A-07-090 Proposed Floor Plan - Level 00-B (Upper Concourse) P01 A-07-097 Proposed Floor Plan - Level B3 A-07-098 Proposed Floor Plan - Level B2 A-07-099 Proposed Floor Plan - Level B1-A (Lower Concourse) P01 A-07-100 Proposed Floor Plan - Level 00-A (Upper Concourse) P01 A-07-103 Proposed Floor Plan - Level 03 P01 A-07-104 Proposed Floor Plan - Level 04 P01 A-07-105 Proposed Floor Plan - Level 05 P01 A-07-106 Proposed Floor Plan - Level 06 P01 A-07-107 Proposed Floor Plan - Level 07 P01 A-07-108 Proposed Floor Plan - Level 08 P01 A-07-109 Proposed Floor Plan - Level 09 P01 A-07-110 Proposed Floor Plan - Level 10 P01 A-07-111 Proposed Floor Plan - Level 11 P01 A-07-112 Proposed Floor Plan - Level 12 P01 A-07-113 Proposed Floor Plan - Level 13 P01 A-07-114 Proposed Floor Plan - Level 14 P01 A-07-115 Proposed Floor Plan - Level 15 P01 A-07-116 Proposed Floor Plan - Level 16 P01 A-07-117 Proposed Floor Plan - Level 17 P01 A-07-118 Proposed Floor Plan - Level 18 P01 A-07-119 Proposed Floor Plan - Level 19 P01 A-07-120 Proposed Floor Plan - Level Rf P01 A-07-300 Proposed Section A-A P01 A-07-301 Proposed Section B-B P01 A-07-302 Proposed Section C-C P01 A-07-303 Proposed Section D-D A-07-304 Proposed Section E-E A-07-400 Proposed Elevation - North P01 A-07-401 Proposed Elevation - East A-07-402 Proposed Elevation - South A-07-403 Proposed Elevation - West P01 A-08-098 Andaz Existing-Level B2 A-08-099 Andaz Existing - Level B1 A-08-100 Andaz, Memorials & Police Box Existing - Level 00

	A-08-105 Andaz Existing - Level Rf A-08-110 Andaz Existing - North Elevation A-08-111 Andaz Existing - East Elevation A-08-112 Andaz Existing - South Elevation A-08-113 Andaz Existing - West Elevation A-08-198 Andaz Existing-Level B2 A-08-199 Andaz Demolition - Level B1 A-08-200 Andaz, Memorilas & Police Box Demolition - Level 00 A-08-205 Andaz Demolition - Level Rf A-08-210 Andaz Demolition - North Elevation A-08-211 Andaz Demolition - East Elevation A-08-212 Andaz Demolition - South Elevation A-08-213 Andaz Demolition - West Elevation A-08-298 Andaz Proposed - Level B2 A-08-299 Andaz Proposed - Level B1 A-08-300 Andaz, Memorials & Police Box Proposed - Level 00 A-08-305 Andaz Proposed - Level Rf A-08-310 Andaz Proposed - North Elevation A-08-311 Andaz Proposed - East Elevation A-08-312 Andaz Proposed - South Elevation A-08-313 Andaz Proposed - West Elevation A-20-100 Station Interface Details 1 A-20-101 Station Interface Details 2 A-20-102 Station Interface Details 3 A-20-103 Station Interface Details 4 P01 A-20-104 Station Interface Details 5 A-20-120 Memorial Interfaces A-24-100 Entrance A Hope Square A-24-200 Entrance B Bishopsgate Square A-24-300 Entrance C Exchange Square P01 A-61-010 Station Typical Details - Western Wall & Columns A-61-015 Station Typical Details Western Wall & Columns A-61-025 Station Typical Details Eastern Wall & Columns A-61-051 Station Typical Details - New Concourse To Andaz A-61-055 Station Typical Details - New Facade To Andaz Facade A-62-100 Station Roof Details - New Concourse Roof To Existing A-81-001 Summary Of Historical Relics For Proposed Reuse A-81-010 Police Call Box REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

Recommended Conditions - 25/00475/LBC (Former Great Eastern Hotel)

