

16 January 2026 at 12:49

To: Support Planning <support.planning@adur-worthing.gov.uk>

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----- Forwarded message -----

From: **Judith Reid**

Date: Fri, 16 Jan 2026 at 11:37

Subject: OBJECT to AWDM/1596/25

To: planning@adur-worthing.gov.uk <planning@adur-worthing.gov.uk>

Cc:

I am writing to **OBJECT to AWDM/1596/25**

Application for Prior Approval for installation of a replacement telecommunications base station comprising 20m high monopole (5G), wrap-around cabinet, supporting 9no. antennas and 2no. 300mm diameter transmission dishes and ancillary development thereto.

Telecommunication Site Bn0914

North Of Durrington Community Centre [2 Romany Road Worthing West Sussex BN13 3FJ](#)

My full name and address = JUDITH REID, 32, Deepdene Vale, Dorking, Surrey, RH4 1NL

The proposed mast is for 4G/5G. As the rollout of 4G/5G is a national policy and hence a national issue, this mast concerns locals and non-locals alike.

Note: **anyone can comment on a planning application** - see the Planning Practice Guidance on Consultation.

As this is a new mast, please ensure it is treated as a Prior Approval application which should be fully adjudicated as any other planning application under the Town and Country Planning Act 1990. According to 'Changes to permitted development rights for electronic communications infrastructure: technical consultation' of 7 March 2022, paragraph 10, all new masts still require the Prior Approval of the LPA, and community views should be considered.

This application is to introduce 5G into the area. 5G has been demonstrated to cause adverse health effects in real life 5G case studies. (See below for more details)

It is now well known that individuals with metal implants and AIMDs (active implantable medical devices) are NOT covered by the safety certificate (ICNIRP).

Both these points are of huge concern, especially considering the proximity to residential property.

See below for more details.

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SITING and APPEARANCE

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Immediately to the east of the proposed site is a heavily residential area.

Telecoms installations, antennae, etc are overbearing and unnerving. For many people, including myself, they cause anxiety and stress. The impact of this proposal on the health and well-being of locals (including fear and anxiety of harm) is a material planning consideration, which should be taken into consideration.

Telecoms apparatus is an industrialising feature incongruous with residential neighbourhoods and would have a harmful impact on the area.

At 20m high, it would be overly prominent and clearly visible, and particularly so from properties directly opposite.

Being visible also means that it is a constant reminder to those in the immediate area of its presence which can cause stress.

The proposed site is within 500m of 'sensitive receptors' (all distances given are approx)

All houses and their occupants (including “sensitive receptors”) in that area would be well within 500m.

Of particular concern

** House on Romany Rd, immediately opposite the proposed site. Closest just 33m away.

** Durrington community centre, 33m away. This is used by vulnerable young children and the elderly, both of which are deemed “sensitive receptors”.

** Flats at Columbia House, the closest being 74m away.

** Tesco petrol station (105m away), where employees would be subjected to emissions throughout their work day.

** Tesco supermarket (275m away), where employees would be subjected to emissions throughout their work day.

** Hawthorns Nursery School – 300m; Hawthorns Primary School - 310m; The Laurels Primary School – 430m, all with pupils deemed “sensitive receptors”.

This is an **INAPPROPRIATE and INSENSITIVE siting** as it is FAR TOO close to dwellings as well as the community centre,

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The distance of 500m is of particular interest after the New Hampshire Commission (and now Bill) recommended a setback of this distance for telecoms installations from residences, schools, and businesses. **Please see below for details.**

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IT IS quite frankly disgusting that anyone should think that this would be acceptable. Please see below for further concerns on distances from the mast.

I would further add that with the evidence of potential harm stated below, it would be unethical were it to be approved.

Would the CEOs of MBNL, EE Ltd & H3G UK Ltd, or any member of government pushing the rollout be happy living so close? Would THEY enjoy such a view or

wish to live with the uncertainty of just how safe / dangerous these installations really are? I think not.

A home should be a sanctuary for EVERYONE, but particularly for children.

Children are deemed sensitive receptors at school, and this should apply at home too. Likewise, pre-school children and pregnant women are equally vulnerable at home and elsewhere.

Elderly individuals are also considered “sensitive receptors” and more likely to have metal implants (e.g. knee or hip replacements). Individuals with metal implants are not covered by ICNIRP guidelines (see below).

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The proposed site would be close to mature trees.

Trees have a calming influence on people’s mental wellbeing. Telecoms apparatus has quite the opposite effect. There is also concern for the health of any trees that would be close to the proposed mast. This is discussed later. (see Plants and Wildlife).

To call it “screening” is a bit of a joke, but any such “screening” provided by the trees would only be at the lower levels AND would be seasonal. During the autumn and winter months, there is a natural die-back which means that screening would be reduced substantially for almost half of the year.

The cabinets would cause unnecessary clutter degrading the look and feel of the place. Cabinets are known to attract graffiti, which would further upset the appearance of the locality.

The size and impact of this development is contrary to NPPF (2024) paras 129 & 131 which aims for well-designed, beautiful places, sympathetic to its history and character, and engagement with community representation.

It is contrary to Code of Practice Para 22 and 28, with the siting of the proposed mast representing a discordant, intrusive feature to the character of the surrounding area. Local residents could well find their enjoyment of a peaceful life

in their own homes replaced by anxiety and distress over the harmful effects of radiation and the alien presence so close to their homes. Many people throughout the country have already found their lives suddenly catapulted into a stress-fest when similar installations have been put up.

The NPPF and ICNIRP as GUIDELINES ONLY

Please note that all public authorities have an obligation and duty to act in the public interest and protect people from harm.

Furthermore, there is **NOT a single study to support** the radiation from this technology being safe **for any human over their lifetime**.

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It can also not be emphasized enough that

both the NPPF and ICNIRP are GUIDELINES only and NOT legislation.

As asserted by Lord Gill in the Supreme Court judgment in *Suffolk Coastal District Council v Hopkins Homes Ltd* [et.al](#), ***'the guidance given by the Framework (the NPPF) is not to be interpreted as if it were a statute. Its purpose is to express general principles on which decision-makers are to proceed'***

The NPPF is just another material planning consideration and should be considered no more or less important than any other.

In addition, the whole of the NPPF (not just section 10) applies to telecoms applications, and hence the paragraphs on health are just as valid for telecoms as for any other type of application.

Therefore, rather than solely focusing and relying on the isolated paragraph (123, NPPF 2024), equal weight should be given to all paragraphs of the NPPF.

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ICNIRP guideline's SPECIFIC EXCLUSIONS

** The ICNIRP Guidelines (2020) specifically excludes individuals with any metal implants or active implantable medical device (AIMD) in their body.

This was acknowledged in the appeal (13th March 2025, CA-2024-001169).

“Compliance with the ICNIRP Guidelines therefore tells one nothing about the specific risk of harm which may potentially be caused by EMFs unintentionally interfering with active implantable medical devices. That risk is recognised in the Guidelines, but deliberately not addressed in them.”

(See below for further details on this.)

ICNIRP states that the effect of RFR inside the body is unpredictable when metal implants are present and that people with "implantable medical devices" and "metallic implants" in the body are "outside the scope of these guidelines".

