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# **THE VICTORIAN SOCIETY**

The champion for Victorian and Edwardian architecture

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

Your reference: 23/00453/FULEIA  
Our reference: 188849

9<sup>th</sup> February 2024

Dear Lydia Nutt,

**RE: 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:**

**Patron**  
HHH The Duke of Gloucester KG, GCVO  
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**Chair**  
Professor Hilary Grainger OBE

**Vice Presidents**  
Sir David Cannadine  
The Lord Howarth of Newport CBE  
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## **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.**

The Victorian Society **objects in the strongest terms** to the proposed partial demolition of Liverpool Street Station (Grade II), the proposed partial demolition of the former Great Eastern Hotel (Grade II\*) and the proposed construction of a 16-storey building within and above both heritage assets.

The Victorian Society is a national amenity society with a formal statutory role within the planning system by virtue of the Secretary of State's Arrangements for handling heritage applications Direction 2015. Under this direction we must be notified of all applications for Listed Building Consent that involve an element of demolition. When determining applications, local planning authorities must take our response into account.

The seriousness of the proposals at Liverpool Street Station have resulted in an unprecedented union of National Amenity Societies under the umbrella of LISSCA (Liverpool Street Station Campaign). Members include Save Britain's Heritage, The Twentieth Century Society, Historic Buildings & Places, The Georgian Group, The Spitalfields Trust, Civic Voice, London Historians, and the Council for British Archaeology. LISSCA is taking legal advice to inform its position and procedures moving forward.

The Victorian Society made a formal request of the Secretary of State to call in the application: 23/00453/FULEIA on the 14<sup>th</sup> November 2023. We considered this an appropriate case as planning issues of more than local importance are involved.

### **Significance: Liverpool Street Station**

We would like to make it clear that we are awaiting additional material in order to determine our response to the application and undertake further research on the significance and impact upon core affected assets which will need to inform the final impact assessment.

Liverpool Street Station was designed by Chief Engineer Edward Wilson and built between 1873 and 1875 for the Great Eastern Railway. The building is primarily noteworthy for its unique and broad west trainshed which culminates in two naves, a transept and aisles made up of cast iron cantilever brackets and suspended truss' supplied by Fairbairn Engineering Company of Manchester. It is an exemplary and individual design not found elsewhere, and one of the last termini stations designed before the wider standardisation in the 1880s.

During the 1970s British Rail attempted to flatten the station. The first Liverpool Street Station Campaign (LISSCA) formed in September 1974 and chaired by Sir

John Betjeman, was backed by The Victorian Society and its allies. After a public inquiry which favoured the objectors changes were made to the station between 1985-92 by British Rail Architects Department under the direction of architect Nick Derbyshire. This phase saw the introduction of a nave-like train shed extension, linking the surviving 19th century western train shed and hotel with various sensitive and historicised additions, including the facsimile of the end block of the former 'L' shaped railway office block, 50 Liverpool Street.

The extension to the trainshed is an outstanding example of an historicist infrastructure project that closely and expertly follows the design and details of the historic buildings, in this case Wilson's trainshed, maintaining and enhancing the historic visual connection with the former Great Eastern hotel whilst providing cohesive and unified design.

Historic England amended the station's listing entry in December 2022 to recognise the architectural and historical significance of the C20 adaptations to the station. Their designation at Grade II shows them to be of national importance as an architecturally distinguished example of adapting a nationally important historic London terminus.

### **Harm: Liverpool Street Station**

The applicant has intentionally sought to separate the 19th-century station trainshed from the former Great Eastern Hotel through the demolition of the connecting 1990s historized trainshed and introduction of the large white, impermeable, heavy underbelly of a 16-storey tower. It has been claimed that the introduction of the proposed tower would provide a heritage benefit, with the contrasting modern material allowing the surviving historic assets "to be appreciated" in isolation.

We strongly disagree with this assertion of benefit. The clear and permanent separation of these two integral 19th-century elements would be unprecedented in the history of the station, drastically altering the historic character, appearance, and setting of the station. The surviving heritage assets would be reduced to out-of-place curiosities or relics within a modern development, rather than working parts of a cohesive, legible, and united design, performing a continuous function since the 19th century.