1	The development hereby permitted shall be begun before the expiration of five years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
2	All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
3	No works of demolition, removal of fabric, or construction shall commence until the appointment of an appropriately qualified professionals specialising in restoration and reclamation of historic fabric, to supervise the hereby approved works. All documents thereafter requested via conditions of this permission must be prepared by a suitably qualified professional. REASON: To ensure that the Local Planning Authority may be satisfied with the proposed works in accordance with Policy DM 12.3 of the Local Plan.
4	During the works, if hidden historic features are revealed they should be retained in-situ. Works shall be halted in the relevant area of the building and the Local Planning Authority should be notified immediately. Failure to do so may result in unauthorised works being carried out and an offence being committed. Particular regard must be given to the following area. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
5	No cleaning of masonry, other than low pressure (20-100 psi) surface cleaning using a nebulous water spray is authorised by this consent unless otherwise agreed in writing by the Local Planning Authority REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
6	Before work begins, any other cleaning proposals must be approved in writing and carried out strictly in accordance with those details. At the commencement of the cleaning, a test panel shall be undertaken in an inconspicuous position and the method recorded to the approval of the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
7	Before work begins, a method statement showing how the cleaning will conform to BS 8221-1:2012 (Code of practice for cleaning and surface repair of buildings. Cleaning of natural stone, brick, terracotta and concrete) must be agreed and approved in writing by the Local Planning Authority. Cleaning shall be implemented strictly in accordance with the method statements. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
8	No demolition, removal of fabric, or construction works shall commence until evidence has been submitted to the Local Planning Authority through a condition survey prepared undertaken by an appropriately qualified professional specialising in conservation work, to confirm the state of repair of the existing historic fabric within the site. The survey should a. identify any damage

	b. confirm all retained historic fabric will not be adversely affected by additional loading/and or fixings as a result of the proposals. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
9	No demolition, removal of fabric, or construction works shall commence until a construction methodology, including details of scaffolding and typical protection details between pole and the elevation, with reference to the Historic England "Scaffolding for Historic buildings checklist" has been submitted to and approved in writing by the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with policy DM12.3 of the Local Plan
10	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details: A. Drawn details to 1:20 including elevations plans and sections providing details of intersection of proposed new concourse and station roof with the Former Great Eastern Hotel. B. Full details of all waterproofing and jointing between the FEGH and the proposals. C. Drawn details to 1:20 including elevations plans and sections providing details of openings within the northern elevation of the FEGH into the proposed concourse. D. Drawn details to 1:20 including existing and proposed internal elevations, plans and sections for the works at Basement, Lower Ground and Ground Level. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
11	Before work begins, the position, type and method of installation of all new or relocated services and related fixtures (for the avoidance of doubt this includes communications and information technology servicing), shall be specified and agreed in writing with the Local Planning Authority where ducts or other methods of concealment are proposed. The works shall be implemented only in accordance with such approval. Particular regard should be given to work affecting the following features or parts of the building: The Northern Elevation of the Hotel where the facade is re-exposed to public view. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
12	No new plumbing, pipes, soil-stacks, flues, vents or ductwork shall be fixed on the external or internal faces of the building other than those shown on the drawings hereby approved. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
13	No new grilles, security alarms, lighting, security or other cameras or other fixtures shall be mounted on the external or internal faces of the building other than those shown on the drawings hereby approved. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