This includes pacemakers, defibrillators, cochlear implants, dental implants, hip replacements and many more.

For anyone who falls under the above categories, this can cause fear, anxiety, and distress. As such, these constitute a material planning consideration on the grounds of siting.

Further, the UK Health Security Agency (UKHSA) has stated in a response to an FOI that anyone with an AIMD *should* be protected if they respect the ICNIRP public exclusion zones around masts.

This indicates that AIMD users should have ready access to such information and yet applicants do not publish exclusion zones to the LPAs or public and in fact there is a resistance to doing so, as illustrated below. (STROUD application)

APPEAL (Cheltenham Council) (13th March 2025, CA-2024-001169)

NPPF (2024) Para 123 (prev 118), & the Judicial Review / Appeal Judgements - Cheltenham Council / Thomas

The Judicial Review (AC-2023-CDF-000079) against Cheltenham Council concerned a mast situated close to a block of flats and care home, and the LPA's

role in granting approval for the mast application without giving adequate consideration for the health impacts on a resident with metal implants.

In May-2024, Judge Jarman* ruled, in relation to the care home, that the existence of a Declaration of Conformity (ICNIRP certificate) was not sufficient with regard to those with metal implants.

“The failure on the part of the authority to grapple with potential impacts on medical implants was, in my judgment, an error and this ground succeeds”

This was upheld in the subsequent appeal [Cheltenham Borough Council lost their Appeal on 13-March-25, CA-2024-001169 (Justices Andrews*, Asplin*, Jackson*)]. _

“I consider that the Judge was right to identify that the Planning Officer fell into error, ...”

** Please note that these names are an important part of the public record and should not be redacted.*

With respect to NPPF (2024) Para 123 (referred to in the appeal as 118, as the Judicial Review had used the 2023 version) which states that the LPA cannot set health safeguards different from those set by ICNIRP,

The appeal judgement stated

“...the possibility of interference by EMFs with medical equipment or medical implants is a different consideration from the effect of EMFs on the health of the population at large (or even from their effect on the health of those who, like the elderly, may be particularly vulnerable).”

It also states

“Compliance with the ICNIRP Guidelines therefore tells one nothing about the specific risk of harm which may potentially be caused by EMFs unintentionally interfering with active implantable medical devices. That risk is recognised in the Guidelines, but deliberately not addressed in them.”

“The Planning Officer was labouring under the misapprehension that by reason of paragraph 118 of the NPPF, a certification of compliance with the ICNIRP Guidance was a bar to his even considering whether the concerns raisedabout the impact of EMFs on pacemakers and other implants were relevant and should be specifically addressed when deciding whether prior approval should be required, and that was the reason why he disregarded them.”

“.....instead of believing that he was obliged to disregard the material before him because of his misreading of paragraph 118 of the NPPF, he should have appreciated that he had a choice.”

I was present at the court hearing of the Judicial Review and Judge Jackson said

“Either it's important or it's not, irrespective of objections mentioning it. People have implants.”

In summary, the Court of Appeal clarified the legal framework for LPAs when considering the potential impact of EMFs on medical implants. In particular, the importance of (a) distinguishing between general health concerns and specific risks (to medical implants) which require separate consideration and (b) exercising discretion in evaluating objections concerning the latter.

STROUD – APPLICATION (S.24/1123/FUL) and APPEAL (APP/C1625/W/25/3360512)

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In August-2024 an application in Stroud (S.24/1123/FUL) documented at length such a scenario. There were 3 locals, with metal implants, living / working close to the site. Acting in accordance with paragraph 122, the LPA requested additional information regarding power output and exclusion zones. The applicant/agent refused to supply this info.

Refusal to disclose information raises questions as to why such data should be withheld and raises concerns as to the validity of the ICNIRP certificate issued, if key data used in determining safety is not forthcoming.

Why is such information not readily available? This lack of transparency casts doubts on the validity of any ICNIRP certificate.

Excerpts from the Officer's Report

“Insufficient information has been submitted in relation to the benefits of the upgrade over the existing and proposed infrastructure performance as well as existing and proposed output and exclusion zones in relation to EMFs, to enable the LPA to understand the full benefit and potential harm of the proposed

development. The applicant/agent refused the LPA request for this additional information."

And

"It is reasonable given the sensitivities of the site due to more vulnerable members of the public in such proximity to the proposed upgraded mast location, for the LPA as to seek comparison details, which can then be shared publicly. The LPA are acting in accordance with paragraph 122 in requesting information on planning grounds rather than specifically imposing health safeguards, as it is seeking a comparison between the current and proposed details due to the proposal being an upgrade to enable understanding of any potential impact, if any."

This decision was UPHELD by the Planning Inspectorate when the subsequent planning appeal (APP/C1625/W/25/3360512) was dismissed on 15 July 2025

Excerpts from the Planning Inspectorate's Report

Para 12: *"The Council's concerns relate to nearby users and residents who have medical equipment that could be affected by electromagnetic fields "*

Para 17: *"Due to the particular circumstances of this case, including its location and proximity to individuals with medical devices, I cannot be certain that the proposed development would not have a harmful impact on individuals with medical devices."*

BEARE TRADING ESTATE, EXETER APPEAL (APP/U1105/A/04/1137356)

Original application = RC/JH/7/22/03/V0003/720)

Appeal Ref. APP/U1105/A/04/1137356 refused 27 MAY 04

The application proposed a replacement of an existing 15m monopole with a new 15m monopole.

Appeal - Excerpts only

"The more fundamental difficulty I have with the project is my inability to properly consider, assess and explain the potential health effects on local people. This is all the more important when there are such high levels of anxiety amongst nearby

residents expressed in the representations. There are also specific allegations of harm to health although these are not supported by medical evidence to demonstrate a link with the masts. Although I have a certificate stating that the ICNIRP Guidelines would be complied with for the proposed mast, and PPG8 advises that ICNIRP compliance should be sufficient assurance for a favourable decision to be made on the application from a health viewpoint, I nevertheless feel it right that the impact of the radio emissions should be properly explained and understood.”

*“To illustrate this lack of evidence, I have no comprehensible data on radiation levels from the proposed (and other) mast as they affect the surrounding land and buildings in order to assess the potential impact on occupiers of houses, offices and industrial businesses. I have only the most basic technical information and not, for example, predicted radiation levels at relevant points of interest, calculation or estimation of power losses or the likely power output profile of the mast. There is no attempt by Vodafone to explain or counter the results of the AcoustiCom monitoring carried out by local residents which clearly gives effect to their worries. The evidence submitted does not allow me to carry out the appraisal exercise expected by the High Court in *Skelt v First Secretary of State & Three Rivers DC & Orange PCS Ltd* [C0/2466/2003].”*

“Overall I conclude that the high level of anxiety amongst local people is of sufficient weight that approval for siting the proposed mast should not be granted without more and better information, and particularly a competent assessment of the likely effects of the project on the health of local people.”

GUNNING PRINCIPLES

GUNNING PRINCIPLES (Case law), state that **a consultation is only legitimate when** the four GUNNING principles are met:

Specific to this case is Principle #2

The consultation is only legitimate when **“there is sufficient information to give ‘intelligent consideration’** The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response.”

