

The Rt Hon Sir Sadiq Khan,  
Mayor of London  
City Hall  
Kamal Churchie Way  
LONDON  
Via email  
[mayor@london.gov.uk](mailto:mayor@london.gov.uk)

27 March 2026

Dear Sir Sadiq,

**RE: 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**

I write on behalf of the Victorian 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 Victorian Society is a National Amenity Society responsible for the preservation of architecture between 1837 and 1914. The Society has a long involvement with Liverpool Street Station, having campaigned throughout the 1970s and 1980s against British Rail's proposals for the station's comprehensive redevelopment. We were instrumental in securing the listing of the station in 1983 and in ensuring that the subsequent redevelopment respected the significance of Edward Wilson's 1873-5 trainshed and the former Great Eastern Hotel, resulting in the sensitive 1985-91 scheme by Nick Derbyshire that the present proposals would now substantially alter.

#### Criteria Assessment

- **The Development Would Have a Significant Impact on the Implementation of the London Plan**  
The proposal contravenes multiple policies of the London Plan (2021), the City of London Local Plan 2015, and emerging City Plan 2040.
- i. **Tall Buildings Policy (CS14 / D9) and Policy C(g):** The proposal measures 97.67m or 19 storeys, substantially exceeding the City of London Local Plan 2015 definition (6 storeys or 18m, Policy CS14) and the emerging City Plan 2040 definition (75m AOD). Located beyond

Campaigning for  
Victorian & Edwardian  
Built Heritage

#### The Victorian Society

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**Patron:** HRH The Duke of Gloucester KG, GCVO  
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**Director:** James Hughes

the Eastern Cluster and north Broadgate Cluster, the site sits within an area deemed unsuitable for this scale of development.

Policy CS14(2) requires tall buildings to *'make a positive contribution to the character and appearance of the City.'* By virtue of its improper massing, scale, materials and design – in relation to both the neo-gothic Liverpool Street Station, and the landscape literacy of the Listed heritage in the broader setting – the proposed cannot claim to fulfil this. Whilst this is discussed at length in our letter dated 4<sup>th</sup> July 2025, a key example of the design's quality is apparent in the elevational treatment based on Sir Paul Pindar's House (c.1599), with the design's fundamental reference point creating visual division from the Neo-Gothic Conservation Area character.

In addition, Policy C(g) prohibits *'adverse reflected glare.'* The glass panel curvature produces such glare, as is recorded by the applicant's proposed renders. The impact this light pollution will have on neighbouring buildings is not understood by the applicant, again, emphasising a proposed scheme at odds with the character and appearance of its setting.

Policy D9 of the London Plan requires *'clear and convincing justification'* for harm to heritage assets, demonstrating that *'alternatives have been explored.'* The scheme is, by its own admission in the Financial Viability Assessment, *'not technically viable.'* Any benefits of the scheme cannot therefore be assumed and there is therefore no justification for the substantial harm proposed; the scheme would obviously therefore benefit from further alternatives having been explored. This also contravenes NPPF paragraphs 213 and 214.

- ii. **Heritage Policy (HC1 / C1):** Policy HC1 requires development to *'conserve heritage assets' significance.* The proposal would cause a high level of less-than-substantial harm to the Grade II-listed station, the Grade II\*-listed former Great Eastern Hotel, and the Bishopsgate Conservation Area.

Policy C1 requires development to *'respect and enhance the character, legibility and setting of London's heritage assets.'* The proposal fails this policy for:

- a. Long-range views (C1(a i)): Negatively impacts protected views to St Paul's Cathedral under the London View Management Framework. Seasonal shedding of London plane trees was not considered; the impact will be visible for significant periods of the year, further enhanced by the effects of global warming.
- b. Mid-range views (C1(a ii)): The 2007 Bishopsgate Conservation Area reappraisal establishes the Station as *'one of London's principal gothic revival buildings'* in a

*'notable Victorian townscape group'* with the Andaz Hotel. The proposal, owing to the choice of material, scale and massing, would overwhelm the Grade II\*-listed Hotel. Rendering the architecture permanently overshadowed. In addition, No. 50 Liverpool Street (proposed for demolition), whilst un-listed, does enhance the Conservation Area's character. No.50 is a good example of how modern additions to the cityscape can enhance mid-range views, choosing a design which is in-keeping with the scale and appearance of adjacent Listed buildings.

