



A National Amenity Society

Lydia Nutt
Planning Case Officer
City of London Corporation
Via email: plans@cityoflondon.gov.uk

29 November 2023

Dear Ms Nutt,

Liverpool Street Station, Liverpool Street, London, EC2M 7QH. Application No. 23/00453/FULEIA

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

Summary

The CBA **object in the strongest terms** to the proposals for this site, which we consider to be excessive in scale and massing and which would cause unjustified and substantial 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**.

Significance

Liverpool Street Station is an iconic part of London's industrial heritage, one of the main termini which connects the capital to the rest of the country and a key legacy of the development of the city as a whole and the impact of rapid technological and urban development during the nineteenth century. The site contains two listed buildings, the former Great Eastern Hotel and the station itself, and several listed memorials. The site retains a legibly Victorian aesthetic character with sensitive modern additions, and its location, layout and phased development hold considerable evidential value; these are a record of the development of key infrastructure which changed this area of the city and the wider British landscape. The whole site's historic fabric and considered design and layout hold evidence about changing construction techniques and patterns of travel due to developing technologies and lifestyles. The combination of the functional but high-quality architecture of the station and the elaborate aesthetic statement of the hotel demonstrate the economic and social impact of the railways and the pride of their Victorian constructors.

Council for British Archaeology

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

 archaeologyuk.org

 info@archaeologyuk.org

Registered charity in England and Wales
(287815) and Scotland (SC041971)

Company Limited by Guarantee (1760254)
Patron: HRH The Prince of Wales



The original station (Grade II, NHLE No. 1286133) was completed in 1875 for the Great Eastern Railway, with an additional trainshed constructed to the east by 1894. Only minimal changes followed until the 1980s, when after a high-profile campaign to conserve the Victorian heritage of the station, a sensitive scheme of extension and updating was undertaken which replaced the eastern trainshed with a new concourse and created a new neo-Victorian extension to the south of the station including entrances off Bishopsgate and Liverpool Street. The station is described within the Bishopsgate Conservation Area Appraisal as ‘one of London’s principal gothic revival buildings’, whose ‘vast shed is characterised by pointed arches and naturalistic detailing, inside and out’.

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

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

The Andaz Hotel (formerly the Great Eastern Hotel, Grade II*, NHLE 1252272) was constructed by the railway company to serve the railway’s passengers, and was intended as a public visual representation of their wealth and status. The hotel has a typically elaborate high Victorian exterior inspired by Flemish Renaissance architecture in red brick with stone dressings, marked by octagonal turrets and stepped gables. After its original construction in 1883-1884, to designs by noted architects Charles Barry Junior and Charles Edward Barry, it was altered and extended in 1901, in a style which reflected the high-quality detailing of the earlier sections. In the 1990s the hotel was refurbished and extended upwards in a sympathetic style utilising high-quality materials and designs by the Manser Practice. The hotel’s exceptional architectural and aesthetic character and historical significance is recognised in its Grade II* listing, which indicates that it is of more than national importance. Its fine architectural detail and prominence within the street scape, communicating the grand arrival of the railway age, are central components of the site's significance and contribution to the multi-phased development of the conservation area. Internally the building's significance is not restricted to its imposing grand spaces. Retaining the legible juxtaposition between polite outward facing spaces and functional utilitarian areas of grand buildings and their plan form is crucial to future understanding of how buildings were created to function as well as revealing their historical, social and cultural back drop.



Comments

The CBA consider that the current proposals would amount to **substantial harm** to the Great Eastern Hotel and to the station complex as a whole, as set out in para. 199 of the NPPF. Substantial harm is defined in Planning Policy Guidance as when ‘the adverse impact seriously affects a key element of its special architectural or historic interest’, and the CBA consider that this application would have a serious negative impact on the site’s historic and architectural values through overdevelopment, the impact on its external appearance and the loss of historic fabric and designed forms.

While CBA are not opposed to the principle of necessary works to the station concourse and platform access to ensure the station remains functional and accessible, only a heritage-led scheme which conserves the station’s significance could be supported. The current proposals do not appear to have been created with the historic significance of the station in mind, and involve an excessive and harmful level of change and development.

