

Begum, Shupi

From: [REDACTED]
Sent: 02 April 2024 16:55
To: PLN - Comments
Subject: Planning Application Ref23/01387/LBC Objection

THIS IS AN EXTERNAL EMAIL

Dear Sir, Madam,

I am writing to make my objections known to you with respect to Luminets Solutions Ltd application to place 92 antenna on the roof of the Grade 2 listed residential building Cromwell Tower, Barbican.

My objections are:

1. The disfigurement of a listed building. The profile of such a large number of relatively large antenna/ masts will completely alter the profile of Cromwell Tower in a negative manner and is unacceptable on a listed property. The masts are quoted as small but this could only in the context of a major field based Industrial version. They are indeed quite large and many - 92 large antenna/ masts.
2. The potential health risks to place a very large quantity of masts on a residential property. While there is not yet evidence of the health risk of such prolonged proximity to this level of radiation emitted by these antenna/ masts. the long term health risks are **not** understood as the monitoring of impact is relatively new. There is therefore **no** evidence to say there is no health risk.
3. There is potential for unacceptable interference to wireless services currently received by the residents .
4. There is a significant likelihood that the maintenance and repair of such a large number of masts with their workforce will create an unacceptable level of noise and inconvenience to no benefit of the residents and will require use of the residents' elevators, paid for by the residents, to allow a third party and their staff carry out their business again to no benefit of the residents.

I ask that you reject this planning application in full and encourage Luminet to seek a more suitable non-listed and non-residential building. I also draw attention to their unethical approach to the planning process in submitting two identical applications under two separate planning application numbers. I assume they are trying to confuse objectors and divide the number of objections by doing this. You will therefore receive a second email Planning application objection from me which will note the second planning application number of 23/01386/FULL, which is identical to this planning application 23/01387/LBC.

Yours Faithfully,

Wendy Harrison

303 Cromwell Tower

From: [REDACTED]
To: [REDACTED]
Subject: Planning applications OBJECTIONS, reference numbers 23/01387/LBC and 23/01386/FULL
Date: 06 April 2024 17:13:21

THIS IS AN EXTERNAL EMAIL

Dear City of London,

I am writing to make my strenuous objections to Luminet Solutions Ltd dual applications to install 92 antennae on the roof of Cromwell Tower, an iconic London skyline Grade II listed residential building, planning reference numbers 23/01387/LBC and 23/01386/FULL.

I am a resident of Cromwell Tower. This stealthy plan, made in two separate identical planning applications (I assume in order to confuse objectors and divide the number of objections registered) is made without any regard to the residents of the building.

My objections are as follows:

- 1) The applicant did not engage in ANY pre-application consultation with local stakeholders. This is against the City's own policies. Residents of Cromwell Tower were simply confronted with surprise, dual planning applications taped to the front door.
- 2) These applications fly in the face of the Listed Grade II status of the building, which is of both architectural and historic interest. Cromwell Tower is an iconic part of the Barbican and London skyline. Any change to the roofline would be totally out of line with its listed status, let alone the 92 (ninety-two!) antennae and a cartoonishly large 3.2 metre high shroud (greater than a building storey in height) that Luminet is proposing adding to the roof. This will wreck the unspoilt south-west facade of Cromwell Tower. I note that in a sleight-of-hand, Luminet does not provide any visual representations of the installation and shroud, only line drawing plans and elevations, and these alone are incredibly imposing.
- 3) There is absolutely no communications benefit for the Tower residents from this proposed project, this is solely for businesses who choose to contract with this private comms utility.
- 4) There is no financial benefit for the residents of Cromwell Tower.
- 5) There is no offer from Luminet to indemnify the long lessees any service charges for the costs to rectify any long term damage to the concrete, roof, fabric, or mechanics of the building from their proposed installation or maintenance of the antennae.
- 6) There is no thought to the impact the installation and maintenance of the antennae will have on the residents of the building. An enormous amount of material will have to be hauled up to the roof. Cromwell Tower is a fully occupied, 42-storey residential building, where the lifts are already heavily overused. On weekdays, the lifts strain to provide access for all the current residents, postmen, rubbish collectors, cleaners, maintenance, contractors, and the battalion of delivery persons coming and going from the building. We already have to wait extended periods for a lift at busy times. Adding a major construction project to the roof, which would require the use of the lifts for hauling all the materials, tools, safety equipment, supplies and workmen to the roof would jam up the lifts so that residents would not be able easily leave or access their homes, and strain the lifts far beyond their already strained traffic capacity.
- 7) In addition, the lifts are due to be replaced in the next couple of years, so the tower would be down one lift for lengthy periods of time. We could not cope with a major installation project on the roof normally, let alone during a period when there are limited lifts.

In conclusion, Luminet`s double planning applications are riding roughshod over the interests of the residents of the building.

I would ask anyone considering this application to ask themselves if they would be happy to have an industrial-sized installation placed on their own home roofs, that provides them with no benefit, impedes their access, and does not indemnify them for any damage or costs of repair, and changes how their roof looks.

These dual applications by Luminet are absurd. And I suspect Luminet knows it's absurd, or they wouldn't be relying on stealth in the application process to limit objections. If they were operating in good faith, they would've engaged with resident stakeholders before submitting the application. They also would not be submitting dual applications to water down the number of objections.

Thank you for your consideration.

Best wishes,

Sarah Stobbs
Flat 11 Cromwell Tower
Barbican
London EC2Y 8DD

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Alastair Cookson

Address: 161 Shakespeare Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I strongly object to this application on the following grounds, and find it extraordinary that it has even been made

1. Unacceptable alteration to a listed building, constructing what amounts to an additional storey (3.2M) on the top of one of three iconic towers. The application states that the technology relies on "line of sight" between the antennae and users, so it is ambitious simultaneously to argue that no-one can see it.
2. Considerable inconvenience and cost (in wear-and tear) to residents of Cromwell Tower, during both installation and on-going maintenance
3. Wholly unnecessary and commercially unproven technology. The application does not state the exact technology being deployed here but says that it is for the provision of internet connectivity, but not via 4G/5G or WiFi. Probably therefore WiMax or similar, a technology with very limited application globally, and widely considered a commercial failure. Directly in contravention of the planning guidelines prioritising direct fibre connectivity, for which the local area has probably one of the best provisions in the country.
4. Impossible to comment on potential health risks to residents without knowing the technology being deployed, but with 92 antennae there is likely to be very considerable EM radiation. Given it seems to be an uncommon or novel technology the risks will not be well understood in any case.

5. There are plenty of commercial buildings nearby which it is obvious would be much better candidates

From: Tom and Helen Flanagan
63, Cromwell Tower,
Barbican
London EC2Y 8DD

Application 23/01387/LBC, “The installation of 92 no. small antennas attached to new supporting steelwork, plus development ancillary thereto, all contained within new GRP – shrouding, upon the rooftop of the building. Cromwell Tower Barbican London EC2Y 8DD”

(There as a separate Application identical to the one quoted above, under the reference 23/01386/FULL. For the avoidance of doubt, we object, also, to that Application on the same grounds as set out below. For completeness, we have submitted a separate Objection to 23/01386/FULL, also.)

Objection

7 April 2024

Dear Sirs,

Please accept this note as our objection to the application **23/01387/LBC**. The grounds for our objection are as follows.

- **Listing building status:** Cromwell Tower is part of the Barbican group of iconic Grade 2 listed buildings. Any alteration to the sky line of the sort suggested will be in blatant contravention of the listed building guidelines.
- This proposal would interrupt the skyline of the three iconic Barbican towers, in that one of them, Cromwell, would have metal structures on its rooftop.
- Whether or not these structures would be easily visible from the street or to neighbouring properties, there is more to maintaining the integrity of listed buildings than such sight lines. Contrary to the unsupported conclusions of the Applicant in this application, this proposed development would be obtrusive, would not respect the historic quality of the site and its surroundings and any proposed benefits would not outweigh the harm to the residents most closely affected.
- Previous plans to site various antennae structures on the Barbican Estate, including on Cromwell Tower, have either been rejected or withdrawn on grounds of objection similar to those in this document. It follows that the Planning Authority has already concluded that these are genuine concerns. Where there was one example of a successful application to instal radio equipment on the roof of Cromwell Tower, that was, contrary to the statement in this Application, only for a couple of arials – i.e. not a precedent for 92 antennae within metal structures 9.2m high.
- **Structural damage:** The rooftops of the three Barbican Estate Towers were designed specifically to help manage high level wind currents. The insertion on the roof of large areas of blocked in structures would defeat the purpose of that design and potentially cause

instability to the building in high winds. The potential damage could be severe, even catastrophic.

