



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

Dear Sir Sadiq,

The London and Middlesex Archaeological Society (LAMAS) is a member of the Liverpool Street Station Campaign (LISSCA) and are writing to request that you **direct refusal of the above planning applications** under powers available to you under article 6 of the Town and Country Planning (Mayor of London) Order 2008.

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage.

In the event that you decide not to refuse the applications, we request that you use your powers under article 7 of the Town and Country Planning (Mayor of London) Order 2008 to direct that you **become the local planning authority for these applications**.

The criteria to be considered when deciding whether to call in an application are given in this article 7, namely:

1. The development would have a significant impact on the implementation of the London Plan
2. The development would have significant effects that are likely to affect more than one London borough
3. There are sound planning reasons for intervention.

We firmly believe that these three criteria apply in the case of these planning applications. As summarised below, we believe the proposed scheme contravenes the policy and guidelines set out in the NPPF and the London Plan, as well as the City of London's own Local Plan and emerging 2040 Plan.

We fully support the detailed objections set out in the Victorian Society's letter to you of 27 March and the Georgian Group's letter to you of 10 April. We reiterate the objections to these applications that we submitted in June 2025 to the City of London, whose Planning Committee approved the applications in February 2026.

Substantial harm would be caused to (a) the setting of the Grade II* listed former Great Eastern Hotel and Liverpool Street Station by the new 97m, twenty storey building being erected over the station, and to (b) the setting of the Bishopsgate Conservation Area as a whole, which is generally an area of low-rise buildings. As stated in the objection to the scheme by the City of London Archaeological Trust (CoLAT) of 7 January 2026, the architecture of the oversailing block is of little merit.

The **Bishopsgate Conservation Area SPD 2014** states (p22) that '*The [Liverpool Street] 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 setting of this 'grouping' would be materially damaged by the proposed new building. The importance of this 'group value' is highlighted also in Historic England's Listing Particulars for Liverpool Street Station.

The harm to the settings caused by the new tower would be contrary to the relevant planning guidelines in (a) the NPPF, (b) the London Plan, (c) the 2015 City of London Local Plan, and (d) the City Plan 2040, currently being consulted on:

1) NPPF (December 2024 version): **Paragraphs 212-214**. We do not believe that any 'substantial public benefits' have been demonstrated which would outweigh the substantial harm that would be caused to the settings.

2) London Plan: Policy D9 (Tall Buildings), particularly (C)(1)(d). We do not believe that 'clear and convincing justification' of the harm to heritage assets and their settings has been demonstrated, or that the proposed new buildings 'positively contribute to the character of the area' (the Bishopsgate Conservation Area). Also, **Policy HC1 Heritage conservation and growth** is relevant.

3) City of London Local Plan 2015: We consider that the proposed development most certainly 'detracts from' the settings of the heritage assets, and would contravene (a) **Core Strategic Policy CS12**; (b) **Policy DM 12.1**; and (c) **Policy DM 12.2**.

4) City Plan 2040: This proposed new Local Plan constitutes a material consideration in planning terms. **Policy HE1: Managing Change to Heritage Assets** sets out three sets of criteria that development proposals should meet in relation to heritage assets. None of these criteria have been met by the proposed development.

Also, **Strategic Policy S12: Tall Buildings** is relevant, as is **Strategic Policy S21: City Cluster**: there is no 'contribution to' or 'preservation of' heritage assets and their settings in the proposed scheme.

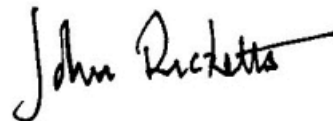
The Heritage Statement prepared by Donald Insall Associates for the LBC application concludes (p9) that '*In summary, the proposals **comply in part** with the development plan comprised of the heritage policies in the City of London Local Plan, the draft City of London Plan, and the London Plan, **although some harm will be caused to heritage assets which prevents full compliance with certain policies.***' We believe strongly that the harm caused will be material, and that the proposals represent an unacceptable contravention of these planning policies.

The proposed scheme will also have a significantly adverse effect on neighbouring boroughs, in particular in relation to the compromising of views from London Borough of Southwark identified in the City of London's *Protected Views SPD* (see the Georgian Group's letter); and the adverse impacts noted by the London Borough of Tower Hamlets.

We therefore strongly recommend that you refuse these planning applications or, if not, that you use your powers to call it in.



John Schofield
President
London and Middlesex Archaeological Society



John Ricketts
Chair
LAMAS Historic Buildings and Conservation Committee

13 April 2026