


LONDON
REVIEW PANEL


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

March 2023

Dear 

London Review Panel: Liverpool Street Station

Please find enclosed the London Review Panel report following the design review of Liverpool Street Station on 17 February. 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

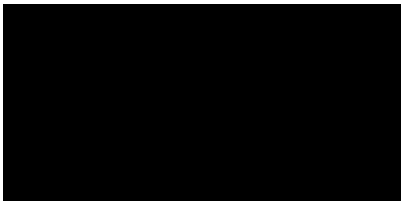
LONDON REVIEW PANEL

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

17 February 2023

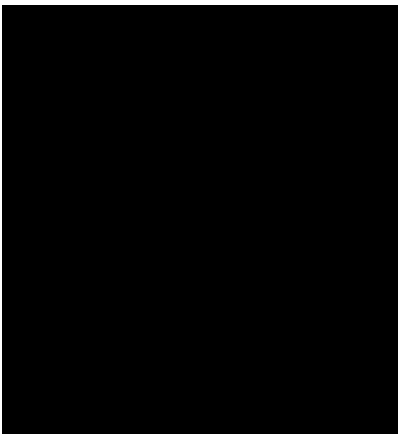
Herbert Smith Freehills LLP, Exchange House, Primrose Street, London, EC2A 2EG

London Review Panel



MDA (Chair)
MDA
MDA
MDA

Attendees



City of London, Assistant Director (Design)
City of London, Principal Planner
City of London, Design and Heritage Officer
City of London, Planning Officer
Transport for London
GLA Regeneration
GLA Regeneration
GLA Planning
GLA Growth Strategies & Urban Design
GLA Principal Conservation Officer

Report copied to

Jules Pipe
Philip Graham
Louise Duggan



Deputy Mayor for Planning, Regeneration and Skills
GLA Executive Director of Good Growth
GLA Head of Regeneration
GLA Regeneration

Confidentiality and publication

Please note that while schemes not yet in the public domain, for example at a pre-application 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.

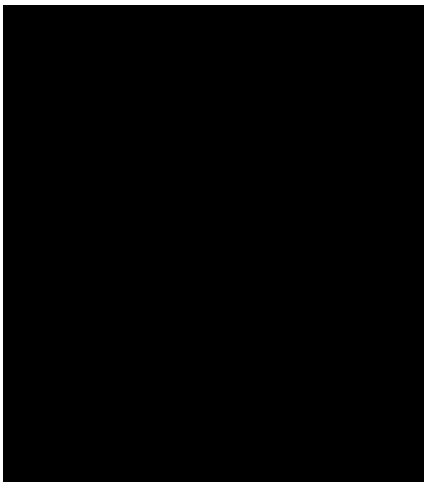
Declaration of interest

██████████ is Director of Landolt + Brown, and a Mayor's Design Advocate. His practice is involved in several station design projects for Network Rail, and he acts as chair of the Network Rail Design Advice Panel.

Project location

Liverpool Street Station, Liverpool Street, London EC2M 7PY

Presenting team



Sellar
Network Rail
Network Rail
Herzog and de Meuron
Herzog and de Meuron
WSP
WSP
DP9
Bridge Associates
Herbert Smith Freehills
Murray Twohig

Planning context and background

The red line boundary is rectangular, incorporating the 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.

In December 2022 Historic England upgraded its listing of the station and hotel. The 1992 station elements are now included in the Grade II listing of Liverpool Street Station. The Great Eastern Hotel has been upgraded from Grade II to Grade II*.

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).

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 proposals incorporate significant demolition, and new buildings of a very large scale, which will have an impact on designated heritage assets. The National Planning Policy Framework (NPPF) states that great weight should be given to the conservation of heritage assets; harm should be avoided or minimised; clear and convincing justification is required for any harm caused; and proposals resulting in substantial harm should be refused unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh the harm.

The proposals also fall within London View Management Framework (LVMF) views, and would have an impact on the setting of St. Paul's Cathedral from Waterloo Bridge and Golden Jubilee/Hungerford Bridge. GLA officers have identified potential harm to LVMF views, which would not be in accordance with the London Plan.

The site proposes a tall building in a conservation area, which both the existing and emerging Local Plan identify as inappropriate and should be refused, which would not be in accordance with the London Plan.

The London Review Panel previously commented on the emerging proposals at a review in September 2022. The panel's advice at this second review was requested on the following issues:

- whether the proposals would deliver a world class interchange for the twenty-first century
- the extent to the impact on heritage assets is justified by substantial public benefits
- the extent to which the scheme conserves the historic environment
- the scheme's impact on long distance views and the LVMF
- the significant demolition of existing buildings
- the design of the new build elements, and their responsiveness to the particular qualities of the site context.