CONSIDERATIONS for THIS APPLICATION

The Stroud application / appeal relate to a case where objections were received from individuals living / working close to the site who had medical implants. The Beare Trading Estate relates to high levels of anxiety (over health risks) of nearby residents.

Please NOTE: Most people are unaware of the potential risk and gaping hole in the ICNIRP guidance (i.e the specific exclusions) and would not even know to “declare” their medical status in relation to a planning application. We therefore cannot assume that absence or paucity of objections from locals with such devices reflects the actual number of locals who fall within this excluded category and therefore the potential risk of installing any RFR equipment at the proposed site.

Furthermore, one of the Judge’s said at the Cheltenham appeal hearing “Either it’s important or it’s not, irrespective of objections mentioning it. People have implants.”

Surely this is common sense.

The onus should not fall on individual members of the public who happen to live / work in the vicinity of a planning application site to do hours of research in order to determine their "informed" opinion on an application.

Nor should it fall to a member of the public (such as myself) to alert those in the vicinity of such a site that they need to declare their medical status in respect of metal implants and AIMDs. This should fall squarely within the LPA’s responsibilities (as per Gunning and EECC law).

Would you not agree that the public deserve to know whether they are covered by a safety certificate or not?

What attempts have been made to notify individuals living / working in the nearby properties of the specific exclusions to ICNIRP guidelines?

All the above would indicate a BREACH of the GUNNING PRINCIPLES (in particular, principle #2).

I request that the LPA

** obtain and make available the technical details about the proposed apparatus, including the power potentials of the 5G non-isotropic antennae in dbm. the power drop-off over distance in relation to the ICNIRP guidance in 1mw/cm2, and exclusions zones, in line with the recent court cases which are pointing out that people with metal implants and AIMDs are not covered by the ICNIRP guidance which councils are relying on for safeguarding the health of its residents.

** notify households / businesses near to the site about the ICNIRP specific exclusions.

** notify the public at large by appending a suitable notice at the site

Unless some sort of local risk assessment has been performed to demonstrate the contrary, it is highly likely that the ICNIRP certificate does not cover a large proportion of the local residents. Such people are particularly vulnerable and need to be afforded extra protection under the council's obligations within the Health and Social Care Act 2012. If there is no disability impact assessment in relation to this technology, it could be argued that provisions of the Equality Act 2010 may well have been broken.

It cannot be stressed enough that individuals with metal implants are specifically NOT covered by the ICNIRP certificate. What guarantee of safety from harm does the applicant give to those individuals?

FURTHER INFO on the ICNIRP certificate

** Self-certification is the telecom company certifying itself, which is **a conflict of interest.** Surely, it is common sense that a self-certified safety declaration (rather than one produced by an independent and accredited body) does little to instil confidence or allay concerns. Such a document unchecked by an independent body, is UNRELIABLE.

** Both ICNIRP and OFCOM state that they do not issue certificates or verify / guarantee the safety of any device or installation and therefore do not verify any such self-certified certificate. This is clearly stated on both websites.

** The application lacks transparency. The document declares that the proposed equipment and installation will comply with ICNIRP but does not include the calculations used to draw that conclusion.

** ICNIRP guidelines (2020) only cover HUMANS, NOT animals, plants or the environment. This is a concerning omission as pollinators are in a drastic decline. Studies have also shown that trees are adversely affected by EMFs.

** ICNIRP guidelines only protect against THERMAL effects, not non-thermal effects. There are now thousands of studies showing adverse, NON-thermal effects to human health, at well below the ICNIRP limits.

** The International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF) challenged the safety of current wireless exposure limits to radiofrequency radiation (RFR) and called for an independent evaluation.

FURTHER CONCERNS

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There are now thousands of studies showing harm to humans and wildlife from 2G – 4G, but the more recent real-life 5G case studies (6 published in 2023, 2 published in 2024 so far) from Sweden (Hardell and Nilsson) demonstrate, without a shadow of a doubt, that 5G most definitely causes harm to humans, at levels below those given in the ICNIRP guidelines. (See sources.) The cases covered individuals living / working close to 5G antennae as well as a family holidaying close to one, and a young 8yo boy who suffered severe symptoms at school.

Symptoms included severe headaches, tinnitus, nosebleeds, insomnia, anxiety, memory loss, irregular pulse, skin rashes, burning skin etc.

The distances from the antennae ranged from 5m to 125m (2023 cases); just under and over 500m (2 base stations), and 285m (2024 cases). **These are similar distances to those in this case.**

I appeal to you as a fellow human, to read the short summary of findings which I have included at the foot of my letter.

I have also included studies wrt 4G installations.

Swisscom (telecoms company) made the patent application WO2004075583A1 and disclosed the **carcinogenic nature** of the associated EMF/RF radiation. It also states that the carcinogenic effects are non-thermal, whereas ICNIRP covers only thermal effects.

Further evidence of genetic changes / **carcinogenic effects** was published in July-2024 (“**Cell Tower Radiation Linked to Genetic Changes in Nearby Residents**”) (See sources)

The WHO published a systematic review paper in April 2025 **confirming a link between EMF and cancer in animals** ‘Effects of Radiofrequency Electromagnetic Field Exposure on Cancer in Laboratory Animal Studies’ (Mevisen et al.) (See sources)

It was concluded with high certainty that chronic exposure to RFR causes cancer in the brain (gliomas) and in the heart (schwannomas). Such high-quality animal evidence is considered a sound predictor of cancers in humans.

An increasing number of people are now suffering with EMR-S (Electromagnetic Radiation Syndrome, aka EHS – Electro Hypersensitivity) which is being exacerbated by the growing number of electronic devices, masts, hubs etc which are becoming ubiquitous. Their day-to-day lives, trying to do normal activities such as shopping (or sometimes even in their own homes), is becoming a stressful and unpleasant, and in some cases, impossible, experience.

EMR-S / EHS was recognised by the tribunal court decision for a schoolgirl who needed a learning environment free of all wifi / mobile connectivity. See sources.

A research paper by Paul Hensinger and Bend I Budzinski (2024) entitled “Why electrohypersensitivity (EHS) is a biologically expected reaction to harmful radiation” explains how the body is affected. (See sources)

If we continue to roll out 5G (and also 4G), ignoring the veritable elephant in the room and the genuine concerns of the public, who are rightly worried about the harm these structures will do to their health, then we are heading for a national health crisis in the near future.

Despite, reassurances from the government and telecoms alike, the public are now becoming increasingly aware of the scientific studies which show adverse health effects caused by EMFs at levels well below ICNIRP guidelines. The case studies, mentioned above, not only highlight the reason why members of the public ARE indeed anxious (which is a material planning consideration) but also highlight the need for caution.

Is there an Environmental Impact Assessment? Under Environmental Law and the ruling against Surrey County council **Finch v Surrey County Council** [2024] EWCA Civ 187 that emphasised the importance of public participation in environmental decision making, which is an objective not only of the EIA Directive but also central to the Aarhus Convention; the Court identified two issues in relation to public participation, namely: increasing the democratic legitimacy of environmental decision, and serving an educational function. **An EIA should include the effects of the radiation emitted from all the antennae on the proposed mast (which can be regarded as effluvia or as a pollutant) on public health.**

PLANTS and WILDLIFE

The council should conserve and enhance the natural environment as per The National Planning Policy Framework (NPPF) (2024) - section 15.

