

Studio Director UK
Herzog and de Meuron
The Coal Office
1 Bagley Walk
London N1C 4PQ

September 2022

Dear

London Review Panel: Liverpool Street Station

Please find enclosed the London Review Panel report following the design review of Liverpool Street Station on 14 September. I would like to thank you for your participation in the review and offer ongoing Mayor's Design Advocate support as the scheme's design develops.

Yours sincerely,



Mayor's Design Advocate

cc.

All meeting attendees
Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills
Philip Graham, Executive Director of Good Growth, GLA
Louise Duggan, Head of Regeneration, GLA



Report of London Review Panel meeting for Liverpool Street Station, City of London

14 September 2022

Herbert Smith Freehills LLP, Exchange House, Primrose Street, London, EC2A 2EG A site visit took place ahead of the review this date

London Review Panel



MDA (Chair)

MDA MDA MDA

Attendees



City of London
City of London
City of London
City of London
Transport for London

GLA Regeneration GLA Regeneration GLA Planning

GLA Planning

Report copied to

Jules Pipe Deputy Mayor for Planning, Regeneration and Skills

Philip Graham GLA Executive Director of Good Growth

Louise Duggan GLA Head of Regeneration

Confidentiality and publication

Please note that while schemes not yet in the public domain, for example at a preapplication stage, will be treated as confidential, as a public organisation the GLA is subject to the Freedom of Information Act (FOI) and in the case of an FOI request may be obliged to release project information submitted for review. Review reports will target publication to the London Review Panel webpage six months following the review unless otherwise agreed.

Project location

Liverpool Street Station, Liverpool Street, London EC2M 7PY

Presenting team



Sellar
Herzog and de Meuron
Herzog and de Meuron
Herzog and de Meuron
WSP
WSP
DP9
Bridge Associates
Herbert Smith Freehills
Townsend Landscape Architects

Planning context and background

The red line boundary is under discussion; however, as currently proposed it is rectangular, incorporating the Grade II Listed Great Eastern Hotel, 50 Liverpool Street, the Station entrance open space from Liverpool Street (Hope Square), the Station entrance open space from Bishopsgate (Bishopsgate Square), and the Station concourse and roof structure above, including adjacent retail space.

The hotel, 50 Liverpool Street, Hope Square, and the station entrance frontage from Hope Square, including the two decorative brick-clad towers, are within the Bishopsgate Conservation Area, which contains numerous listed buildings. The Conservation Area stretches to the south beyond Liverpool Street, and to the east of Bishopsgate, stretching northwards along the eastern side of Bishopsgate. Other conservation areas adjoin.

The site is within the Central Activities Zone. It is not allocated for development in the Local Plan or emerging Local Plan, although it is located in the emerging Liverpool Street Key Area of Change. It is outside the City's 'Eastern Cluster' of tall buildings and in an area (the Bishopsgate Conservation Area) deemed inappropriate in principle for a tall building (Policy CS 14). The site is in the immediate skyline backdrop and setting of St Paul's Cathedral, a Strategically Important Landmark, in kinetic London View Management Framework (LVMF) views from Waterloo Bridge (15B.1-2), Hungerford Bridge (17B.1-2) and to the right of the Cathedral from Gabriel's Wharf (16B.1-2). The site is very close to (but currently just outside) the background Protected Vista from King Henry's Mound to St. Paul's Cathedral from Assessment Point 9A.1.

Parts of the Liverpool Street and Bishopsgate frontages are identified in the Local Plan as being within the Liverpool Street Principal Shopping Centre. The site is within the boundary of the City's Liverpool Area Enhancement Strategy (2013), which identifies potential for enhancements of highways and the public realm primarily under the City's stewardship.

Network Rail and TfL's joint draft 'Vision for Liverpool Street Station' (April 2022) identifies current issues being the third highest priority station requiring overcrowding relief. Network Rail states that for the foreseeable future, the required station improvements cannot be delivered without a third party due to lack of funding. Similarly, TfL is unable to fund a planned scheme to provide step-free access to the Underground platforms, which has remained unimplemented for over 10 years. Potential partners were therefore invited to set out how proposals could achieve the vision and objectives, funded by an over- station commercial development. The development proposals by Mersey 1 Limited respond to this through a joint venture between Sellar and MTR (operators of the Elizabeth Line).

The panel's advice was asked for its view on whether the proposals have the potential to deliver transformational change resulting in a world class station interchange for the twentieth-first century, including:

- the place-making vision and principles underpinning a concept for a twentiethfirst century world class transport interchange
- proposed improvements to efficiency of interchange, including people movement/overcrowding, operational issues, safety and security, movement within/outside the interchange.
- the approach to inclusive design, including improvements to accessibility, step-free access, legibility/wayfinding, and permeability
- design quality
- sustainability.

The panel was also asked for initial comments on the relationship of the proposals to the heritage and strategic views context, which is expected to be discussed in more detail at a future review.

London Review Panel's Views

Summary

The proposals for improvements to Liverpool Station Interchange funded by commercial over site development are ambitious and challenging, and the panel welcomes this introductory review. The significance of this project as an important gateway to London, and the need to balance the public benefit of station improvements with townscape and heritage impacts suggests the need for a series of London Review Panel meetings. The initial comments provided by the panel emphasise the need for the scheme to reflect the City of London's 'Liverpool Street Area Enhancement Strategy' and the mayor's 'Good Growth by Design' principles.