- Also, the addition on the roof of the weight of the proposed structures could cause further instability which would increase the risk of the danger and damage set out above.
- In addition, attaching this size and weight of structure could damage the now ageing concrete of the building, causing structural and visual damage. In recent years there have been detailed inspections of the concrete of the building requiring remedial works at some cost to the residents through the service charges mechanism. Unnecessary additional structures should not be attached to the building.
- **Inadequate consultation process:** The planning consultation has been entirely inadequate. In advance of the formal planning Application, there was no information to nor consultation with residents closely affected by the proposal. The first indication we had of the existence of this proposal was a notice of the Application placed on glass panels near the door of the building, with a short deadline for comments. A timely response was made more difficult because this was immediately just before the long Easter break. This is in contravention of the City's own guidelines for such applications.
- This is not a public building. It is a residential block of 111 flats. There is a finite and well defined group of people immediately affected – the residents of Cromwell Tower. Through the Barbican Estate Office and our own residents' committee, or even just circulating a note around the building, the Applicant could have easily identified itself, explained the proposal and arranged at least one consultation meeting, with follow up. By failing to create even a basic form of information and consultation, the Applicant not only failed to follow proper guidelines but also deprived the Cromwell Tower residents of any opportunity to understand and contribute to the process. It would be very unfortunate if it had to be concluded that that was not an oversight but an intended result.
- **Other Impact on residents of Cromwell Tower:** In addition to the structural issues set out above, there are a number of ongoing potential impacts on the residents.
- The **public health** impact of this type of radio equipment is still uncertain. However, it is clear that there are risks which are still being investigated. The application itself inherently recognises that it has a problem with risks to health which it has not addressed properly. It confirms that it has commissioned a report but the Application has gone ahead without it. Despite that, there is an unsupported assertion that there will be no risk to the health of residents. While there are some general (though irrelevant) comments about the possible impact of single antenna units or devices, there is no assessment at all of the risks or impact of 92 antennae, crowded together on the roof of a residential building. It is, of course, for the Applicant to satisfy the burden of proof on this point. The Applicant's own supporting documentation recognises that there is a concern of risks to health attached to the plan but does not answer it, properly. In the circumstances, it is wholly inappropriate for this Application to be granted, permitting the Applicant to impose on the residents of Cromwell Tower a recognised type, though unknown level, of risk to health.

- **Installation and maintenance:** This will include significant disruption, particularly during installation, probably requiring the use of at least one of the three lifts for a considerable period to get an enormous amount of kit and personnel to the roof and back at regular intervals. Because of the calls on the lifts for other regular purposes, there is a real risk of having a lengthy period when, from time to time, there will be no lifts available to residents.
- **Maintenance/supervision:** There is very little detail in the Application about the level, frequency and type of maintenance required. Those doing the installing, maintenance and management of the antennae will not be Barbican employees. How will they be managed and by whom? There will be concerns about security in the building if unknown and unchecked personnel can wander about the building unsupervised.
- Wear and tear on the lifts and carpets and fabric of the building – bearing in mind that both the exterior and interior have recently undergone a major programme of renovation.
- There is the potential for interference to wireless services currently received by the residents.
- Noise: nothing is said in the Application about ongoing noise from the proposed installation. It is reasonable to assume that a site of this nature will give off some sound, probably a hum of some sort or even a vibration. If so, that is likely to be a 24 hour disturbance and will be comparatively louder at night when the rest of the city's background hum has subsided. That would be a significant and permanent intrusion.
- It is clear that the presence of such a development on the roof of our flats is likely to have an impact on their value and may even impede any sale at all. Whilst we realise that this is not usually a major issue in a planning application, exactly the same argument was raised by Taylor Wimpey in relation to the impact of the proximity of planned development of arials to the Denizen – and that objection was accepted. Again, it follows that the Planning Authority has recognised, already, that this a valid argument in relation to plans of this nature.
- **General comments:** having set out these various grounds of objection, we would just like to make the following general observations.
- Given the issues outlined above, it is disappointing – in fact remarkable - that the City of London is giving any credibility at all to this Application.
- Put simply, it is proposed to put 92 antennae on the roof of our home without any warning, explanation and consultation. This is outrageous behaviour, particularly as the somewhat sparse and dismissive comments in the Application about the effects of the installation and management of the antennae shows no understanding of life in the Tower and how the residents might be affected by the Application.
- This development needs a high vantage point from which to disseminate signals to various buildings in the area. There are other tall, non-residential buildings in the vicinity which would suit the Applicant's needs and do not have similar issues to those above.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Tom Flanagan

Address: 63 Cromwell Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Tom and Helen Flanagan object to this Application for the reasons set out in the document attached to our email of 7 April at 3.12pm.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Gordon Wise

Address: 283 Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: This is an appalling proposal and that is not a subjective statement. Cromwell Tower and indeed the Barbican Estate as a whole is a Grade II listed building and this proposal puts a large structure on the uppermost profile of an iconic part of London's post-war skyline. The three Barbican towers were conceived as part of a unified concept, surrounded by a low-rise scheme. This puts an addition on its profile making it at odds with its three Barbican tower neighbours, and creating disruption that will be seen from all vantage points, and pejoratively impact upon the impact of the listed whole..

There has been no consultation with residents for this proposal, nor is there any material compensation proposed for the inconvenience that will be incurred - should it even be deemed an acceptable intrusion on the skyline or our lives.

The Barbican is now in its sixth decade, and while deemed structurally sound, there are structural sensitivities around concrete finishes. What responsibility will the applicant take for its interventions in the fabric of our homes?

The infrastructure of our lifts is acknowledged as being delicate, with a major review of plant currently being undertaken given that their lifespan is deemed to be ending. If works take place before lift replacement work is done, they could jeopardise our entire internal transportation structure. If they take place during replacement, the disruption will be intolerable. If they take place afterwards, they take advantage of what will be a very costly outlay for residents.

This is before we even begin to assess known or unknown impacts of antennae on a residential building. These antennae will be just a few metres from residents' heads.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Paul Moriarty

Address: Flat 91, Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: My objections are:

The disfigurement of a grade 2 listed building. The proposed works will significantly change the profile of the tower placing it at odds with its sister towers Shakespeare and Lauderdale. These three towers make up an iconic London skyline. Therefore the placing of the new elevation upon the roof will diminish the brutalist beauty of the entire Grade 2 listed Barbican Estate.

The installation and continuing maintenance and repair of 92 masts with their workforce will create an unacceptable level of noise and inconvenience to all the residents of Cromwell Tower.

Furthermore, it would require use of the residents' three lifts, already two of the lifts are out of use in the mornings due to cleaning and postal deliveries. Lifts are also being renewed this year thus putting further stress and strain on the use of the lifts which are paid for by the residents in their service charges.

There are concerns regarding the roof top installation to wind noise through the masts, e.g, continuous hum and/or scream depending wind direction.

There are concerns regarding damage to the 50 year old concrete roof during and after installation, water ingress and spalling. Again residents pay for all repairs in their service charges.

There are potential health risks to place 92 masts on a residential property. While there is not yet evidence of the health risk of such prolonged proximity to this level of radiation emitted by these antenna/ masts, the long term health risks are not understood as the monitoring of impact is relatively new. There is therefore no evidence to say there is no health risk.

There is potential for unacceptable interference to wireless services currently received by the residents .

Please note that the applicant did not engage in any pre-application consultation with local stakeholders.

I also draw attention to their unethical approach to the planning process in submitting two identical applications under two separate planning applications.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Ms Elizabeth Evans

Address: Flat 263, Cromwell Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:Objection

I strongly object to this proposal for the following reasons:

It would significantly change the original roofline of the Tower which is a listed building. This changes the original design significantly.

It will interrupt the skyline view of the three towers, meaning one of the three iconic towers would have a metal structure on its rooftop.

There is potential or unknown impact on residents' health from the electromagnetic radiation plus a hazard from falling debris given the stronger winds we are now experiencing.

The extra weight of the proposed structure may impact the fabric of the building. Attaching it to the existing listed and aging concrete may cause permanent structural and visual damage to the building.

Installation and maintenance will impact the residents of the tower. There will be costs of wear and tear on the Lifts and carpets and the fabric of the building, which in the past has always been met by the residents despite gaining no financial benefits from the installation.

And lastly, there is a potential for interference to wireless services currently received by the residents.

Begum, Shupi

From: Stephen Rothholz [REDACTED]
Sent: 09 April 2024 16:31
To: PLN - Comments
Subject: 23/01387/LBC and 23/01386 FULL OBJECTION

THIS IS AN EXTERNAL EMAIL

Dear Sir/Ms,

I am writing to object to the proposed installation of aerials on the roof of Cromwell Tower in the Barbican.

Some of the reasons for the objection are

The roofline of the listed tower building would be changed significantly.

Possible negative effects on the health of the tower's residents from electromagnetic radiation.

Hazards from falling debris given that stronger winds are being experienced in this area.

Possible unacceptable interference to wireless services currently used by residents.

Installation and maintenance will affect the residents of the tower.

Regards

Stephen Rothholz

Stephen Rothholz
263 Cromwell Tower
Barbican
London
EC2Y 8DD

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr christos christou

Address: 132 cromwell tower barbican london

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment:1.Question of compliance with listing requirement

Unclear whether and how the proposed superstructure with 92 large antennas complies with listing requirements.

2.Potential impact on structural integrity of building from extra weight

No analysis submitted to indicate the impact of adding the considerable weight of a superstructure and 92 large antennas on the rooftop

3.Potential impact on concrete from radiation from the 92 large antennas

Recent research is raising serious questions about the deleterious effects of radiation on concrete buildings as can be seen through link below.

<https://www.sciencedirect.com/science/article/pii/S221450952200586>

4.Potential impact from cluster of 92 antennas on health and safety of residents

Studies of impact of exposure to radiomagnetic fields have on the whole been focused on casual exposure to mobile phone sets, mobile phone masts and base stations. They have not considered prolonged exposure to residents living in close proximity to radiomagnetic fields arising from a cluster of 92 large antennas. The information provided by the applicant concerns different type of exposure that the one the residents will be exposed if the application is granted.

5.Consultation is insufficient mechanism to deal with this type of application where economic benefits accrue to the Freeholder and potential costs and health and safety impact are borne by the residents and long leasedholders.

It is reasonable to assume the Corporation will charge rent for the 92 antennas if the application is granted. It is also reasonable to assume that if these antennas impact the building and/or the health of the residents and long leaseholders the Corporation will not underwrite any associated costs. This is fundamentally unfair and the residents and long leaseholders should be involved in the decision-making process for this type of application in order to redress this type of asymmetric distribution of costs and benefits.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Lisa Shaw

Address: Flat 103 Cromwell Tower, Barbi London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I am objecting to the installation on multiple grounds -

Negative visual impact to a listed building:

Cromwell Tower has been awarded Grade II listed building status and is in a conservation area. Permitting the defacing of its appearance with multiple antennae and a 9.2m structure would dramatically change the design of its roofline, losing its consistency with the other towers, and leading to a materially detrimental visual impact.