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

1. **The insertion of a tall building cantilevered over the Grade II* Andaz (Great Eastern) Hotel.**

The CBA consider that the insertion of a large building over an existing listed structure is a highly unsuitable approach. It will cause considerable harm to the building’s historic and aesthetic values, causing the loss of the legibility of its dominant position within the street setting and overshadowing its elaborate façade, as well as causing the loss of fabric and structural impacts during the construction of the tall structure. We consider that this development would cause harm to the building through the loss of its aesthetic position in the street scape and the dominant scale and massing of the new structure, which is contrary to paras 199 of the NPPF.

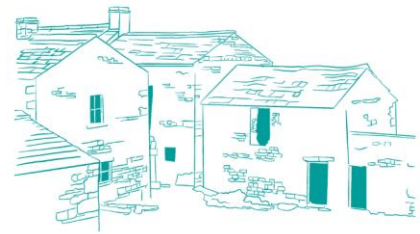
This new structure would also cause harm to the Bishopsgate Conservation Area; the 2014 SPD specifically notes that:

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

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

The scale and massing of the proposed development would be overly dominant in these views, affecting the Hotel’s character as a designed status symbol, representative of the industrial boom era for railway construction and the nineteenth-century development of the area. This is contrary to NPPF paragraph 206 and section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act, as the loss of the station’s prominence and harm to its architectural character would cause harm to the Bishopsgate Conservation Area.

The CBA consider that this application could set a highly damaging precedent for



developments above listed buildings, and recommend that the applicants explore alternative options which do not require development over the hotel.

2. **The demolition of large portions of the interior of the Andaz (Great Eastern) Hotel**

The current proposals involve a considerable amount of demolition to the existing Hotel, in part to facilitate the above mentioned cantilevering. The material to be removed or altered has not been adequately assessed or described within the submitted documentation, but includes a large amount of the internal partitions across multiple floors. Although some rooms with exceptional historical or aesthetic value are being retained, the function (and thereby evidential and historical value) of the hotel relies upon its designed plan form and scale, developed in the late nineteenth and early twentieth centuries. The legibility of these would be largely lost in these proposals, which would remove large proportions of the existing fabric above the ground floor level. Although the hotel was subject to alterations in the 1990s, these took a considered and light-touch approach to the historic fabric, leaving much of the hotel's historic internal plan form and external aesthetic character legible, and therefore cannot be taken as justification for the loss of surviving historic fabric.

As the significance of the building as a whole does not appear to be understood or appreciated by the applicants, we do not consider that this aspect of the proposals meets the requirements of the NPPF, para. 194.

The Hotel is a Grade II* listed building, which puts it in the top 8.3% of all listed buildings in England, and signifies that it is of particular importance and sensitive to change. Under para. 200 of the NPPF, substantial harm to or loss of a Grade II* listed buildings 'should be wholly exceptional'. The CBA consider that the combination of the insertion of a tall building above the hotel and considerable demolition of the existing plan form would cause **substantial harm** to the Hotel, as it would adversely affect its architectural and historic significance through the loss of its dominant position in the streetscape, its legible high-status character, and its evolved plan form. We **strongly object** to this aspect of the proposals, and recommend that the Hotel is sensitively refurbished and that the space above it is retained to allow its designed character in the street scape to remain legible.

3. **The extent of the proposed alteration to the Grade II listed Station, including the loss of light and the visual impact of the proposed construction above.**

The proposed alterations have been designed in a way which would have a clear negative impact on the listed station building. In particular, the sympathetic 1980s trainshed, which is specifically included in the List description and is a high-quality example of a conservation-led renovation, would be partially lost and replaced by a monolithic structure which neither respects nor reflects the historic form and function of the station's architecture. This would harm the legibility of the station's evolved character, responding to changing travel patterns and technological developments, as well as losing an architecturally significant and aesthetically striking section of the station building.

