



New Life for
Remarkable Buildings

The Rt Hon Sir Sadiq Khan,
Mayor of London
City Hall
Kamal Chunchie Way
London
E16 1ZE

By email to: mayor@london.gov.uk

23.03.26

Dear Sir Sadiq,

City of London planning application 25/00494/FULEIA and 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 7PY.

I write on behalf of SAVE Britain's Heritage, regarding the highly controversial plans for Liverpool Street Station, to request that the Mayor exercise his statutory powers under the Mayor of London Order (2008) to direct **refusal** of the above application.

SAVE is an independent charity that campaigns across the UK to stop the wasteful demolition of historic buildings, and to find opportunities for their viable reuse. We work with architects and developers to come up with reuse proposals, helping local community groups to rescue the buildings they care about. From saving 400 terraced houses in the Welsh Streets, Liverpool, to Smithfield Market in the City of London – due to re-open as the new London Museum this year – we have a strong record of success over our 50-year history.

With regard to Liverpool Street Station, Network Rail seeks to demolish most of the listed station's concourse roof and construct a 19-storey office block over it, causing substantial heritage harm and extensive passenger disruption. Network Rail claim that this is the only way to deliver essential station upgrades such as new escalators, lifts and toilets. We agree that station upgrades are needed, but do not consider that the case to justify this high level of harm and disruption has been convincingly made. This £1.2bn+ development is "not technically viable" according to Network Rail's own advisers and raises significant national questions about how we fund upgrades to infrastructure and major listed public buildings. Liverpool Street is Britain's busiest railway station, and this scheme would have a significant impact on commuters and travellers from London and beyond. The scheme would have cross-boundary impacts, with Tower Hamlets raising objections to the plans, alongside over 3,800 members of the public – the most objections ever received by the City for a planning application. The submitted scheme contravenes local and national policy, including the London Plan (2021) and GLA policy on sustainability and embodied carbon. We append below a detailed submission which sets out material planning reasons for why the Mayor should refuse this scheme, as set out in the Mayor of London Order.

The submitted scheme is not the only option for Liverpool Street Station, and the scale of harm and policy non-compliance it implies cannot be justified when a less harmful scheme exists. John McAslan + Partners (JMP), the lead architects of the award-winning King's Cross Station refurbishment, have created a financially viable alternative vision which shows that all the essential station upgrades can be

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provided with a lighter touch scheme, at an estimated half the cost. The JMP scheme offers a policy compliant alternative which would cause minimal harm to the listed station and waste far less embodied carbon. A fitting legacy for London, the scheme's cutting-edge design enables the suspension of an over-station development above the Victorian trainshed, providing 52,000+ sqm of grade A office space in the heart of the City – approximately 60% of that offered by the submitted scheme. The alternative scheme supports local and national growth objectives. By retaining the existing concourse, the scheme would not only minimise passenger disruption but allow works to improve station retail, which would help fund the development, to begin immediately. We attach a copy of this alternative vision and a comparison of this scheme with the submitted, which outlines the clear economic, sustainability and policy benefits of the JMP alternative.

We ask the Mayor to direct refusal of the submitted scheme to allow for a full consideration of the McAslan alternative vision for Liverpool Street Station.

Yours sincerely,



Henrietta Billings MRTPI
Director, SAVE Britain's Heritage

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Greater London Authority, jules.pipe@london.gov.uk
Natan Doron, Head of Policy, Greater London Authority, natan.doron@london.gov.uk
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Enc: Key advantages of the John McAslan + Partners alternative (1)
McAslan Alternative Vision (2) Simon Sturgis Embodied Carbon Assessment (3) SAVE letter of
objection (4)

Planning Application 25/00494/FULEIA: Policy Non-Compliance with Spatial Development Strategy

We consider the above proposals to be contrary to the spatial development strategy for London as set out in the London Plan (2021).

Policy GG6 – the proposals do not *"support the move towards a low carbon circular economy"*

- The scheme fails to meet GLA benchmarks for greenhouse gas emissions, UK Net Zero Carbon Building Standards, or Low Energy Transformation Initiative (LETI) standards. This is contrary to the legislated net-zero commitment as set out in the Climate Change Act (2008, amended 2019) and paras 161 and 164 of the NPPF.

Policy SI 2 – the proposals are not net-zero carbon

- The scheme contravenes London Plan policy SI2. Leading carbon expert Simon Sturgis, co-author of the GLA London Plan Guidance on Whole Life Carbon Policy SI2 (2022), has confirmed that the scheme contravenes this policy. We attach his full report for your consideration. While described by the applicant as "state of the art" (DAS 6.3), the development has been described by Sturgis as having an "overall whole life carbon figure [...] approximately what you would expect of an equivalent office building built in circa 1990." This raises serious concerns about both the scheme's sustainability and its viability.

Policy D9 – the proposals' harm is not justified

- Despite repeated requests to City of London officers, no baseline costs for station upgrade works in isolation from over-station development costs have been provided as part of the submitted application. We consider that without these figures it is not possible to weigh up the true public benefit of the submitted scheme.
- The premise of the proposed over-station development as financial enabler of station upgrades is flawed. The scheme is, by its own admission, "not technically viable", and given the failure to provide baseline costs, we consider that the planning balance conducted at local authority level was not supported by "*clear and convincing justification*". Compensation due to Transport for London does not appear to have been accounted for in application documents, and this could pose significant additional costs.
- Policy D9 of the London Plan states that proposals for tall buildings should "*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*". We consider that without these costings there is insufficient evidence to conduct this balancing exercise, also required by NPPF 213 and 214, and that application therefore contravenes both local and national policy.

Policy HC1 – the proposals do not conserve heritage assets' significance

- The scheme proposes substantial harm to several designated heritage assets, in contravention of London Plan Policy HC1, which states that development proposals should conserve heritage assets' significance. These include Liverpool Street Station (grade II), the Bishopsgate Conservation Area and the setting of the grade II*-listed former Great Eastern Hotel, as set out in our detailed letter of objection to the City of London (25th June 2025, attached for ease of reference).
- Historic England (HE) has identified a high level of harm caused to Liverpool Street Station, the conservation area, and the hotel. In their consultation response submitted 14th July 2025 it is stated that there is "*the high level of harm to Liverpool Street Station caused by the loss of most*

of the 1990s work”, adding that this “is a weighty consideration” and that “the proposals are radically at odds with the character of the conservation area, [and] would cause a high degree of harm to its significance”. HE has also identified harm to the hotel, stating that “the new entrances and OSD [over-station development] would greatly reduce the ability to appreciate the hotel’s landmark qualities causing considerable harm”.

- We consider that this unjustified heritage harm is grounds for refusal.