Negative physical impact on the building:

The additional weight of the structure has the potential to cause structural and visual damage to the aging concrete fabric of the building. This has required inspection and remedial repair works (paid for by residents) in recent years and additional stress to the roof should not be risked.

Negative impact on residents' amenities:

The installation and maintenance of the equipment will place significant imposition on the residents of the tower through the heavy usage of residential lifts. Again, these lifts are fragile with regular outage and should not be placed under additional strain, nor should residents have to withstand the imposition of lifts being out of action due to being used for the installation.

No pre-application consultation with local stakeholders:

In contravention of the City's policies, the applicant has undertaken no consultation with local

stakeholders to explain the proposals or how they intend to manage any of the above material issues.

Begum, Shupi

From: David Candy [REDACTED]
Sent: 10 April 2024 16:44
To: PLN - Comments
Subject: 23/01387/LBC and 23/01386/FULL

THIS IS AN EXTERNAL EMAIL

I am writing to confirm that Cromwell Tower is a listed building and the construction of structures totally out of keeping with the architecture of the building is totally forbidden. The proposers could find numerous buildings in the neighbourhood which are not listed or residential to complete this project, which has no value to the residents who pay enormous service charges for the pleasure of living in the building.

The Barbican has suffered greatly from proposals to demolish and alter parts of it which have been withdrawn, and this must be one of them.

Yours
David Candy
41 Cromwell Tower

Sent from Gmail Mobile

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Richard Barrett

Address: 293 Cromwell Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to the proposal to install 92 antennae and supporting steelwork on the roof of Cromwell Tower, especially in the absence of more detailed information.

- i) I have seen no impact assessment despite Cromwell Tower being a residential building and listed grade 2 star.
- ii) Residents must be able to consider this proposal based on an objective and professionally conducted assessment that examines the possibility of any detrimental impact on residents' health and well-being over time.
- iii) In this respect, residents also need to know if, once the masts are installed, the owners would need to make new applications before changing their number, size or nature.
- iv) Residents should also know how the masts will impact the grade 2 star quality of Cromwell Tower in particular and of the Barbican Estate in general. Objectively, the addition of masts to the roof of Cromwell Tower, even before any future upgrades, can at best have a neutral impact on this iconic estate, and is likely to have an adverse one.
- v) I have seen no rationale for why Cromwell Tower is a more suitable location for these antennae than any other nearby building, many of which are as tall or taller (assuming that height is a relevant factor), and most of which are more modern and sturdy.
- vi) I have seen no assessment of how often the operators of the antennae would need access for

maintenance or replacement with respect to the security and structural integrity of the building, nor of how their work might be inspected.

vii) The application does not say how the general maintenance of the roof might be affected by the presence of the antennae. In many cases such antennae are surrounded by an exclusion zone. This would make general maintenance more difficult and also suggests that the antennae may present a danger to anyone who needs to work nearby.

vii) Insofar as the operators of the antennae will be required to pay rent to lease the roof space, it is not clear how this income will be used

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Ms Lucy Sisman

Address: 293 Cromwell Tower, Barbican, London EC2Y 8DD

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am writing to object to this planning application for the installation of 92 no. small antennae attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building where I live, Cromwell Tower.

The reasons for my objections are as follows:

1. Cromwell Tower is a Grade II listed building in a conservation area and therefore we suggest this proposal is inappropriate. We feel the existing antennae are inappropriate so adding more just compounds this. Just because an application was approved in the past doesn't make it right then or now.
2. The tower is one of three and their symmetry is important. While the proposal suggests that you will not be able to see the antennae from the ground, you will be able to see them from the two adjacent towers and anyone (from the ground or another building) will be able to see the shrouding and the asymmetry this would create. Ironically (given it's a brutalist building) the balance and proportions of the building were carefully considered and precise at their inception and any shrouding will only spoil this.
3. We have great concerns about the proposed steelwork frames and their fixing compromising the fabric of this concrete building.
4. We have great concerns about access to not only install these masts, but also to allow for subsequent maintenance. We would receive no revenue from this proposal and yet we would be asked to bear the costs to all wear and tear.
5. The health considerations are many and it should be remembered this is a residential building.
6. We feel that the application itself has been handled in a shabby and underhand manner (last-minute posting with a shortened objection window) and with no consultation with residents - it suggests something unpleasant is trying to be slipped by us.

7. Two planning numbers - 23/01387/LBC and 23/01386/FULL merely confuse an already murky application.

Begum, Shupi

From: Michele Riley [REDACTED]
Sent: 11 April 2024 16:26
To: PLN - Comments
Subject: Applications 23/01386/FULL and 23/01387/LBC

THIS IS AN EXTERNAL EMAIL

From: Dr Michèle Riley
83 Cromwell Tower
Barbican
London EC2Y 8DD

Application: 'The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building Cromwell Tower Barbican EC2Y 8DD'

OBJECTION

Thursday 11 April 2024

Dear Sir or Madam

I strongly object to this application on several grounds.

Cromwell Tower is a Grade II listed building, and the installation would be in blatant contravention of the Listed Buildings guidelines in terms of alterations to the skyline. Moreover it is a wholly residential building.

This represents the potential of structural damage to a building where problems of concrete have already been experienced.

The presence of 92 antennas would pose a health risk to the residents.

Several similar - but smaller in scale - applications have been made and rejected in the past.

It is surprising, to say the least, that the City of London should not have consulted the residents of Cromwell Tower well ahead of time, and that they should have permitted for such an application to even proceed thus far.

Yours faithfully

Michèle Riley

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Dr Michèle Riley

Address: 83 Cromwell Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Please refer to my email sent on 11/04/2025

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Ms Karen Munroe

Address: Flat 192 Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This proposal would change the roofline of the Tower and interrupt the skyline view of the three towers - in contravention of the LBMG (Listed Building Management Guidelines).

In addition to non-compliance with Listed Building and Conservation Area guidelines, other issues are:

- Damage to the structure of the building given the extra height and weight. Height increase is 3.2m (10.5 feet) This is not a small indistinct shroud but a large new structure on top of the roof.
- Possibility of falling debris in strong winds
- No financial compensation to residents from the revenues and it is expected that residents have to bear the costs of wear and tear on use of lifts and carpets

There is no accurate visual representation of what this installation will actually look like but the application asserts that it will be visually acceptable. Where is this evidence?

Begum, Shupi

From: Claire Anstee [REDACTED]
Sent: 14 April 2024 14:26
To: PLN - Comments
Subject: PLN - Comments Subject: Planning Application Ref 23/01387/LBC & 23/01386/FULL - OBJECTION TO BOTH

THIS IS AN EXTERNAL EMAIL

Dear Sir, Madam,

In support of others, I am writing to make my objections known to you with respect to Luminet Solutions Ltd application to place 92 antenna on the roof of the Grade 2 listed residential building Cromwell Tower, Barbican.

My objections are:

- **Inadequate consultation process:** The planning consultation has been entirely inadequate. In advance of the formal planning Application, there was no information to nor consultation with residents closely affected by the proposal. The first indication we had of the existence of this proposal was a notice of the Application placed on glass panels near the door of the building, with a short deadline for comments. A timely response was made more difficult because this was immediately just before the long Easter break. This is in contravention of the City's own guidelines for such applications.
- There also appears two identical applications have been submitted under two separate planning application numbers. I assume they are trying to confuse objectors and divide the number of objections by doing this. Y
- **The disfigurement of a listed building:** The profile of such a large number of relatively large antenna/ masts will completely alter the profile of Cromwell Tower in a negative manner and is unacceptable on a listed property. The masts are quoted as small but this could only in the context of a major field based Industrial version. They are indeed quite large and many - 92 large antenna/ masts.
- **The potential health risks** to place a very large quantity of masts on a residential property. While there is not yet evidence of the health risk of such prolonged proximity to this level of radiation emitted by these antenna/ masts. the long term health risks are not understood as the monitoring of impact is relatively new. There is therefore no evidence to say there is no health risk.
- There is potential for unacceptable interference to wireless services currently received by the residents .
- There is a significant likelihood that the maintenance and repair of such a large number of masts with their workforce will create an unacceptable level of noise and inconvenience to no benefit of the residents and will require use of the residents' elevators, paid for by the residents, to allow a third party and their staff carry out their business again to no benefit of the residents.

I ask that you reject this planning application in full and encourage Luminet to seek a more suitable non-listed and non-residential building.

Yours faithfully
Claire Anstee

Mrs. Claire Anstee
213 Cromwell Tower
Barbican
London
EC2Y 8DD

Mobile: [REDACTED]
Email: [REDACTED]

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Robert McKay

Address: Flat 352, Cromwell Tower Barbican LONDON

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Opposed on grounds that available and visible documents setting out the purposes and beneficiaries of the proposed works are inadequately clear and transparent. As a resident of Cromwell Tower, I wish to know how I and other residents will benefit and/or be affected.

From: [REDACTED]
To: [REDACTED]
Subject: 23/01387/LBC and 23/01386/FULL
Date: 15 April 2024 22:06:30

THIS IS AN EXTERNAL EMAIL

Dear Sirs

I am writing about the application to install 92 antennas on Cromwell Tower.

I wish to object to this installation. I live on the 38th floor and am concerned about potential health issues.

Regards

Terry Bennett
381 Cromwell Tower
Barbican
London EC2Y 8NB

From:
To:
Subject: 23/01387/LBC and 23/01386/FULL
Date: 15 April 2024 22:10:21

THIS IS AN EXTERNAL EMAIL

Dear Sirs

I am writing about the application to install 92 antennas on Cromwell Tower.

