



Historic England

Mr Samuel James  
City of London Corporation  
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Direct Dial: 020 7973 3764

Our ref: P01574426

20 March 2024

Dear Mr James

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CROMWELL TOWER BARBICAN LONDON EC2  
Application No. 23/01386/FULL**

Thank you for your letter of 11 March 2024 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



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## Representing the interests of Barbican Residents

Barbican Association Planning Sub-Committee  
c/o 343 Lauderdale Tower  
Barbican  
London EC2Y 8NA

Department of the Built Environment  
City of London  
PO Box 270,  
Guildhall  
London EC2P 2EJ

8th May 2024

**For the attention of Mr Samuel James, Planning (Development Management) Officer**

Dear Mr James

**Ref: Planning reference numbers: 23/01387/LBC and 23/01386/FULL; Cromwell Tower**

We are writing on behalf of the Barbican Association, a Recognized Tenants' Association representing the 4000+ residents of the Barbican Estate, to **object** to the above applications for 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*".

Our objections focus on: the damage to heritage and landscape, paucity of information provided, loss of residential amenity, potential health issues and an inadequate consultation process.

### **Damage to Heritage and Landscape**

Cromwell Tower is a key element in the Grade II listed Barbican Estate and is part of the Barbican and Golden Lane Conservation Area. Cromwell is one of three towers in the Barbican Estate whose symmetry and relationship to each other is important. Their different orientation in relation to due North is a key architectural design feature and makes their skyline view an iconic one. Indeed, they are used as staging posts for all Royal and commemorative flypasts en route to Buckingham Palace.

The proposed antennae are most definitely not compatible with the Grade 2 listing of the Barbican Estate. The regularity of these towers is part of the aesthetic of the estate and a contributor to its value. Putting a 3m+ high structure on top of Cromwell Tower will not only destroy this symmetry but it will also deface its appearance.

The applicant makes frequent reference to a successful submission to erect telecommunications equipment on Cromwell Tower in 2009. However, we would point out that that submission was approved **before** the Barbican and Golden Lane Conservation to Area was designated in 2018 and was also carried out without the knowledge of the residents. This current application neither adequately recognises the importance of the Conservation Area nor meets the Barbican Listed Building Management Guidelines (LBMG). In Volume II of the LBMG it states that "*The architectural form and character of the residential buildings is consistent and distinctive. No alteration should be made that*

would affect the silhouette, massing, volume, modelling, material character, surface, colour ...or regularity of any of the buildings”.

This application rides a coach and horses through this requirement as the installation of a 3.2m high shroud encasing 92 antennae on top of this Grade II listed tower would most definitely affect not only Cromwell Tower itself but the whole of the Barbican Estate. This blatant non-compliance with Listed Building and Conservation Area guidelines will cause clear and obvious damage to heritage and landscape and must not be allowed. Whilst the height of the surrounding “shroud” of the antennae is reported by the applicant at 3.2m, the heights of the antennae themselves are neither given nor shown. This is surely a most significant omission.

We are told that the “shroud” will be made from GRP Fibreglass which can degrade and discolour when exposed to weather. GRP is not a material that is in keeping with the rest of the Tower or the Estate and again is in clear breach of the LBMG.

The applicant claims that *“It is not anticipated that the proposed shrouding will be visible from ground-level, as it is purposely designed to be set-back from the roof-edge..... Whilst the shrouding may be visible from neighbouring towers within the immediate vicinity, the shrouding is likely to be viewed as part of the building rather than an identifiable telecommunications installation”*.

While the proposal suggests that you will not be able to see the antennae from the ground, we are not totally convinced this is in fact the case. One will definitely be able to see the “small building extension” both from the two adjacent towers, the nearby tall buildings, the approach from Whitecross Street and from the Barbican Lakeside and it will destroy the planned symmetry of the landscape. This is unacceptable. We also utterly refute the applicant’s claim that *“the shrouding is likely to be viewed as part of the building”* as that most definitely is not the case.

The applicant continues: *“...the visual impact on the rooftop, and the building itself, is considered negligible as the GRP-shrouding will allow the telecommunications to be effectively deployed on the building rooftop whilst creating the appearance of a **small building extension** on the 123m-high tower..”*

The installation of a 3.2m high shroud encasing 92 antennae can hardly be described as “a small building extension” – neither can the visual impact be described as “negligible”. The applicant may claim that *“This type of extension on a residential tower within London is not unusual”*. We would completely disagree as Cromwell Tower is not just an “ordinary” residential tower but a Grade II listed building in an historic Conservation Area. In addition, if the application were to be approved, this could set an unwelcome precedent as it could be argued that similar structures could be placed on other Barbican Towers or buildings, causing even further damage to this iconic and architecturally renowned Listed Estate.

