Gmail

Planning - <planning@adur-worthing.gov.uk>

AWDM/0375/23 | Application for determination as to whether prior approval will be required for the siting and appearance of proposed 15m 5G telecommunications monopole with two wraparound cabinets at base and associated ancillary works. | Land Opposite 214 Upper Shoreham Road Shoreham-by-sea West Sussex BN43 6TQ

1 message

John Wood [redacted] 5 April 2023 at 00:17
To: [redacted] planning@adur-worthing.gov.uk, [redacted], [redacted]

OBJECTION FROM JOHN WOOD Bridge Cottage Poolewe IV22 2JU

I object to this application. I do so because I myself have suffered ill effects from this technology where I live, and I also noted apparent signs of distress in my bees when a local mast was being upgraded. I don't want others to suffer as I have. My attention was brought to this application by a local person.

This is an unsuitable site for this application, because it is an incompatible and unacceptable use of land.

This is a built up area with many residences and businesses within 500m of the site. In particular there are: Southlands Hospital (112m), Ro-jo's Childcare (281m) , Elmcroft-Shaw Healthcare (396.33m) (see: J M Pearce, 2019, "Limiting liability with positioning to minimize negative health effects of cellular phone towers" www.pubmed.ncbi.nlm.nih.gov/31791710/). Health impacts on children must be considered (NPPF para117a). Failure to consider health implications could provide grounds for legal challenge. Brighton & Hove CC (Nov 2021) conceded a Judicial Review, and paid costs, having failed to properly follow planning law when considering a planning application for a telecoms mast near a school. "The Council failed to address the health impacts of this particular proposal and to obtain adequate evidence of the assessment of the proximity to the school and the amended proposal."

Apart from the visual intrusion, and sensitive receptors here, there are more general - and extremely serious - considerations to take into account. The technology this application serves risks serious harm to human rights, including property rights, and especially public health, and the biodiversity we all depend upon for our survival as a species. It also contributes significantly to climate change and poses a threat to national security. Risks associated with this technology are in fact uninsurable.

NPPF Paragraph 117 reminds the authority of its duty to make an informed and reasonable decision based on evidence. I here submit some evidence of actual and potential harm to people and planet alike. There can be no more important material consideration. The government has no authority to instruct a local planning authority to reject objections on public health or environmental grounds.

Much of the evidence presented here for your consideration has previously been submitted to the planning inspectorate, UK government ministers, OfCom, and the UKHSA. None of them have been able to engage with, comment on or answer any of it at all. Contrary to government advice, there is also no other legislation that adequately protects the public or addresses the environmental concerns at all. Even when presented with clear evidence of harm in the recent case at the Royal Courts of Justice, the government failed to answer it in any way. It seems that it takes no responsibility whatsoever on this and merely panders to the demands of the industry. I am not a Luddite; but where there is clear evidence of harm, this simply must be taken into account. For protection, the public has no option but to rely on the planning authority to follow the precautionary principle.

Therefore, regardless of NPPF paragraph 118, all public authorities have an overriding, primary duty to act in the public interest, and protect people and planet from harm. This duty does not cease at any current geographical boundary because the decisions reached can have implications and effect far beyond your borders. As has been shown by the case in the US Federal Courts in August 2021 (see below), the ICNIRP's standards are wholly unsatisfactory. The Government cannot therefore require a planning authority to adopt them. No certification from the ICNIRP will adequately cover effects on human health and as far as the environment is concerned, there has been no environmental assessment carried out to inform possible effects on biodiversity; while relevant nature conservation bodies appear to believe this technology is not their responsibility.

Regarding ICNIRP certification, please confirm antenna spec (power / Hz) and occupational and public Exclusion Zones with a diagram, accompanying the self certification.

Will the council follow due process and inform residents, workers, and families with children who will be inside a 50m and a 24hr 500m exclusion zone?

Further information is required about the maximum possible operational radiating output, including any cumulative effects, especially since once the ap[paratus is installed, there sems to be no further chak on increasing the pwoer as the operator pleases.

Therefore, I am asking that this matter is considered by full council, and that all those responsible for deciding this case read and digest the following, which surely must be taken into account by in reaching the 'informed and reasonable' decision required. This list is by no means exhaustive.