I wish to object to this installation. I live on the 38th floor and I am concerned about potential health issues.

Regards

Hiroko Mitomi
381 Cromwell Tower
Barbican
London EC2Y 8NB

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Rob Letham

Address: Flat 242 Cromwell Tower Barbican

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I object to the application.

1. Cromwell Tower is Grade II listed. If successful the installation would impact adversely on the look of the tower. The skyline view of the three towers is iconic and the proposal would ruin that. It would certainly be visible from Shakespeare Tower and from other places on the estate. The towers were designed to look as they are. They are very similar. The new structure will be big and obtrusive.
2. There is nothing in the application about the materials to be used - we are only told that they would match the building.
3. There is nothing in the application about the method or time length of construction, nor about maintenance schedules or any consequential impact on building wear and tear or the use of lifts. I note that the existing lifts are to be replaced which will mean we will only have access to two out of three at any one time. The antennae work will further impact on lift availability. There will be associated noise.
4. The antennae would be very close to the upper flats. There is a potential risk of harm from radiation - albeit unknown.
5. There is a risk of permanent damage to the roof of the building. Extra structures should not be attached.
6. I presume that in high winds (increasingly common) there will be wind noise. Has anyone assessed whether this can be heard in flats?
7. The existing ariels are not a precedent to be followed. They are minimal - not a protruding set.

8. Peregrine falcons use the tower for hunting. They also use the other two towers for nesting and rearing their young. Peregrine falcons are protected under the Wildlife & Countryside Act 1981. This means that it is a criminal offence intentionally or recklessly to kill, injure or take a Peregrine. Nests and eggs are also protected. I believe the installation, maintenance and presence of antennae would disturb either nesting sites or sites enabling the rearing of young falcons.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Ms Helen Fairfoul

Address: 242 cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This significant antenna structure would permanently disfigure the iconic shape and look of this Grade II listed tower. The 3 identical towers are a treasured feature of the City skyline. This alteration would be clearly visible to the Barbican's thousands of residents and visitors and surely contravene the Listed Building and Conservation Area guidelines.

Any previous small aerials placed on Barbican towers in the past are dwarfed by the massive structure being proposed and in no way provide a precedent.

There is no evidence the weight of the antenna structure will not damage the 50+ year old concrete roof which would never have been designed to support such weight. Residents would bear this risk and the huge cost of any necessary repairs.

Both the building period and subsequent maintenance would lead to considerable disturbance and loss of amenity to Tower residents.

Questions remain about potential radiation harm to people who live immediately proximate and risk of audible wind noise from the structure has not been assessed.

Residents would suffer detriment and expense from use by contractors causing congestion and wear and tear on the Tower's lifts and carpets.

The Tower tops are used every year by Peregrine Falcons nesting and raising their young. The Wildlife and Countryside Act makes it a criminal offence to cause intentional harm to these rare protected birds, as the presence of this structure undoubtedly would.

The application materials and the consultation have been inadequate. Tower residents are still waiting to be directly consulted and the information provided is lacking in detail, for example on materials, and presents no proper visualisation to enable a genuine examination of the proposer's assertion that the structure would have minimal visual impact.

It would be a massive dereliction of the Corporation's responsibilities as custodian of the iconic Barbican estate and to its leaseholders if it allowed this proposal.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Felicity Guinness

Address: 333 Cromwell Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:As a resident of Cromwell Tower, I would like to join all those in very strongly opposing the installation of 92 small antennae on the rooftop of Cromwell Tower, a listed building, for all the reasons stated very clearly by others.

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Planning application 23/01386/FULL and 23/01387/LBC
Date: 21 April 2024 17:00:50

THIS IS AN EXTERNAL EMAIL

To Samuel James, Development Division
From Jane Northcote, Leaseholder, 162 Cromwell Tower, EC2Y 8DD
Concerning: Planning application 23/01386/FULL and 23/01387/LBC

I write to object to these two planning applications, which seem to relate to the same proposed development: installation of antennas and associated equipment on the roof of Cromwell Tower

If you require me to submit two separate objections, please let me know.

My objections are that:

- 1) This proposal is not compatible with the Grade 2 listing of the Barbican Estate and Cromwell Tower
- 2) residential amenity will be damaged

Details follow:

The antennae are not compatible with the Grade 2 listing of the Barbican Estate

Cromwell Tower is Grade 2 listed and in a conservation area.

It is part of a Grade 2 listed estate which includes two other matching “sister” towers. The regularity of these towers is part of the aesthetic of the estate and a contributor to its value. Putting a 3mx3m structure on top of Cromwell will destroy this symmetry. It will also deface the appearance of Cromwell Tower. I note that the heights of the antennae are not shown in the plans: For example this one:

https://www.planning2.cityoflondon.gov.uk/online-applications/files/119C56832C1EB5FC0AB14EA62F558D06/pdf/23_01386_FULL-PROPOSED_ELEVATION_PLAN-1481786.pdf. This document apparently does not show the full height or shape of the antennae. (“Heights of antennas not shown for clarity”). It is unclear whether the side elevation shown is the full extent of the proposal or whether additional equipment is envisaged. “Supporting steelwork” is mentioned in the application but not shown on the diagram.

If permission is granted for this installation, we have zero control over any future expansions or installations. This installation should be stopped now.

The antennae are apparently to be in a box made of “GRP”, which I understand to be fibreglass. This is completely out of keeping with the rest of the tower, which is concrete. Although the applicant says that the construction will not be visible “from ground level”, our tower is visible and appreciated from many viewpoints, including other towers on this and other estates. A large fibreglass box on top of the tower is completely at odds with the listing and should be refused.

The effect of the antennae on the Tower has not been researched: our safety is potentially compromised.

These 92 antennae with their steel supports and fibreglass box will be heavy, and will be subject to wind pressure. The Tower was not built with this strain considered in the design. The proposal must be stopped and proper research conducted.

Furthermore the supports and box installation will require that the roof of the tower is drilled, again adversely affecting the structure.

There is a serious possibility that the antennae will damage the structure of the tower and have an adverse effect of our safety. The wind noise from the antennae is another factor not mentioned in the proposal. Our experience of living here is that noise transmits itself down the tower, which vibrates and amplifies noise like a musical instrument. This is another factor which will detract from our residential amenity.

In addition we have had problems with water ingress into the upper floors of the tower. This large fibreglass box of the roof of the tower will certainly affect how water flows, and will have unknown effects on rainwater channels. Again this affects residential amenity and seems not to have been considered by the applicant.

The antennae will need maintaining: this will damage residential amenity

92 antennae is a lot. There will be always be one which will go wrong and need replacing or updating. This residential tower does not have facilities to accommodate antennae engineers visiting and doing work. We have only three lifts, one of which is often unavailable due to deliveries. The lifts are used by residents, Royal Mail, the cleaner, and engineers working on the tower, such as plumbers. There is not capacity to accommodate antenna engineers as well: their use of the lifts will certainly detract from residential amenity. In addition, the continued and frequent arrival of antenna engineers will adversely affect our security: they will have to be given keys, and allowed access to spaces that are normally reserved or private. This imposes an additional security risk on top of the rising risk from “urban explorers”, and other unwanted incursions into our tower. Our concierge services are already under strain, and it is unreasonable to add this burden to their task. The additional risk of incursion into the tower will damage our residential amenity.

Our experience is that operatives from outside organisations cause a mess and do not clear up after themselves. Antenna engineers have no interest in keeping our tower clean and tidy. They will treat our tower as a building site: damage our carpets, drill holes in the concrete at will, and leave lunch and rubbish in the lobbies, fire stairs and other areas. Our concierge service does not have the capacity to supervise them. It will fall to our cleaner to clean up after them, at our expense. In addition, because they are working in private and reserved areas, these areas will require additional inspection, checking and cleaning, for example by fire officers to check they have not left combustible waste. Again this will be at our expense and increases our exposure to fire risk. I see nothing in the proposal about how the engineers will be made to respect the site. This is not just at the construction stage. With such a large number of antennae, engineers will be on site frequently. This is an intolerable detriment to our residential amenity.

There was a previous proposal : 19/00108/FULL 5 April 2019, subsequently withdrawn. This proposal should equally be withdrawn.

May I respectfully suggest that a suitable site for these antennae would be the roof of the Guildhall, a nearby public building, which has adequate security, and no residents. There is also the HiLo building just North of our Tower, which has a special roof area for equipment and plant. It too has security guards and no residents.

Cromwell Tower is the wrong place for this installation. This application should be withdrawn.

regards
Jane Northcote (Miss)

--

Jane Northcote




From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Objections to planning and listed building applications 23/01386/FULL and 23/01387/LBC
Date: 22 April 2024 18:09:54

THIS IS AN EXTERNAL EMAIL

Dear Sir,

I am writing to object to both these applications. I am a resident of Cromwell Tower and the proposed installation of 92 antennas on the roof of this building, along with various ancillary works, is completely inappropriate for a number of reasons. My objections are as follows;

1. The work is completely inappropriate for a listed building and will alter and severely damage its roofline and integrity. This is one of three iconic towers that are London landmarks and this proposal will deface one of them.
2. The installation is likely to damage the exterior of Cromwell Tower. As well as damage to the concrete structure we have suffered for years from leaks from the roof, and the building work associated with the proposal is likely to make that worse.
3. Installing all these antennas and associated structures is likely to damage the interior of Cromwell Tower and cause great inconvenience to residents as all the materials will need to be brought through the lobby and up in a lift, then on to the roof. At least one of the three lifts will not be available for residents while this is done and the lifts are due for renewal soon which will mean at least one is out of action at a time for replacement. As the lifts are also used for the delivery of post and removal of rubbish, it's likely there will be none available for residents at all at certain times (in a 38 storey building) if this proposals is allowed to go ahead.
4. Maintenance of the antennas will involve more material and workers coming through the lobby in Cromwell Tower and up in the lifts – more inconvenience and probable damage.
5. As residents we pay through our (very high) service charge for maintenance and repairs to Cromwell Tower so will end up paying more to repair damage caused by the proposed work.
6. There has been no consultation at all with the people who actually live in the building this proposal will damage. Do the applicants not realise this is a residential building with people living in it? Have the applicants been trying to sneak this through in the hope we will not notice?

