



10/04/26

Application Reference: 25/00494/FULEIA

Address: Site Comprising Liverpool Street Station, 50 Liverpool Street, Sun Street Passage, 40 Liverpool Street (in Part), Hope Square, And Bishopsgate Plaza, London, EC2M 7PY.

RE: Liverpool Street Station Redevelopment

Dear Mr Khan,

The Georgian Group writes to request that, under the powers afforded to you by Article 6 of the Mayor of London Order (2008), you direct refusal on the above application for Planning Permission.

Should you not be minded to direct refusal, we request that, under the powers afforded to you by Article 7 of the Mayor of London Order (2008) and section 2A of the Town and Country Planning Act 1990, you call in the application for your own determination.

Article 7 of the Town and Country Planning (Mayor of London) Order 2008 sets out three criteria which, if met, enable the Mayor to take over the application and act as the local planning authority. These are set out below:

- A. The development would have a significant impact on the implementation of the London Plan.*
- B. The development would have significant effects that are likely to affect more than one London borough.*
- C. There are sound planning reasons for intervention.*

The Group considers that these policy tests have been met and expands on this below. The application for Planning Permission is contrary to policy and guidance set out within the National Planning Policy Framework and the London Plan and fails to meet the statutory duties set out in sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The Group's concerns relate specifically to heritage matters, and in particular to those heritage assets which fall within our statutory remit. We defer to the expertise of other organisations on matters outside of this remit.

Significance of Surrounding Heritage Assets

The Georgian Group's statutory remit includes buildings dating between 1700 and 1840 and it is only those buildings which the Group will highlight in our correspondence. For the impact on Liverpool Street Station itself, the Group defers to the expertise of our sister National Amenity Societies.

- a) St Paul's Cathedral

St Paul's Cathedral is Wren's masterpiece, and its dome became his lifelong obsession. As part of plans to repair and rejuvenate Old St Paul's - before its destruction in The Great Fire - Wren proposed the introduction of a new domed crossing to the medieval building. The idea of the dome persisted through all his subsequent designs for the new cathedral and was ultimately realised in the form we see today.

Since its completion, St Paul's has dominated London's skyline. It has provided the stage for great national events and has been depicted in countless works of art. Its location - deliberately positioned on a hill within the city - was intended to ensure the building remained visible from the River Thames and from long-range views across the capital.

The role and contribution of St Paul's Cathedral to the London skyline are formally recognised within the *London View Management Framework*. However, views toward the cathedral are not confined to the protected viewpoints alone. St Paul's is visible from numerous other locations and notable landmarks, particularly along the southern bank of the Thames, all of which contribute to its significance and enduring presence within London's townscape.

b) St Botolph-without-Bishopsgate

St Botolph-without-Bishopsgate is a Grade II* listed building, designed by James Gould and George Dance the Elder in the early 18th century. Dance later became Clerk of Works for the City of London, giving him effective control over architectural changes within the City. The body of the church and its tower are well preserved, with the eastern elevation and arched window - framed by pairs of Doric pilasters supporting a pediment - being of particular interest.

This impressive composition occupies a prominent position on Bishopsgate and is visible in longer views, enhancing both the surrounding streetscape and the wider Bishopsgate Conservation Area. Views of the tower and lantern against a clear skyline along Bishopsgate contribute significantly to the church's importance, as well as to the historic character of the conservation area, reflecting what would historically have been its most prominent building.

c) Bishopsgate Conservation Area

The Bishopsgate Conservation Area is of particular interest, illustrating notable examples of Georgian town planning, with later Victorian and Edwardian developments woven into the historic fabric. Views within the conservation area make a strong contribution to its distinctive character and reflect the unique building stock found within its environs. *The Bishopsgate Conservation Area SPD* identifies these key views, which include notable buildings dating from the 18th and early 19th centuries, alongside historic street patterns that have survived from the period.