14	No demolition, removal of fabric, or construction works shall commence until a scheme identifying methodology for safe storage of historic fabric to be temporarily removed from site should be submitted to the local authority for approval. The methodology should include: A. Fabric and fixings to be removed should be photographed and numbered in a catalogue identifying their quantity and original location. B. Tools used to for the removal of fabric and fixings should be specified. C. Confirmation of the location and precautions taken for their safe storage including security arrangements and weatherproofing. D. Confirmation of the person or body specialising in this procedure appointed by the applicant; E. Timetable for their reinstatement F. Proposed tools, fixings and methodology for reinstatement. In respect of the above, particular regard should be given to the following items • 1991 re-opening memorial • Great Eastern Railway Lettering • Listed London Society of East Anglians War Memorial • Listed Great Eastern Railway Company War Memorial. • Transept roof trusses and glazing junction with the Former Great Eastern Hotel. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																																	
15	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: Particulars and samples of all the materials to be used where they create junctions with the fabric of the Former Great Eastern Hotel. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																																	
16	Before any relevant works thereby affected are begun a method statement and material samples should be submitted to the Local Planning Authority indicating methods used to make good the fabric of the Hotel following the removal the existing 1990s structure where hotel fabric is to be re-exposed. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																																	
17	The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars: <table><tr><td>A-03-219</td><td>Andaz Proposed Location Plan - Level B1</td><td>P01</td></tr><tr><td>A-03-220</td><td>Andaz Proposed Location Plan - Level 00</td><td>P01</td></tr><tr><td>A-08-198</td><td>Andaz Demolition-Level B2</td><td></td></tr><tr><td>A-08-199</td><td>Andaz Demolition - Level B1</td><td></td></tr><tr><td>A-08-200</td><td>Andaz, Memorilas & Police Box Demolition - Level 00</td><td></td></tr><tr><td>A-08-205</td><td>Andaz Demolition - Level Rf</td><td></td></tr><tr><td>A-08-210</td><td>Andaz Demolition - North Elevation</td><td></td></tr><tr><td>A-08-211</td><td>Andaz Demolition - East Elevation</td><td></td></tr><tr><td>A-08-212</td><td>Andaz Demolition - South Elevation</td><td></td></tr><tr><td>A-08-213</td><td>Andaz Demolition - West Elevation</td><td></td></tr><tr><td>A-08-298</td><td>Andaz Proposed - Level B2</td><td></td></tr></table>	A-03-219	Andaz Proposed Location Plan - Level B1	P01	A-03-220	Andaz Proposed Location Plan - Level 00	P01	A-08-198	Andaz Demolition-Level B2		A-08-199	Andaz Demolition - Level B1		A-08-200	Andaz, Memorilas & Police Box Demolition - Level 00		A-08-205	Andaz Demolition - Level Rf		A-08-210	Andaz Demolition - North Elevation		A-08-211	Andaz Demolition - East Elevation		A-08-212	Andaz Demolition - South Elevation		A-08-213	Andaz Demolition - West Elevation		A-08-298	Andaz Proposed - Level B2	
A-03-219	Andaz Proposed Location Plan - Level B1	P01																																
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	A-08-299 Andaz Proposed - Level B1 A-08-300 Andaz, Memorials & Police Box Proposed - Level 00 A-08-305 Andaz Proposed - Level Rf A-08-310 Andaz Proposed - North Elevation A-08-311 Andaz Proposed - East Elevation A-08-312 Andaz Proposed - South Elevation A-08-313 Andaz Proposed - West Elevation A-20-100 Station Interface Details 1 A-20-101 Station Interface Details 2 A-20-103 Station Interface Details 4 A-20-104 Station Interface Details 5 A-61-051 Station Typical Details - New Concourse To Andaz A-61-055 Station Typical Details - New Facade To Andaz Facade REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

Recommended Conditions - 25/00476/LBC (Great Eastern War Memorial)

1	The development hereby permitted shall be begun before the expiration of five years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
2	All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
3	No works of demolition, removal of fabric, or construction shall commence until the appointment of an appropriately qualified professionals specialising in restoration and reclamation of historic fabric, to supervise the hereby approved works. All documents thereafter requested via conditions of this permission must be prepared by a suitably qualified professional. REASON: To ensure that the Local Planning Authority may be satisfied with the proposed works in accordance with Policy DM 12.3 of the Local Plan.
4	No cleaning of masonry, other than low pressure (20-100 psi) surface cleaning using a nebulous water spray is authorised by this consent unless otherwise agreed in writing by the Local Planning Authority REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
5	Before work begins, any other cleaning proposals must be approved in writing and carried out strictly in accordance with those details. At the commencement of the cleaning, a test panel shall be undertaken in an inconspicuous position and the method recorded to the approval of the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