The applicant goes on to state that the proposed 16-storey tower would "reduce natural lighting" throughout the station, with the need to artificially light the interiors with "uplights... [and with a] ... luminous ceiling." The loss of natural lighting would strongly alter the intended character and appearance of this station. The majority of 19th-century termini stations were designed with a glazed trainshed or with direct openings to the sky, in part to provide practical ventilation and maximise light to a smoke-filled environment while simultaneously showcasing the engineering talents of the railway company. The proposed over-station development would transform Liverpool Street station from an open, light-filled space to an artificially lit, partially subterranean space, reminiscent of the design approach of the 20th-century redevelopment at Euston station or Penn Station in New York. This, would greatly harm the ability to understand, experience and appreciate these heritage assets as

intended. It would also cause significant harm to the setting of the western trainshed and Great Eastern Hotel.

### **Significance: The former Great Eastern Hotel (Andaz Hotel)**

Acting as a frontispiece for Liverpool Street Station, the former Great Eastern Railway Hotel (now Andaz), built 1883-1884, prominently occupies the corner of Bishopsgate and Liverpool Street. Originally designed by Charles Barry Junior, son of Sir Charles Barry who designed the Palace of Westminster and an important architect in his own right, it was extended and altered by Colonel Edis and Maples (1901) with later additions by Manser and Conran (2000). The exterior treatment of this building is architecturally well accomplished; built in a loosely Flemish Renaissance and Neo-Chambord style in Essex red brick, adorned with gables, pinnacles, mullion and transomed windows reminiscent of grand 16<sup>th</sup> century gabled houses.

The interiors possess a number of surviving opulent reception and function rooms, including notably two masonic temples, in a vast array of decorative styles from the Baroque, Rococo, Renaissance and Classical to the Egyptian. The initial range of rooms and the continued additions during the early 20<sup>th</sup> century reflect the aspirations and social status of the hotel, catering for the city worker as well as hotel guests. Despite changes and alterations to the hotel the historic plan form is still strongly legible, with many rooms performing their original function. Significantly, this is now the last historic hotel within the City of London.

### **Harm: The former Great Eastern Hotel (Andaz Hotel)**

The grade II\* listed former Great Eastern Hotel would be substantially harmed by the aggressive and brutal imposition of a 16-storey vertical extension plunging through the core of the building and cantilevering out over the existing historic building. The level of harm this extension would cause to the hotel cannot be overstated. Effectively the proposal would turn the hotel into an ornate base to the principal structure above, severely diminishing its historically prominent role as a frontispiece to Liverpool Street Station. Despite the applicants' efforts to mitigate this harm to the hotel by the slight setting back the tower, the introduction of a garden with 'moving...plants' in an attempt to separate the two buildings, in conjunction with the misguided removal of the sensitive and high quality architectural late 20<sup>th</sup> century mansards, the effect of this proposal would also be to permanently weld the two buildings together resulting in the total inability to appreciate the hotel as a separate structure. This would cause significant harm to the setting of the former Great Eastern Hotel .

### **Change of use**

This building has continuously operated as a hotel since its opening in 1884. This proposal would bring this to an end through its conversion to office space. These proposals would entail the loss of historic fabric and the significant erosion of the historic hotel plan form by opening up corridors and bedroom walls to create a number of large open plan spaces to accommodate a modern office - in contrast to

the regimented formal layout of a hotel. This will leave remaining historic features isolated and will confuse the legibility of the historic layout.

As noted above this proposal would also result in the loss of the last continually functioning historic hotel in the City of London. This proposed changes would significantly reduce the ability to appreciate and understand the significance of this building as a railway hotel. The building has operated successfully as hotel for over a century and with adaptations it has continued to cater to a modern audience and increased demand whilst maintaining its historic significance and legibility as an historic hotel. Both the unprecedented change in use *and* the insertion of a 16 storey tower would result in unnecessary and harmful changes to the heritage asset.

This is a clear test for optimal viable use as set out by NPPF:

*“the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes but also as a result of subsequent wear and tear and likely future changes.”*

In this case, the optimal viable use for this building in line with the least harm to the significance of the asset would be its current and not the proposed use. Given that a new hotel would be incorporated into the 16 -storey tower above the former Great Eastern Hotel, there must be a compelling economic argument for the retention of a hotel in this part of the city. Moreover, the loss of the mansard roof to facilitate the insertion of a 16-storey tower above, would result in the substantial loss of square footage within the heritage asset, which could in turn harm the future independent economic viability and usage of this building and thereby threaten its future conservation.

