



Emailed to: mayor@london.gov.uk

CC: jules.pipe@london.gov.uk, natan.doron@london.gov.uk, hannah.thomas@london.gov.uk

10/04/2026

Dear Sir Sadiq,

**Site: Liverpool Street Station, 50 Liverpool St, Sun Street Passage, 40  
Liverpool St (in Part), Hope Square, Bishopsgate Plaza EC2M  
Ref: City of London Listed Building Consent Application 25/00474/LBC and Planning Application  
25/00494/FULEIA**

I write on behalf of the Twentieth Century Society to request that the Mayor exercise his statutory powers under the **Mayor of London Order (2008)** to direct refusal of the above applications.

The Twentieth Century Society is the national amenity society concerned with post-1914 architecture, townscape and design. The Victorian Liverpool Street Station was redeveloped in the latter half of the twentieth century, with a vociferous and successful heritage campaign – the Liverpool Street Station Campaign (LISSCA), which thwarted British Rail’s demolition plans and led to the Grade II listing of the Liverpool Street offices and western train shed in 1975. The success of the campaign led British Rail to develop a new scheme that proposed greater retention, extension and upgrade of the Victorian station, which was carried out between 1985 and 1998 by British Rail’s Architecture and Design Group, directed by Nick Derbyshire, working with the project architect Alistair Lansley. We regard the historicist concourse and trainshed roof of 1985-1992 as a highly significant work of late-twentieth-century heritage-led architecture and transport infrastructure. Historic England recognised the significance of this fabric in 2022, when the statutory list description for the station was amended to explicitly include the 1985-1992 remodelling, for both its architectural and historic interest. This application proposes the demolition of this highly significant fabric for the sake of the proposed over-station development (OSD). This will result in substantial heritage harm. While Liverpool Street Station is in need of essential station upgrades, including toilets, lifts and escalators, we are not convinced that the proposed 19-storey OSD and demolition of the concourse roof is the appropriate approach.

**Article 6 of the Mayor of London Order (2008) states at part 1 that:**

**6(1).** *If the Mayor considers that to grant permission on a PSI application would be–*

*(a) contrary to the spatial development strategy or prejudicial to its implementation; or,*

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*(b) otherwise contrary to good strategic planning in Greater London*  
he may, within the period specified in article 5(1)(b)(i), direct the local planning authority to refuse the application.

**Policy Assessment:**

We are of the assessment that the above applications are contrary to the spatial development strategy for London as set out in the **London Plan** (2021):

- Policy **HC1(C)** states that *development proposals affecting heritage assets... should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings... development proposals should avoid harm and identify enhancement opportunities*. It is our assessment, and the assessment of other heritage bodies, that these applications do not conform to this policy. As the **London Plan** states at part **7.1.1**, *London's historic environment... provides a depth of character that benefits the city's economy, culture and quality of life*. The **London Plan** recognises that London's *layers of architectural history provide an environment that is of local, national and international value*, and that *London's heritage assets... are irreplaceable*. Harm to designated heritage assets would include impact on the grade II-listed Liverpool Street Station, the grade II\*-listed former Great Eastern Hotel, and the Bishopsgate Conservation Area. We consider the heritage harm that would result from this application to be grounds for dismissal due to nonconformity with Policy **HC1(C)**.
- Policy **D9(B)(3)** states that tall buildings should only be developed in locations that are identified as suitable in Development Plans. The **City of London Local Plan 2040** (Revised Proposed Submission Draft April 2024) states at policy **S12(2)** that *the tall building areas identified [the City Cluster and Fleet Valley areas]... are areas where tall buildings may be appropriate*. This application proposes a tall building outside of these identified areas, contrary to **D9(B)(3)**. Paragraph **11.5.4** of the **City of London Local Plan 2040** states that *outside the identified tall building areas, tall buildings would be likely to [sic] very significant impacts on heritage assets... and could significantly undermine the prevailing townscape and character of the area*. Again, the proposed development will result in significant impacts on heritage assets, partially as a result of the proposed OSD height (97.67m Above Ordnance Datum).
- Policy **D9(C)(1)(d)** requires that *proposals resulting in harm will require clear and convincing justification*, as well as *demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm*. The applicant has stated that the proposed scheme is *not technically viable*, and the City of London has not provided baseline costs for station upgrade works in isolation from OSD costs. In the absence of viability, and the required costs for the station upgrade works, we do not consider that *clear and convincing justification* has been provided.
- Policy **SI 2** requires that *major development should be net zero-carbon*. Simon Sturgis, co-author of the **GLA London Plan Guidance on Whole Life Carbon Policy SI 2** (2022), has confirmed that the proposed scheme contravenes Policy **SI 2**. Sturgis has stated that the

development has an *overall whole life carbon figure... approximately what you would expect of an equivalent office building built in circa 1990*. In the Mayor's foreword to the **London Plan**, you state that the Plan is about *making London a greener city... and one where we lead the way in tackling climate change by moving towards a zero-carbon city by 2025*. This proposed scheme runs contrary to these requirements for net-zero carbon emissions.

**Alternatives for sustainable growth:**

An alternative, viable scheme exists: John McAslan + Partners (JMP), a notable architecture practice that has won multiple awards worldwide for transport and transit stations, has designed a financially viable alternative scheme which provides essential station upgrades with minimal heritage harm, less embodied carbon, and a lighter touch. By refusing these applications, the JMP alternative can be fully considered as an alternative, less harmful, and viable vision for the future of Liverpool Street Station.

Yours sincerely,

Catherine Croft

A handwritten signature in black ink that reads "Catherine Croft." The signature is written in a cursive, flowing style.

**Director**

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**Remit:** The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the *Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.