## **Key information lacking**

The applicant provides scant information about the proposed installation and leaves many key questions unanswered. We are told that the increase in height is 3.2m and will be located in a “small area” in the centre of the upper roof Level of the building. No details as to colour, height, shape, material etc of the actual antennae are provided. *“Heights of antennas not shown for clarity”* on the submitted Elevation drawing is seemingly the only reference made to this key question. *“Not shown for clarity”??!* This lack of clarity is both concerning and unacceptable. There are also no depictions of the Tower with this “small building extension” in situ. The lack of any proper visualisation does not

allow a genuine examination of the proposer's assertion that the structure would have minimal visual impact.

There is nothing in the application about the method or length of time needed for its construction or how the required equipment would be transported to the roof. There is nothing about the frequency and timing of maintenance schedules.

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. How will this "supporting steelwork" be fixed to the roof and will this damage/compromise the fabric of this concrete building?

Cromwell Tower is now 50 years old and yet the applicant provides no assessment of the impact of this proposal on its structural integrity. The total weight of the proposed installation is not given, nor are the potential effects of adverse weather conditions, strong winds and associated noise around the top of the tower. Any damage to the roof and the structure itself would threaten both the residents of the tower and other users/visitors to the estate. The additional, but unknown, weight of the proposal has the potential to cause not only visual but also and more worryingly structural damage to the fabric of the building. Why is there no comprehensive and independent structural engineering report provided with this application to discuss the potential impact of the proposed installation on the structural integrity and safety of the tower?

### **Loss of residential amenity**

The disruption and damage that would be caused by the structure and its maintenance would have a seriously negative impact on residential amenity.

The proposals take no account of the inevitable disruption to residents during the installation. The lifts would clearly have to be used extensively during both the installation of this "small building extension" and for its subsequent maintenance. This will not only cause considerable inconvenience to residents but also additional costs in terms of wear and tear. Lifts in the tower were designed for the needs and use of the residents who live there and pay for their upkeep via their service charges, **not** for the construction and maintenance of commercial features such as this.

The proposals also take no account of the also inevitable ongoing disruption to residents in the form of e.g the noise of the wind blowing around the antennae, the possible buzzing/humming of the equipment, the potential for damage to the concrete on the roof and potential water ingress. Residents in the high-rise blocks will confirm that noise transmits itself down the towers and can vibrate and get amplified on its travels. This is yet another factor which will impact on residential amenity. We would also advise that the residents of Cromwell Tower (as well as more widely across the estate) have had problems with water ingress into the upper floors. This large fibreglass "small building extension" on the roof of the tower will inevitably affect how any water flows, and will have unknown effects on rainwater channels. This does not appear to have been considered by the applicant and is an issue which again will adversely impact residential amenity.

We note that the applicant makes no mention of any intention to pay for any damage caused to concrete, carpets, paintwork or the lifts. Hence we must assume that this is expected to be covered by residents service charges. This is totally unacceptable. Residents' homes should not be used as a convenient and cost-free construction site.

Such an installation could also affect security, particularly if contractors need frequent access to the roof. Will they be given keys to the tower or certain utility areas? Will they be able to access all of the residential parts of the building as well, thereby compromising security and further reducing residential amenity?

We would also advise that so-called Urban Explorers have managed to get onto the roof of the tower blocks, including Cromwell Tower, before. Were they to climb on the structure and cause damage, it could become unsafe and cause parts of the installation to fall. There is also no comment from the applicant if the equipment will increase the risk of fire. We would stress that there is very limited access for the Fire Brigade if a fire did occur. Indeed, were an emergency to arise, there is only one staircase in the building.

What responsibility will the applicant take for its interventions in the fabric of many residents' homes? What responsibility will the City Corporation take if these antennae damage the structural integrity of the building and/or the health of the residents? On the basis that we assume the City will charge rent for the proposed installation if it is approved, then the balance between costs and benefits is distinctly discriminating, with residents having to bear all of the costs without any related benefit whatsoever. This is also unacceptable.

### **Inadequate consultation process**

In advance of the formal planning application, no information was provided nor consultation offered to the residents closely affected by the proposal. The first indication residents were given of its existence was a notice of the Application placed on the glass panels near the entrance door of the building, just before the Easter holidays and with a short deadline for comments.

The documents supporting the application state however that local stakeholders, including the Barbican Association and the Barbican and Golden Lane Neighbourhood Forum, were consulted on 18<sup>th</sup> March. This consultation absolutely did not happen which is against the City's own policies. When made aware of this, the City finally sent out consultation letters to residents on 11<sup>th</sup> April, albeit that they were only received about a week later, around the 18<sup>th</sup> April.

Whilst we accept that the City has acknowledged that there were delays to letters arriving by post and that the date for representations was therefore extended, it is still disappointing that the process fell so short of the required consultation procedure.