### **Significance: Bishopsgate Conservation Area**

The Bishopsgate conservation area is defined by a mixture of low-rise and medium-height buildings; largely characterised by narrow plots, alleyways and courts alongside wider streets, churchyards, and squares, representing the growth of London and intensification of the built environment outside the city walls. The arrival of Liverpool Street station and the construction of a railway hotel had a pivotal impact on the immediate area introducing an unmatched scale replacing the narrow plots and intricate streets that made up the west side of Bishopsgate. The architecture of the Great Eastern Hotel in part echoes those lost 16<sup>th</sup> century buildings of Bishopsgate, but it largely reflects the building styles of eastern England, served by the Great Eastern Railway, which in turn reflects connections to northern Europe. The impact of the architecture of the hotel was to have a lynch-pin effect on the style of later warehouses, civic buildings and other commercial buildings in the area.

### **Harm: Bishopsgate Conservation Area**

This proposal strikes at the very heart of the significance of the conservation area and its chief reason for designation. The proposed demolition and the scale and design of the proposed development would have a far-reaching and catastrophic effect on the appearance and special architectural and historic character of the Bishopsgate conservation area, causing substantial harm.

The proposal involves the demolition of a significant portion of Liverpool Street Station and partial demolition the former Great Eastern Hotel. Specifically targeting the carefully executed remodelling undertaken under the direction of Nick Derbyshire between 1986 and 1991 and later works from Manser and Conran (2000), this includes the partial demolition of the grade II listed trainshed and the grade II\* listed mansard roof and hotel core, as well as the demolition of the unlisted facsimile of the Great Eastern ticket offices at 50 Liverpool Street, four neo-Victorian ventilation towers featuring incorporated 19th-century stone cartouches, and the removal of facsimile stone piers and iron gates.

The majority of these elements not only play a crucial role in the overall cohesive design of the station but also contribute to the unified Victorian railway landscape that defines the Bishopsgate conservation area. The replication of lost 19th-century features and the adoption of a scale and materials sensitive to both the station/hotel and the conservation area have maintained the unique character of the streetscape. The proposed demolition of these would not only impact the station's design integrity but also negatively alter the distinctive character of the Bishopsgate conservation area. In 2006, the City of London amended the Bishopsgate Conservation area to include these very structures:

*“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... Hope Square is a raised area framed to the front by tall stone columnar gate piers, with elaborately detailed iron gates.”*

These buildings and structures were seen to make a contribution collectively to the setting of the Grade II station, Grade II\* hotel and the wider Conservation Area. Furthermore, in 2017, listed building consent was required for works to the unlisted 50 Liverpool Street, in which the City of London must have considered it a building contributing to the special setting of the grade II listed station. These assets therefore should be considered non-designated heritage assets. We ask whether the City of London can confirm these views?

NPPF 212 states *“Local planning authorities should look for opportunities for new development within Conservation Areas... 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.”*

It is difficult to see how this proposal could possibly enhance or ‘better reveal’ the significance of this conservation area. Architecturally, the proposal has more in common with the buildings that form the city cluster, an area specifically designated for tall buildings and outside of this protected area. The proposal offers a complete and damaging contrast to the predominant character, materiality and scale which makes this area unique and specifically protected.

## **Views and Vistas**

Numerous views and vistas make a strong contribution to the character of the conservation area. The scale and age of buildings and the intricate historic street patterns have resulted in a diverse range of views that contribute to the rich tapestry

of this area's character. This proposal threatens to substantially disrupt the open and historic views of intricate details and the roofline of the imposing landmark of the former Great Eastern Hotel along Devonshire Row, New Street, Liverpool Street and Bishopsgate. Views westward would be abruptly curtailed by the verticality of the proposed building alongside the jarring contrast in materials... a change from predominant stone and brick to aluminium and glass causing substantial harm.

