



## HISTORIC BUILDINGS & PLACES

FAO: Lydia Nutt  
Planning Case Officer  
City of London Corporation

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

**Address: Site Bounded By 40 Liverpool Street, 50 Liverpool Street, Open Space From Liverpool Street (Hope Square) And Bishopsgate (Bishopsgate Square), And Sun Street Passage/Liverpool Street Bus Station At The Western Boundary London**

**Application Ref: 23/00453/FULEIA**

**Proposal:** 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, public house/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 public house/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.

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

**Comments:** Thank you for notifying HB&P about the above application for the extensive redevelopment of Liverpool Street Station and the Andaz (Former Great Eastern) Hotel and the associated public realm. HB&P strongly **object** to the application.



## HISTORIC BUILDINGS & PLACES

Whilst HB&P welcome the principle of access improvements to ensure Liverpool Street Station meets the current and future expectations of passengers, any new build elements must not be to the detriment of the listed buildings involved, the character of Bishopsgate Conservation Area, or the protected views of St Paul's Cathedral across Greater London. The proposed development shows complete disregard for the historic environment and, by virtue its design, height, bulk, scale, and the extent of demolition involved, represents substantial harm. HB&P recommends that the application is refused.

### *Site and Context*

The current form of Liverpool Street Station is a result of a public inquiry into the proposed demolition of both the station and the former Great Eastern Hotel in 1976. The 1870s trainshed was listed and the hotel was omitted from the scheme, while the former Broad Street Station was sacrificed to fund the alterations to Liverpool Street Station, including the extension of the train shed and remodelling of the concourse between 1986-1991. The redevelopment won awards for its conservation led approach and celebration of the gothic and Victorian architecture that characterises the station today.

Historic England's list descriptions for both Liverpool Street Station and the former Great Eastern Hotel clearly outline the architectural, social, historic and group value of both key buildings. The station's grade II listing very clearly includes both the original trainshed dating from the 1870s, as well as the current concourse and the trainshed extension from the late 1980s/early 1990s reorganisation of the station. The former Great Eastern Hotel was added in phases between 1883 – 1901 as the street facing frontispiece to the station and was designed in a Flemish Renaissance style by the noted architects Charles Barry Junior and Charles Edward Barry. It was later restored by Manser and Conran. The listing for the hotel was recently upgraded to grade II\*.

The Bishopsgate Conservation Area Appraisal, amended in 2007 to include Liverpool Street, notes that the CA consists of '*predominantly Victorian and Edwardian buildings*' and '*overlaid with key examples of Georgian town planning and Victorian railway infrastructure*'. It is also '*An area distinct in the east of the City in terms of building scale and diversity of use, contrasting with the large-scale office buildings to the north, south and west*'. It describes Liverpool Street Station as '*one of London's great Victorian stations, and is a dominating presence in Liverpool Street and Bishopsgate. The station, its 1990s additions, its Gothic style office wing on Liverpool Street and the former Great Eastern Hotel (1880-84) collectively form a notable Victorian townscape group. The Hotel dominates the corner, in terms of its size and elaborate decorative treatment.*'

### *Harmful Impact of the Development*

The application would demolish a substantial portion of the grade II listed station, including the almost complete loss of the remodelled work carried out between 1986-1991 to the concourse and trainshed. This section of the station is listed grade II for the quality of its sympathetic design, which carefully follows the detailing, form and proportions of Wilson's original 1870s trainshed, integrating a second transept that enhances the spatial quality and cohesiveness of the remodelled and unified station concourse.



## HISTORIC BUILDINGS & PLACES

HB&P dispute the suggestions in Section 13 of the Heritage Statement that the loss of the trainshed, the Sun Street walls and the main concourse is the lower level of less than substantial harm due to the 'limited historic value'. These are all part of the grade II listing and the age of the building fabric is not any less significant, given the contribution to the overall cohesiveness and character of the station.

Demolition of such a large proportion of a listed building that contributes so much to its current significance, spatial qualities, and overall Victorian character of the Station is considered to represent substantial harm. The demolition and the replacement of the concourse with a modern tower structure would also divide and separate the hotel from the remaining historic parts of the station and their significance is partly derived from their integration. The incremental development nearby has resulted in the station being encircled by midrise development, and this 20-storey building over the southern end of the station would drastically block natural light to the concourse and platforms, even with the restoration of the glazing to the trainshed.

The partial demolition and alterations to the grade II\* Andaz/ former Great Eastern Hotel are also considerable, and demolition of the historic planform to provide open plan office space erases the historic hotel layout and understanding of its original use. At ground floor, key hotel spaces are to be opened up to the street as alternative public access routes. This is inappropriate for spaces such as the ballroom for which the highly decorative plaster work would be at risk of damage from the nature of the public thoroughfare and is unnecessary, considering the adjacent former carriage way is to be reopened. Further, the 1990s alterations helped enhance the use and significance of the hotel, and their removal adds to the level of harm to this grade II\* listed building.