In addition to these objections I think the Corporation of London, as freeholder, should have told the applicant already that it would never agree to such an inappropriate and damaging proposal for the building. The Corporation has a duty to both conserve this listed building and to respect the welfare and interests of the people who live here – people who, directly or indirectly, have paid a lot of money to the Corporation for their leases.

Yours sincerely

John Shuker

51 Cromwell Tower
Barbican
London
EC2Y 8DD

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mrs Myra Moriarty

Address: 91 Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I object to this application for 6 reasons.

1: The company have not consulted with the residents of the property

2: The plan lacks detail. For instance it mentions screening but does not say what the screening looks like or is made from. There are no drawings of the antennae. It does not explain how the equipment will be fixed to the roof. There are no drawings of the Tower with additional equipment as it would be seen

3: The Grade 2 listed building has an iconic roofline which will be ruined by antennae and/or screening. The plans state that the construction will not be visible from the road, however, I think it will be visible from surrounding towers, from the approach to Cromwell Tower from Whitecross Street and from the Barbican Lakeside. This is unacceptable

4: The plan does not take into account disruption to residents during installation. e.g. builders and equipment taking up the use of at least one lift. The noise during construction, the mess and wear to carpets caused by plant, equipment and work boots being transported across the foyer and up the lifts.

5: The plan does not take into account the ongoing disruption to residents. eg The noise of the wind around the antennae, the humming of equipment, the need for maintenance and further wear to lifts and carpets, the potential for damage to the concrete on the roofline and potential water ingress. There is no mention of any payment for wear and tear or damage caused to concrete, carpets, paintwork or the lifts. so this is presumably expected to be covered by residents service charges. this is unacceptable

6: I believe there would be possible health issues for residents, particularly at the top of the Tower

There are any number of alternative Towers in the vicinity where these antennae could be placed, why the applicant has chosen a Grade 2 listed residential building is beyond me. I strongly urge you to reject their application

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Roger Braybrooks

Address: Flat 323 Cromwell Tower London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The detail of the antennae - color, material, etc.- is not clear from the application.

However, the drawings do show that this would alter the skyline of the Grade II listed Cromwell Tower quite significantly and would spoil the classic appearance.

Additionally as a resident I am concerned about the disruption and damage that would be caused by installation and maintenance -including what will need to be extensive use of one of the three lifts.

Finally, I would be concerned at the potential and unknown health impacts of the installation given I live on a high floor.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Roger Braybrooks

Address: Flat 323 London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The detail of the antennae - color, material, etc.- is not clear from the application.

However, the drawings do show that this would alter the skyline of the Grade II listed Cromwell Tower quite significantly and would spoil the classic appearance.

Additionally as a resident I am concerned about the disruption and damage that would be caused by installation and maintenance -including what will need to be extensive use of one of the three lifts.

Finally, I would be concerned at the potential and unknown health impacts of the installation given I live on a high floor.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Alison Braybrooks

Address: Flat 323 Cromwell Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to this application. Although we do not know how it will look in terms of materials, it will change the roofline of this iconic listed building.

Secondly I am concerned about the health issues related to 90 antennae so close to my home

Finally, the noise and disruption during installation and maintenance, particularly as the lift system is about to be upgraded, will be very inconvenient for all residents

Adjei, William

From: PLN - Comments
Subject: FW: Planning application 23/01386/FULL and 23/01387/LBC

From: Alan Budgen
Sent: Monday, April 29, 2024 10:29 PM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>; James, Samuel <Samuel.James@cityoflondon.gov.uk>
Subject: Planning application 23/01386/FULL and 23/01387/LBC

THIS IS AN EXTERNAL EMAIL

To Samuel James, Development Division

From Alan Budgen, Leaseholder, 301 Cromwell Tower, EC2Y 8NB
I am writing as a Leaseholder and Chair of the House Group a recognised RTA.
Concerning: Planning application 23/01386/FULL and 23/01387/LBC

I am writing to object to the two planning applications, which appear to be identical, for the proposed installation of 92 antennas attached to a new structure on the roof of Cromwell Tower. Cromwell Tower is a Grade 2 listed building, therefore no additional structures should be added to the exterior of the building.

There has been no consultation with the residents

There has been no dialogue with residents and therefore we have not been given any information as to how this structure would change the appearance of the Tower, both close up and further away. We have asked that the applicant at least provides an illustration, which they have not done. All we have seen is the technical drawings associated with the application. There has been no communication with the applicant at all.

Application notices appeared in Cromwell Lobby on 27th March, with the application date of 21st March. Letters were finally sent out on the 11th April after residents queried the application, and were received around the 18th. No attempt has been made by the applicant or Landlord (The City) to consult with the residents. The residents have been left to work out for themselves how this large structure will impact on the building and their lives.

- We do not know how the structure will be constructed on the roof, what will be the process and methods to instal it?
- How will materials get onto the roof? If it is through the building, how will the lobbies and lifts be protected? If it is externally, will there be a temporary lift outside flats on one or more sides of the building?
- What plan is in place to avoid contact with residents during construction and future maintenance, and not disrupt their daily lives in any way?
- How will lift access be maintained, especially during busy periods?
- Will contractors only be permitted on site during the agreed working hours - and never outside of these times?
- Will there be excessive noise during construction, and any maintenance? It will be directly above some flats. Sounds travels through the building and can impact many floors.
- The lifts of all of the Barbican Towers will be replaced in the coming months. A project that will take several years, and cost the residents a great deal of money. Installation and maintenance cannot happen during this time, as the tower may be down to one lift at times.
- Residents will be very reluctant to allow unnecessary additional contractors to use the brand new lifts that they have just paid for.

- Will the contractor be made to use the 01 Lobby entrance, and be logged in by the concierge? Will the concierge be able to stop them from using the lifts at congested times?
- There is no financial benefit to the residents suffering this intrusion.
- There are no benefits to residents at all, only inconvenience.

The application should not proceed for assessment until these issues have been addressed, and residents consulted.

The proposal is not compatible with the Grade 2 listing of the Barbican Estate and Cromwell Tower

The 3.2m structure is overly large and will dramatically change the roof profile of the Tower. The drawings on the document apparently do not show the full height or shape of the antennae. (“Heights of antennas not shown for clarity”), therefore we don't know the full extent of the structure.

Externally the 3 towers are largely unchanged since construction and are protected Grade 2 listed. They should not have parasitic additional structures added. The Towers of the Barbican are iconic and well known around the world. They are very noticeable in aerial views of London and The City. Changing one will affect the symmetry of all three.

The structure will be made from GRP 'Fibreglass'. This is not a material that is in keeping with the rest of the Tower or the estate. GRP is known to degrade and discolour when exposed to the weather. In the harshest instances, studies show this can be within one year (as little as 270 days).

It is well known that Peregrine Falcons nest on various levels of the Towers. The birds are protected, and once they have chosen a spot, that balcony or rooftop cannot be used until they move on. What would happen if they nest near the equipment?

Residential amenity will be damaged

The equipment is likely to cause damage to the concrete. There was an urgent repair programme on the Towers a few years ago to repair concrete that had failed. Drilling into the tower roof to attach a large heavy structure could create further damage. The fabric of the building must be protected and not take a chance on a needless and unwanted installation.

There could be damage caused by strong winds and other effects of the weather. The Tower is not designed to have a large structure attached to the roof. This could create additional noise (from winds blowing around it) and be dangerous if anything falls from the structure.

The structure will change how water flows from rain and storms, with the potential of creating further water ingress problems.

Potential Radiation impact on reinforced concrete structures. There are several reports written on the subject that show that it could be a potential problem. Even if this is unlikely, the possibility needs to be considered.

Potential Radiation impact on health is still uncertain. There are many people who are already very anxious that aerials are on the building. The safety and wellbeing of the residents and the building should come before any commercial application.

Maintenance and Security

92 Antennae will need maintenance. The Tower does not have the sufficient access or space for contractors and engineers to be working on the antennae. There are three lifts, which are often locked off for refuse collection, post, people moving in or out, maintenance etc. Sometimes only one lift is in use.

It could affect security, if contractors are often using the roof. Will they be given keys to the tower or certain utility areas?

There will be additional wear and tear on the communal areas of the building, such as lobbies, carpets and lifts. External contractors have proved in the past that they don't recognise that the tower is a residential property, and often cause damage to carpets, paint work, lifts and tend to leave rubbish behind.

Urban Explorers have managed to get onto the roof before. If they climb on the structure and cause damage, it could become unsafe and parts may fall.

We do not know if the equipment will increase the risk of fire. There is very limited access for the Fire Brigade if a fire did occur. We do not know how the materials used in the structure would affect the rest of the building, or nearby buildings, if they did catch fire. In an emergency there is only one staircase in the building, for escape and Firefighter access. A commercial building would be much better suited, as all round access will be better.

There are no benefits to the residents of the tower, or the wider Estate. This is simply a commercial enterprise that could be placed on any number of more suitable non listed towers. Commercial buildings will be better suited as there are no residents. The roof space will be bigger, lift and in particular stair access will be better. Contractors could be able to work when the building is less busy or empty.