A group of late 18th-century warehouses on New Street and the eastern side of Devonshire Square create a distinctive character within this part of the conservation area. Originally constructed for the East India Company in the late 18th and early 19th centuries, the buildings were later used by the Port of London Authority from 1909 and subsequently converted for office use in the 1970s. Views looking east along New Street are specifically referenced in the SPD as contributing to the area's special interest. From this viewpoint, the historic scale and character of the area are particularly evident.

Similarly, when situated within or to the east of Devonshire Square, one can clearly perceive the historic scale of this part of the conservation area - an important factor contributing to its overall significance.

The wider conservation area is characterised by distinct sections of consistent scale and height, with few buildings deviating from this pattern. This consistency allows for prominent views across the area and enables the historic character and appearance to be clearly read and appreciated while moving through the surviving street layout.

Proposal

The proposals for planning permission include the redevelopment of Liverpool Street Station including the demolition and creation of new entrances into the station to provide new lifts, escalators and stairs. The project includes the introduction of over-station development which will reach a height of 97.67m AOD to provide commercial, service and business use.

The Proposals and Their Impact

a) St Paul's Cathedral

The height and massing of the proposed development would cause harm to the setting and therefore significance of St Paul's Cathedral.

The *London View Management Framework* (LVMF) Supplementary Planning Guidance (SPG) outlines the importance of View 15: River Prospect - Waterloo Bridge and provides specific guidelines for development within its setting. With respect to View 15B, the SPG states that development should not dominate the peristyle, drum, dome, or western towers of St Paul's, and that the visual separation between the Cathedral and the eastern and northern clusters must be maintained.

View 15B faces downstream, with St Paul's Cathedral serving as a key landmark that draws the viewer's eye when crossing the bridge. In this view, the Cathedral is clearly separated from both the eastern and northern clusters, and its drum, peristyle, and dome are distinguishable against a clear skyline. The proposed development sits within the setting of St Paul's, positioned between the northwestern tower and the peristyle. AVR 9 from the accompanying Townscape and Visual Impact Assessment (TVIA) shows a wireline of the proposed development, partially obscured by the tree canopies on the Victoria Embankment in the foreground. Your local authority must be assured that seasonal changes would not reveal more of the development, which would introduce a visible intrusion into the setting of St Paul's - contrary to LVMF guidance.

There is also the potential for harm in kinetic views along Waterloo Bridge and in glimpse views, where the proposed development could obscure the silhouette St Paul's Cathedral.

St Paul's Cathedral is also the dominant structure in Views 17B.1 and 17B.2 (from the Golden Jubilee and Hungerford Footbridges), as recognised in the LVMF SPG. The document makes clear that St Paul's is the single most important structure in this view and that its setting should be preserved. AVRs 3 and 4 of the TVIA demonstrate the harmful impact the proposed development would have, primarily through reducing the visual gap between St Paul's and the eastern cluster - thereby diminishing its skyline prominence.

Wren and his contemporaries deliberately designed a harmonious skyline of towers and spires across the city, with St Paul's as the architectural and symbolic centre. A historic and significant relationship exists between St Paul's Cathedral and the surrounding City churches. This relationship is clearly visible in many south-bank views of the Thames, where, for example, the spire of St Mary-le-Bow appears to the east of the Cathedral's dome. The proposed development would obscure and challenge this historic visual relationship. This impact is evident in AVRs 15, 16, 17, and 18 of the TVIA and represents a further encroachment on the Cathedral's setting.

The Group has previously raised concerns with the City of London regarding two additional applications for planning permission that would similarly harm the setting of St Paul's Cathedral:

1. 55 and 65 Old Broad Street, which would appear in views along Waterloo Bridge and harm the visibility of the peristyle - contrary to LVMF guidance.
2. 55 Bishopsgate, which would further erode the visual separation between the eastern cluster and the Cathedral, diminishing its prominence on the skyline.

Given these examples, the cumulative impact of the proposed development must be considered.

