

Dear Sir/Madam,

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

Comments were submitted at 12/01/2026 2:09 PM from Mr J Philipps.

Application Summary

Address:	Telecommunication Site Bn0914 North Of Durrington Community Centre 2 Romany Road Worthing West Sussex
Proposal:	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.
Case Officer:	Gary Peck

[Click for further information](#)

Customer Details

Name:	Mr J Philipps
Email:	
Address:	1 New Broadway Worthing West Sussex

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:	I object to the application, as follows: 1) (a) The ICNIRP 'self-certification' Declaration provided by MGroup Ltd (Agent) and signed "For and on behalf of: EE & H3G, [by] Design Supplier: Waldon Telecom, Approved By: (Senior Design Supplier): Alex Bailey" on behalf of applicants MBNL, EE Ltd & H3G UK Ltd (as stated on the Application Form) - refers ONLY to the 'DESIGN' of the installation and DOES NOT conform to the MANDATORY REQUIRED DECLARATION as provided in the 'Code of Practice for Wireless Network Development' --- where the OPERATOR/APPLICANT is REQUIRED to declare that "the proposed site shall be operated to be in full compliance with the requirements of the radio frequency (RF) guideline limits of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) for public exposure and UK legislation." (taken from ANNEX C pgs. 37-38 Code of practice for

wireless network development in England)

(b) By using the term 'is designed', the Applicant is EVADING RESPONSIBILITY (liability) for the operation of the installation within the required ICNIRP levels and thus DEFLECTS THAT LIABILITY AWAY FROM THE APPLICANT/OPERATOR onto whom...Worthing Council?

(c) This, to the best of my understanding, INVALIDATES the authenticity of the ICNIRP Declaration, as supplied here, and hence, the application itself.

Which brings me to the next related issue of the inadequacy of the ICNIRP Declaration:

2) The ICNIRP Guidelines state that people with "implantable medical devices" and "*metallic implants" in the body are "outside the scope of these guidelines" (as mentioned on page 2 of the 2020 ICNIRP Guidelines report) which indicates that these vulnerable people are NOT protected by the 'Guidelines' and may be SUBJECT TO HARM from 5G telecoms installations within their local area.

*There are many scenarios in which metal is used in the human body for medical reasons: Surgical - metal pins, plates, rods, discs, screws e.g. scoliosis surgery and joint replacement of knees and hips. Urinary, gynaecological and intestinal repairs - e.g. mesh repairs and copper contraceptive coils. Cardiovascular - implantable heart loop recorders, stents and pacemakers. Implants to treat and monitor health conditions, deliver drugs or to restore bodily functions e.g. diabetes related products. Magnetic cerebral spinal fluid shunts. Cochlear implants for hearing loss. Dental work - braces, implants, metal crowns, pins, denture arches, mercury amalgam fillings. What about body piercings?

FURTHERMORE, relative to 2) above:

3) In a recent High Court case, Thomas v Cheltenham Borough Council (CBC), the Presiding Judge Jarman stated at para. 43: "...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."

And at para. 39: "...the guidelines expressly stated that EMF's can cause harm by interfering with medical implants, and that such issues were beyond the scope of the guidelines. A consideration of such an issue, for example by considering whether the proposed development in the present case should be sited further away from Lefroy Court, would not in my judgment involve setting health guidelines different from ICNIRP guidelines for public exposure so as to fall foul of [118] of NPPF. The reason for that is that the guidelines do not address the issue of potential harm caused by EMFs in relation to medical implants. I do not accept Mr Kohli's [Defendant] submission that... there is no such impact. The wording of the guidelines, albeit in the context of medical procedures, clearly refers to such a potential impact, and indeed goes further and refers to a potential impact on electrical equipment more generally."

Thus confirming that lawful obligations extend beyond simply accepting the ICNIRP

certificate. The court made clear that risks to individuals with metal or medical implants are not assessed by the ICNIRP certification process, and that these risks **NEED TO BE TAKEN INTO ACCOUNT** by local planning authorities when deciding where masts are sited. As stated at paragraph 46 of the Judge's 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."

(SEE: <https://caselaw.nationalarchives.gov.uk/ewhc/admin/2024/1035>)

I urge you to refuse this application.