6	Before work begins, a method statement showing how the cleaning will conform to BS 8221-1:2012 (Code of practice for cleaning and surface repair of buildings. Cleaning of natural stone, brick, terracotta and concrete) must be agreed and approved in writing by the Local Planning Authority. Cleaning shall be implemented strictly in accordance with the method statements. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																		
7	No demolition, removal of fabric, or construction works shall commence until evidence has been submitted to the Local Planning Authority through a condition survey prepared undertaken by an appropriately qualified professional specialising in conservation work, to confirm the state of repair of the existing historic fabric within the site. The survey should a. identify any damage b. confirm all retained historic fabric will not be adversely affected by additional loading/and or fixings as a result of the proposals. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																		
8	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details: A. Drawn details to 1:10 showing full elevation, plans and sections for the proposed reinstatement of the War Memorial. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																		
9	No demolition, removal of fabric, or construction works shall commence until a scheme identifying methodology for safe storage of historic fabric to be temporarily removed from site should be submitted to the local authority for approval. The methodology should include: A. Fabric and fixings to be removed should be photographed and numbered in a catalogue identifying their quantity and original location. B. Tools used to for the removal of fabric and fixings should be specified. C. Confirmation of the location and precautions taken for their safe storage including security arrangements and weatherproofing. D. Confirmation of the person or body specialising in this procedure appointed by the applicant; E. Timetable for their reinstatement F. Proposed tools, fixings and methodology for reinstatement. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3																		
10	The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars: <table><tr><td>A-03-300</td><td>GER War Memorial - Existing Location Plan - Level 00</td><td>P01</td></tr><tr><td>A-03-310</td><td>GER War Memorial - Proposed Location Plan - Level 00</td><td>P01</td></tr><tr><td>A-08-100</td><td>Andaz, Memorials & Police Box Existing - Level 00</td><td></td></tr><tr><td>A-08-113</td><td>Andaz Existing - West Elevation</td><td></td></tr><tr><td>A-08-200</td><td>Andaz, Memorilas & Police Box Demolition - Level 00</td><td></td></tr><tr><td>A-08-213</td><td>Andaz Demolition - West Elevation</td><td></td></tr></table>	A-03-300	GER War Memorial - Existing Location Plan - Level 00	P01	A-03-310	GER War Memorial - Proposed Location Plan - Level 00	P01	A-08-100	Andaz, Memorials & Police Box Existing - Level 00		A-08-113	Andaz Existing - West Elevation		A-08-200	Andaz, Memorilas & Police Box Demolition - Level 00		A-08-213	Andaz Demolition - West Elevation	
A-03-300	GER War Memorial - Existing Location Plan - Level 00	P01																	
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A-08-200	Andaz, Memorilas & Police Box Demolition - Level 00																		
A-08-213	Andaz Demolition - West Elevation																		

	A-08-300 Andaz, Memorials & Police Box Proposed - Level 00 A-20-120 Memorial Interfaces REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

Recommended Conditions - 25/00479/LBC (London Society of East Anglians War Memorial)

1	The development hereby permitted shall be begun before the expiration of five years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
2	All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
3	No works of demolition, removal of fabric, or construction shall commence until the appointment of an appropriately qualified professionals specialising in restoration and reclamation of historic fabric, to supervise the hereby approved works. All documents thereafter requested via conditions of this permission must be prepared by a suitably qualified professional. REASON: To ensure that the Local Planning Authority may be satisfied with the proposed works in accordance with Policy DM 12.3 of the Local Plan.
4	No cleaning of masonry, other than low pressure (20-100 psi) surface cleaning using a nebulous water spray is authorised by this consent unless otherwise agreed in writing by the Local Planning Authority REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
5	Before work begins, any other cleaning proposals must be approved in writing and carried out strictly in accordance with those details. At the commencement of the cleaning, a test panel shall be undertaken in an inconspicuous position and the method recorded to the approval of the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
6	Before work begins, a method statement showing how the cleaning will conform to BS 8221-1:2012 (Code of practice for cleaning and surface repair of buildings. Cleaning of natural stone, brick, terracotta and concrete) must be agreed and approved in writing by the Local Planning Authority. Cleaning shall be implemented strictly in accordance with the method statements. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
7	No demolition, removal of fabric, or construction works shall commence until evidence has been submitted to the Local Planning Authority through a condition survey prepared undertaken by an appropriately