In addition, the construction of a building above the station concourse would result in the loss of light to the station, negatively impacting the experience of its users, and affecting the



legibility of its original design and aesthetic appearance. Although the ironwork and glass roof has been largely replaced due to bomb damage and deterioration, its characteristic arched aesthetics are a key part of the architecture and internal and external character of the station. Construction over the station would clearly harm this character and public appreciation of the Victorian heritage of the site.

Although the street entrances to the station from Bishopsgate and Liverpool Street are not included within the Grade II listing, they are nevertheless sympathetic and provide an architecturally and aesthetically coherent approach to the station building, as noted in the submitted Heritage Statement:

9.18. 'The replacement of the four ramps of the Liverpool Street entrance with the small piazza of Hope Square is a much improved public realm. The twin pylons with the recreated Harwich House cartouches are good signifiers. The projecting canopy cantilevered off attached gothic columns brings the train shed aesthetic through to outside the station.'

The loss of the two entrances and the over-building of the existing open space of Hope Square would harm the setting of the station and appreciation of its architectural and historical significance.

Overall, the CBA do not consider that these proposals have been designed in a way which recognises and conserves the significance of the historic Station and Hotel. The proposals would cause **substantial harm** to the Grade II* listed Hotel and to the wider station complex, including the Grade II listed station, due to the loss of its historic character, architectural significance, evidential value, and setting. This is contrary to paras. 199, 200 and 201 of the NPPF.

In addition, the scheme will cause harm to the Bishopsgate Conservation Area. The architectural and historic character and street scene prominence of the station and hotel are noted contributors to the Conservation Area. The scale and massing of the proposed new development on and above the site would have a strong negative impact on the architecture of the station group and views to the retained historic elements. In particular, the insertion of new construction on the existing Hope Plaza will block views of the iconic hotel and train shed from Old Broad Street and Sun Street Passage (both noted views in the Conservation Area SPD). The insertion of a new tall element above the site would prevent appreciation of its designed architectural dominance, the scale of the linear station development, and its legibly Victorian character. The existing 1980s train shed, proposed for partial demolition, has external frontages which clearly reflect the industrial railway heritage of the site to the public realm, making use of sympathetic materials and arched forms. The partial demolition of this would harm the contribution the station makes to the character and appearance of the Conservation Area. The loss of the sensitively designed Liverpool Street entrance to the station in Hope Square would also cause harm to the Conservation Area through the loss of the legible external character of the station and the architectural detailing of the existing entrance. This is contrary to NPPF paragraph 206 and section 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act.



The CBA note that there will also be impacts on the protected views to St Paul's Cathedral, which will have a negative impact on the City of London's heritage.

Other undesignated heritage assets which would be harmed by these proposals include the Kindertransport sculpture which, as described above, commemorates the arrival of children fleeing the Holocaust, many of whom arrived at Liverpool Street Station from a port. Although unlisted, this memorial is part of the station's communal value and contributes to its historical value. This memorial currently occupies a prominent position in Hope Square, highly visible to station users and passing pedestrians, and is noted within the Conservation Area Appraisal as a contributor to the character of the Bishopsgate Conservation Area. The removal and relocation of this memorial is likely to reduce its public and visual prominence, negatively affecting its significance, its contribution to the Conservation Area, and the historical and communal value of the station as a whole. This would be contrary to the requirements of NPPF paras. 198 and 200.

50 Bishopsgate Street, although a 1990s construction with less evidential value than the older parts of the site, was nevertheless designed to replicate a Victorian building formerly on the site. It therefore complements the rest of the station, reflecting its still legibly nineteenth-century character and blending harmoniously with the wider street scene and the character of the Conservation Area. It is the only external element of the station which retains the French Gothic character of the Victorian developments and therefore reflects and illustrates the historic development of the site. The replacement of this with a large modern construction would harm the setting of listed buildings and the Conservation Area by reducing the legibility of the station's historic character and the Victorian development of the area.