### **Potential health risks**

It is hard to comment on potential health risks to residents without knowing the precise technology that is being planned, but the fact that the proposal includes a cluster of 92 antennae suggests that there are likely to be substantial levels of EM radiation from the site. This will be of considerable concern to residents, particularly those whose flats are closest to the installation and will be subject to prolonged exposure.

### **Protected wildlife**

The tops of the Barbican towers are used every year by peregrine falcons for nesting and raising their young. As we are sure you will be aware, 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. Nests and eggs are also protected.

In our view, the installation, maintenance and presence of the proposed antennae would disturb either nesting sites or sites enabling the rearing of young falcons.

## **Summary**

Cromwell Tower is the wrong place for this installation. There are no benefits whatsoever to the residents of Cromwell Tower or to the wider Barbican Estate. This type of equipment should be installed on a commercial building where there are not only no residents but the roof space is likely to be bigger and access to the lifts and stairs better, thereby allowing contractors to work when the building is either empty or less busy. A Grade 2 listed residential building in an historic Conservation Area is not the place for this type of equipment.

This application should be withdrawn or rejected outright.

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-Committee

Sue Cox – Deputy Chair, Barbican Association Planning Sub-Committee

**From:**  
**To:**  
**Subject:** FW: Ref: Planning reference numbers: 23/01387/LBC and 23/01386/FULL; Cromwell Tower  
**Date:** 13 June 2024 15:27:59

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**From:** Brenda Szlesinger  
**Sent:** Thursday, May 16, 2024 8:19 AM  
**To:** PLN - Comments <  
**Subject:** Ref: Planning reference numbers: 23/01387/LBC and 23/01386/FULL; Cromwell Tower

THIS IS AN EXTERNAL EMAIL

The Barbican and Golden Lane Neighbourhood Forum's objections to the proposed installation on Cromwell Tower are centered around several key concerns. First, we oppose these applications due to the potential damage to heritage and landscape. Cromwell Tower is a vital component of the Grade II listed Barbican Estate, and the proposed antennae would disrupt its architectural integrity and visual appeal. Moreover, the lack of information provided by the applicant to date raises doubts about the project's impact and necessity.

Concerns about residential amenity loss, including disruptions during construction and ongoing maintenance, are also highlighted. The inadequate consultation process has left affected residents across the Neighbourhood Area feeling marginalized and uninformed.

In conclusion, Cromwell Tower is an unsuitable location for such an installation and the Barbican and Golden Lane Neighbourhood Forum advocates for its REJECTION.

Brenda Szlesinger and Peter Jenkinson

Co-Chairs of the Barbican and Golden Lane Neighbourhood Forum



## Barbican Estate

Dan Sanders

Assistant Director Barbican & Property Services



Telephone [REDACTED]

Email [REDACTED]

Date 17/05/24

For the attention of Samuel James, Planning (Development Management) Officer

The Barbican Estate Office (BEO) object to the applications for 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. Ref: Planning reference numbers: 23/01387/LBC and 23/01386/FULL; Cromwell Tower. The BEO make the following comments:

Cromwell Tower is a Grade II listed building and this proposal will substantially change the appearance of the building and what is proposed contravenes Listed Building Management Guidelines.

The use of shrouding will actually change the building line adding an additional structural feature to the top level of Cromwell tower and will substantially change the appearance of the building particularly in comparison to Shakespeare's and Lauderdale's roof lines.

The BEO have concerns about the scale of what is proposed for the roof space and in practice how this could be safely installed and maintained without causing damage to the roof structure, concrete and waterproof surface which protects the tower. Installing such a forest of equipment on the roof will no doubt have a negative effect on the surface of the roof and affixing so much equipment to the roof surface could potentially cause damage and leaks into the building.

There are a small number of aerials at various points on the estate, mainly on the three towers but these are small scale in appearance and limited in numbers and are dwarfed by this proposal. Other pre-existing users of Cromwell Tower roof space would be adversely affected by the introduction of these proposed antennas and this proposal could jeopardise their use of the roof space.

Access to the roof is arranged through BEO officers, engineers and the Cromwell concierge team. Installing and maintaining 92 antennas would require regular and frequent maintenance visits potentially disrupting residents and also taking up valuable officer, concierge and engineer time in dealing with access and queries about the roof.



The tower has three passenger lifts, which are heavily used and are not fit for transporting materials, engineers and kit required for an installation of this size. Residents should not be disadvantaged in having to wait for a lift nor facing additional maintenance costs as a result of an installation of antennas on the roof. This is a residential building and not suitable for an installation such as proposed here.

Residents living in close proximity to the antennas will have concerns about the potential health risks from this installation as will members of staff who routinely need access to the roof and so will come into close contact with the proposed antennas.

Protected wildlife nests on a nearby building and also lands and uses Cromwell Tower and would be disturbed by this proposal.

The BEO don't believe that Cromwell Tower, nor the wider Barbican Estate is a good fit for a proposal such as this.