Cromwell Tower is the wrong place for this installation. This application should be withdrawn or rejected.

Yours,

Alan Budgen
301 Cromwell Tower

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Roy Sully

Address: 253 Shakespeare Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: My objections are:

1. There appears to have been no consultation with residents in the tower;
2. Cromwell Tower is a listed building and the structure should therefore not suffer unnecessary additions;
3. Following on from point 2, why not put the antennae on a non-listed building?;
4. It will bring no benefit to residents but they will suffer inconvenience, as the route up is, obviously, by lift which will not be available to a resident if being used for antenna maintenance;
5. Following on from point 3, the lifts in Cromwell are in any case due for renewal so even without the extra inconvenience of the antennae, residents will shortly be down to two lifts (at best) for an extended period;
6. How are these antennae structures going to get up there in the first place? No doubt by lift which is not appropriate for the reasons stated above.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Chris Dixon

Address: 261 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Inappropriate development for a listed building particularly one with the design characteristics of Cromwell Tower. Equipment of this type should be designed into new buildings and not erected on buildings of architectural interest.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Tony Brady

Address: 372 Shakespeare Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I object to this proposal because it will have a negative impact on the appearance of Cromwell Tower and appears to breach the Grade 2 Listed Building regulations. I live opposite Cromwell Tower and the fortress like outline of the roof will be impaired by this hideous metal cage plonked on top. Workers on the roof will also lead to overlooking of our flat.

It will lead to loss of residential amenity and an increase in noise for residents both during construction and for ongoing maintenance. Use of the residents lifts by contractors for their own commercial purposes will lead to a reduction in availability, and carrying their equipment to the roof inside the lifts could cause damage and increase wear and tear. I recently worked in a building where masts were installed on the roof above our office and it led to a surprising amount of extra noise and frequent visits by maintenance workers. I think for those living near the top of Cromwell Tower this will be a significant nuisance.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr John Spicer

Address: Flat 272, Shakespeare Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: We object to this planning application as it may pose a health risk. All of our rooms, including our bedrooms face Cromwell Tower and therefore would be affected 24 hours a day to any emissions. They could also affect our electrical equipment.

Previous similar applications have been turned down.

The lack of consultation is appalling.

Mr & Mrs J Spicer

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Peter Archbold

Address: Flat 122 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I fully support the comments made by Wendy Harrison in her submission dated 2nd April.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mrs Helen Clifford

Address: 15 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment:Regarding: Planning applications 23/01386/FULL and 23/01387/LBC, I'm reaching out to express my objection to both proposals, as they seem to be identical. These applications pertain to the proposed placement of 92 antennas on a new structure atop Cromwell Tower.

Cromwell Tower holds Grade 2 listed status, making it imperative that no additional structures be appended to its exterior. Regrettably, there has been a lack of consultation with the residents regarding the proposed changes. Consequently, we remain uninformed about the potential alterations to the Tower's appearance, both up close and from a distance. Despite our requests, the applicant has not provided any illustrations, offering only technical drawings associated with the application. Moreover, there has been no communication whatsoever with the applicant. Application notices were posted in Cromwell Lobby on March 27th, with the application dated March 21st. Subsequently, letters were dispatched on April 11th following resident inquiries, and they were received around April 18th. Disappointingly, neither the applicant nor the landlord (The City) has made any effort to engage in dialogue with the residents.

- A comprehensive structural engineering report is necessary to assess potential impacts on the tower's weight and wind dynamics, ensuring its structural integrity and safety.

- The distinctive profile of the three towers, visible from both close proximity and afar, is an iconic aspect of the Grade II listed estate. Even a relatively minor addition to one tower would disrupt this characteristic.

- This situation reflects the subtle yet consequential pattern of "creeping change," which poses a threat to the estate's overall integrity, akin to the installation of flues on the Girls' School.
- Considering alternatives, why not install the antennae on Citypoint Tower instead?

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mrs Jane Samsworth

Address: 106 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I am against alterations that would change the appearance of the Barbican. What consultation was there? Why this place and not somewhere less architecturally important?

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Ms Mary Gilchrist

Address: 21 Shakespeare Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: My principal reasons for objection are:

Physical impact on the building - NEGATIVE - the risk / likelihood of damage to the concrete structure of the building.

As a long term resident of the Barbican estate, I recall the very lengthy work undertaken (and the painfully large service charge bills borne by residents) on concrete repairs for Shakespeare Tower.

In light of that experience, it is almost beyond belief that anyone would consider putting anything extrinsic on our concrete buildings.

Impact to a listed building - NEGATIVE - Cromwell Tower has Grade II listed building status.

The proposed changes to the roofline are a defacement and materially detrimental to the listed design of the tower and to the Estate.

Impact on residential amenity - NEGATIVE - our homes are not a construction or industrial site.

Work associated with installation and maintenance would inevitably have adverse impact on residents.

I suggest that there are plenty of alternative sites on non-residential, unlisted buildings in the locality.

I urge you to reject this proposal.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Ms Anett Rideg

Address: Flat 121 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I strongly object to this scheme. Cromwell Tower is a Grade II listed building and a residential block. It should not be subjected to this installation and a more appropriate commercial building should be selected instead.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Dr Martin Farebrother

Address: 117 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment:As a matter of fact, the postcode for Cromwell Tower is EC2Y 8DD, not W1F 7EH as stated on pages 1 and 3 of the Application and Planning Statement.

The proposed antennas are not compatible with maintaining the integrity of the Grade II listing of the Barbican Estate. Although the structure may be difficult to see from the ground, more distant views of the 3 towers of the estate are iconic, and depend on the relationship of the 3 towers, all the same but differently oriented in relation to due north. Alterations to the roof profile of one, such as this proposal, completely spoil this important aspect of the estate.

In addition this is another example of 'creeping change' in which it is said that this 'small alteration' does not make much difference. However the cumulative effect of these changes ruins the architectural value of the whole.

The tower is 50 years old. I found no assessment of the impact of this proposal on the structural integrity of the top of the tower. The weight of the proposal is not stated, nor are the effects on wind flow and noise around the top of the tower. Any damage threatens not only the inhabitants of the tower but other residents and users of the estate, and the wider public.

The construction period is not stated. Any noise of construction will affect neighbouring buildings, spreading from such a high point.

Lifts in the tower were designed for the needs of the flats there, not for additional uses such as the construction and maintenance of new commercial features such as this. The lifts are fully used for the purpose intended. These lifts are paid for by the residents, who we fully support in their objections on this ground. There has been no previous discussion with residents of the tower or the rest of the estate.

We (my wife and I) object most strongly on these grounds. Other non-listed tall buildings with commercial occupants in the area must be more suitable. No reason is given to reject the use of one of these.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Dr Martin Farebrother

Address: 117 Defoe House, Barbican, London EC2Y 8ND

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment:As a matter of fact, the postcode for Cromwell Tower is EC2Y 8DD, not W1F 7EH as stated on pages 1 and 3 of the Application and Planning Statement.

The proposed antennas are not compatible with maintaining the integrity of the Grade II listing of the Barbican Estate. Although the structure may be difficult to see from the ground, more distant views of the 3 towers of the estate are iconic, and depend on the relationship of the 3 towers, all the same but differently oriented in relation to due north. Alterations to the roof profile of one, such as this proposal, completely spoil this important aspect of the estate.

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Lifts in the tower were designed for the needs of the flats there, not for additional uses such as the construction and maintenance of new commercial features such as this. The lifts are fully used for the purpose intended. These lifts are paid for by the residents, who we fully support in their objections on this ground. There has been no previous discussion with residents of the tower or the rest of the estate.

We (my wife and I) object most strongly on these grounds. Other non-listed tall buildings with commercial occupants in the area must be more suitable. No reason is given to reject the use of one of these.

PLANNING OBJECTION

23/01386/FUL & 23/01387/LBC

The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Cromwell Tower Barbican London EC2

Grounds of objection

1. Cromwell Tower is part of the Grade II listed Barbican complex, and it is one of the three Barbican towers distinctive within London's skyline. The Barbican Estate is highly significant and internationally renowned as a major housing development with cultural facilities integrated, that was conceived as a unique single project. Subsequently seen as a pioneering example of 'Brutalist' architecture in the late twentieth century, the estate as whole is of great architectural value for its innovative treatment of concrete and design consistent across the estate.
2. The special interest of the Barbican was recognised by its listing in 2001 at Grade II. In 2003, its designed landscape was inscribed on the Register of Parks and Gardens at Grade II*. In 2018, the estate was included within the Barbican and Golden Lane Conservation Area. The significance is described in key documents including:
 - Barbican list entry description, 2001;
 - Barbican landscape register entry description, 2003;
 - Listed Building Management Guidelines, 2012-20; and
 - Barbican and Golden Lane Conservation Area SPD, 2022
3. The proposed structure will materially change the roof profile of Cromwell Tower. It will be seen in views from many publicly accessible locations across London. It will be clearly seen from ground level even from various public areas of the estate, including from St Giles' Churchyard across the Lakeside, and from parts of the Barbican highwalk. This will be detrimental to the distinctive design and character of the building, and to the ensemble of the three distinctive Barbican towers resulting in significant harm to the heritage asset.
4. The applicant's statement '*the shrouding is likely to be viewed as part of the building, rather than an identifiable telecommunications installation*' is unsubstantiated. The scant details and sketch drawings submitted show a structure that is incongruous in its setting as it changes the shape and materiality of the roof profile. The statement '*As the high-rise buildings continue to grow within London, a 3.2m-high increase on a 123m-high tower is not considered to be out of the ordinary, but rather wholly appropriate for the times in which we now live*' demonstrates a lack of consideration for the significance of and impact on the heritage asset.
5. Even if the authority accepts the inference that the harm is 'less than substantial', no meaningful case has been advanced to demonstrate that public benefits would outweigh this harm. The statement '*When the balanced assessment of public benefits vs harm, which is advocated within the NPPF, is undertaken, it is considered that, in this instance, the public benefits outweigh harm and any associated visual impact*', is not substantiated. No public benefits are described.