1. National Security

China can Weaponise Laptops Cars and Fridges for Spying, Daily Telegraph, 24 January 2023:
https://www.pressreader.com/uk/the-daily-telegraph/20230124/281505050345166

2. Human Rights and Privacy

It is completely unnecessary to provide adequate mobile phone coverage for the public. The main purpose seems to be to create the the Internet of Things – which automates and destroys jobs and services, destroys human rights and de-humanises society. It is also a form of mass surveillance and control the Gestapo would be proud of. This proposal, and all like it, should be rejected on that ground alone as against the public interest.

'Smart' Cities are Surveilled Cities
https://foreignpolicy.com/2021/04/17/smart-cities-surveillance-privacy-digital-threats-internet-of-things-5g/

3. Material Resources impacts:

The Royal Society of Chemistry tells us that the consumption and wasting of resources for use in this technology is unsustainable:
https://sustainability.rsc.org/

4. Energy Use and Climate Change

Each 5G mast requires approximately 3 x more power than a 4G mast (as much as 73 typical homes).
(www.spectrum.ieee.org/5gs-waveform-is-a-battery-vampire)

With 5G's greatly increased mobile traffic, electricity usage from telecommunications could create up to 23% of global greenhouse gas emissions by 2030; power demand would be the equivalent of 36 nuclear reactors or 7800 massive offshore wind farms worldwide. (www.mdpi.com/2078-1547/6/1/117/htm - www.wsimag.com/science-and-technology/64080-green-5g-or-red-alert).

The France, Spain and California Green Parties, the France Climate Change Council, and Greenpeace East Asia have all warned of the climate footprint of 5G. An extra 7 billion tonnes of carbon dioxide could be released into the atmosphere by 5G (www.france24.com/en/europe/20201220-deploying-5g-will-lead-to-spike-in-co2-emissions-french-climate-council-warns)

Insufficient research into energy demands of 5G: https://www.sciencedirect.com/science/article/pii/S1364032121012958

5. Human health impacts:

Stop global roll out of 5G networks until safety is confirmed, urges expert (Professor John William Frank, Usher Institute, University of Edinburgh, in the British Medical Journal). www.bmj.com/company/newsroom/stop-global-roll-out-of-5g-networks-until-safety-is-confirmed-urges-expert/

Risks to Health and Well-Being From Radio-Frequency Radiation Emitted by Cell Phones and Other Wireless Devices,
Anthony B Miller, Margaret E Sears, L Lloyd Morgan, Devra L Davis, Lennart Hardell, Mark Oremus, Colin L Soskolne, (published online by the US National Library of Medicine): https://pubmed.ncbi.nlm.nih.gov/31457001/

Fast Track to New York 5G Microwaved City http://westviewnews.org/2023/01/24/fast-track-to-new-york-5g-microwaved-city/james/

6. Environmental Impacts, including on pollinators and biodiversity

Research showing that manmade RF radiation (RFR) may be seriously harmful to wildlife, including vital pollinators such as bees:

www.sciencedirect.com/science/article/abs/pii/S0048969720384461?dgcid=author

www.emfdata.org/en/studies/detail&id=566

www.mdpi.com/2075-4450/12/8/716?&ml_subscriber=1772077450675623693&ml_subscriber_hash=s0w7

The British Ecological Society has identified RFR as one of the top emerging issues that could affect global biological diversity and conservation.

> "*Potential Effects on Wildlife of Increases in Electromagnetic Radiation*
> 'Understanding the potential effects of nonionising radiation on wildlife could become more relevant with the expected adoption of new mobile network technology (5G), which could connect 100 billion devices by 2025. During use, mobile telephones and other smart devices generate radiofrequency electromagnetic fields (RF-EMFs), a form of nonionising radiation, which may change biological processes such as neurotransmitter functions, cellular metabolism, and gene and protein expression in certain types of cells, even at low intensities [82]. The notion of risk to human health remains controversial, but there is limited evidence of increased tumour risk in animals [83]. 5G uses the largely untapped bandwidth of the millimetre wavelength, between 30 and 300 GHz on the radio spectrum, which uses smaller base stations than current wireless technology. As a result, wireless antennae may be placed densely throughout neighbourhoods on infrastructure such as lamp posts, utility poles, and buildings. This could expose wildlife to more near-field radiation. Although some studies reported negative associations between electromagnetic field strength (radiofrequencies and microwaves: 1 MHz–3 GHz range) and species, for example the density and abundance of house sparrows (Passer domesticus) [84, 85], these studies have not yielded clear empirical evidence that the observed effects are due to RF-EMFs. The potential effects of RF-EMFs on most taxonomic groups, including migratory birds, bats, and bees, are largely unknown. The evidence to inform the development of exposure guidelines for 5G technology is limited, raising the possibility of unintended biological consequences [86].'
> (www.cell.com/trends/ecology-evolution/fulltext/S0169-5347(17)30289-6)