### **The Metropolitan Arcade**

The Metropolitan Arcade/Liverpool Street Underground station, formerly known as Bishopsgate Station, is a two-storey building originally designed by Edward Wilson and constructed c.1875 for the Metropolitan Railway as an independent terminus station. It holds historical significance as the world's first example of a connection between mainline and underground services. The later electrification of the underground line led to the enclosure of the station, and a shopping arcade was added over the line between 1911 and 1912, designed by Frank Sherrin with further remodelling between 1994-95.

The Metropolitan Arcade strongly contributes to the overall group value of Liverpool Street as a coherent 19<sup>th</sup> century railway landscape primarily and historically catering for the railway and its passengers. These proposals would serve to distance and isolate this historically unique and important connection with the station through the removal of the facsimile of the former Great Eastern ticket offices (50 Liverpool Street), and the diminishment of the landmark quality of the frontispiece to Liverpool Street Station, former Great Eastern Hotel, with the imposition of a 16-storey tower. The alien scale of the proposal would, overshadow the wider streetscape, reducing this building to another curiosity or relic.

The proposal would be highly damaging to the special architectural and historic interest of the Bishopsgate Conservation area by introducing a contrasting scale, contrasting and conflicting materials, damaging the setting of heritage assets and by the separation of intrinsically linked designated assets. The approval of this scheme would raise serious questions about the protection of other such specifically designated areas and the City of London understanding and interpretation of the NPPF guidance.

### **St Paul's Cathedral**

The proposal would also impact views of the nationally important landmark, St. Paul's Cathedral (Grade I) from Waterloo Bridge, protected under the London Views Management Framework. We ask whether the City of London can confirm the impact assessment criteria for views of St Paul's and the impact on designated 'Skyline Features'?

## **Justification**

The applicant has claimed that this proposal will help deliver a world-class passenger experience at no cost to the taxpayer. However, this scheme is characterised by an absence of information pertinent to this proposal. It has been framed as the only solution to achieve the improvements required at Liverpool Street Station with seemingly no option to explore a more cost-effective and less disruptive heritage-led solution.

## **Passenger footfall**

Network Rail's optioneering report concludes: "*Overall usage of the station has declined significantly following the pandemic and will take a number of years to recover*".

According to Network Rail, 135 million passengers passed through the station in 2019, dropping during COVID, with 80 million in 2022. These are the figures Network Rail have used to provide passenger footfall predictions for this station, but they have puzzlingly not provided passenger figures for 2023, or indeed used them in footfall predictions.

The applicant provides figures for estimated footfall for 2050, based on 2019 figures with adjustments, is:

1. No COVID scenario: 157 million.
2. Medium COVID scenario: 133 million.
3. Low COVID scenario: 110 million.

Liverpool Street Station is one of the busiest stations in the country. Improvements to the station addressing issues related to capacity, accessibility, and permeability are crucial. However, despite some adjustments, the primary footfall projections rely on 2019 passenger figures, not accounting for the subsequent opening of the Elizabeth line and the substantial post-Covid trend toward remote working. This highlights the need for a re-evaluation of the project, as the large-scale investment is justified by arguments based on outdated figures that no longer accurately project the future footfall requirements of Liverpool Street Station.

## **Capacity and Accessibility**

Network Rail have identified a number of key accessibility and capacity improvements, include an increase in the provision of addition lifts, escalators and an increase in gate line capacity from 70-93.

Funding for gate line improvements were secured from the Department of Transport in 2019. The first phase saw the removal of staff buildings and an increase in gates from platforms 11-17, completed in June 2021. The second phase included the removal of five retail units and the installation of additional gates to platforms 1 to 10, with a target date for entry into service of August 2024. This indicates that one of the public benefits lauded during pre app and in this proposal has already been paid for and is very likely already easing overcrowding.

Overcrowding is a perennial problem within any station; often exacerbated by late running trains. Network Rail invested £700 million in the redevelopment of London Bridge Station between 2012-2018, with the goal of “*increase[ing] passenger capacity*”. Despite this, there have been a number of occasions of “dangerous overcrowding” at this station proving that overcrowding still occurs despite major investment to increase passenger capacity.

### **Negative public benefit**

The redevelopment of London Bridge Station entailed several improvements including an increase in the number of platforms. Despite the scale of this project, the proposed redevelopment at Liverpool Street Station does not include plans for an increased number of platforms.