In conclusion, the proposed development would harm the significance of St Paul's Cathedral through its negative impact on the Cathedral's setting. For the purposes of the National Planning Policy Framework (NPPF), this would constitute less than substantial harm at the middle of the spectrum.

b) St Botolph-without-Bishopsgate

The setting of St Botolph's Church contributes significantly to its overall significance. Positioned prominently on Bishopsgate, the church features in both short-range and long-range views, giving it a distinct landmark quality. The height and massing of the proposed development would have a harmful impact on this setting, effectively erasing the church's visual prominence in views along Bishopsgate and undermining its historic relationship with this important thoroughfare.

Views 47, 48, and 49 clearly demonstrate the harmful impact of the development on the church's setting. Currently, the tower and lantern of St Botolph's are framed against a clear skyline, enhancing the church's visibility and landmark status. The introduction of the proposed development would harm this composition, with the height and massing of the new towers effectively removing the church's prominence.

This impact would cause considerable harm to the significance of the church itself, as well as to the wider streetscape, and the character and appearance of the Bishopsgate Conservation Area. For the purposes of the National Planning Policy Framework (NPPF), the level of harm is assessed as being at the mid to higher end of less than substantial harm.

c) Bishopsgate Conservation Area

Specific views within the Bishopsgate Conservation Area contribute significantly to its significance and allow its special character and appearance to be fully appreciated. The proposed development would negatively impact several of these important views, thereby causing harm to the significance of the conservation area.

As previously outlined in relation to St Botolph's Church, similar concerns apply to the Bishopsgate Conservation Area, in which the church is a key feature. The church occupies a prominent position on Bishopsgate and makes a substantial contribution to the area's character and appearance. The proposed development would compete visually with the church, and its height and massing would effectively remove the landmark quality of the church's tower and lantern. This would result in considerable harm to the significance of the conservation area by disrupting the historic and visual relationship between the church, Bishopsgate, and the wider streetscape. This impact is clearly demonstrated in Views 47, 48, and 49 of the TVIA.

New Street is another important component of the conservation area, where its late 18th and 19th century character can still be experienced. Formerly known as Hand Alley, it became New

Street in 1782, and Nos. 5, 6, and 7 New Street survive from this period. These dwellings form a coherent group that contributes to the streetscape and to views along the street. No. 12, the Magpie Public House, dating to 1830, sits on the northern side and, together with adjacent buildings and later warehouses, maintains a consistent scale. The southern side is defined by the former East India Company and later Port of London Authority warehouse buildings, which help establish the street's unique character. The consistent rooflines and architectural scale reflect the phased development of the area during the late 18th and 19th centuries.

The proposed development would be sited at the western end of New Street, replacing the existing, sensitively designed late-20th-century entrance to Liverpool Street Station. The scale and height of the new scheme would introduce a visually intrusive element to views down New Street, undermining the established character of this part of the conservation area. This view is rightly identified in the Bishopsgate Conservation Area SPD as a contributing townscape view, and the harm is illustrated in Views 39 and 40 of the TVIA.

Devonshire Square, laid out between 1678 and 1708, is an early surviving example of a formal square in London. Although buildings surrounding the square have been altered over time, they continue to contribute to the sense of enclosure characteristic of such planned urban spaces. Nos. 12 and 13 are notable early 18th-century townhouses, while the former East India Company warehouses to the east represent a later industrial phase of the area's development during the 19th century. This section of the conservation area offers valuable insight into the historical evolution of both the square and the wider locality. Views play a vital role in reinforcing this contribution by allowing the historic scale and architectural character to be appreciated. Views 41, 42, and 43 of the TVIA show how the height and massing of the proposed development would dominate views from within the square, harming the setting of the former warehouses, which currently serve as the dominant features in terms of scale and historic use.

In conclusion, the proposed development would cause harm to three distinct areas within the Bishopsgate Conservation Area, each of which exemplifies aspects of 18th and 19th century development. The character and appearance of these areas contribute considerably to the overall significance of the conservation area. For the purposes of the National Planning Policy Framework (NPPF), the harm is assessed as being at the mid to higher end of the less than substantial harm spectrum.