	qualified professional specialising in conservation work, to confirm the state of repair of the existing historic fabric within the site. The survey should - identify any damage - confirm all retained historic fabric will not be adversely affected by additional loading/and or fixings as a result of the proposals. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																
8	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details: Drawn details to 1:10 showing full elevation, plans and sections for the proposed reinstatement of the War Memorial. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																
9	No demolition, removal of fabric, or construction works shall commence until a scheme identifying methodology for safe storage of historic fabric to be temporarily removed from site should be submitted to the local authority for approval. The methodology should include: - Fabric and fixings to be removed should be photographed and numbered in a catalogue identifying their quantity and original location. - Tools used to for the removal of fabric and fixings should be specified. - Confirmation of the location and precautions taken for their safe storage including security arrangements and weatherproofing. - Confirmation of the person or body specialising in this procedure appointed by the applicant; - Timetable for their reinstatement - Proposed tools, fixings and methodology for reinstatement. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																
10	The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars: <table border="0"> <tr> <td>A-03-320</td><td>LSOEA War Memorial - Existing Location Plan - Level 00 P01</td></tr> <tr> <td>A-03-330</td><td>LSOEA War Memorial - Proposed Location Plan - Level 00 P01</td></tr> <tr> <td>A-08-100</td><td>Andaz, Memorials & Police Box Existing - Level 00</td></tr> <tr> <td>A-08-110</td><td>Andaz Existing - North Elevation</td></tr> <tr> <td>A-08-200</td><td>Andaz, Memorilas & Police Box Demolition - Level 00</td></tr> <tr> <td>A-08-210</td><td>Andaz Demolition - North Elevation</td></tr> <tr> <td>A-08-300</td><td>Andaz, Memorials & Police Box Proposed - Level 00</td></tr> <tr> <td>A-20-120</td><td>Memorial Interfaces</td></tr> </table> REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.	A-03-320	LSOEA War Memorial - Existing Location Plan - Level 00 P01	A-03-330	LSOEA War Memorial - Proposed Location Plan - Level 00 P01	A-08-100	Andaz, Memorials & Police Box Existing - Level 00	A-08-110	Andaz Existing - North Elevation	A-08-200	Andaz, Memorilas & Police Box Demolition - Level 00	A-08-210	Andaz Demolition - North Elevation	A-08-300	Andaz, Memorials & Police Box Proposed - Level 00	A-20-120	Memorial Interfaces
A-03-320	LSOEA War Memorial - Existing Location Plan - Level 00 P01																
A-03-330	LSOEA War Memorial - Proposed Location Plan - Level 00 P01																
A-08-100	Andaz, Memorials & Police Box Existing - Level 00																
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A-08-300	Andaz, Memorials & Police Box Proposed - Level 00																
A-20-120	Memorial Interfaces																

Recommended Conditions - 25/00477/LBC (Police Call Box)

1	The development hereby permitted shall be begun before the expiration of five years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
2	All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
3	No works of demolition, removal of fabric, or construction shall commence until the appointment of an appropriately qualified professionals specialising in restoration and reclamation of historic fabric, to supervise the hereby approved works. All documents thereafter requested via conditions of this permission must be prepared by a suitably qualified professional. REASON: To ensure that the Local Planning Authority may be satisfied with the proposed works in accordance with Policy DM 12.3 of the Local Plan.
4	No cleaning of masonry, other than low pressure (20-100 psi) surface cleaning using a nebulous water spray is authorised by this consent unless otherwise agreed in writing by the Local Planning Authority REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
5	Before work begins, any other cleaning proposals must be approved in writing and carried out strictly in accordance with those details. At the commencement of the cleaning, a test panel shall be undertaken in an inconspicuous position and the method recorded to the approval of the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
6	Before work begins, a method statement showing how the cleaning will conform to BS 6270-3 (A code of practice for cleaning and surface repair of buildings, specifically for metals) must be agreed and approved in writing by the Local Planning Authority. Cleaning shall be implemented strictly in accordance with the method statements. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
7	No demolition, removal of fabric, or construction works shall commence until evidence has been submitted to the Local Planning Authority through a condition survey prepared undertaken by an appropriately qualified professional specialising in conservation work, to confirm the state of repair of the existing historic fabric within the site. The survey should - identify any damage - confirm all retained historic fabric will not be adversely affected by additional loading/and or fixings as a result of the proposals. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