This area of London currently suffers from congestion, pollution, poor pedestrian permeability, and a lack of public open space. This creates an environment that can often feel hostile, unsafe, and difficult to navigate. Whilst the panel recognises the ambition of the project to improve the station, it asks the applicant team to look beyond the red line boundary and demonstrate the contribution it can make to transformation of the wider Liverpool Street area. Presenting the development proposals in the context of this bigger picture will be essential to demonstrate a positive contribution to this part of London. Similarly, more comprehensive townscape and visual impact analysis is needed to allow the panel to comment on the scale, massing and architecture of the proposals. Illustrating how the scheme will be seen by people on streets around the site will be as important as analysis of LVMF views.

The panel would request the team provide more information of the history of options that were discounted and why they were discounted to demonstrate why the team are proposing the presented scheme as the best option. Options that consider the existing buildings and structures and their potential retention should be included. These options should refer to the historic environment and climate change impact. The team should also consider the project moving beyond the red line boundary and cover a larger area if impact. The panel offers some initial reactions to the emerging designs and looks forward to discussing the evolving scheme in more detail at future reviews.

City making

- In the panel's view it will be essential for the project to demonstrate its value as a piece of city, to make a case for the value of the station upgrade, and the scale of the over site development. The project needs to also demonstrate in its analysis what makes this place special.
- The team should reference the City of London's adopted 'Liverpool Street
 Enhancement Strategy' to demonstrate a clear understanding of the constraints and
 opportunities already identified in this strategy for this area. There are opportunities
 for this project to implement some of the recommendations of this strategy and this
 should not be overlooked.

- Similarly, the panel would welcome a clearer analysis of how the proposals respond to the Mayor's 'Good Growth by Design' principles. The station is a civic building, used by a diverse range of people, and as such themes such as making London child friendly and gender in city making are of great relevance. The Public London Charter should also be referenced in the research and project response to this.
- The area around Liverpool Street Station has activity 24 hours a day, due to both the station operations and the night time economy. Its streets are crowded, confusing to navigate, and provide few public places to rest. Because of this they are challenging to manage, maintain and cleanse, and can feel unsafe particularly for women and girls.
- There is an opportunity for the station redevelopment to play a part in addressing these issues, and the planning policy basis for this is clear.
- For example, the way retail space is curated, and allows for a change in the people
 using it in the evening, can help to provide activity and natural surveillance. A
 narrative about how the development functions at night is essential.
- In post-Covid London, the panel would also like to see more analysis of how changing work and travel patterns have informed the proposals.
- Where the station alterations would create a lower ground level covered by the proposed new concourse, the extent to which this can function as an urban space and the uses it accommodates need further explanation.
- Similarly, onward routes, interchange with the bus network, taxis and taxi rank, and
 access to cycle storage will be as important as interchange between train lines. The
 team should design extend the red line boundary to include these important wider
 public realm improvements.

Views analysis

- The presentation included a range of views of the development, including LVMF views, and mid-height / mid-distance views. However, there were few illustrations showing the way the scheme would be seen by people on streets around the site and the impact on the historic environment.
- The panel requests more comprehensive views analysis to show how the station and over site development would be experienced from the surrounding area.

Engagement

• It is essential that the applicant team engages with local people including station interchange users and local businesses so that this can inform design decisions.

- For example, where publicly accessible spaces (which should reference the Public London Charter) are proposed at upper levels of the over site development, it will be essential to understand who is likely to use these, and what facilities they require.
- Without this information, the panel questions whether spaces such as the wintergarden will be used by local people or station users or whether these would be primarily for the benefit of the offices.
- The panel understands that focus groups and online surveys have been carried out, but more extensive public consultation will be needed.
- Engagement with station staff will also be important, so that opportunities to improve their working conditions and wellbeing can be maximised.

Demolition of existing buildings

- The panel questions whether the extent of demolition of existing proposed is justified in terms of both embodied carbon and townscape quality and harm to the historic environment.
- Whilst the building adjacent to the 50 Liverpool Street entrance is not part of the original historic fabric of the station, it appears to be in good condition and has contributed well to the streetscape for several decades.
- Similarly, the area of station roof highlighted for demolition, whilst not original, is a good quality extension of the historic roof.
- The panel asks for evidence of options to allow retention of these elements to be presented, to enable discussion of whether demolition is justified.
- The scale of demolition of the hotel is not clear, however it appears to be significant and requires more explanation and justification. This should include justification for the carbon impacts of any large-scale demolition.

Station

- Removal of the glazed roof above the station concourse is proposed, to allow construction of office and hotel above. This is proposed to generate funds for improvement of the station, but the panel questions if this is to the station's advantage – including the loss of natural light and the extend of demolition.
- The panel is not able to give a view on whether the scheme would achieve transformational change for the station, because of a lack of information about Network Rail and Transport for London's future operational requirements, with predicted increases in footfall. This is something to explore in more detail at future reviews.

Architecture

- The panel reserves its comments on the scale and massing of the development proposals, in the absence of comprehensive townscape analysis, including views from streets around the site.
- However, it notes that historic examples such as St Pancras Station show that
 combining a hotel with a station can be successful in creating scale and civic
 presence. As such the project team should reference the sensitive development of St
 Pancras and Kings Cross as examples to inform the proposals.
- The panel encourages more exploration of how the different uses come together to create high quality architecture, as a well-integrated whole.
- It recommends further work to develop an architectural language that is rooted in this part of London. The current proposals appear generic, with an appearance that might be found in any business district internationally.
- Herzog and de Meuron have an impressive track record of designing in historic contexts, and the panel asks for further work to develop an architecture that responds to and elevates the Liverpool Street area.

Interim benefits

 The scale and complexity of the development means that it would take years to deliver. The panel would like to know more about the interim benefits the scheme can offer the local area, including meanwhile uses and mitigation of construction impacts.

Next steps

The panel thanks the applicant for its clear presentation of the scheme and requests an opportunity to review the scheme again at the next stage of its design development.