As mentioned above, ICNIRP makes NO provision for Wildlife and plants in its guidelines.

In view of Biodiversity Net Gain, the impact on plants and wildlife needs to be considered.

It is interesting to note that loss of biodiversity and wildlife on both Mt Nardi in Australia and on Samos (see below sources) occurred in areas where 4G masts had been erected.

Both record DRAMATIC declines in both volume and species type.

Of particular concern is the detrimental effect of EMFs on pollinators.

5G can cover miles as documented in the INDUSTRY article by NOKIA

- For low band: *“Wireless carriers could serve thousands of customers within hundreds of square miles with just one tower.”*
- For mid-band: *“it can carry plenty of data while traveling significant distances.”*

Therefore, the impact of this mast could be far-reaching (from 4G and 5G).

The site is close to mature trees. Could any be damaged during groundwork? Any harm to the root structure would threaten the health and longevity of these trees over time. Once up and running, further harm could be done to the trees from radiation. Studies have shown harm to trees by EMFs, and this should also be taken into consideration. See sources for more information.

Trees provide a very positive contribution to the character and appearance of the local area benefiting the mental health and wellbeing of local residents. As such, they should be protected at all costs.

The trees may produce some screening during summer/spring but come autumn/winter, vegetation dies back, and therefore the mast would be more visible during that time.

LEGAL ISSUES

All public authorities have an obligation and duty to act in the public interest and protect people from harm.

There is **NOT a single study to support** the radiation from this technology being safe **for any human over their lifetime**.

Too much reliance is made on NPPF (2024) Paragraph 123 which states that they cannot set health safeguards different from those set by ICNIRP, but please note that

both the NPPF and ICNIRP are GUIDELINES ONLY, NOT STATUTE.

As asserted by Lord Gill in the Supreme Court judgment in *Suffolk Coastal District Council v Hopkins Homes Ltd et.al*, ***‘the guidance given by the Framework (the NPPF) is not to be interpreted as if it were a statute. Its purpose is to express general principles on which decision-makers are to proceed’***

The NPPF is just another material planning consideration and should be considered no more or less important than any other. The whole of the NPPF (not just section 10) applies to telecoms applications, and hence the paragraphs on Health are just as valid for telecoms as for any other type of application.

This means that councils ARE free to investigate health issues, and there are cases where health has been taken into consideration, such as in Mendip.

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Mendip Planning Board refused a 5G mast application (2021/1951/FUL) in March 2022 on health grounds despite the Case Officers recommendation to approve it. The Meeting minutes record the refusal: "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". The planning application was then withdrawn by Telecoms, and the "decision notice" on the portal only records the withdrawal. A copy of the minutes is available on request.

Please note that refusing an application for a specific mast in a designated place is not the same as setting different standards.

Setting different standards would entail creating a new standard for every mast application throughout the borough.

The adjudication of a single application is about the validity and suitability of that application with its specific mast/antennae at the proposed site.

In addition, there is the issue of liability for future litigation.

The solicitor for the campaign group "Stop 5G Bath" received a letter from PHE's own solicitors, DLA Piper, (dated 08-Aug-2019) which exempted PHE from all liability in the event of future legal action relating to health effects from 5G if their guidance should turn out to be incorrect or misleading. In this letter they state: **"A public body must determine how much weight to put on the PHE guidance. Equally that body must determine what other evidence from your client or other members of the public or interested parties to consider in making any decision. If it be alleged that a public body now or in the future acted unlawfully in placing reliance on the guidance, that cannot retrospectively taint the guidance with illegality."**

"PHE's lawyers advise public bodies to balance PHE's guidance with evidence from other sources i.e. not only from ICNIRP. This contradicts the government's own planning regulations which require local authorities to adhere strictly to

ICNIRP's guidelines... This gives no choice to public bodies about accepting a potentially catastrophic risk."

5G health effects are uninsurable and at the same time recognised by reinsurers as a high impact risk with regard to future litigation.

Lloyds of London has refused to insure against health effects from all wireless technology since 2010 (Exclusion 32) and there are currently no insurers in the world who will cover this.

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5G is rated a high impact risk by reinsurers Swiss Re in their Emerging Risks Report (May 2019) which states: "To allow for a functional network coverage and increased capacity overall, more antennas will be needed, including acceptance of higher levels of electromagnetic radiation. In some jurisdictions, the rise of threshold values will require legal adaptation. Existing concerns regarding potential negative health effects from electromagnetic fields (EMF) are only likely to increase. An uptick in liability claims could be a potential long-term consequence..."

"As the biological effects of EMF in general and 5G in particular are still being debated, potential claims for health impairments may come with a long latency."

*These are referred to by **Wera Hobhouse (MP for Bath) in her letter to DCMS (Feb-2020)***

More information and sources available on request.

The insurance industry clearly recognises that potential claims for health impairments may come with a **long latency**. Cases of Cancer Clusters (and other serious adverse effects) are now being recorded in areas in which a mast was installed, approx. 5 – 7 years ago. If this was to happen in your area – who then would be responsible?

Verizon (US-based telecoms company, with offices in the UK) makes provision in their statutory accounts for potential claims regarding the effects of EMF radiation (aka RFR). Would they do so if they were sufficiently indemnified by their insurance policy?

As mentioned earlier, Swisscom (telecoms company) made the patent application WO2004075583A1 and disclosed the **carcinogenic nature** of the associated EMF/RF radiation. It also states that the carcinogenic effects are non-thermal,

whereas ICNIRP covers only thermal effects. Further evidence of genetic changes / **carcinogenic effects** was published in July-2024 ("**Cell Tower Radiation Linked to Genetic Changes in Nearby Residents**") (See sources)

EECC

The requirement for Local Authorities to reconcile the risks to environmental and public health consequences from radio frequency emitting infrastructure is embedded within the European Electronics Communications Code (EECC).

There is a current challenge to the UK government concerning their policies that constrain LPAs blindly accepting an ICNIRP declaration of conformity. (Case Z2309835, filed 12-Sep-2023)

The council, **as a competent authority under EECC law** (which is enshrined into UK law), have an obligation to follow EECC recitals 106 and 110 as well as EECC Article 45 2(h)

EECC recital 106: "competent authorities should seek to reconcile the environmental and public health considerations in question, taking due account of the precautionary approach set out in Council Recommendation 1999/519/EC"

EECC recital 110: "the need to ensure that citizens are not exposed to electromagnetic fields at a level harmful to public health is imperative"

EECC Article 45 2(h): "promote the harmonisation of use of radio spectrum by electronic communications networks and services....(pursuing objectives including)...consistency and predictability throughout the Union regarding the way the use of radio spectrum is authorised in protecting public health taking into account Recommendation 1999/519/EC"

In addition, NPPF (2024) Paragraph 123 (which states that they cannot set health safeguards different from those set by ICNIRP) is in conflict with Paragraphs 198 and 135.

*Paragraph 198: "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects **(including cumulative effects) of pollution on health**, living conditions*

and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development”

RFR non-thermal effects are potentially polluting.

