From: planning@adur-worthing.gov.uk
Sent: 14 December 2023 13:51
To: planning@adur-worthing.gov.uk
Subject: Comments for Planning Application AWDM/1560/23

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 14/12/2023 1:50 PM from Serena Stallard.

Application Summary

Address:	Telephone Exchange 1 Tarmount Lane Shoreham-by-sea West Sussex BN43 6DA
Proposal:	A proposed 2 metre extension to existing headframe, removal of 6No Antennas at existing installation, installation of 1No CSC cabinet on new concrete base, installation of 12No Antennas on existing support poles, installation of 2No 0.3m dishes at 18.7m on the existing headframes and the installation of associated ancillary equipment to aid in facilitating 5G technology. Located on the rooftop of Shoreham ATE.
Case Officer:	Gary Peck

Click for further information

Customer Details

Name:	Serena Stallard
Address:	34 Arundel Road, Eastbourne BN21 2EG

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Other
Comments:	The proposed antenna is located within Shoreham-by-Sea Conservation area. It has multiple heritage designations within the surrounding area including Listed Buildings and the Marlipins Scheduled Monuments. The Council has a duty to protect these designations under the Planning (Listed Buildings and Conservation Areas) Act 1990 There is clear visual intrusion. The proposal is obviously an industrialising and incongruous feature, with a completely unacceptable impact on the neighbouring character. Under NPPF para 206 only 'Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'

Under NPPF 117. Applications must consult with organisations with an interest in the proposed development, in particular with the relevant body where a mast is within a statutory safeguarding zone surrounding an aerodrome.
Brighton City Airport has not signed off on the safety of this proposal, as shown in the applicant's own evidence.
UK planning policy, as stated in paragraph four of PHE Guidance on 'Mobile phone base stations; radio waves' (2021 version) and reinforced on behalf of PHE by the DLA Piper Solicitors (2019), makes it clear that public exposure to radiofrequency radiations (RFR) is regulated by local authorities through its 'planning policy' which would include policy on procedural and legal compliance by local authorities.
There is a legal obligation placed on local planning authorities to consider all relevant material planning considerations arising from radio mast siting. The public health and environmental consequences of any new mast proposal must be determined through an evidence-based decision.
Frome Town Council, in Somerset, has recently turned down, with legal backing, a 5G mast on health grounds. The Frome Planning Board recognised that they were not in possession of enough evidence concerning the safety of 5G:
-"the refusal is carried. We have closed the loop. That is now a legal decision'.
Meeting minutes -"RESOLVED - refused contrary to Officer Recommendation due to concerns on the impact to public health for all ages and lack of backed up evidence of the impact to health'. (Excerpt from the meeting transcript, Frome Town Council)
The proposed mast would be sited opposite the Sunshine Day nursery. It is now well-known that children are even more vulnerable to Radio Frequency Radiation (RFR) than adults, because of their thin skulls and undeveloped brains. Studies show that they can absorb 10x more radiation than an adult.
Adverse health effects from involuntary exposure to radio-frequency radiation, if raised by members of the public as objections to the proposed siting of the radio mast, may provide more significant evidence of incompatible use than the evidence of compatibility provided by the applicant.
The LPA would determine the material planning consideration on a balance of acceptability, and after considering the likely reliability of evidence cited as demonstrating safety of the EMF exposures. LPAs would be wise to not rely solely on EMF safety reassurances provided by the International Commission on Non-ionising Radiation Protection (ICNIRP), which is a private body, some of whose members have strong ties to the Telecommunications industry. ICNIRP also seems to be suffering from what the UN Climate Change scientific body, IPCC, warned its lead scientific authors about in 2010 i.e. the tendency towards intellectual "group think" that needs to be checked.
The unreliability of ICNIRP's EMF evidence evaluation, and of their associated recommended EMF exposure limits, has been noted by Courts in the USA, Italy and Holland, as well as by academics.
LPAs have a duty to protect public and environmental health. Elected representatives have a fundamental moral duty to consider the health of the constituents they represent.
The European Parliament's STOA Committee has recently issued a report calling for a halt to the 5G rollout, based on sufficient evidence of the adverse health effects of RFR microwave radiation. They describe 5G as an experiment on the population and state that the official safety guidelines (as provided by ICNIRP) do not protect the population.
ICNIRP does not consider those with metal implants, or with metal dental braces.
Please see a recent planning case involving health considerations and siting:
https://rfinfo.co.uk/fishersgate-mast-in-brighton-quashed-at-judicial-review/
There is no evidence that ICNIRP certificate submitted with the application has considered cumulative impacts from radiation. As with Brighton Fishersgate, inadequate ICNIRP certification may lead to a successful legal challenge.
Published research shows that health effects from living near masts can include: higher levels of cancer, cardiovascular problems, diabetes, depression, anxiety, headaches, sleep problems, memory problems and blurred vision.
Thank you for taking the above points into consideration; I hope the application will be refused.

Kind regards