

From: **Melanie Gambrill**

Date: Sun, 25 Jan 2026 at 22:19

Subject: Mast Objection AWDM/1596/25 Community Centre 2 Romany Road
WORTHING BN13 3FJ

To: Gary Peck

Dear Gary Peck

I have attempted to submit this objection via the planning portal and get a '403 Forbidden' error message. Please kindly confirm receipt by email.

Mast Objection **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.

Community Centre 2 Romany Road WORTHING BN13 3FJ

Siting and appearance

A 20m monopole with over 10 antenna and the supporting cabinets would be an eyesore in this densely populated and utilised community area. This would be detrimental for residents and visitors.

The cabinets in this busy area are likely to attract graffiti which would be unsightly.

There are homes, businesses and schools close to the site and the National Planning Policy Framework gives guidance stating that mast installations should minimise visual impact via sensitive siting and possibly using camouflage to reduce the visual impact. This application does not address this.

Those living close to the mast are likely to feel it is overbearing and potentially threatening due to perceived risks. This will cause them distress and anxiety and reduce the amenity of the area.

The fact that residents and users of the facilities in the area may perceive risk must be taken into account as a material consideration when looking at the siting and appearance of the proposed monopole and all its associated equipment.

Children are 'sensitive receptors'

There are several schools close to the site - Hawthorns Nursery School, Hawthorns Primary School and The Laurels Primary School.

The fact that there are safety guidelines with regards to EMF emissions from masts means they are recognised as potentially harmful. Children, being 'sensitive receptors', are more vulnerable to the damaging effects of EMF emissions from masts so installing a 20m monopole so close to schools and nurseries is a very bad idea. Would you want your children or grandchildren to spend a large amount of time close to a phone mast?

In December 2022 an appeal was dismissed for a mast next to a school in Worthing, West Sussex. Robert Parker, Inspector appointed by the Secretary of State, wrote in Appeal Decision APP/M3835/W/22/3297928:

"16. Within their evidence, the appellant states that the site maintains a reasonable distance from 'sensitive receptors'. This term is not defined but I agree with the Council that a school should be treated as being sensitive – not least due to the level of concern a proposed mast is likely to generate amongst parents and carers. Although the effect on health is not in and of itself a valid material consideration, I have noted the public fears about health. This makes it all the more important for alternative sites to have been properly and thoroughly considered in liaison with the local planning authority, and for a detailed record of that exercise to be provided as part of the application."

I recognise the planning is for replacement of an existing mast but the above remains critically relevant. Do you propose increasing the risks to children's health?

NO safety guidelines for people with implants or plants and animals

People with Implants are not covered by the ICNIRP safety guidelines and to ignore the potential impact on their health or indeed their survival, should pacemakers malfunction, is discriminatory in the very least.

Please refer to the ICNIRP website here:

<https://www.icnirp.org/en/activities/news/news-article/rf-guidelines-2020-published.html>

Which states the guidelines do not cover people with implants:

"However, some exposure scenarios are defined as outside the scope of these guidelines. Medical procedures may utilize EMFs, and metallic implants may alter or perturb EMFs in the body, which in turn can affect the body both directly (via direct interaction between field and tissue) and indirectly (via an intermediate conducting object)."

There are numerous houses and flats close to the site and users of the Community Centre cover a wide age range. Have all local residents and users of the Community Centre been asked whether they have implants and been made aware of the risks?

The location is close to green spaces and woodland.

ICNIRP have not yet published guidelines in relation to animals and plants. The ICNIRP 2021 Report which you can view here <https://www.icnirp.org/en/about-icnirp/-annual-reports/index.html> states:

"Effects of NIR on the environment

Under the leadership of Dr Eric van Rongen, a Project Group will undertake a statement on the

effects of NIR on the environment (plants and animals in their natural environment). As identified by ICNIRP in 2000 and confirmed more recently in 2019 by the German Federal Office (BfS), whether there are effects of EMFs on the living environment is yet to be determined, with this uncertainty largely due to the lack of adequate data. Accordingly, the ICNIRP Project Group intends to present an overview of the environmental effects of EMF and, where possible, analyze whether the current human exposure guidelines are sufficiently protective for plants and animals in their natural environment. Following the exploratory and constitutive phase, it is expected that the PG will start its work in the second half of 2022".

It is irresponsible to install a mast not knowing whether the impact on animals and plants may impact at a population level over time. Such an action goes against central and local government policies of protecting the environment.

Human health impact

There is an abundance of studies relating to health impacts of EMF emissions. It is well established that the ICNIRP safety guidelines do not consider the biological effects, only the heating effects.

Health IS a material consideration in relation to planning.

The UK Health Security Agency (formerly Public Health England, PHE) has "a statutory duty to provide advice to Government on any health effects that may be caused by exposure to electromagnetic field emissions". As we know, HSA advises that operators adhere to the ICNIRP safety guidelines. It is important to note that HSA does not accept liability for reliance on its guidance. PHE lawyers DLA Piper have stated:

"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.”

EMF emissions from telecoms masts are mostly unregulated

Telecoms operators are required to submit an ICNIRP certificate with their planning applications which SELF CERTIFIES that the mast will operate within the safety guidelines set by ICNIRP (which is a self-selecting NGO much criticised by numerous experts concerned about public health and safety).

I have corresponded with a Project Manager at Waldon Telecom in relation to planning for another telecoms mast and when asked about whether the safety guidelines cover people with implants and animals and plants, he replied that they were covered. Per above this is completely incorrect. We must question why those signing ICNIRP certificates are not even aware of what they cover.

There is no requirement for telecoms operators to disclose the public exclusion zones around their masts or the figures for the actual EMF emissions. CO2 emissions for vehicles are publicly available and car owners must pay the cost of regulation, via an MOT. Telecoms operators are not required to test the actual EMF emissions from their masts and indeed if the public wish to have a survey done to measure these emissions, they must pay Ofcom £1200. Why are the public required to pay for safety regulation of the telecoms industry?

It is a particular concern to know there is no required test of the actual EMF emissions from this mast when it is located close to schools and nurseries. I recently asked Ofcom about a survey and they confirmed they take the measurements from the 1998 public safety limits and NOT from the updated 2020 guidelines.

Council obligations extend beyond accepting the ICNIRP certificate

Is the Council aware of a recent court case against Cheltenham Borough Council (CBC) which confirmed that lawful obligations extend beyond simply accepting the ICNIRP certificate?

The court made clear that risks to individuals with metal or medical implants, such as pacemakers, clips, plates, and shunts, are not assessed by the ICNIRP certification process (see my comment above on this), and that these risks must be taken into account by local planning authorities when deciding where masts are sited. Did you know this?

Presiding Judge Jarman stated at paragraph 46 of his ruling: *“The issue of medical implants was not raised in respect of the residences closest to the proposed equipment. If it had been so raised, then it may well have been a factor in a decision*

to re-site

the equipment." <https://caselaw.nationalarchives.gov.uk/ewhc/admin/2024/1035>

That passage was not overturned on appeal. On the contrary, the higher court confirmed that risks to those with implants represent a separate consideration beyond reliance on ICNIRP and may influence mast siting where properly raised. The Council claimed it was prohibited from considering health impacts, but the Court made clear that this position was incorrect. The longstanding mantra—"we cannot consider health"—can no longer be relied upon by any planning authority. <https://caselaw.nationalarchives.gov.uk/ewca/civ/2025/259>

I urge you to refuse the planning application for this 20m monopole and associated equipment. Thank you.

Kind regards
Melanie Gambrill