Indeed, **The Pollution Prevention and Control Act 1999**, in Section 1(3), defines 'environmental pollution' as,
*'pollution of the air, water or land which may give rise to any harm ... (to include) ... (a) pollution caused by noise, heat or vibrations or any **other kind of release of energy**, and by 'air' includes air within buildings and air within other natural or man-made structures above or below ground'.*

Clauses (a) and (d) of Section 79(1) of the **Environmental Protection Act 1990**, require local authorities to address “statutory nuisances”, defined as

1. *any premises in such a state as to be prejudicial to health or a nuisance,*

*and (d) any dust, steam, smell or other **effluvia** arising on industrial, trade or business premises and being prejudicial to health and a nuisance.*

Further, Local councils have an obligation to safeguard the health of its constituents by virtue of **the National Health Service Act 2006, section 2B.**

2B Functions of local authorities and Secretary of State as to improvement of public health

(1) Each local authority must take such steps as it considers appropriate **for improving the health of the people in its area.**

Paragraph 135: *Planning policies and decisions should ensure that developments :*

f) create places that are safe, inclusive and accessible and which promote health and well-being,

SUSTAINABILITY, CLIMATE CHANGE and ENERGY CONSUMPTION

Humans are part of nature, despite our best efforts to disconnect from it and even control it.

Sadly, “sustainability”, “climate change” and “net zero” have become buzz-terms to allow the political hijacking of genuine green issues.

Those of us who DO ACTUALLY CARE about the health of our planet, recognise that to bring about some sort of balance and restore Earth to a less vulnerable place, we need to take our foot off the techno-pedal, and listen to and observe the natural world around us and what it is telling us.

Councils are committing to net zero by 2030, but it is well worth looking into the green credentials of our technology. It is FAR from green, contrary to what is being touted. As well as being energy hungry, the infrastructure needed to implement the network uses child labour, poor working conditions and devastation to areas caused by intense mining. The energy consumption from cradle to grave is not sustainable. We cannot have technology AND net zero or sustainability. They are totally incompatible!

Is the opportunity for constant connection (or to download a video at the blink of an eyelid) so important to people, that we plunder the earth for its precious metals, leave devastation in its trace, exploit children and poorer communities in the mining process, often in dangerous conditions, and generally pollute our planet? Absolutely not. More importantly, we cannot boast sustainability, whilst this is happening on the other side of the world.

With the big drive for “net zero”, “sustainability” etc, it is essential to understand just how **energy-hungry** our technology is (particularly 5G) with the huge power requirements base stations and associated infrastructure. Facilitating the growth of networks, is in fact counter to the objectives of “net zero”.

In the 2020 Study by the Haut Conseil pour le Climat (HCC) – report “Controlling the carbon impact of 5G” December of 2020, the HCC report found that **5G technology will lead to a significant increase in the carbon footprint of digital technology and could add between 2.7 to 6.7 million tonnes of CO2 equivalents per year by 2030.**

[IEEE Spectrum, 5G's Waveform Is a Battery Vampire](#) reports “A 5G base station is generally expected to consume roughly **three times as much power as a 4G base station**. And more 5G base stations are needed to cover the same area”

A 2022 review by the University of Sussex Business School entitled “[The energy use implications of 5G: Reviewing whole network operational energy, embodied energy, and indirect effects](#)” published in Renewable and Sustainable Energy

Reviews finds that **the notion that 5G is green technology is not currently backed up by a strong, publicly available, fully transparent evidence base.**

Quoted from a planning application from Clarke Telecom (23/00631/TEL, Wakefield), “5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications..... The way 5G works, it is closely connected with the Smart City agenda”

In a Cornerstone application (113879/TEL/24, Trafford), advantages of 5G are listed as: the few seconds needed to download a movie; the ultra-fast speed of autonomous vehicles and providing the “backbone for the evolution of the Internet of Things.”

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These highlight the true reason for 5G: a smart-IoT-vision for the future. There will be no escape.

It beggars belief that we prioritise these over our PRECIOUS HEALTH.

Who voted for SMART cities, IoT, autonomous cars? I do NOT want these, and I don't know anyone else who does. Do your residents?

IN SUMMARY

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There is too much emphasis nowadays wrt to the perceived benefits of digital, which has been extrapolated from our behaviours during lockdown, when we had no choice but to move a lot of our lives online. It is assumed that people want to continue in this fashion, but in fact, many of us prefer **REAL connections with people, community, and nature.** Many of us do not want to live in a digital world, surrounded by masts.

Using the internet as a means of education, entertainment, and contact has, instead of boosting health and well-being, created social isolation and an addiction to technology, especially in a generation of youngsters who now have serious mental health issues. Moving to a more digital life offers very little “well-being”. We should not be encouraging this behaviour, but instead moving away from it.

Those of us who DO ACTUALLY CARE about the health of our planet, recognise that to bring about some sort of balance and restore Earth to a less vulnerable

place, we need to take our foot off the techno-pedal, and listen to and observe the natural world around us and what it is telling us.

What we are seeing is a repeat of what happened with the Tobacco industry, when risks were ignored / denied, until a critical mass of data showing damage was no longer possible to brush under the carpet. The drive for constant connection with 4G/5G etc al is far worse because it will be ubiquitous. There is no escape or relief for anyone.

What is paramount and must override every other consideration must be (1) public safety and avoidance of risk and harm to an unsuspecting public that has given no informed consent and (2) protection of our precious wildlife, flora, and natural environment. The public is being kept in the dark, just as they were with tobacco and asbestos (covered in the book “Late Lessons from Early Warnings”).

Valid concerns of members of the public should be given a thorough and well considered hearing. I urge you to listen to those concerns.

The ICNIRP guidelines on which LPAs rely so heavily are deeply flawed. Even if all the thousands of health studies showing adverse health effects and harm to wildlife/environment are conveniently ignored, **the 8 recent REAL-LIFE case studies showing harm from 5G exposure PLUS the recent evidence showing genetic changes and carcinogenic effects** should surely make everyone sit up and pay attention to what could happen locally, if we allow all these telecom developments to go ahead unchecked.

PLEASE - Before you dismiss any concerns over health, quoting NPPF (2024) Para 123 (“*should not set health safeguards different from the International Commission guidelines for public exposure*”), I am asking you to consider **and protect** all individuals who are specifically EXCLUDED from the ICNIRP guidelines (as stated above) i.e. those with a metal implant or active medical device in their body.

The mere presence of an ICNIRP certificate is irrelevant for such individuals and hence consideration of health for them is NOT setting health safeguards DIFFERENT from ICNIRP, as ICNIRP quite openly admits that they are not covered.

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Surely, we should not adhere rigidly to a “guidance” and neglect the genuine concerns of local residents who after all would have to live with the consequences of the decision and the risks attached to any subsequent installation / upgrade.

Note also that there is **NOT a single study to support** the radiation from this technology (2G – 5G) being safe **for any human over their lifetime**.

Would it not be prudent to exercise the precautionary principle? This is an ethical question, not a scientific one, and the time to invoke the precautionary principle is before harm is done and before we know with full certainty the scientific outcome.

