



HISTORIC BUILDINGS & PLACES

13 April 2026

The Rt Hon Sir Sadiq Khan
Mayor of London
By email to: mayor@london.gov.uk

Address: Liverpool Street Station, 50 Liverpool St, Sun Street Passage, 40 Liverpool St (in Part), Hope Square, Bishopsgate Plaza EC2M 7PY
Reference: City of London planning application 25/00494/FULEIA and listed building consent application 25/00474/LBC

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

Comments: HB&P is a member of the Liverpool Street Station Campaign (LISSCA) and write to request that you direct refusal of the above applications under Article 6 of the Town and Country Planning (Mayor of London) Order 2008.

You will be aware of the background to Network Rail's harmful applications for the redevelopment of Liverpool Street Station, which for the sake of brevity, will not be repeated here. Both HB&P and LISSCA's objections to the City of London focused on:

- The exact needs of the station upgrade and the baseline costs have never been clearly specified (i.e. stating clearly how many escalators/ lifts, etc are needed for the increased passengers) which means it has been impossible to determine the minimum development necessary to fund the stated station benefits.
- The applications include the demolition of a substantial proportion of the listed station building (the concourse) to facilitate the construction of a non-railway related OSD office tower;
- The proposed 19 storey OSD has a harmful impact on the character and setting of the Bishopsgate Conservation Area and surrounding heritage assets, including view corridors to St Paul's Cathedral;
- The viability assessment demonstrated that the scheme is not viable;
- The scheme does not meet net zero targets;
- Alternative schemes have been put forward that can provide station upgrades with significantly less physical harm that have not been considered;
- The scheme impacts greater London and beyond, not just the City; and
- The 10 year construction time will cause significant disruption and safety issues for commuters.

In our assessment, the applications meet the criteria for refusal in Article 6(1) as they are considered to be contrary to the following policies and strategy for London as set out in the London Plan (2021):

- Policy **HC1(C)** states that *Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets'*

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significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. There is clear harm, both physically through demolition, and to the setting by the inclusion of a 19 storey tower, to numerous designated heritage assets, including the grade II-listed Liverpool Street Station itself, the adjacent grade II listed former Great Eastern Hotel, the St Paul's Cathedral view corridor, and the Bishopsgate Conservation Area.*

- **Policy HC3:** *The Mayor will also identify Strategically-Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista.*
- **Policy D9(B)(3)** relates to **Policy HC3** and states that *Tall buildings should only be developed in locations that are identified as suitable in Development Plans.* Liverpool Street Station clearly falls out of the two areas identified in the City of London Local Plan 2040 (Revised Proposed Submission Draft April 2024). In addition, this location impacts view corridors to St Paul's Cathedral.
- **Policy D9(C)(1)(d)** states that *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.* The applicant's own documentation stated that the proposed scheme is not technically viable; Network Rail has not been able to clearly state what the baseline costs are to upgrade the station or separate these costs from the OSD; and the alternative scheme presented by John McAslan + Partners that involves minimal demolition work and much reduced range of harm have not been considered. We do not consider that clear and convincing justification that this scheme is the only option has been provided.
- **Policy SI 2** requires major development achieve net zero-carbon. Simon Sturgis, co-author of the GLA London Plan Guidance on Whole Life Carbon found that the proposed scheme contravenes Policy SI 2.

In addition, the primacy of the Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 prevails that requires 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.

HB&P urge you to direct refusal.

Regards



Ross Anthony
HB&P Case Work