Legislative and policy considerations

6. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies of the statutory Development Plan, unless other material considerations indicate otherwise.
7. Section 66 of the Planning (Listed Buildings Conservation Areas) Act 1990 places a duty on the local planning authority to have special regard to the desirability of preserving listed building or their settings or any features of special architectural or historic interest which it possesses. Section 72 of the same Act requires that special attention is given to the desirability of preserving the character and appearance of Conservation Areas.
8. Paragraph 200 of the National Planning Policy Framework (NPPF) requires an applicant to give a summary of the significance of the building or area affected, proportionate to its importance. This has not been done.
9. Paragraph 201 advises local authorities to take account of that significance in assessing proposals to avoid or minimise conflict between the proposals and conservation of the asset. No reason has been given as to why this development cannot be avoided, e.g. by locating on another tall building which is not listed (of which there are several in proximity). Paragraph 203 emphasises the desirability of sustaining and enhancing the significance of individual assets and wider, local distinctiveness. This development does not sustain or enhance the significance of Cromwell Tower or the wider Barbican estate.
10. Paragraph 205 of the NPPF requires that great weight should be given to the conservation of designated heritage assets. Para 206 confirms that harm to the significance of a designated heritage asset can arise from its alteration or destruction, or from development within its setting. Any harm should require clear and convincing justification. No clear and justification has been provided.
11. Para 208 requires that 'less than substantial' harm should be outweighed by public benefits, including where appropriate securing its optimum viable use. Refer to 5 above.
12. The City of London Local Plan (2015) Policy **CS10 Design** promotes a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment. The outline details provided do not evidence a high standard of design.
13. Policy **CS12 Historic Environment** and policy **DM 12.1 Managing change affecting all heritage assets and spaces** seeks to conserve, sustain and enhance heritage assets, their settings and significance. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings. Policy **DM 12.3 Listed buildings** states that consent will be granted for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting. The proposals are insensitive to and fail to conserve the heritage asset and are in conflict with the Local Plan policies.

Conclusion

14. The proposed roof level structure will be detrimental to the distinctive design and character of Cromwell Tower resulting in significant harm to the heritage asset. The proposals are clearly in conflict with local and national planning policy and should therefore be refused planning permission and listed building consent.

7th May 2024

371 Cromwell Tower, Barbican London EC2Y 8NB

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Bruno Min

Address: Flat 371 Cromwell Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Grounds of objection

1. Cromwell Tower is part of the Grade II listed Barbican complex, and it is one of the three Barbican towers distinctive within London's skyline. The Barbican Estate is highly significant and internationally renowned as a major housing development with cultural facilities integrated, that was conceived as a unique single project. Subsequently seen as a pioneering example of 'Brutalist' architecture in the late twentieth century, the estate as whole is of great architectural value for its innovative treatment of concrete and design consistent across the estate.

2. The special interest of the Barbican was recognised by its listing in 2001 at Grade II. In 2003, its designed landscape was inscribed on the Register of Parks and Gardens at Grade II*. In 2018, the estate was included within the Barbican and Golden Lane Conservation Area. The significance is described in key documents including:

- Barbican list entry description, 2001;
- Barbican landscape register entry description, 2003;
- Listed Building Management Guidelines, 2012-20; and
- Barbican and Golden Lane Conservation Area SPD, 2022

3. The proposed structure will materially change the roof profile of Cromwell Tower. It will be seen in views from many publicly accessible locations across London. It will be clearly seen from ground level even from various public areas of the estate, including from St Giles' Churchyard across the Lakeside, and from parts of the Barbican highwalk. This will be detrimental to the distinctive design and character of the building, and to the ensemble of the three distinctive

Barbican towers resulting in significant harm to the heritage asset.

4. The applicant's statement 'the shrouding is likely to be viewed as part of the building, rather than an identifiable telecommunications installation' is unsubstantiated. The scant details and sketch drawings submitted show a structure that is incongruous in its setting as it changes the shape and materiality of the roof profile. The statement 'As the high-rise buildings continue to grow within London, a 3.2m-high increase on a 123m-high tower is not considered to be out of the ordinary, but rather wholly appropriate for the times in which we now live' demonstrates a lack of consideration for the significance of and impact on the heritage asset.

5. Even if the authority accepts the inference that the harm is 'less than substantial', no meaningful case has been advanced to demonstrate that public benefits would outweigh this harm. The statement 'When the balanced assessment of public benefits vs harm, which is advocated within the NPPF, is undertaken, it is considered that, in this instance, the public benefits outweigh harm and any associated visual impact', is not substantiated. No public benefits are described.

Legislative and policy considerations

6. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies of the statutory Development Plan, unless other material considerations indicate otherwise.

7. Section 66 of the Planning (Listed Buildings Conservation Areas) Act 1990 places a duty on the local planning authority to have special regard to the desirability of preserving listed building or their settings or any features of special architectural or historic interest which it possesses. Section 72 of the same Act requires that special attention is given to the desirability of preserving the character and appearance of Conservation Areas.

8. Paragraph 200 of the National Planning Policy Framework (NPPF) requires an applicant to give a summary of the significance of the building or area affected, proportionate to its importance. This has not been done.

9. Paragraph 201 advises local authorities to take account of that significance in assessing proposals to avoid or minimise conflict between the proposals and conservation of the asset. No reason has been given as to why this development cannot be avoided, e.g. by locating on another tall building which is not listed (of which there are several in proximity). Paragraph 203 emphasises the desirability of sustaining and enhancing the significance of individual assets and wider, local distinctiveness. This development does not sustain or enhance the significance of

Cromwell Tower or the wider Barbican estate.

10. Paragraph 205 of the NPPF requires that great weight should be given to the conservation of designated heritage assets. Para 206 confirms that harm to the significance of a designated heritage asset can arise from its alteration or destruction, or from development within its setting. Any harm should require clear and convincing justification. No clear and justification has been provided.

11. Para 208 requires that 'less than substantial' harm should be outweighed by public benefits, including where appropriate securing its optimum viable use. Refer to 5 above.

12. The City of London Local Plan (2015) Policy CS10 Design promotes a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment. The outline details provided do not evidence a high standard of design.

13. Policy CS12 Historic Environment and policy DM 12.1 Managing change affecting all heritage assets and spaces seeks to conserve, sustain and enhance heritage assets, their settings and significance. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings. Policy DM 12.3 Listed buildings states that consent will be granted for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting. The proposals are insensitive to and fail to conserve the heritage asset and are in conflict with the Local Plan policies.

Conclusion

14. The proposed roof level structure will be detrimental to the distinctive design and character of Cromwell Tower resulting in significant harm to the heritage asset. The proposals are clearly in conflict with local and national planning policy and should therefore be refused planning permission and listed building consent.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mrs Jill Jones

Address: 62 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Concerning: Planning application 23/01386/FULL and 23/01387/LBC

We object to both these planning applications, for the proposed installation of 92 antennas attached to a new structure on the roof of Cromwell Tower.

Cromwell Tower is a Grade 2 listed building, and no additional structures should be added to the exterior. Reasons for objection:

1. Listed status/heritage impact. The proposal is incompatible with the Grade 2 listing of the Barbican Estate and Cromwell Tower, and will permanently change the symmetry of the three-tower arrangement. The 3.2m structure will change the Tower's roof profile - externally the 3 towers are largely unchanged since construction. Additionally, if these antennae are added, then what is to stop other changes to the Towers, further degrading the unique and world-famous heritage skyline?
2. Construction integrity/Health and safety impact. The proposed fiberglass structure is out of keeping with the Tower, and any unnecessary drilling into the top of the structure may add risk to the concrete. It is unclear what the noise, rainfall or impact on wind resistance will be, nor any vibration or fire impact to occupants of the Tower. Winds are significant around the Towers and any additional structure may present an unnecessary health and safety risk from falling debris.
3. Wildlife. The Tower is periodically home to nesting Falcons. What expert advice has been taken?
4. Consultation. The Towers are due to have lift replacement (paid for by leaseholders), but we cannot see how this proposal factors in construction and maintenance - adding to wear and tear on the lifts, and on other communal areas. There has been no consultation with residents - invidious given the proposal alters the visual impact of the Tower and impacts the communal services we pay for, as well as potentially the quality of living within Cromwell Tower (c.f. vibration,

noise, fire/debris risks)

5. Commercial. It is unclear how this proposal compares with other options - such as installing antennae on surrounding non-residential commercial buildings. Why is this proposal essential, and what alternative options are there?

This application should be withdrawn or rejected.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Alberto Garciga

Address: FLAT 151 LAUDERDALE TOWER, BARBICAN, LONDON London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: Dear Sirs

I completely object to this inconsiderate planning application proposing to install 92 antennae on top of Cromwell Tower. I fully object simply on the matter of the lack of consultation with residents. There's been no approach by the company submitting this proposal to residents. Simply and utterly inconsiderate on what are people's homes.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr andrew smith

Address: 233 cromwell tower barbican london

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Listing Building - unnecessary damage/change to structure, it will change the roofline structure and appearance of the building, the towers are not designed for additional tall structures which is a potential health and safety risk, and subsequent permanent damage to the structure. Other suitable buildings non listed will be available that are more suited, especially commercial where disruption can be minimised by working outside of working hours.