A while back Swansea University announced that Swansea Bay was to be a “**live lab**” for 5G, and WM5G (West Midlands 5G) has been a nominated **testbed** for several years, similarly Liverpool. The vocabulary used only confirms suspicions that the UK population is indeed being used as guinea pigs to test out 5G.

By virtue of the nuisance and credible harm or injury to the local residents and to the local area, being sufficient to outweigh the benefits of the development, the application should be refused.

I urge you to REFUSE THIS telecoms application (and all future ones) before irreversible damage is done to your residents and the environment.

SOURCES

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New Hampshire Commission

The **New Hampshire HB522 Commission on 5G** (formed by legislation to explore the environmental and health effects of 5G technology) published their findings after a year-long study in Nov-2020. The commission found that wireless radiation is harmful and recommended 1,640 feet (500 metres) as a realistic protective setback distance against radiation from masts. Their recommendation was evidence based, and as such, is globally applicable.

Please note that studies reviewed included those involving earlier generations (3G/4G). Hence this commission is relevant to 4G as well as 5G.

Based on the Commission, the U.S. state of **New Hampshire introduced a bipartisan bill (HB1487) in Dec-2023**, requiring measures to be put in place to inform the public about the health risks of radio-frequency radiation (RFR) (including information online, public service announcements, notifications on poles carrying 5G antennae), wireless antennae to be placed at least 500 metres away from residences, businesses and schools, replacing Wi-Fi with wired technology in schools.

FINAL COMMISSION

report <http://www.gencourt.state.nh.us/statstudcomm/committees/1474/reports/5G%20final%20report.pdf>

Video of commission member Kent Chamberlin discussing NH Commission Setback Justification 28-Dec-2021 (20 mins) <https://www.youtube.com/watch?v=DWK74ie7krc>

Bipartisan Bill

<https://legiscan.com/NH/bill/HB1487/2024>

https://gencourt.state.nh.us/bill_status/legacy/bs2016/billText.aspx?sy=2024&id=1797&txtFormat=html

8 recently published case-studies demonstrate the real-life effect of 5G on human health. These clearly show that 5G deployment is a serious public safety issue.

The cases covered individuals living / working close to 5G antennae as well as a family holidaying close to one, and a young 8yo boy who suffered severe symptoms at school.

Symptoms included severe headaches, tinnitus, nosebleeds, insomnia, anxiety, memory loss, irregular pulse, skin rashes etc.

The distances from the antennae ranged from 5m to 125m (2023 cases); just under and over 500m (2 base stations), and 285m (2024 cases).

A summary of the first 6 cases can be found here https://www.journalserapublications.com/issues/v01/i01/JEPL_102024010101.pdf

The more recent cases are here

<http://www.fortunejournals.com/articles/a-woman-aged-82-years-with-electromagnetic-hypersensitivity-since-almost-four-decades-developed-the-microwave-syndrome-after-insta.html>

<https://www.fortunejournals.com/articles/a-woman-aged-82-years-with-electromagnetic.pdf>

and

<https://www.medtextpublications.com/open-access/an-eight-year-old-boy-developed-severe-headache-in-a-1582.pdf>

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An excellent summary of the first 7 real-life 5G case studies can be found here

Summary of seven Swedish case reports on the microwave syndrome associated with 5G radiofrequency radiation, Lennart Hardell and Mona Nilsson, June-2024

https://www.degruyter.com/document/doi/10.1515/reveh-2024-0017/html?fbclid=IwY2xjawEgeVRleHRuA2FlbQlXMQABHZeG6ToEqT_w0ThGuEMZ-cMc73eAkUVGU7du8JNT-b8ZdK2CQOCr-Jz6TQ_aem_4esr7Pyje9k62298xdJ9tw

Published online by [De Gruyter](#) June 19, 2024

From the journal *Reviews on Environmental Health* (<https://doi.org/10.1515/reveh-2024-0017>)

“Most prevalent and severe were sleeping difficultly (insomnia, waking nighttime, early wake-up), headache, fatigue, irritability, concentration problems, loss of immediate memory, emotional distress, depression tendency, anxiety/panic, dysesthesia (unusual touched based sensations), burning and lancinating skin, cardiovascular symptoms (transitory high or irregular pulse), dyspnea, and pain in muscles and joints. Balance disorder and tinnitus were less prevalent. All these symptoms are included in the microwave syndrome.”

“Our seven case studies, comprising 16 persons, on health effects from real 5G RF radiation exposure, showed that the study persons developed the microwave syndrome after installation of 5G base stations in the neighborhood of their

dwelling.....Very high RF radiation levels, although much lower than limits recommended by ICNIRP and the FCC were measured

OTHER STUDIES

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Case Study showing health effects when working in close proximity to 4G antennae

Electromagnetic hypersensitivity close to mobile phone base stations – a case study in Stockholm, Sweden

<https://www.degruyter.com/document/doi/10.1515/reveh-2021-0169/html>

Lennart Hardell and Tarmo Koppel From the journal [Reviews on Environmental Health](#)

A 55-year-old previously healthy female office worker changed her workplace in April 2018, when she returned to a building in which she had previously worked. This time her office was situated on the 6th floor close to base stations on the roof, where 4G had been installed a couple of years before her return. She had full time work in the office. At the previous working place, she had had no health problems.

In the study: Mobile Phone Base Station Tower Settings Adjacent to School Buildings: Impact on Students' Cognitive Health Meo et al, 2019

This studied phone mast exposure of adolescents, the MPBTS **located within 200 metres** from the school.

**MPBTS = Mobile Phone Base Station Tower Settings)*

It was identified that EMFs from MPBSTs were associated with a decrease in fine and gross motor skills and spatial working memory and attention in school adolescents. It was recommended that MPBSTs be installed away from thickly populated residential zones, particularly in or near school buildings.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6775553/>

Why children absorb more microwave radiation than adults – the consequences (Morgan et al, 2014)

<https://www.sciencedirect.com/science/article/pii/S2213879X14000583>

From the Abstract

Children absorb more MWR than adults because their [brain](#) tissues are more absorbent, their skulls are thinner and their relative size is smaller.

MWR from wireless devices has been declared a possible human carcinogen. Children are at greater risk than adults when exposed to any carcinogen. Because the average latency time between first exposure and diagnosis of a tumor can be decades, tumors induced in children may not be diagnosed until well into adulthood. The fetus is particularly vulnerable to MWR.

Belgium, France, India and other technologically sophisticated governments are passing laws and/or issuing warnings about children's use of wireless devices.

Adverse health effects of 5G mobile networking technology under real-life Conditions

Kostoff, Heroux, Aschner, Tsatsakis

[Toxicology Letters Volume 323](#), 1 May 2020, Pages 35-40,

<https://pubmed.ncbi.nlm.nih.gov/31991167/>

<https://www.sciencedirect.com/science/article/abs/pii/S037842742030028X>

This article from **2020** looks at studies so far on “wireless radiation”, both LABORATORY-based and EPIDEMIOLOGICAL.

“Neither 4G nor 5G have been tested for safety in credible real-life scenarios.”

It emphasises that laboratory studies are done in pristine conditions, not reflective of real-life, usually excluding the pulsing-modulating carrier signal, and looking singly at the radiation stimulus (i.e. not including other toxic stimuli such as chemical, biotoxins, other radiation which would be experienced in real-life and would act synergistically).