Liverpool Street Station suffers from a bottle-neck effect between Bethnal Green Junction and Liverpool Street Station caused by two four-track railways (West Anglia & Great Eastern) feeding into a six-track section causing issues with track capacity, the ability to receive and disperse passengers and the ability to handle conflicting movements efficiently.

The Enfield Transport User Group Freedom of Information (FOI) request unveiled details from the Anglia Long-Term Planning and Programming (LTPP) Route Study, indicating intentions resolving the bottle neck issue with an 8-track solution and the provision of additional platforms at Liverpool Street. The study identified the possibility of expanding the current 18 platforms to 23 without requiring additional land or extending the existing shed. 3 out of 5 of these new platforms would need to be extended into the main concourse. The installation of new columns, to accommodate the proposed 16-storey over station development, would obstruct the ability to add platforms, curtailing the ability for Liverpool Street Station to expand within its current envelope and increase its passenger capacity in the future. This would actively incur public disbenefits.

The NPPF emphasises that substantial harm to or loss of a designated heritage asset is only acceptable in exceptional circumstances such as where it is necessary to achieve substantial public benefits that outweigh that harm or loss of a heritage asset. The proposals would only provide *moderate* public benefits but *considerable* public disbenefit through limiting the stations reduction of the capacity for expansion and future increased passenger capacity.

### **Good design**

London Plan Policy D4 states that “*Masterplans and design codes should be used to ...ensure it delivers high quality design... based on the requirements set out in Part B of Policy D3*”. The test of a high standard or good design as set out by the Local Plan CS10, DM10.1 and NPPF 131 would not be met by this application due to:

- Abject, insufficient optioneering, including severe lack of consultation and engagement on options; as required by NPPF 131 “*effective engagement between applicants, communities, local planning authorities and other*

*interests throughout the process” and by London Plan D3 “a consultative design-led approach that allows for meaningful engagement and collaboration with local communities, organisations and businesses”.*

- Failure to deliver on the obligations set by legislation in considering impact on heritage, protected views and severe damage to local character and context. The NPPF indicates that a good design must be *“sympathetic to local character and history, including the surrounding built environment and landscape setting”*, London Plan D3 that *“Development should be designed to respond to the special characteristics of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value”* and CS10 that *“Ensuring 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”*.
- Severe diminishment of the user experience at the station, resulting from the proposed changes. NPPF indicates that acceptable proposals: *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development”*. And London Plan D3 that *“Buildings should be of high quality and enhance, activate and appropriately frame the public realm. Their massing, scale and layout should help make public spaces coherent and should complement the existing streetscape and surrounding area. Particular attention should be paid to the design of the parts of a building or public realm that people most frequently see or interact with in terms of its legibility, use, detailing, materials and location of entrances. Creating a comfortable pedestrian environment with regard to levels of sunlight, shade, wind, and shelter from precipitation is important”*.
- Unjustified demolition and the very high embedded carbon cost of an unprecedented scale of development. The Local Plan CS15 advises *“Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources.”*

We ask whether the City of London can confirm that the following serious design flaws would mean the that as part of an overall ‘design balance’, even with some much more limited positives, the proposal could not be considered *high quality design* (London Plan D3), *a high standard of design* (Local Plan CS10, DM10.1) or *good design* (NPPF), which is a high test, and in this instance would not be achieved?

As a tall building under London Plan Policy D4 there must be independent and objective design scrutiny on public record. Part E states:

*“The format of design reviews for any development should be agreed with the borough and comply with the Mayor’s guidance on review principles, process and management, ensuring that:*

- 1) *design reviews are carried out transparently by independent experts in*

*relevant disciplines.*

*5) schemes show how they have considered and addressed the design review Recommendations”*

We ask whether the City of London can confirm how this will be made available the details of this independent review so these can be assessed?