Visual documentation - little of the impact is clearly shown, a technical drawing is not sufficient.

Inappropriate Access - the 'resident' lifts are for residential purposes not shifting heavy tech gear and all the regular maintenance required.

No consultation with residents in advance.

Building wear and tear - the contractors being in will generate additional wear and tear, extra costs using electricity for lifts and so forth

Potential increase in the risk of fires - best to avoid this risk given previous events.

If you applied for planning permission to stick even one of those antennae on a listed building - let's say on Cloth Fair - the answer would be no. Just like it should be in this case.

Th application should be rejected.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Dr Alexander Wilson

Address: 52 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object on the following grounds

i) lack of consultation,

ii) why put it on a listed building when it could go on any number of non-listed commercial buildings nearby,

iii) it appears to breach the Grade 2 Listed Building regulations (adding stuff to the exterior of the building)

iv) it offers no benefits to residents and will undoubtedly increase unwanted traffic in the tower (for maintenance etc) thereby causing a loss of residential amenity.

v) how can this go ahead when the lifts in the towers are about to be replaced in a programme that will last about three years,? Surely, that would hamper installation and maintenance and put an extra and unacceptable demand on lifts when only 2 of the 3 lifts would be working.

This should not go ahead

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Dr Nicholas Deakin

Address: Flat 372, Lauderdale Tower, Barbican Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I am not sure why there are two related applications here. The mass and scale of this addition to a listed building is totally out of proportion with what would be acceptable. It will be visible from other buildings in the vicinity and substantially change the roofline as envisaged by the architects in the original scheme.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Dr Elaine Murphy

Address: Flat 382, Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I write to object to the proposal to place antennae on the roof of Cromwell Tower on the grounds that it is an inappropriate development on a Grade 2 listed building, it will spoil the sightline and design at the roof.

Further, the development is likely to cause considerable inconvenience to residents of the estate, especially Cromwell Tower residents and there has been no consultation.

If there is to be no benefit to residents of Cromwell Tower, what compensation is envisaged to offset the considerable inconvenience that will ensue?

Comments for Planning Application 23/01387/LBC

Application Summary

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Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Philip Crawford

Address: 73 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I am a resident of Lauderdale Tower, part of the Barbican estate, and I am writing to formally object to the planning application regarding the installation of 92 antennas atop Cromwell Tower. This proposal has raised significant concerns, which I share, about the potential impacts on our community and the historical integrity of the Barbican estate. First and foremost, the lack of consultation with the residents is alarming. As stakeholders in the estate, it is imperative that we are included in discussions about changes that will affect our living environment and the aesthetic of our surroundings. The Barbican is not only a place of residence but also a Grade II* listed architectural landmark, and any modifications should be approached with careful consideration of their historical and cultural impact. Furthermore, the installation of such a significant number of antennas raises concerns about the structural stress and increased wear and tear on Cromwell Tower, which could potentially apply to other buildings in the estate, including Lauderdale Tower. The additional burden on building infrastructure such as lifts and the possible health implications of having a large array of antennas so close to residential units have not been adequately assessed. The proposal also reflects a broader issue of disregard by the City of London towards the residents of the Barbican. The notion that our homes could be altered without proper consultation or consideration is disrespectful and undermines the community's right to a stable and satisfactory living environment. Given these points, I strongly oppose the planning application and urge you to consider the broader implications of such a development. Approval of this application may set a precedent for similar future developments not only on Cromwell Tower but also potentially affecting Shakespeare and Lauderdale Towers. Thank you for considering my objection. I hope that the City will reconsider its approach and engage more openly and respectfully with the Barbican community.

Comments for Planning Application 23/01387/LBC

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Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Judith Flanders

Address: 122 Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Cromwell Tower has been awarded Grade II listed building status and is in a conservation area. Permitting the defacing of its appearance with multiple antennae and a 9.2m structure would dramatically change the design of its roofline, losing its consistency with the other towers, and leading to a materially detrimental visual impact. Further, the roofline of the Tower will be altered, interrupting the skyline view of the three towers, which contravenes Listed Building Management Guidelines.

The application and consultation materials have been (intentionally?) inadequate. Residents have still not been directly consulted; the information that has been provided is lacking in detail: nothing on the materials, and with no proper visualisation to enable a genuine examination of the proposer's assertion that the structure would have minimal visual impact. There is no impact analysis on the fabric of the building of the addition of a large superstructure.

There is nothing in the application about the method or time length of construction, nor about maintenance schedules or any consequential impact on building wear and tear or the use of lifts. Existing lifts are in line to be replaced which ensuring that residents will be able to access only two out of three at any one time. The antennae work will further impact on lift availability.

It is noticeable that the residents will cover the cost of the wear and tear on the building and the lifts during and after installation, while the City and licensee will reap the financial rewards.

Comments for Planning Application 23/01387/LBC

Application Summary

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Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Mr Michael Callow

Address: 161 Lauderdale Tower Barbican

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I write to object on a number of grounds:

1. There has been no proper consultation with residents of Cromwell Tower or residents of the wider Barbican Estate or their representatives. Considering the residential nature of the building and the estate and the Landlord's duties to Long Leaseholders this is very concerning.
2. The proposal cannot be consistent with the Grade 2 listed status of the Barbican estate - has there been an assessment of its compatibility with its listed status? Despite comments in the application that impact will be negligible, the drawings indicate otherwise. Additionally there is the risk that incremental creep of changes such as this have a long term impact on the Grade 2 listed estate. Such options should not be pursued for listed sites when other options are available. The application does not give consideration to other alternative options.
3. Risk of damage to the structure of the building - considering this structure will be affixed to the fabric of the building and not least its roof, what assessment has been undertaken for the potential for damage during the lifetime of the structure and the building?
4. Fire safety - has there been an assessment by the Building Safety Regulator, the Fire Service or any other authority responsible for fire safety in tall residential buildings? If so this is not clear.
5. Maintenance, security and amenity - residents of Cromwell Tower are liable for the cost of servicing and repair of the interiors of the lobby and lifts. I see no reason why they should bear costs associated with any damage or additional servicing of lifts and interiors associated with this commercial enterprise of which they do not benefit? What will be the access requirements and additional security risks?
6. Why is this proposed for a residential building - there are many other alternative structures in the near vicinity more suited.

Comments for Planning Application 23/01387/LBC

Application Summary

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Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Ms Katherine Jacomb

Address: 12 Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This will negatively impact a listed building. It will also cause detriment to tenants of the building in terms of wear and tear that tenants will need to pay for via their service charge. There has been no dialogue with residents either.

Comments for Planning Application 23/01387/LBC

Application Summary

Application Number: 23/01387/LBC

Address: Cromwell Tower Barbican London EC2

Proposal: The installation of 92 no. small antennas attached to new supporting steelwork, together with associated shrouding and ancillary works, on the rooftop of the building.

Case Officer: Samuel James

Customer Details

Name: Dr Harrison Glancy

Address: 172 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I am writing to object to application 23/01387/LBC: the proposal to instal 92 small antennas on the rooftop of Cromwell Tower.

My objections are:

The proposal is not in keeping with the Grade 2 Listing of the Barbican Estate. In particular, the proposals do not make it clear how the installation of this new structure will affect the appearance of this iconic building and estate. Furthermore, the materials listed for constructing the structure are not in keeping with the design of the Barbican Estate.

The building's residents and the residents of the wider Barbican Estate have not been consulted about this proposal. Installing and maintaining the new structure is likely to disrupt the lives of the building's residents, and there is no apparent benefit to them.

This rooftop is an annual nesting spot for Peregrine Falcons, protected birds whose habitat cannot be disturbed. This makes the rooftop an inappropriate site for this installation.

The installation is better suited to a non-residential building, provided that the commercial tenants have been consulted and compensated for the installation and maintenance of the structure.

Comments for Planning Application 23/01387/LBC

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Case Officer: Samuel James

Customer Details

Name: Mr Jan Demytri Szczesny

Address: 233 Lauderdale Tower London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:23/01386/FULL and 23/01387/LBC

I wish to register my objection to these applications.

Firstly, there has been no meaningful consultation with the residents of Cromwell Tower, or the wider estate. There has been no opportunity to get relevant details about the potential impact of the proposal on the fabric of the building, or its appearance when seen from other locations around the estate and beyond. In any case, placing new fibreglass structures on top of the tower is an inappropriate intervention on a grade 2 listed building.

Residents are none the wiser about key elements of the plans, including the method of installation and its ongoing impact on the people who live in the building. This is an extremely poor precedent to set for developments in a site as sensitive as the Barbican Estate, where meaningful consultation needs to be a mandatory element of any proposal.

Consequently, I urge the planners to reject these applications.

Comments for Planning Application 23/01387/LBC

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Case Officer: Samuel James

Customer Details

Name: Mr Peter Savage

Address: 213 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Cromwell Tower is a prominent residential tower located in the northern part of the Barbican Estate. Its Grade II listed status recognizes its special architectural and historic interest¹. The proposed antennae installation could compromise the visual integrity of this landmark.

The proposed antennae, contained within new GRP-shrouding, are intended to enable line-of-sight wireless internet connections between local buildings. While this technology is preferable to laying new fiber cables, we must consider the visual impact on Cromwell Tower. The rooftop measures 123 meters in height, and any additional structures should be carefully evaluated to minimize their effect on the building's appearance.

As a resident, I am deeply concerned about the cumulative impact of telecoms equipment on Cromwell Tower. The proposed shrouding may not be visible from ground level, but we must ensure that it does not compromise the tower's architectural integrity.

I urge the Corporation of London to reconsider this application and explore alternative solutions that balance technological needs with the preservation of our historic built environment. If necessary, a thorough visual impact assessment should be conducted to assess the proposed installation's effects.