

From: **Melanie Gambrill**

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Subject: OBJECTION: AWDM/0641/26 Proposed installation of 1no. new BT Street Hub

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Dear Louise and Ward Councillors

I wish to submit an objection to this planning application. I have not been able to submit this via the planning portal due to errors in the system. Please see my comments below, to be filed on the portal.

AWDM/0641/26 Proposed installation of 1no. new BT Street Hub, incorporating 2no. digital LCD advert screens (following removal of 2no. phone kiosks) Land South Of 2 Broadwater Street West Worthing West Sussex

As a regular visitor to Worthing I strongly object to the installation of a BT street hub at Broadwater Street West.

Hazardous obstruction creating unnecessary noise and light pollution

A BT street hub in this areas would create an obstruction for pedestrians and potentially be a dangerous distraction for drivers and cyclists.

The noise and light pollution are detrimental to the amenity of the area and potentially a danger to insects such as moths and other nocturnal wildlife.

Advertising – effects on mental wellbeing and privacy

Constant bombardment of advertising and brightly coloured LED screens whilst walking or driving in the area are not conducive to mental wellbeing. Sadly, we have seen significant decline in mental health, especially amongst young people in recent years. These advertising hubs are likely to be an assault on the senses for people walking and driving past and be a cause of overwhelm which is not conducive to mental wellbeing.

The technology exists for street hubs to communicate with the mobile phones of passers-by, in order to target advertising. This raises concerns of privacy and the potential for the hubs to be used as some form of surveillance.

Security and Online Safety Act 2023

Anything digital can be hacked. We have recently seen the introduction of the Online Safety

Act designed to protect children especially. It is possible that hackers could take control of the advertising and output inappropriate and harmful material, including pornography.

Anti-social behaviour

The planning application includes a lengthy report on anti-social behaviour and plans for mitigation. The common-sense approach is to not facilitate anti-social behaviour in the first place by installing these street hubs. It is possible people will abuse the facility to make emergency calls, which could put lives at risk elsewhere. The hubs will also be further street furniture which could attract vandalism and, with the equipment being electronic, such vandalism may create a fire risk close to passing vehicles, cyclists and pedestrians.

Biodiversity net gain in planning requirements

All planning applications now require demonstration of biodiversity net gain. Claiming dispensation in the case of the street hubs is riding rough shod over planning legislation. While the impact of a single street hub may be deemed minimal in terms of impact on the environment, including power consumption, the collective environmental impact of a great number of street hubs and all the supporting infrastructure, including data centres and the increased mobile use it encourages, should be considered when assessing biodiversity net gain. The fact that the street hubs may be used for air quality monitoring is unlikely to have substantial enough impact on the biodiversity net gain issue (if at all) and consequently claiming any green credentials as a result amounts to greenwashing, which the Advertising Standards Agency does not permit.

Exclusion zones

Since there are safety guidelines for public exposure to radio frequency radiation this means the radiation is potentially harmful. I cannot see details of the actual exclusion zones in the planning documents. There is mention of them in the ICNIRP declaration which states the exclusion zones can be breached by climbing onto the street hub or passing physical barriers. I see nothing in the planning relating to physical barriers being constructed around the street hubs. The public should be given details about the exclusion zones for these hubs and not just property managers and contractors. Birds and flying insects may not observe these exclusion zones of course.

NO safety guidelines for people with implants or plants and animals and discrimination under Equality Act 2010

People suffering from electro-sensitivity choose not to have mobile phones, to reduce their exposure to radio frequency radiation. Placing what is effectively a giant mobile phone on the pavement where they walk is discriminating against such individuals. No alternative access to the town centre shops is provided for these people.

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

also discriminatory. **Will the street hubs display warning signs for those with implants?**

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)."

Numerous people live and work close to the sites planned for the street hubs and a large number of people pass by when accessing the town centre. Have any local residents, workers and shoppers been asked whether they have implants and been made aware of the risks?

Worthing is a pleasant town bordered by countryside and there are green spaces all around the town, including churchyards.

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 street hub 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.

ICNIRP declaration of conformity contains misinformation

The ICNIRP declaration submitted with the application states “The ICNIRP public exposure guideline is in accordance with the precautionary approach outlined by the Stewart Report (IEGMP)”. This is incorrect as the Stewart Report in fact recommended additional precautionary measures which ICNIRP safety guidelines do not include. It is concerning that Tony McAlesse who signed the declaration was not aware of this. This brings into question how much reliance can be placed on the declaration, which in any case is only a self-certification of compliance.

Regards

Melanie Gambrill