## **Historic England’s position**

Historic England, The Government’s heritage advisor, has itself opposed the planning application:

*“Historic England will object in the strongest terms to current proposals to redevelop London’s Liverpool Street Station... The proposed tall buildings above are of grossly disproportionate scale and would trample on the station and the former Great Eastern Hotel, which is now listed at Grade II\* in recognition of its role as an impressive station frontage and for its lavish interiors. Its picturesque silhouette and proper grandeur would be radically compromised by the scale and bluntness of the new structures forced onto and through it... The proposed redevelopment of the station would severely damage the Bishopsgate Conservation Area, to which the group of fine Victorian and Edwardian buildings on Liverpool Street is essential. These plans would also harm the extraordinary historic character of the City of London as a whole: the sheer bulk of development proposed above the station and the hotel would be so large that it would encroach on celebrated views of some of London’s great landmarks, including those of St Paul’s Cathedral protected under the London Views Management Framework”.*

Duncan Wilson, Chief Executive of Historic England, has released this statement:

*“We believe that this scheme is fundamentally misconceived and misses the opportunity to unlock real public benefits while also enhancing the station’s heritage. At Historic England we are in favour of development where it secures a sustainable future for our best public and private buildings. This scheme does not. We must seek a better outcome for this special place.”*

## **Policy**

### **1990 Planning (Listed Buildings and Conservation Areas) Act:**

- Section 16(2): Decision-makers must give 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest.'
- Section 72(1): 'Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas.'

The application simply fails to preserve a building of special architectural and historic interest through the demolition of one-third of a grade II listed structure and the

damaging internal alterations to a grade II\* listed building. The application also fails to preserve the setting of both heritage assets by introducing a building of alien scale and bulk, isolating and separating the 19th-century elements from each other and from the wider conservation area they sit within.

The application also fails to preserve or enhance the character or appearance of the Bishopsgate Conservation Area. The proposal would cause substantial harm by introducing a scale, bulk, and material alien to this area, severing the multiple important historic connections shared between the hotel and station and the wider area. It fundamentally undermines the continued existence of this specially designated area.

We ask whether the City of London can confirm whether they will be adhering to the legislation set out in the 1990 Planning (Listed Buildings and Conservation Areas) Act?

### **National Planning Policy Framework (NPPF):**

- Para. 207: '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'.
- Para. 205 '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'.
- Para 206' 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...should be exceptional;
  - b) assets of the highest significance...grade I and II\* listed buildings...should be wholly exceptional'

The NPPF outlines the test for justifying harm to grade II and II\* listed buildings as exceptional and wholly exceptional. This application woefully fails to provide a clear or adequate justification that the scale and bulk of the proposed development, and that the subsequent substantial harm to a grade II and grade II\* listed building, are absolutely necessary to unlock public benefits or to demonstrate that these benefits are indeed substantial, let alone wholly exceptional.

The NPPF specifies that 'great weight' should be given to the conservation of assets. The application also fails to meet this test with the large-scale destruction of a

heritage asset and the substantial harmful impact on the settings of remaining heritage assets.

Furthermore, the proposed over-station development could actively prevent the future construction of new platforms and, consequently, the ability to increase passenger capacity, resulting in a public disbenefit. It follows that, conversely, substantial public benefits could be unlocked by refusing this application.

- Para 201. 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.

We ask whether the City of London can confirm that, there will be an undertaking of a balance exercises for each asset individually before considering each individual harm as a whole cumulatively?

In light of the High Court's decision regarding the Holocaust Memorial, we ask whether the City of London can verify that, when determining the extent of harm as either substantial or minimal, it will employ the specified test outlined in paragraph 018 of the PPG? This test, endorsed by both the Inspector and Secretary of State in 'the Tulip' decision, emphasizes assessing the impact on crucial elements affected rather than identifying elements of significance that remain unharmed.

The loss of a non-designated heritage asset in a conservation area would result in the failure to align with policy CS 12, DM 12.1 and DM 12.2. The recent landmark decision by the Secretary of State to reject the Marks & Spencer's proposal to demolish and replace its flagship building on Oxford Street. The Secretary of State gave substantial weight to the loss of a Non-Designated Heritage Asset outside a conservation area, but which also was deemed to contribute to the settings of listed buildings, as in this case. Michael Gove's ruling found this approach to demolition to be contrary to policy in the National Policy Planning Framework (NPPF).

The application also fails to put the Grade II\* listed former Great Eastern Hotel to its viable use, as detailed above. This is inconsistent with LP Policy DM12.3(2), London Plan Policy HC1, and NPPF para 196(a), which seek to put assets to viable uses consistent with their conservation.