Physicians for Safe Technology have stated that wireless radiation is being increasingly recognised as an environmental pollutant. - www.sciencedirect.com/science/article/pii/S0013935118300161?via%3Dihub

Experts have warned that RFR encourages drug resistance in microbes. - www.ieeexplore.ieee.org/document/8665432

List of studies regarding potential harm to wildlife compiled by the Environmental Health Trust, a US foundation run by the Nobel lead author and eminent environmental oncologist Dr Devra Davis - ehtrust.org/science/bees-butterflies-wildlife-research-electromagnetic-fieldsenvironment/

A field monitoring study spanning 9 years involving over 100 trees found trees sustained significantly more damage on the side of the tree facing the antenna, leaving the entire tree system prone to degradation over time - www.ncbi.nlm.nih.gov/pubmed/27552133

The journal, *Reviews on Environmental Health*, has published the final part of a three-part monograph that examines the effects of non-ionising electromagnetic fields (EMF), including wireless radiation from cell towers and EMF from power lines, on flora and fauna. This 150 page tome (plus supplements) written by B. Blake Levitt, Henry Lai and Albert Manville cites more than 1,200 references.
B. Blake Levitt, an award-winning journalist/author and former contributor to the New York Times, has specialized in medical and science writing for over three decades. Since the late 1970's, she has researched the biological effects of nonionizing radiation. Henry Lai is a scientist and bioengineering Professor Emeritus at the University of Washington and former Editor-in-Chief of Electromagnetic Biology and Medicine. Dr. Lai is best known for his research published in 1995 which concluded that low-level microwave radiation caused DNA damage in rat brains. Albert Manville is a retired branch manager and senior wildlife biologist in the Division of Migratory Bird Management at the U.S. Fish and Wildlife Service. Dr. Manville has served as an adjunct professor and lecturer for more than two decades at Johns Hopkins University where he has taught field classes in ecology, conservation biology, and wildlife management.
Part 1: Effects of non-ionizing electromagnetic fields on flora and fauna. Rising ambient EMF levels in the environment https://pubmed.ncbi.nlm.nih.gov/34047144/
Part 2: Effects of non-ionizing electromagnetic fields on flora and fauna, impacts: how species interact with natural and man-made EMF https://pubmed.ncbi.nlm.nih.gov/34243228/
Part 3: Effects of non-ionizing electromagnetic fields on flora and fauna. Exposure standards, public policy, laws, and future directionshttps://doi.org/10.1515/reveh-2021-0083

See also: Alfonso Balmori. *Electromagnetic radiation as an emerging driver factor for the decline of insects* https://www.sciencedirect.com/science/article/abs/pii/S0048969720384461

6. Legal and Regulatory concerns:

Planning legislation

Under the Planning Acts, planning authorities must come to an 'informed and reasonable' decision, based on evidence presented. They are empowered to require applicants to present assessments and mitigation proposals as necessary. Planning authorities act in a quasi-judicial role, and are legally responsible for their decisions.

They must also consider whether any subsequent monitoring and / or mitigation measures may be required to protect people and planet. If they fail to adopt the precautionary principle, and approve a development that is then found to have damaged people's health, their livelihoods or the environment those responsible lay themselves open to possible future legal action for compensation. It is worth noting here that the risks from this technology are uninsurable.

Effects to be considered must include cumulative effects where there is shared equipment or other networks in operation; usage including re-transmission by mobile devices; the differences between background and very high peak levels according to traffic, or differences in levels of pollution according to distance from the transmitter. However at present these are not being taken into account by planners.