Even with these simplified parameters, however, the article states that there are reasons for concern.

It states that “the results reported in the biomedical literature should be viewed as 1) extremely conservative and 2) the very low ‘floor’ of the seriousness of the adverse effects from wireless radiation, not the ‘ceiling’.”

And concludes that “Superimposing 5G radiation on an already imbedded toxic wireless radiation environment will exacerbate the adverse health effects shown to exist. Far more research and testing of potential 5G health effects under real-life conditions is required before further rollout can be justified.”

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The evidence demonstrating adverse effects to human health is now overwhelming. We are already living in a soup of electro smog. At what critical point do we stand up and say enough is enough? How much more harm needs to be done?

See also

- Compilation of Research Studies on Cell Tower Radiation and Health <https://ehtrust.org/cell-towers-and-cell-antennae/compilation-of-research-studies-on-cell-tower-radiation-and-health/>
- The BioInitiative 2012 Report <http://www.bioinitiative.org>
- Physicians' Health Initiative for Radiation and Environment <https://phiremedical.org/>

EAM v East Sussex County Council (Special educational needs) [2022] UKUT 193 (AAC), where the Upper Tribunal required council to secure EHCP for student who is hypersensitive to Wi-Fi signals (UK).

<https://www.localgovernmentlawyer.co.uk/education-law/394-education-news/51400-upper-tribunal-requires-council-to-secure-ehcp-for-student-who-is-hypersensitive-to-wi-fi-signals>

<https://phiremedical.org/education-health-care-plan-ehcp-awarded-aug-2022-for-uk-child-on-the-basis-of-electromagnetic-hypersensitivity-ehs/> includes statements from the parents, child and excerpts from 3 tribunal hearings.

Upper Tribunal judge Jacobs found that the child should be considered disabled by her condition under the Equality Act 2010 and that she required an Education, Health and Care Plan (EHCP).

“Why electrohypersensitivity (EHS) is a biologically expected reaction to harmful radiation” (2024)

Research paper by Paul Hensinger and Bend I Budzinski

<https://www.diagnose-funk.org/aktuelles/artikel-archiv/detail&newsid=2098>

ICBE-EMF PAPER = https://icbe-emf.org/wp-content/uploads/2022/10/ICBE-EMF-paper-12940_2022_900_OnlinePDF_Patched-1.pdf

SWISSCOM PATENT APPLICATION (WO2004075583A1)_

<https://patents.google.com/patent/ /en>

Description – the below are **all excerpts from the patent.**

The influence of electrosmog on the human body is a known problem.

When, for example, human blood cells are irradiated with electromagnetic fields, clear damage to hereditary material has been demonstrated and there have been indications of an increased cancer risk (Mashevich M., Folkman D., Kesar A., Barbul A., Korenstein R., Jerby E., Avivi L., Department of Human Genetics and Molecular Medicine, Tel-Aviv University, Tel-Aviv, Israel, "Exposure of human peripheral blood lymphocytes to electromagnetic fields associated with cellular phones leads to chromosomal instability," Bioelectromagnetics, 2003 Feb., 24(2): 82-90).

..... These findings indicate that the genotoxic effect of electromagnetic radiation is elicited via a non-thermal pathway. Moreover aneuploidy is to be considered as a known phenomenon in the increase of cancer risk.

Thus it has been possible to show that mobile radio radiation can cause damage to genetic material, in particular in human white blood cells, whereby both the DNA itself is damaged and the number of chromosomes changed. This mutation can consequently lead to increased cancer risk. In particular, it could also be shown that this destruction is not dependent upon temperature increases, i.e. is non-thermal.

Cell Tower Radiation Linked to Genetic Changes in Nearby Residents (July 1, 2024)

<https://microwavenews.com/news-center/cell-tower-radiation-linked-genetic-changes-nearby-residents>

"More Chromosomal Aberrations

Senior European scientists are reporting that people living near cell phone towers show significant changes in their genetic makeup. This is the first time that chronic exposure to cell tower radiation has been linked to unrepairable genetic damage.

A team led by Wilhelm Mosgöller of the Medical University of Vienna and Igor Belyaev of the Slovak Academy of Sciences in Bratislava contend that years of low-dose RF exposure can increase the incidence of a number of different types of chromosomal aberrations. Such changes could lead to serious, though uncertain, health consequences, including cancer and neurological disease."

'Effects of Radiofrequency Electromagnetic Field Exposure on Cancer in Laboratory Animal Studies' (Mevissen et al.)

<https://www.sciencedirect.com/science/article/pii/S0160412025002338>

It was concluded with high certainty that chronic exposure to RFR causes cancer in the brain (gliomas) and in the heart (schwannomas). Such high-quality animal evidence is considered a sound predictor of cancers in humans.

TREES

**** Radiofrequency radiation injures trees around mobile phone base stations (2016)** https://www.researchgate.net/publication/306435017_Radiofrequency_radiation_injures_trees_around_mobile_phone_base_stations

And <https://www.ncbi.nlm.nih.gov/pubmed/27552133>

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A detailed long-term (2006-2015) field monitoring study of 120 trees was performed in the cities of Bamberg and Hallstadt (Germany) and demonstrated electromagnetic radiation from phone masts is harmful to trees. _

We selected 60 damaged trees, in addition to 30 randomly selected trees and 30 trees in low radiation areas The measurements of all trees revealed significant differences between the damaged side facing a phone mast and the opposite side, as well as differences between the exposed side of damaged trees and all other groups of trees in both sides.....The 30 selected trees in low radiation areas (no visual contact to any phone mast and power flux density under $50\mu\text{W/m}^2$) showed no damage. Statistical analysis demonstrated that electromagnetic radiation from mobile phone masts is harmful for trees. These results are consistent with the fact that damage afflicted on trees by mobile phone towers usually start on one side, extending to the whole tree over time.

Additional photos here (published Mar-2022)

https://www.researchgate.net/publication/359481325_Tree_damage_caused_by_mobile_phone_base_stations_An_observation_guide_Photos_and_RF_measurements_by_Cornelia_Waldmann-Selsam_Additional_photos

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WILDLIFE / INSECTS

5G Cell Towers Cause Massive Insect Decline on the Greek island of Samos (Kordas 2022)

<https://safetechinternational.org/wp-content/uploads/2022/03/5G-causes-massive-insectdeclines-on-Samos.pdf>

Diana Kordas lives in a rural area on the Greek Island of Samos. Her paper is “an effort to document what has happened in an area which has cell tower radiation but does not have pesticides or monoculture, which has a rich variety of plant life and is surrounded by wild land. It is based purely on observation”.

The paper opens with the alarming statistics “In 2017, a major German study found that flying insects had decreased over 75% in protected areas over the previous 27 years while ruling out climate change and pesticides. In 2021, the bumblebee was declared **extinct in nine** U.S. states.” Her paper includes tables of species observed.

It is Kordas’s opinion that “Cell tower radiation is causing insects to die. An ongoing decline in insect numbers occurred after the introduction of 4G/LTE, and the new 5G network on Samos has caused insect declines to reach a tipping point.”

