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From: **Melanie Gambrill** <[redacted]>
Date: Mon, 7 Jun 2021 at 22:59
Subject: AWDM/0886/21 Planning Objection
To: Gary Peck <gary.peck@adur-worthing.gov.uk>

Dear Gary
I tried to submit this planning objection online and was delivered to a page saying '403 Forbidden'. Is there an error with your system?

Please see below the details of my objection to this 'Replacement of existing 17.2m mast with a 20m monopole mast (5G) with 12 antennas and associated enabling radio equipment and development works'.

Kind regards
Melanie Gambrill

PUBLIC HEALTH MATTERS.
There is no appropriate site for telecoms infrastructure that causes harm or injury to the public and wildlife. There is always a potential for such infrastructure to create a hazardous obstruction to pedestrians, vehicles and wildlife, in particular to birds.
The public is constantly told by council officers and elected officials that councils have no powers to reject mast applications on health grounds, referring to paragraph 116 of the National Planning Policy Framework (NPPF) which states:
"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."

The NPPF is titled a 'framework' which means it is a Directive and consequently not Law. Public health must always be a material consideration in any planning matter and councils have a legal duty to recognise this so they are expected to listen to the health fears of the public who object to mast planning applications.

As stated here:

https://www.gov.uk/government/publications/mobile-phone-base-stations-radio-waves-and-health/mobile-phone-base-stations-radio-waves-and-health

"Industry has **voluntarily** committed to comply with international guidelines and to provide certificates of compliance with planning applications for base stations".

Note that the telecoms industry is not required by law to comply with ICNIRP safety guidelines. Compliance is **voluntary** as stated above.
The details of this compliance are found in the 'Code of Best Practice' here:
https://uploads-ssl.webflow.com/5b7ab54b285dec5c113ee24d/5d5d4cd69a3f3827f30d06e9_Codes%20of%20Practice.pdf
which is referenced on the Ofcom website here
https://www.ofcom.org.uk/manage-your-licence/radiocommunication-licences/mobile-wireless-broadband/exposure-electro-magnetic-fields
Operators evidence their compliance with the ICNIRP safety guidelines by submitting a 'Declaration of Conformity with ICNIRP Public Exposure Guidelines'. This document is a voluntary self-certification and technical details supporting the declaration, including information about safety exclusion zones, are not included with planning applications and requests for this information by the public are refused. Quite why operators are not willing to show transparency regarding their declaration of compliance with the ICNIRP safety guidelines is unknown. LPAs and the public are simply expected to have faith that the telecoms equipment being installed meets safety guidelines.
ICNIRP, the International Commission on Non-Ionizing Radiation Protection, is a German NGO consisting of 14 self-selected members and chaired by Rodney Croft, Professor of Health Psychology at the School of Psychology, University of Wollongong, Australia. See ICNIRP website for more details www.icnirp.org
There is currently no regulatory requirement for installers to comply with the ICNIRP safety guidelines and ICNIRP does not accept any responsibility for reliance on the safety guidelines they set. PHE has chosen to adopt the ICNIRP safety guidelines and only just recently has OFCOM carried out a consultation to consider "proposed measures to require compliance with international guidelines for limiting exposure to electromagnetic fields (EMF)". The results of this consultation are yet to be published. See OFCOM website for more details https://www.ofcom.org.uk/consultations-and-statements/category-1/limiting-exposure-to-emf
Paragraph 7.3 of the 'Code of Best Practice' referenced above states that Public Health England advises the government on health policy in relation public exposure to radio frequency electromagnetic radiation exposure, taking advice from the Advisory Group on Non-Ionizing Radiation (AGNIR). In 2012 the Health Protection Agency (now part of PHE) published a response to the 2012 AGNIR Report which stated "HPA's view is that the continuing possibility of: (a) biological effects, although not apparently harmful, occurring at exposure levels within the ICNIRP guidelines, and (b) the limited information regarding cancer effects in the long term, together **support continuation of the UK's long-standing precautionary**

approach to mobile phones. Excessive use of mobile phones by children should be discouraged, while adults should make their own choices as to whether they wish to reduce their exposures, but be **enabled to do this from an informed position**" (my highlights).

Dr Sarah Starkey, MSc (Neuropharmacology), PhD (Neuroscience), has produced a highly succinct and expert review of the HPA response to the 2012 AGNIR report highlighting the inadequacy and inaccuracy of its conclusions, upon which public health now depends. I urge you read Dr Starkey's published paper covering the AGNIR report here:

https://pubmed.ncbi.nlm.nih.gov/27902455/

Advice published in 2012 does not take into account the new 5G frequencies.
AGNIR was disbanded in May 2017, which seems ironic in light of the fact that we are seeing a huge increase in public exposure to radio frequency electromagnetic radiation with the roll out of 5G. Whilst AGNIR's remit was to "to review work on the biological effects of non-ionising radiation relevant to human health and to advise on research priorities" PHE now looks to the Committee on Medical Aspects of Radiation in the Environment (COMARE), which the government website states "is an existing Department of Health expert committee that has a watching brief on non-ionising radiation".
Do you consider having an advisory committee with simply a "watching brief" to be adequate to ensure protection of public health now?