- Para 196. a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

### **City of London's Adopted Local Plan (2015):**

The Core Strategic Policy CS10: Design requires "*that the bulk, scale, massing and height of buildings are appropriate to the character of the City and the setting and*

*amenities of surrounding buildings and spaces” and CS14: Tall buildings “Refusing planning permission for tall buildings within inappropriate areas, comprising conservation areas”* The proposed site sits within the Bishopsgate Conservation area characterised by a mixture of low-rise and medium-height buildings. The approval of this scheme would directly contradict the extant local plan by introducing a building of bulk, scale, massing and height inappropriate for this area. We ask whether the City of London can confirm whether it intends to abide by policies set out in its extant local plan?

### **City of London’s Draft City Plan (2040) & Greater London Plan (2021):**

We are aware that the draft City Plan 2040 is about undergo considerable public consultation ahead of its submission to the Secretary of State and subsequent adoption. We welcome the clearly defined boundaries for areas appropriate for tall buildings. Policy 12, Figure 14 ‘Area’s appropriate for tall buildings’ clearly show the whole of the application site would be situated within an area inappropriate for a tall building.

Once the City Plan 2040 has been adopted by the Corporation, the approval of the scheme at Liverpool Street Station would be in direct violation of the London Plan, Policy, D9 on Tall buildings which states: *“Tall buildings should only be developed in locations that are identified as suitable in Development Plans.”*

London Plan Policy SD4, C The Central Activities Zone (CAZ) states: ‘The distinct environment and heritage of the CAZ should be sustained and enhanced.’ Given the substantial harm to the distinct environment and heritage of the CAZ, this application would be in direct contradiction.

We ask whether the City of London can clarify whether it intends to abide by policies set out in both its Draft City Plan 2040 and the London Plan?

### **Local Plan Policy: Climate change**

The demolition and replacement of viable and functional building, including the total demolition of 50 Liverpool Street, the 4 neo Victorian service towers, and one third of the train sheds, aspects of the former Great Eastern Hotel, would be in direct contradiction to strategic sustainable development and climate change Local Plan Policy CS15(3) and London Plan Policies SI 2 and 7.

Emphasis needs to be put on the importance of reusing and recycling buildings such as this as per Historic England guidance <https://historicengland.org.uk/whats-new/news/recycle-buildings-tackleclimate-change/>.

Can the City of London clarify whether it intends to abide by policies set out in both its Local Plan and the London Plan?

### **London Views Management Framework**

The approval of this scheme would be non-compliant with the London View Management Framework (LVMF), harming the composition and characteristics of

Views 15B, 17B and 16B, whilst failing to preserve a recognition and appreciation of St Paul's as the Strategically Important Landmark, contrary to CS13(1) and HC4. We believe that the economic benefits of the proposed would not outweigh the material harm to the setting of St Paul's Cathedral. Can the City of London confirm whether it intends to abide by these policies?

## **Conclusions**

It was once said of Penn Station that "*One entered the city like a god. One scuttles in now like a rat.*" Liverpool Street Station is facing a very similar moment. The disfigurement of a monumental public space from a light filled cathedral to a subterranean shopping centre, stripped of its dignity as the grand entrance to this grand city.

It's often said, "*A fool learns only from his own mistakes; a wise man learns from the mistakes of others*". The short-term decisions made at Euston and Penn Station have led to profound issues around capacity and user experience. For decades both have tried to rectify these issues at great expense and with limited success. This scheme essentially derives from another century, the applicant seemingly not learning from past mistakes or indeed taken note of the conservation movement born out of these tragedies.

Liverpool Street Station needs upgrading. There is no debate or fight here. But the solution is a shockingly excessive over-reaction to moderate and solvable problems facing many stations.... problems which could be overcome by balancing the need for enabling development with heritage concerns. Instead, one scheme has been pushed onto the City. No option has been given for a public competition. There has been little meaningful consultation with communities or heritage bodies. The scheme attempts to tear up the rule book that collectively safeguards our architectural treasures. If the City is cajoled into approving this scheme, history will not look kindly upon the governance and members that made up the council in the year 2024. Its members must have the courage to fight for the soul and dignity of this city. It must reject this scheme.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Newton', with a long, sweeping horizontal stroke at the end.

Guy Newton, BA (Hons), MA

**Conservation Adviser**