- c. Immediate views (C1(a iii)): The over-station development would engulf the Hotel, reducing daylight by approximately 50% - as is understood in the applicant's daylight assessment. What the applicant does not address is the level of harm that this sudden and disproportional reduction in light can do to the Listed fabric of the station. Ultimately, this is a scheme that fails to *'maintain the pedestrian scale, character and vitality of the street'* and a such will be harmful to the immediate views.

- iii. **Sustainability Policy (GG6 / SI2):** Policy GG6 requires development to *'support the move towards a low carbon circular economy'* and Policy SI2 requires the achievement of net-zero carbon emissions. The scheme contravenes both, failing GLA benchmarks. Reliance on an 8-year forecast and *'upswing in market conditions'* for viability represents an exceptional risk that does not outweigh the harm caused via these key sustainability policies.

- iv. **Design Policy HC1:** The proposed elevated platforms with retail units would cause high harm to Edward Wilson's 1873-5 train shed, contrary to Policy HC1. Platforms would occupy entire bays, with retail units (16.5m depth) subsuming arcade columns, irrevocably diminishing the trainshed's symmetry. The Heritage Impact Assessment inconsistently judges this as a *'heritage benefit.'* In addition, NPPF Paragraph 213 requires *'clear and convincing justification'* for substantial harm, for which, none was provided for the demolition of the Italianate neogothic columns, original to the Wilson scheme and vital to significance.

- **The Development Would Have Significant Effects That are Likely to Affect More Than One London Borough**

Liverpool Street is Britain's busiest railway station. The scheme would impact commuters from various boroughs of London and beyond, with cross-boundary effects extending far beyond the City.

- i. **Borough-wide impacts** – A key objection was made by Tower Hamlets, who strongly condemned the plans. Tower Hamlets council warned that the proposed 97-meter tower block would sit ‘awkwardly’ on top of the station’s main entrance and ‘overpower’ and ‘undermine’ the area between the City and the East. Fundamentally, the station sits at the watershed of a cross-boundary, transitional space, suggesting that the scale of the development would stand to punctuate the city in a way that lends itself to division and segregation.
- ii. **Regional transport impacts** - The 8-year construction period raises major concerns about how the Station will continue functioning during such prolonged intervention. As both a station for regional connectivity – with the majority of commuters travelling via rail in peak times from outside of the City – and cross-boundary London commutes via the tube network, Liverpool Street Station stands to affect the lives of multiple strands of commuters, as well as the livelihoods of businesses that rely on the functionality of the commute. The impact on travel times, travel effectiveness, platform congestion, accessibility requirements and ticket fares is not clarified by the applicant, and all factors will have a considerable impact on more than one London Borough.
- iii. **Economic impacts** - The proposal will have direct implications for neighbouring boroughs' economies. For example, Spitalfields Market, located in Tower Hamlets, will face competition from the extensive retail proposed within the trainshed. This historic market, updated in 1893 to encourage prosperity in an area occupied by low-income migrants, stands to lose custom, harming a cultural epicentre of the local area, again, reiterating the concerns about division highlighted by Tower Hamlets.

- **There are Sound Planning Reasons for Intervention**

The Society acknowledges the necessity of operational upgrades and enhancements to the functionality and accessibility of Liverpool Street Station. However, it is essential that any improvements to the Station's facilities are respectful of the significance and setting of both the Station and neighbouring heritage assets.

Network Rail seeks to demolish most of the Listed station's concourse roof, constructing a 19-storey over site development to rest on the station’s infrastructure; this will cause a high level

of less-than-substantial harm to the Listed heritage asset, as well as extensive, long-term passenger disruption at the busiest train station in the City.

Notwithstanding, 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. Fundamentally, 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 gravity of the heritage and daily impact of this scheme is reflected in the objections made by over 3,800 members of the public; this is the most objections ever received by the City for a planning application.

Network Rail maintain 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, nor would such minimal upgrades be disputed by the Society, but we do not consider that the '*clear and convincing justification*' for his high level of harm and disruption has been suitably made in reference to either the necessary National Planning Policy Framework or the City's own Local Plan; nor do we agree that this harmful development is the only means of delivering the station upgrades.

### **Conclusion**

The application contravenes multiple policies of the London Plan (2021) and City of London Local Plan 2015. The approach would cause substantial harm to the Station and high levels of harm to surrounding heritage assets. Neither the approach nor the harm has been justified; the approach is, by the applicant's admission, financially unviable. A less harmful, viable alternative exists.

We ask the Mayor to direct refusal of the submitted scheme to allow for a full consideration of alternative approaches for the provision of new facilities at Liverpool Street Station.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Hughes', written in a cursive style.

James Hughes  
Director