Legislation, Policy and Guidance

Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* applies to applications for planning permission that affect a listed building or its setting. It places a statutory duty on decision-makers to have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest that it possesses.

Section 72(1) of the Act relates to any buildings or land within a conservation area. It requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of that conservation area.

The *National Planning Policy Framework (NPPF)* provides guidance on how the statutory duties set out in the *Planning (Listed Buildings and Conservation Areas) Act 1990* should be applied in practice.

Paragraph 212 of the NPPF states that “*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).*”

Paragraph 213 goes on to state that *“any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.”*

Government *Planning Practice Guidance (PPG)* further clarifies that any harm identified must be categorised as either less than substantial harm or substantial harm. Where harm is judged to be *less than substantial*, Paragraph 215 of the NPPF requires that this harm be weighed against the public benefits of the proposed scheme.

Section 38(6) of the *Planning and Compulsory Purchase Act 2004* states that “where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.”

This provision establishes the primacy of the development plan in planning decisions, requiring that applications be determined in line with the adopted plan unless other material considerations justify a different outcome.

London Plan Policy HC1 states that *“development proposals affecting heritage assets, and their settings, should conserve their significance by being sympathetic to the assets’ significance and their appreciation within their surroundings.”* It further requires that the cumulative impacts of incremental change from development on heritage assets and their settings be actively managed.

Policies HC3 and HC4 address local and strategic views, as well as the *London View Management Framework (LVMF)*. Specifically, Policy HC4 states that *“development in the foreground, middle ground, and background of a designated view should not be intrusive, unsightly, or prominent to the detriment of the view”* and makes clear that development must not harm the protected views identified within the plan.

Policy D9 (Tall Buildings) requires Development Plans to define what constitutes a tall building and for local authorities to determine appropriate locations for such development. The policy states that *“tall buildings should only be developed in locations identified as suitable in Development Plans.”* Regarding heritage assets, it requires that proposals *“take account of, and avoid harm to, the significance of London’s heritage assets and their settings.”* Proposals that would cause harm must provide clear and convincing justification, demonstrating that alternatives have been considered and that there are clear public benefits outweighing that harm. Furthermore, tall buildings should positively contribute to the character of the area.

The *Protected Views Supplementary Planning Document (SPD)*, produced by the City of London, acknowledges the visual tension between tall buildings and the protected views of St Paul’s Cathedral. It states that: *“In some of the views protected by St Paul’s Heights, tall buildings can be seen in juxtaposition to the Cathedral, compromising its dominance of the skyline. The relationship of tall buildings to the Cathedral varies with the viewpoint. In some cases, tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints, tall buildings appear above the roof of the Cathedral or crowd close to the Cathedral on the skyline.”*

The SPD specifically identifies compromised views from several key locations, including: the south bank between New Globe Walk and Gabriel’s Wharf, areas adjacent to Waterloo Bridge, and from the Millennium Bridge, Blackfriars Bridge, the southern part of Waterloo Bridge, Hungerford Bridge, and Fleet Street. It goes on to state that, within these views, *“new development and the redevelopment of existing tall buildings should aim not to worsen and, where possible, to improve the backdrop to the views.”*

The LVMF SPG provides management guidelines for View 15B, stating in paragraph 266 that *“consideration should be given to the space St Paul’s Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect.”* Furthermore, paragraph 267 states that *“Development should not dominate the peristyle, drum, dome, or western towers of St Paul’s Cathedral in the background of the view. Development that visually interacts with the dome in the immediate background should not diminish the viewer’s ability to recognise and appreciate the Strategically Important Landmark.”*

With reference to View 17B, the LVMF SPG states that *“the setting of St Paul’s Cathedral within the view, as the single most important structure, should be preserved or enhanced.”*

The City of London is currently consulting on the draft City Plan 2040, which proposes changes to the policies on tall buildings and their relationship to heritage assets. Strategic Policy S12: Tall Buildings identifies five criteria to which tall building proposals must have regard. These include:

- The effect on the city skyline and the impact on the wider London skyline and historic skyline features.
- The character and amenity of their surroundings; and
- The significance of heritage assets, including both their immediate and wider settings.