The hotel's flamboyant and distinctive design, particularly its roofline, including the 1990s mansard roof, is a noted landmark in the CA Appraisal. It 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 proposed cantilevered over development is a horrific intrusion directly above the listed hotel and is wholly inappropriate. The design, materials and nature of the tower element do not respect the architectural qualities of the hotel, particularly the gabled roofline, and the tower completely dominates and overwhelms the hotel and its corner location, causing substantial harm, both directly and to its setting. As per the NPPF, substantial harm to or loss of a Grade II\* listed building 'should be wholly exceptional'. The City must not establish a precedent for the construction of cantilevered buildings over listed buildings.

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



## HISTORIC BUILDINGS & PLACES

of the proposed development certainly does not help to ‘*better reveal*’ the significance of the conservation area. This would represent substantial harm to the setting and character of the Conservation Area.

Additionally, the proposal will result in a negative impact on St Paul's Cathedral and strategic views. Views 4, 8, 9, 10 and 11 within the Townscape and Visual Impact Assessment demonstrate that the proposed development will harm the setting of St Paul's Cathedral and adversely affect strategic views, mainly those experienced from the west.

The London Plan stresses importance of maintaining strategic view corridors to key landmark buildings, most notably St Paul's, given their ‘*significant contribution to the image of London*’. Para. 7.3.1 of the London Plan indicates that ‘*where development is likely to compromise the setting or visibility of a key landmark it should be resisted.*’

### *Public benefits*

HB&P wish to be very clear that the provision of additional retail/ commercial/ office space, and novelty features such as a roof top garden and pool, are not considered a public benefit that would outweigh the harm caused by this proposal. They are clearly not essential for the ongoing use and efficient operation of Liverpool Street Station or the hotel. In addition, the application has not adequately demonstrated that the scale and quantum of the proposed over station development is the minimum required to deliver the necessary access improvements to the station.

The lack of ticket barriers is largely being addressed in current application 23/01271/LBC to relieve crowding on the platform side, which will see the existing food kiosks removed and 24 additional gates installed – an increase of 67 percent. There is also a current application for a high-capacity lift from the lower concourse to street level.

In terms of public realm, the proposed overdevelopment would dramatically alter the character and passenger experience within the station. The loss of natural light across both proposed concourses, as well as the wind tunnel and climatic conditions that will result from the open upper concourse is a regression from the existing arrangement. The lower concourse (which would be the most heavily used area as it connects the mainline platforms with the Underground, Elizabeth Line and the exits) would become a fully enclosed subterranean space and the low ceilings will make wayfinding more difficult due to the lack of opportunity for clear overhead departure boards and signage that can be seen from a distance at this level.

Considering the last major capacity upgrade was only 30 years ago, the suggested 10-year construction timeframe is a further long-term disadvantage for users of the station and those offices and businesses in the vicinity.

The rebuilding of Liverpool Street Station in the late 1980s, as well as the more recent refurbishment of Kings Cross and St Pancras stations, demonstrate how a heritage-led scheme can achieve a successful and high-quality station that meets passage needs. This should be the basis for the any new scheme at Liverpool Street Station.



## HISTORIC BUILDINGS & PLACES

### Policy

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, in considering whether to grant listed building consent for any works, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Chapter 16 of the NPPF 2023 sets out the requirements for the Historic Environment. Paragraph 206 advises that: *'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'*. And *'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'* (Paragraph 207).

Regarding conservation areas, Para 212 of the NPPF, states that: *'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'*.

Further, chapter 12 of the NPPF states that *'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'*. Paragraph 135 – in part – seeks to ensure that new developments:

*(c) 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);*

Chapter 7 of the London Plan (2021) aims to protect the strategic view corridor to St Paul's Cathedral. Para. 7.3.1 states that *'where development is likely to compromise the setting or visibility of a key landmark it should be resisted.'*

### Summary

This application does not meet the legislative, national or local policy requirements to protect and conserve heritage assets. The application does not demonstrate that this scale of development is essential for the efficient, ongoing use of the station and that a lesser, more sensitive, heritage-led scheme could not deliver those necessary access improvements, and therefore it lacks clear and convincing justification.

In heritage terms, this application is unacceptable due to:

- the substantial harm to the significance and setting of the Grade II listed Liverpool Street Station and the Grade II\* former Great Eastern Hotel.



## HISTORIC BUILDINGS & PLACES

- the substantial harm to the significance, appearance, and setting of the Bishopsgate Conservation area;
- the harm caused by the placement of a tall building within the protected view corridors for St Paul's Cathedral;
- the application has not adequately demonstrated that the scale and quantum of the proposed over station development is the minimum required, or if there is a less harmful option that could deliver the necessary access improvements to the station.

The Planning (Listed Buildings and Conservation Areas) Act 1990 and Chapter 16 of the NPPF makes it clear that your Authority has a duty to protect and conserve all heritage assets, including historic townscapes within conservation areas. The London Plan and Chapter 12 of the NPPF also requires your Authority to ensure new development is sympathetic to the established built and historic environment and does not harm strategic view corridors. The application does not meet these local and national policy requirements.

Given the substantial harm this proposal would have on key designated heritage assets and the wider historic environment and cityscape, the application should be refused.

This letter is a formal objection. Should your authority be minded to approve the application, it should be referred to the Secretary of State, in accordance with paragraph 5 of '*Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*'.

I would be grateful if HB&P could be informed of the outcome when this becomes available.

Regards,

Ross Anthony

HB&P Casework