Objection to planning application AWDM/1209/21

1 message

spencer chapman <[redacted]> 30 July 2021 at 15:39
To: "planning@adur-worthing.gov.uk" <planning@adur-worthing.gov.uk>

Dear Peter Barnett,

As an Adur resident and a parent of a child who uses Buckingham Park I strongly object to the above application for a new mobile mast on the verge along Upper Shoreham Road. It will be located too close to areas where children spend long periods of time, namely a nursery, a playgroup and two primary schools.

Adverse Health Impacts

I believe the location of the monopole is too close to residents and the local school given the known negative health outcomes from exposure to RFR. I am not going to list scientific papers showing this as other objectors have already provided ample examples. I will however share one statistic of note from the **December 2018 Lancet Planetary Health Journal entitled 'Planetary electromagnetic pollution: it is time to assess its impact':** "A recent evaluation of 2266 studies.....found that most studies (n=1546, 68.2%) have demonstrated significant biological or health effects associated with exposure to anthropogenic electromagnetic fields." The article goes on to say: "This weight of scientific evidence refutes the prominent claim that the deployment of wireless technologies poses no health risks at the currently permitted non-thermal radiofrequency exposure levels."

Children are More Vulnerable

By nature of their physical differences to adults children are more susceptible to RFR. Even if non-thermal effects are discounted children will be more adversely effected thermally to exposure of microwave frequencies. They have a greater surface area to volume ratio thereby resulting in a greater energy absorption compared to adults. A child of 20kg has about 50% more surface area per kg than a 75kg adult. The basic restriction values provided by ICNIRP do not take into account different body morphologies and this one size fits all approach is imprecise at best and negligent at worst. In a February 2008 paper by E Conil et al. entitled **'Variability analysis of SAR from 20 MHz to 2.4 GHz for different adult and child models using finite-difference time-domain'** voxel models of 5 and 8 year olds exceeded ICNIRP basic restrictions by 25% and 8% respectively for an incident power equal to ICNIRP reference levels, ie 10 W/m2 at 2 GHz. Therefore the ICNIRP basic restrictions cannot be relied upon when it is children on the receiving end of RFR.

Precautionary Principle Enshrined in Law

The European Electronic Communications Code (EECC) was brought into UK law in December 2020. Contained within are recitals and articles relating to 'competent authorities' making public health an imperative. Since local authorities are resposible for RFR exposure through planning powers, the council becomes the aforementioned 'competent authority'. The precautionary principle should be applied as the EECC refers to the European Council recommendations 1999/519/EC, which state in paragraph 19: "the Member States should take note of progress made in scientific knowledge and technology with respect to non-ionising radiation protection, taking into account the aspect of precaution, and should provide for regular scrutiny and review with an assessment being made at regular intervals in the light of guidance issued by competent international organisations, such as ICNIRP" Therefore guidance other than ICNIRP can be considered.

ICNIRP Self-certification is not Adequate

Another point I wish to make is that even if the RFR levels are below ICNIRP guidelines a classroom of young people will likely have a number of handsets connecting to the mast. This additional RFR could,

when added to the incoming signal, take the power density level in parts of the room over the safety threshold.

I also think it is important to note that several countries employ precautious lower power densities than those in the ICNIRP guidelines. Italy for example is 1 W/m2 generally and 0.1 W/m2 around schools, 10x and 100x lower than ICNIRP respectively.

I do not feel it is right to allow a commercial company to self certify that their equipment complies with safety rules. In almost all other areas of health and safety some form of independent inspection or certification is required, building control being one that springs to mind.

Justification of Need

The area has sufficient coverage of 3G/4G and I believe there is no great demand for even faster mobile download speeds. Given that there are two masts about 125m from this proposal how can it be necessary to erect a new monopole? Improvements in the fibre broadband network should be the priority for a more connected community.

Future Council Income Stream Not Guaranteed

Under changes to the electronic communications code many land owners are seeing a dramatic drop in rental income from masts on their property. The council could see its income severly impacted by these reforms. In effect greater profit for the telecoms firms will come at the expense of council cuts. Is this something

In conclusion this is simply experimental technology being proposed on a site against the wishes of many local residents and parents. For the reasons given above and many more that time and space do not allow to be laid bare I believe this application should be rejected.

Kind regards,

Spencer Chapman