London Review Panel's Views

Summary

The information presented to the panel at this review provided more detail on Network Rail's brief for Liverpool Street Station, testing of massing options, views analysis and architectural proposals. However, this greater level of information does not allay the significant concerns expressed by the panel at the previous review. The panel is not convinced that the alterations to the Network Rail station would achieve the ambition of a world class interchange for the twenty-first century and therefore justify the above station development. It is surprised that Network Rail's Design Review Panel has not been offered an opportunity to comment on the scheme. It recommends further work to analyse how successfully the proposed station would function operationally and for commuters that use it. The panel notes that the designs do not seem to reflect the functional differences between this primarily commuter station, and precedents such as King's Cross, serving primarily long-distance travellers. The panel also questions other fundamental assumptions of the current 'Project Mersey' brief. Massing studies were presented to explain why the bulk of the current proposals are needed to achieve a viable scheme. However, the panel questions whether the improvements to Liverpool Street Station must be funded entirely by development on this site, when Network Rail owns land nationwide? On the basis of the information provided, the panel is unable to say that the proposed station alterations would be an improvement in the round, although it acknowledges the additional lifts would be a benefit; and potentially escalators, subject to their location/alignment. Questions also remain about the extent to which the project would contribute to the City of London's vision for the future of the Liverpool Street area. Because of this, the panel is unable to judge whether the likely 'substantial harm' to heritage assets is 'necessary to achieve substantial public benefits that outweigh the harm'. Further, the panel does not feel able to comment meaningfully on the commercial development proposed above the station until it's demonstrated that the station works will result in clear public benefits. It recommends a rethink of the client brief, including the potential for cross subsidy through development of other Network Rail sites. The aim should be to maximise station improvements, whilst avoiding harm to listed buildings, conservation areas, and LVMF views.

Assumptions of the current 'Project Mersey' brief

- Passenger number projections appear to indicate that pre-covid numbers will not be reached until the late 2040s. This appears to undermine the applicant's haste to submit a planning application in April 2023, which is not supported.
- Massing studies carried out to test the feasibility of funding alterations to Liverpool Street station through commercial development appear to be based on simplistic assumptions.
- Post meeting note – the panel questions the need for improvements to Liverpool Street Station to be funded entirely by development on this site, when Network Rail owns land nationwide, which could cross-subsidise the works.

- It understands that a study has been commissioned to explore improvements to the station independent of commercial development. This will provide an essential baseline against which the proposals can be tested.
- The panel asks what a scheme involving additional lifts and escalators, without oversite development would look like, and whether this would cost £450 million which is the stated contribution of the current scheme to the station?
- The panel notes that the City of London is carrying out studies on the future of the office in post-Covid world, and whether previous levels of demand will return. This project needs to be understood in this wider strategic context.

Stakeholder engagement

- The full range of stakeholder engagement that should inform the brief and feasibility studies for a major station redevelopment appears not to have been carried out.
- The design of King's Cross Station Upgrade, completed in 2012, was preceded by two years of engagement with a wide range of stakeholders including Camden Council, and local residents. This collaborative process was critical to setting the client's brief.

Alterations to the station

- The provision of additional lifts, and escalators (subject to their location/alignment), is a key benefit of the proposals. However, the escalators would take up a significant amount of circulation space on the lower concourse in close proximity to the ticket gate line, which could exacerbate existing overcrowding.
- The panel questions whether the functional operation of the station proposals has been adequately tested.
- Because Liverpool Street Station is primarily a commuter station, it has a high proportion of regular users who will arrive 'just in time' for their train. Platform announcements for commuter services are also normally only a few minutes before the train departs.
- These two factors mean it is likely that commuters will wait in the concourse at platform level. Currently this level benefits from a grand spatial volume, and natural light from above. In the proposals this space will have limited headroom because it will be covered by a new concourse above, with natural light only via escalator shafts.

- The panel therefore questions the value of creating additional concourse floor area on the upper level away from platforms, and thinks the scheme risks creating a congested and constrained environment at the lower level. It fears this would create a station environment similar to Birmingham New Street before its redevelopment.
- Toilets (a vital station facility) will still remain located in the basement - far removed from the street level concourse area.
- It notes that precedents such as King's Cross, primarily serving long distance routes, operate differently. Platforms are announced with more time before trains depart, and users making longer journeys also arrive further in advance.
- Legion modelling is essential to understand crowd flows, and test whether the proposals would work as intended.
- The panel is surprised that the Network Rail Design Advice Panel has not been consulted at an earlier stage in the design evolution, as this is Network Rail policy for station projects.

City making

- The presentation provided information on the way in which the station proposals are intended to fit in the city, including the provision of new public routes, and cycle parking.
- However, it remains unclear how the scheme would contribute to improving the pedestrian environment around the station, and connections with other modes of transport.
- The panel notes that Murray Twohig have been appointed to define the place making strategy, but this work is yet to inform the design proposals.
- The approach to removing taxis from Liverpool Street remains unresolved, which is a significant outstanding challenge.
- The scheme emphasises an east west desire line, which may be less important than north south connections, because of the narrow alleys and courts to the east, and Broadgate to the west.
- The panel questions the degree to which the station spaces would feel welcoming and inclusive – for example without the need to pay for a coffee.
- The upper-level public spaces in the over station development risk feeling exclusive, even if they are technically open to all within controlled hours.

- As noted above, the panel would like to see a scheme that transforms Liverpool Street Station for the benefit of all, without commercial development – as a benchmark against which the scheme can be tested.
- A masterplan context study is needed, to demonstrate a deeper understanding of City of London and GLA policies for the Liverpool Street area. This should inform the designs for Liverpool Street Station, and the way it fits into and improves its urban context.
- The panel understands that the City of London’s policies do not identify this conservation area site as an appropriate location for a tall building.
- There is a risk that the proposals would extend the eastern tall building cluster to the north, setting a precedent for the height of development on nearby sites.
- The panel also has reservations about the architectural approach to the station alterations and commercial development.
- It suggests that any commercial development should be more muted in character, to remain subservient to the station.
- It also notes that the pristine appearance of the coffered ceiling in the station images would require a cleaning and maintenance regime that may be unrealistic. The detailing and materials of any station alterations should take into account the polluted environment.

Next steps

The panel would not support a planning application in April 2023, and recommends further work to address the fundamental issues outlined above.

It is available to review the scheme again, and strongly recommends engagement with the Network Rail Design Advice Panel.