In accordance with the *London Plan*, the draft City Plan also includes a policy map identifying areas considered appropriate for tall buildings.

In the adopted City of London Local Plan, several relevant Core Strategic Policies reinforce the City’s commitment to protecting heritage assets and important views:

- Policy CS12 sets out the objective *“to conserve or enhance the significance of the City’s heritage assets and their settings, and provide an attractive environment for the City’s communities and visitors.”*
- Policy CS13 aims to *“protect and enhance significant City and London views of important buildings, townscape and skylines,”* recognising the value of such views in preserving the overall heritage of the City’s landmarks.
- Policy CS14 relates specifically to tall buildings and clearly states that planning permission will be refused where tall buildings are proposed in inappropriate locations, including the St Paul’s Heights Area and St Paul’s protected vista viewing corridors. It also requires consideration of the potential effect on the city skyline, the character and amenity of surroundings, the relationship with existing tall buildings, and the impact on heritage assets and historic skyline features.

Further relevant guidance is provided by Historic England in their document *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3*. It emphasises that: *“All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it.”*

The guidance further highlights that the capacity of a setting to accommodate change depends on factors such as the nature of the proposed change and the location of the heritage asset. For example, assets located in elevated, open, riverbank, or prominent urban positions may have

greater sensitivity, with reduced ability to absorb visual change without detriment to their significance or appreciation.

The Georgian Group's Comments

The proposed development qualifies as a tall building as defined by the draft *City Plan 2040*. Under this emerging policy, tall buildings are subject to specific criteria and are considered appropriate only in designated areas. The adopted *City of London Local Plan 2015* designates the application site as inappropriate for tall buildings, a position reaffirmed in the draft *City Plan 2040*. The application site lies outside the City Cluster Tall Buildings Area.

In line with Policy D9 of the *London Plan*, "*Tall buildings should only be developed in locations that are identified as suitable in Development Plans.*" This proposal therefore conflicts with both local and regional policy frameworks regarding the appropriate siting of tall buildings.

In the view of the Group, the harm to St Paul's Cathedral would fall within the middle range of the less than substantial harm spectrum. This harm arises from the reduction in the clear skyline and the diminished ability to distinguish the peristyle, drum, dome, and western towers of the Cathedral from designated viewpoints. The cumulative impact of this and surrounding developments must also be considered, as it would further erode the setting and significance of this Grade I listed building and iconic London landmark.

The harm to St Botolph's Church would be more immediate and pronounced, particularly from close-range views along Bishopsgate. The proposed development would challenge the church's landmark status and visual prominence within the Bishopsgate Conservation Area. As such, this harm is assessed to be at the middle to higher end of the less than substantial harm spectrum.

The Bishopsgate Conservation Area is centred around the historic Bishopsgate Road, characterised by a network of historic streets and alleys. The proposed development would result in harm to the significance of the 18th and 19th century townscape that defines this area. This harm arises from the visibility of the proposed development from key locations within the conservation area and the resulting disruption to its historic character. The Group considers this harm to be at the middle to higher end of the less than substantial spectrum.

Recommendation

The Georgian Group objected to the application for Planning Permission when it was considered by the City of London. The City of London recommended the application be approved when the case was considered at their planning committee on the 10th February 2026.

Within our assessment, the Group has identified multiple instances of harm being caused to heritage assets of the highest importance. It is therefore the Group's view that there are sound planning reasons for intervention from the Mayor of London owing to the conflicts with policies set out within the London Plan.

In determining this application, there is a statutory duty for the decision maker to consider the following legislation:

- Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which requires special regard to be had to the desirability of preserving listed buildings, their setting, and any features of special architectural or historic interest they possess.
- Section 72(1) of the same Act, which requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas; and

- Section 38(6) of the *Planning and Compulsory Purchase Act 2004*, which states that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.

Yours sincerely,

Eddie Waller

Senior Conservation Adviser

London and South East England