You will be aware that the government published their response to the consultation on 'Proposed reforms to permitted development rights to support the deployment of 5G and extend mobile coverage' in July 2020. There were 1896 responses received including 1096 personal responses, the vast majority of which (74%) related to public health concerns. The consultation response states that these concerns "did not relate to the specific proposed planning changes that views were sought on". The government has a legal duty to consider **all** responses to a consultation and not pre-judge these. It is noted that paragraph 24 of the response is identical to a paragraph contained in the letter Matt Warman MP wrote to councils in November 2019. Evidently the responses in relation to health concerns have been pre-judged as a stock paragraph is being used. It may also be questioned exactly when this stock paragraph was written since it states "Over the last two decades there have been over 100 expert reports on EMF and health published internationally with well over 3,000 studies informing these reviews and the existing scientific exposure guidelines" referencing the EMF Portal website https://www.emf-portal.org/en As of 30 August 2020 this website has a database with an inventory of 31,828 publications and 6,784 summaries of individual scientific studies on the effects of electromagnetic fields. There are currently 523 items if you search for '5G'. The studies listed on this website include many that show evidence of detrimental health effects and highlight the need for further studies in many areas.

You will also be aware that Digital Infrastructure Minister Matt Warman and Local Government Minister Simon Clarke wrote to councils on 27 August 2020 regarding the 5G roll out and highlighting a new document titled '5G mobile technology: a guide'.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/913179/5G_mobile_technology_a_guide.pdf

This document claims that "concerns that the introduction of 5G could affect people's health…are completely unfounded". This is incorrect. Such concerns are based on a wealth of evidence from studies highlighting harmful effects and the views of expert scientists, engineers and medical professionals, some of whom are included in the 298,431 people from 220 nations that have signed the 5G Space Appeal here https://www.5gspaceappeal.org/the-appeal The government has clearly not shown due diligence in their assessment of the health impacts of the 5G technology and their reluctance to do so was further evidenced in their response to the consultation discussed above.

The new Guide has been written to help councils deal with queries from the public and "combat disinformation". Should you consider anything I have stated here to constitute disinformation I shall be obliged if you would highlight this to me and explain why you consider it to be so.

The new Guide does not address the widespread concern regarding the impact of radio frequency electromagnetic radiation on wildlife and the ICNIRP safety guidelines only consider human health, as clearly stated in the Abstract to the new ICNIRP 2020 Guidelines which can be found here:

https://www.icnirp.org/cms/upload/publications/ICNIRPrfgdl2020.pdf

Matt Warman MP, stated in a recent Parliamentary Written Question here:

https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2020-06-09/57264/

"With regard to animals, electromagnetic radiation has the potential to impact insect movement, but there is currently no evidence that human-made electromagnetic radiation has population level impacts on insects."

Consequently, it is recognised that the 5G roll out **will** have a detrimental effect on our wildlife including insects. You will also note that as stated above the remit of AGNIR only considered human health.

It was encouraging to see a section in this new Guide titled "Which organisations are responsible for public safety relating to 5G". However, sadly the Guide fails to answer this question.

The section starts by reminding the public that the "government's priority is to promote investment and innovation in 5G…to drive economic growth". This seems to imply that driving economic growth is viewed as a priority, over and above public safety. Strange when we consider the government's highly precautionary approach to protecting public health in relation to COVID-19. It seems odd to then talk about the sharing of false information in relation to 5G and COVID-19 when this section is addressing the public safety relating to 5G.

I have already discussed the declaration of compliance with ICNIRP safety guidelines which operators **voluntarily** agree to. Since there is no legislation requiring this compliance there can be no legal enforcement of these safety guidelines. The Guide does not answer the question of whether operators have a legal liability for harm or injury caused to the public resulting from the radio frequency electromagnetic exposure emanating from their equipment.

We are then reminded that 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, PHE advises that operators adhere to the ICNIRP safety guidelines. It is important to note that PHE 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."

PHE is an executive agency that **advises** the government. It is the government that **decides** health policy. Is the government then liable for harm or injury to the public resulting from exposure to radio frequency electromagnetic radiation? The Guide is not clear on this point.

We know that ICNIRP does not accept any liability for reliance on their safety guidelines either, as stated here: https://www.icnirp.org/en/legal-notice.html

The reference to the OFCOM mobile phone base station measurements only confirms that OFCOM carry out some audits of EMF levels. However, as detailed on their website, these are very few in number. Also, they do not form part of any statutory safety audit of equipment.

Consequently, the public is being told here that there is NO legal protection covering their safety in relation to radio frequency electromagnetic radiation exposure.

For further research into the detrimental effects of radio frequency electromagnetic radiation, including information on the huge number of published peer-reviewed studies that evidence harm to life, I recommend these websites:

https://ehtrust.org

https://bioinitiative.org

https://the5gsummit.com

KNOW YOUR FACTS. KNOW YOUR LIABILITY. PROTECT PUBLIC HEALTH.