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

1. The viability of the proposed scheme in light of the reduced demand for office space following the shift to flexible working patterns. This may leave the scheme economically unviable.
2. The public benefits of the proposed station re-organisation must be weighed against the negative impacts of the scheme on the heritage of the site and the wider area, under paras. 200 and 201 of the NPPF. Passenger numbers no longer predicted to rise in the near future following the Covid-19 pandemic and the shift to flexible working; this reduces the public benefit of the proposed reorganisation works, particularly when the impacts of the long-term disruption caused by the extensive redevelopment of the site is taken into consideration. The CBA also note that some access work is already underway (with funding allocated) at the station, including a new lift and improved flow around the existing gatelines. In combination, these factors mean that the urgency of the need for improvements to the concourse is somewhat reduced. This could allow for a far less



disruptive incremental scheme of access improvements, with the benefits and impacts of these assessed against evolving passenger needs.

The CBA concur with Historic England's assessment of the proposals as causing harm to the station, the hotel, the wider conservation area and 'the extraordinary historic character of the City of London as a whole', with only modest improvements to the station achieved (Statement issued 1 November 2023). It is concerning that Historic England, the Amenity Societies and other expert bodies were not part of the development of this scheme for such a sensitive and historically significant area of the city, particularly after concerns were voiced at pre-application stage. The recent refurbishment of Kings Cross and St Pancras stations and the Grade I listed former Midland Grand Hotel demonstrate how a heritage-led scheme can achieve a high-quality, economically successful site which makes a positive first impression for visitors to the city, which should be the aim of any scheme for Liverpool Street Station.

Policy

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

Para. 201 of the NPPF requires that:

'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss'.

The applicants have not adequately demonstrated that the scale of proposed development on the site is required to deliver access improvements to the station; or indeed that the benefits to the public would be substantial, particularly once the disruption of the development work has taken place.

The application also does not meet the requirements of the NPPF, paras. 199 or 200, which require that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation' and that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.'



The CBA do not consider that the applicants have demonstrated that a more sensitive, heritage-led scheme could not deliver improvements to the station while simultaneously conserving the heritage significance of the station, hotel, and wider area. The public benefits of a heritage-led scheme would include the retention of a highly significant and popular industrial heritage site as well as improved passenger facilities; this would be a far preferable alternative. The current scheme has not demonstrated that a heritage-led scheme would not be deliverable, and therefore lacks clear and convincing justification.

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

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

and;

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

The CBA do not consider that this application demonstrates an awareness or understanding of the local character, valued heritage, or forms and proportions of the site, and will damage the heritage assets and architectural features of the site instead of enhancing them.

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

The City of London's Draft City Plan 2040 Policy S12.6 states that 'New tall buildings will be refused in inappropriate areas', which includes Conservation Areas. The CBA advise that this policy applies to the proposed development, which is evidently inappropriate as the hotel, 50 Liverpool Street, the Liverpool Street station entrance and Hope Square all fall within the Bishopsgate Conservation Area. Although a draft document, this plan sets out clearly the Corporation's aims and strategy for the management of the city's historic environment.

Recommendation

Council for British Archaeology

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

 archaeologyuk.org

 info@archaeologyuk.org

Registered charity in England and Wales
(287815) and Scotland (SC041971)

Company Limited by Guarantee (1760254)
Patron: HRH The Prince of Wales



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

The CBA **strongly recommend** that the applicants withdraw these proposals and prepare a more sensitive scheme which begins with existing heritage asset, working with the existing structures to ensure their long-term functionality. A lighter-touch scheme would permit a reduced quantum of development to fund, which would considerably reduce the negative impact of these proposals on the site and wider area.

In particular, the CBA strongly recommend that the Grade II* listed Andaz (Great Eastern) Hotel is retained and refurbished, and that the proposed additional structure above the building is removed from all future applications.

Any future proposals should be prepared in collaboration with expert heritage bodies, which can advise on how the station site's special significance can be conserved while necessary improvements made to facilitate access and maintain the station's functionality.

If the application is not withdrawn, we recommend that it be **refused**.

Please keep the CBA informed of any developments with this case.

Kind Regards,

Dr Alison Edwards
Listed Buildings Caseworker

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