Mount Nardi Wildlife Report to UNESCO FINAL (2000-2015)

<https://www.emrsa.co.za/report-for-the-united-nations-educational-scientific-and-cultural-organization/>

and <https://ehtrust.org/wp-content/uploads/Mt-Nardi-Wildlife-Report-to-UNESCO-FINAL.pdf>

This report was prepared by a naturalist/ethno-botanist, local to the area and detailed the dramatic decline in volume and species variety in the Mt. Nardi area of the Nightcap National Park World Heritage Area (home to ancient forest and endangered plants and wildlife) during a 15-year period (2000-2015) as a result of the introduction of digital technologies, 3G, 4G etc.

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CLIMATE CHANGE, ENERGY CONSUMPTION and SUSTAINABILITY

2020 Study by the Haut Conseil pour le Climat (HCC) “Controlling the carbon impact of 5G” “Dec-2020”

The HCC report found that **5G technology will lead to a significant increase in the carbon footprint of digital technology and could add between 2.7 to 6.7 million tonnes of CO2 equivalents per year by 2030.**

References to the 2020 Study by the Haut Conseil pour le Climat (HCC) can be found here

<https://ehtrust.org/science/reports-on-power-consumption-and-increasing-energy-use-of-wireless-systems-and-digital-ecosystem/>

<https://ehtrust.org/5g-is-a-sinking-ship-slow-poor-performance-and-a-power-hog/?fbclid=IwAR029YFUtklYKIZqnwd6Qjg0kMkt1TCx5QuviYhQgfPRCc1PDzS05NB4Lsl>

<https://www.france24.com/en/europe/20201220-deploying-5g-will-lead-to-spike-in-co2-emissions-french-climate-council-warns>

[IEEE Spectrum, 5G's Waveform Is a Battery Vampire](#) reports "A 5G base station is generally expected to consume roughly **three times as much power as a 4G base station**. And more 5G base stations are needed to cover the same area" <https://spectrum.ieee.org/5gs-waveform-is-a-battery-vampire>

A 2022 review by the University of Sussex Business School entitled "[The energy use implications of 5G: Reviewing whole network operational energy, embodied energy, and indirect effects](#)" published in Renewable and Sustainable Energy Reviews finds that **the notion that 5G is green technology is not currently backed up by a strong, publicly available, fully transparent evidence base.**

<https://sro.sussex.ac.uk/id/eprint/103944/2/1-s2.0-S1364032121012958-main.pdf>

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On Global Electricity Usage of Communication Technology: Trends to 2030
(Published 2015)

www.mdpi.com/2078-1547/6/1/117/htm

Green 5G or red alert? 23 November 2020 <https://www.meer.com/en/64080-green-5g-or-red-alert>

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. _

Quoted from a planning application from Clarke Telecom “5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications..... The way 5G works, it is closely connected with the Smart City agenda and will enable centralized control of lots of different street infrastructure owned or managed by councils, such as streetlights, water meters and bus stops.” <https://planning.wakefield.gov.uk/online-applications/>

Useful articles

How green is 5G? <https://envirotecmagazine.com/2021/11/08/how-green-is-5g/>

What will 5G mean for the Environment? <https://jsis.washington.edu/news/what-will-5g-mean-for-the-environment/>

Smart tech's carbon footprint (The Ecologist April-2020) <https://theecologist.org/2020/apr/30/smart-techs-carbon-footprint>

The Staggering Ecological Impacts of Computation and the Cloud

https://thereader.mitpress.mit.edu/the-staggering-ecological-impacts-of-computation-and-the-cloud/?fbclid=IwAR0dvYDGwxHaT1oASxO58W44bRuhrWSJAbdH4q6z_I3Zq9X9cs0ARUt9ORA

Anthropologist Steven Gonzalez Monserrate draws on five years of research and ethnographic fieldwork in server farms to illustrate some of the diverse environmental impacts of data storage.

With [a greater carbon footprint](#) than the airline industry, the cloud as a CARBONIVOIRE, which is also water-thirsty (causing water shortages near datacentres), creates noise pollution with devastating effects on neighbours as well as creating “immortal waste” in e-waste graveyards.

Lithium fields - out of sight, out of mind (ANH article, Oct-2024)

https://www.anhinternational.org/news/lithium-fields-out-of-sight-out-of-mind/?utm_source=The+Alliance+for+Natural+Health&utm_campaign=934e8fabd8-EMAIL_CAMPAIGN_2024_10_17_03_54&utm_medium=email&utm_term=0_-934e8fabd8-%5BLIST_EMAIL_ID%5D&mc_cid=934e8fabd8&mc_eid=cbf4ae04a2

MISCELLANEOUS

Planning Practice Guidance on Consultation

<https://www.gov.uk/guidance/consultation-and-pre-decision-matters#Public-consultation>

'Changes to permitted development rights for electronic communications infrastructure: technical consultation' (7 March 2022)

[https://www.gov.uk/.../changes-to-permitted-development..."](https://www.gov.uk/.../changes-to-permitted-development...)

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Judicial Review: Thomas v. Cheltenham Council (AC-2023-CDF-000079) <https://www.bailii.org/ew/cases/EWHC/Admin/2024/1035.html>

Subsequent appeal: Cheltenham Borough Council v Thomas (CA-2024-001169)

https://assets.caselaw.nationalarchives.gov.uk/ewca/civ/2025/259/ewca_civ_2025_259.pdf

New Conversations (2.0) LGA Guide to Engagement

<https://www.local.gov.uk/publications/new-conversations-20-lga-guide-engagement>

UK Health Security Agency (UKHSA) response to an FOI (AIMD and Exclusion Zones) <https://www.radiationresearch.org/wp-content/uploads/2025/03/HSA-FOI-response-on-pacemakers.pdf>

INDUSTRY article by NOKIA

<https://www.nokia.com/thought-leadership/articles/spectrum-bands-5g-world/>

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Historic England - Streets for All (2018) (Advice for Highway and Public Realm Works in Historic Places) <https://historicengland.org.uk/images-books/publications/streets-for-all/>

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Finch v Surrey County Council [2024] EWCA Civ 187

<https://www.supremecourt.uk/cases/docs/uksc-2022-0064-judgment.pdf>

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Lord Gill in the Supreme Court judgment in *Suffolk Coastal District Council v Hopkins Homes Ltd* [et.al, https://www.supremecourt.uk/cases/docs/uksc-2016-0076-judgment.pdf](https://www.supremecourt.uk/cases/docs/uksc-2016-0076-judgment.pdf)

The requirement for Local Authorities to reconcile the risks to environmental and public health consequences from radio frequency emitting infrastructure is embedded within the European Electronics Communications Code (EECC). There is a **current challenge to the UK government** concerning their policies that constrain LPAs to blindly accepting an ICNIRP declaration of conformity. (Case Z2309835, filed 12-Sep-2023)

<https://safetechinternational.org/new-legal-challenge-uk-govt-fail-to-enact-public-health-environmental-obligations-within-european-electronics-communications-code/>

The **AGNIR report was discredited by neuroscientist Dr Sarah Starkey**

See <https://www.degruyter.com/document/doi/10.1515/reveh-2016-0060/html>

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