8	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details: A. Drawn details to 1:10 showing full elevation, plans and sections for the proposed reinstatement of the War Memorial. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																		
9	No demolition, removal of fabric, or construction works shall commence until a scheme identifying methodology for safe storage of historic fabric to be temporarily removed from site should be submitted to the local authority for approval. The methodology should include: A. Fabric and fixings to be removed should be photographed and numbered in a catalogue identifying their quantity and original location. B. Tools used to for the removal of fabric and fixings should be specified. C. Confirmation of the location and precautions taken for their safe storage including security arrangements and weatherproofing. D. Confirmation of the person or body specialising in this procedure appointed by the applicant; E. Timetable for their reinstatement F. Proposed tools, fixings and methodology for reinstatement. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.																		
10	The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars: <table><tr><td>A-03-400</td><td>Police Box - Existing Location Plan - Level 00</td><td>P01</td></tr><tr><td>A-03-410</td><td>Police Box - Proposed Location Plan - Level 00</td><td>P01</td></tr><tr><td>A-08-100</td><td>Andaz, Memorials & Police Box Existing - Level 00</td><td></td></tr><tr><td>A-08-200</td><td>Andaz, Memorilas & Police Box Demolition - Level 00</td><td></td></tr><tr><td>A-08-300</td><td>Andaz, Memorials & Police Box Proposed - Level 00</td><td></td></tr><tr><td>A-81-010</td><td>Police Call Box Summary</td><td></td></tr></table> REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.	A-03-400	Police Box - Existing Location Plan - Level 00	P01	A-03-410	Police Box - Proposed Location Plan - Level 00	P01	A-08-100	Andaz, Memorials & Police Box Existing - Level 00		A-08-200	Andaz, Memorilas & Police Box Demolition - Level 00		A-08-300	Andaz, Memorials & Police Box Proposed - Level 00		A-81-010	Police Call Box Summary	
A-03-400	Police Box - Existing Location Plan - Level 00	P01																	
A-03-410	Police Box - Proposed Location Plan - Level 00	P01																	
A-08-100	Andaz, Memorials & Police Box Existing - Level 00																		
A-08-200	Andaz, Memorilas & Police Box Demolition - Level 00																		
A-08-300	Andaz, Memorials & Police Box Proposed - Level 00																		
A-81-010	Police Call Box Summary																		

Appendix B – Policies List

London Plan Policies

- Policy GG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy GG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy GG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy G4 Open Space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets

- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning

- Accessible London: Achieving an Inclusive Environment SPG (October • 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012)
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019)
- Central Activities Zone (March 2016)
- Mayor's Transport Strategy (2018);
- Public London Charter LPG (September 2021);
- Optimising Capacity – A Design Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023);
- Characterisation and Growth Strategy LPG (June 2023); and
- Draft Fire Strategy LPG (February 2022)

Emerging City Plan 2040

- Strategic Policy S1: Health and Inclusive City
- Policy HL1: Inclusive buildings and spaces
- Policy HL2: Air quality
- Policy HL3: Noise
- Policy HL4 Contaminated land and water quality
- Policy HL5: Location and protection of social and community facilities
- Policy HL6: Public Toilets
- Policy HL9: Health Impact Assessment (HIA)
- Strategic Policy S2: Safe and Secure City
- Policy SA1: Publicly accessible locations
- Policy SA2 Dispersal Routes
- Policy SA3: Designing in Security
- Strategic Policy S3: Housing
- Policy HS3: Residential Environment

- Strategic Policy S4: Offices
- Policy OF1: Office Development
- Policy OF2: Protection of Existing Office Floorspace
- Strategic Policy S5 Retail and Active Frontages
- Policy RE1: Principal Shopping Centres
- Policy RE2 Active Frontages
- Strategic Policy S6: Culture and Visitors
- Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Policy CV3: Provision of Visitor Facilities
- Policy CV5 Evening and Night-Time Economy
- Strategic Policy S8: Design
- Policy DE1: Sustainable Design
- Policy DE2: Design Quality
- Policy DE3: Public Realm
- Policy DE4: Terraces and Elevated Public Spaces
- Policy DE5 Shopfronts
- Policy DE6 Advertisements
- Policy DE7: Daylight and Sunlight
- Policy DE8: Lighting
- Strategic Policy S9: Transport and Servicing
- Policy VT1: The impacts of development on transport
- Policy VT2 Freight and Servicing
- Policy VT3: Vehicle Parking
- Strategic Policy S10: Active Travel and Healthy Streets
- Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Policy AT2: Active Travel including Cycling
- Policy AT3: Cycle Parking
- Strategic Policy S11: Historic Environment
- Policy HE1: Managing Change to Historic Environment Development
- Policy HE2: Ancient Monuments and Archaeology
- Strategic Policy S12: Tall Buildings
- Strategic Policy S13: Protected Views
- Strategic Policy S14: Open Spaces and Green Infrastructure
- Policy OS2: City Urban Greening
- Policy OS3: Biodiversity
- Policy OS4: Biodiversity Net Gain
- Policy OS5 Trees
- Strategic Policy S15: Climate Resilience and Flood Risk
- Policy CR1: Overheating and Urban Heat Island Effect
- Policy CR3 Sustainable Drainage Systems (SuDs)
- Policy CR4 Flood Protection and Flood Defences
- Policy CE1 Sustainably Waste Facilities and Transport
- Strategic Policy S16: Circular Economy and Waste
- Strategic Policy S25: Liverpool Street
- Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability February 2025
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016)
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft)
- City Waste Strategy 2013-2020 (CoL, January 2014)