Planning permission is also only required for the installation of new equipment. Having obtained permission, operators may subsequently raise the output as they please, without further scrutiny. This renders any 'certification' by ICNIRP or other body, completely worthless.

To rely unquestioningly on central government planning policy guidance where serious concerns are raised may be contrary to the intention of the Planning Acts, as there can be no more important material consideration in any planning application than the safety of the public and the protection of the environment. The authority has the option to refer the matter to ministers:
(legal test : "in certain circumstances there will be some matters so obviously material to a decision on a particular project that anything short of direct consideration of them by the ministers ... would not be in accordance with the intention of the Act" (Landmark Chambers, Re Findlay at [334])).

The ICNIRP

The ICNIRP is the body that all UK policy in this area depends on. It deals only with human exposure levels (not environmental risks which have not been assessed at any stage). Their recommended maximum levels have been rejected by several major countries, including Russia and India, as well as a growing number of city authorities around the world, and in August 2021, by a US Federal Court:
Decision by US Federal Court of Appeals , District of Columbia Circuit, Argued January 25, 2021 Decided August 13, 2021 No. 20-1025 Environmental Health Trust, Et Al., Petitioners V. Federal Communications Commission And United States Of America, Respondents (https://www.cadc.uscourts.gov/internet/opinions.nsf/FB976465BF00F8BD85258730004EFDF7/$file/20-1025-1910111.pdf

See also:

Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G (International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF)Journal of Environmental Health https://ehjournal.biomedcentral.com/articles/10.1186/s12940-022-00900-9)

Both the European Parliament (in its resolution 2008/2211(INI)) and the Council of Europe recommend lowering the exposure limits based on the ICNIRP opinions. The Council of Europe in its Opinion of 6 May 2011 on health risks associated with electromagnetic fields (12608)

> "29. The rapporteur underlines in this context that it is most curious, to say the least, that the applicable official threshold values for limiting the health impact of extremely low frequency electromagnetic fields and high frequency waves were drawn up and proposed to international political institutions (WHO, European Commission, governments) by the ICNIRP, an NGO whose origin and structure are none too clear and which is furthermore suspected of having rather close links with the industries whose expansion is shaped by recommendations for maximum threshold values for the different frequencies of electromagnetic fields."

Certification by the ICNIRP is therefore no guarantee of safety. This is all the more so as each certificate refers only to the application under consideration. No account is taken of cumulative effects of RF radiation when combined with other sources – for example other nearby networks and equipment, including wifi or emergency networks the public may not be aware of.

OfCom

OfCom have told me, in response to enquiries, that they do not accept any responsibility for environmental safety, referring enquiries to the Environment Agency (who in turn deny any responsibility in this area) and to the UKHSA,

who repeatedly fail to answer any enquiries. OfCom do apparently sometimes carry out cursory checks on a very small sample of sites, for human health impacts, but these appear to be mere window dressing with little real validity; and are based on frankly worthles ICNIRP guidance (see above).

Nothing, it seems, is permitted to delay the rapid and coercive rollout of this technology. In fact operators may be given Code Powers by OfCom to override any objection, even property rights.

Other regulators

At least some of the evidence presented here has been submitted to the Medical Officer of Health for Scotland, the UKHSA, Nature Scot, The Scottish Public Services Ombudsman, the UK and Scottish governments: and representatives of the industry for comment. None of them has been willing to acknowledge, let alone engage with any of the material, or comment in any way: every enquiry is referred to others.

See also: The outcome of the recent *legal action against 5G* in the Royal Courts of Justice can be found at: https://actionagainst5g.org/

7. Further general and background resources:

Arthur Firstenberg, 2020, *The Invisible Rainbow* (https://blackwells.co.uk/bookshop/product/The-Invisible-Rainbow-by-Arthur-Firstenberg/9781645020097)

Katie Singer, 2014, *An Electronic Silent Spring* (https://blackwells.co.uk/bookshop/product/An-Electronic-Silent-Spring-by-Katie-Singer/9781938685088)

Safe Tech International https://safetechinternational.org/

Environmental Health Trust https://ehtrust.org/about/

World scientists' international appeal https://www.5gspaceappeal.org/

Thank you for this consultation. You may publish this response if you wish.

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