From: planning@adur-worthing.gov.uk
Sent: 05 April 2023 15:47
To: planning@adur-worthing.gov.uk
Subject: Comments for Planning Application AWDM/0375/23

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 05/04/2023 3:46 PM from Mr James C.

Application Summary

Address:	Land Opposite 214 Upper Shoreham Road Shoreham-by-sea West Sussex
Proposal:	Application for determination as to whether prior approval will be required for the siting and appearance of proposed 15m 5G telecommunications monopole with wrapround cabinet at base and associated ancillary works.
Case Officer:	Gary Peck

Click for further information

Customer Details

Name:	Mr James C
Address:	Station Rd, Polegate BN26 6EA

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Loss of General Amenity - Other - Overdevelopment
Comments:	As a frequent visitor to this area, I object to this mast as it will be a tall monstrosity of an ugly eyesore in this area of Shoreham. It is out of keeping and would disturb the residential feel and wider landscape. It would tower above the local trees. The associated street cabinets will take up a lot of space and endanger residents especially the disabled, elderly and babies in prams. The local biodiversity and wildlife will suffer. There are NO studies showing this technology is safe. The UK National Planning Policy Framework (NPPF):

Para 117 stipulates that "Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development."

Para 117 goes on to state that applications for an addition to an existing mast or base station must include a self-certificate that the increased capacity will not exceed International Commission guidelines on non-ionising radiation protection

Para 118. Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

DLA Piper solicitors to PHE stated (as quoted in the a letter from MP Wera Hobhouse to the minister, DDCMS) that any public body relying in ICNIRP is liable - no liability accrues to the guidance nor its issuer (in this context PHE now UKHSA).

Two points arise. The first as Wera Hobhouse also points out - is that this technology is uninsurable for harm to health - which might be of concern if potential personal injury claims were to be brought in this respect to any council. In the USA EH Trust points out that Verizon, a multinational telecom company with offices in the UK, has made financial provision in its statutory accounts for such claims.

The secondly is you might be relying in ICNIRP and you are by function the local competence under the retained EU law of the European Electronics Communication Code (ref: written parliamentary answer from the DDCMS in this respect) and which code was brought into UK law before Brexit, as confirmed by OFCOM - how will you make sure the application is ICNIRP compliant as laid out by the NPPF ?

Have you in relation to para 118 NPPF ascertained the power output in the near field of this mast in order to compare it with the ICNIRP timed safe level of exposure of 1mw/cm 2 to make sure you do not give approval to a mast that exceeds ICNIRP guidance both in the power aspect and in the timing aspect in the near field?

Then, as we are dealing with 5G, which is beam formed collimated signals that do not obey the inverse square law of physics (unlike 4G signals which do) and so can go large distances at a high power density - have you asked the applicant for the drop off of power intensity over distance for any main 5G beams and any side lobe beams emergent from any antennae in the application - as without such information any exclusion zones could not be checked for ICNIRP compliance and again you might be issuing an approval for a mast that might exceed the ICNIRP guidance as regards power and timing - and as DLA Piper make clear you are solely liable if as a public body you are relying on such ICNIRP guidance.

If after you have received from the applicant all this necessary detail and made it available to public scrutiny on your planning portal, in relation to this application, and if the apparatus concerned exceeds the relevant ICNIRP parameters, then you, by logic, have no choice if you rely in ICNIRP, and as made clear in the NPPF in this respect, would have to reject this application!

EXCLUSION ZONE: "NO ENTRY" zones are missing from the plan. Every mast has an area around the antenna which should be marked with NO ENTRY signs due to the effects from the radiation.

NO RISK ASSESSMENT HAS BEEN MADE - A Risk Assessment needs to be made from a fully informed position, you will find if you weigh up all the evidence for biological harm, from 1000's of studies, that harm is caused at exposure levels down to at least 0.05 V/m, and compare that to the fact that the environmental levels and those within buildings from WiFi also exceed this low level by 100s of times

Kind regards