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

CS2 Utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Security and Safety

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

CS4 Planning contributions

To manage the impact of development, seeking appropriate developer contributions.

CS5 The North of the City

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure.

CS10 Design

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

CS11 Visitor, arts and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

CS12 Historic environment

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.

CS13 Protected views

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

CS14 Tall Buildings

To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level,

CS15 Sustainable development and climate change

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

CS16 Public transport, streets and walkways

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

CS17 Waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Flood risk

To ensure that the City remains at low risk from all types of flooding.

CS19 Open spaces and recreation

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

CS20 Retailing

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS22 Social infrastructure and opportunity

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM1.2 Assembly and Protection of Large Office Development Sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:
assist developers in identifying large sites where large floorplate buildings may be appropriate;

- invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;
- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
- e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;

- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- a) the amenity of residents and other noise-sensitive uses;
- b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

- 1) To encourage high quality roof gardens and terraces where they do not:
 - a) immediately overlook residential premises;
 - b) adversely affect rooflines or roof profiles;
 - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
 - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 Development in Conservation Areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Ancient Monuments and Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM12.5 Historic Parks and Gardens

1. To resist development which would adversely affect gardens of special historic interest included on the Historic England register.
2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

- a) BREEAM or Code for Sustainable Homes pre-assessment;
- b) an energy statement in line with London Plan requirements;
- c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

- a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
- b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
- c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
- d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development

where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NO_x).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors.

Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

- a) road dangers;
- b) pedestrian environment and movement;
- c) cycling infrastructure provision;
- d) public transport;
- e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

- a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
- b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into

consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward

gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM 18.3 Flood protection and climate change resilience

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.

2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

- a) be publicly accessible where feasible; this may be achieved through a legal agreement;
- b) provide a high quality environment;
- c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
- d) have regard to biodiversity and the creation of green corridors;
- e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;

e) maintenance of habitats within Sites of Importance for Nature Conservation.

DM20.1 Principal Shopping Centres

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:

- maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
 - the contribution the unit makes to the function and character of the PSC;
 - the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.
2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

DM20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.

2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

- a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
- b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

Policy DM 22.2 Provision of public toilets

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

Appendix C – EIA, Reasoned Conclusions

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of the report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The applicants determined and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, archaeology, noise & vibration, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual impact, climate change, greenhouse gas emissions, and cumulative effects.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely the station enhancement works, office space, flexible retail space, and an elevated roof garden with auditorium. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to be implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

The following conditions are recommended:

1. The development shall provide (all figures GIA excluding plant):
 - Office (Class E(g)(i)) – 88,013m²
 - Flexible Retail/Food and Beverage (Class E (a/b), drinking establishments, and hot food takeaway use) – 11,077m²
 - Station Use (Sui Generis) – 10,992m²
 - Roof Garden (Sui Generis) – 3,820m²
 - Auditorium (Sui Generis) – 1,116m²

REASON: To ensure the development is carried out in accordance with the approved plans.

2. The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant), or for use as a drinking establishment, or for use as a hot food takeaway, and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.

3. The areas within the development marked as roof garden space, as well as the auditorium and ancillary café, as indicated on the floorplans hereby approved, shall be used only for these purposes and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that the public benefits of the cultural offer are provided and retained throughout the Pavilion Building in accordance with Local Plan Policy CS11. The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan or Scheme of Protective Works, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, and Travel Plan including a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures as required. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions, and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in condition.