

From:
Date: Wed, 21 Jan 2026 at 15:42
Subject: Application AWD/1596/25 - OBJECTION
To: <planning@adur-worthing.gov.uk>

ATTN: Gary Peck
cc. Cllrs. Dom Ford and Mike Barrett

With regard to **AWD/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. | Telecommunication Site Bn0914 North Of Durrington Community Centre 2 Romany Road Worthing West Sussex](#)

I object to the above application on the following grounds:

1) APPEARANCE AND SITING: The proposed development is contrary to the National Planning Policy Framework 2024 as the mast and associated cabinets would significantly dominate the street scene, introducing an intimidating, industrialising feature within the existing green space that would have a detrimental impact on the character and appearance of the surrounding area.

The array of bulky equipment cabinets will cause unnecessary clutter, and be susceptible to unwanted graffiti and/or vandalism.

The proposed site is in a residential area close to homes, schools and businesses - which contradicts the NPPF objective to minimise potential visual impact through sensitive siting and sympathetic or camouflaged design solutions.

The mast will have a dominant, overbearing, industrialising impact on the amenity of the nearby area causing local residents anxiety and degrading the quality of the local area.

Perception of risk is a material consideration to the siting and appearance of the proposed equipment.

2) ICNIRP GUIDELINES: ICNIRP self-certification DOES NOT remove the applicant's obligation under NPPF 122 to provide the evidence necessary to understand site-specific impacts.

The LACK of exclusion-zone diagrams, propagation modelling, cumulative exposure assessment and receptor-specific evidence means that lawful scrutiny is not possible.

Recent judicial authority also confirms that dismissal of concerns as "perception of risk" is no longer appropriate.

In *Thomas v Cheltenham BC* (2024), the High Court held that individuals with metal implants, orthodontic appliances or Active Implanted Medical Devices FALL OUTSIDE the assumptions underpinning ICNIRP public-exposure declarations.

Their presence makes proximity a material consideration requiring evidence.

Similarly, the 2022 Upper Tribunal decision granting an Education Health and Care Plan (EHCP) on the basis of electromagnetic sensitivity confirms that some individuals experience substantial, disabling effects in ordinary EMF environments, and that public authorities must make provision accordingly. The Tribunal did not treat these impacts as “perception” but as evidence-based impairments requiring accommodation under the Equality Act.

These authorities do not impose alternative health standards. They simply confirm that ICNIRP compliance DOES NOT entitle an applicant to avoid providing site-specific technical information, and that genuine receptor-based risks CANNOT lawfully be dismissed as perception.

NPPF 122(a) specifically highlights the need for evidence and consultation where a mast is installed near a school or college. However, the applicant provides no consultation with the nearby schools/nursery: Hawthorns Nursery School - 296.95 m; Hawthorns Primary School - 307.41 m; The Laurels Primary School - 429.08 m

Absence of Exclusion Zones and Underlying Calculations:

The applicant has provided a declaration of compliance with the ICNIRP Guidelines, but no supporting evidence, including:

- exclusion-zone diagrams;
- near-field or far-field modelling outputs;
- power-density calculations;
- a site-specific explanation of how compliance is achieved above occupied school spaces.

Compliance with ICNIRP DOES NOT relieve an applicant of the evidential duties imposed by NPPF 122, nor does it bind the planning authority. The correct legal position was set out by DLA Piper acting for Public Health England (PHE) in their formal pre-action protocol response in judicial review proceedings, stated in a letter dated 8 August 2019:

“in any other context regard is had to the Guidance that is entirely a matter for the discretion of the relevant body and it must determine what weight to place on the Guidance given the clear indication as to the sources from which the advice and recommendations in the Guidance are derived. Equally, that body must determine what other evidence from your clients or other members of the public or interested parties to consider in making any decision.”

Where PHE (now UKHSA) guidance is cited, it is ONLY advisory; the authority MUST exercise independent judgement, determine the appropriate weight to give that guidance, and consider any other relevant evidence.

UKHSA AIMD Guidance Cannot Be Met Without Published Exclusion Zones:

UKHSA guidance states that AIMD users (e.g., pacemakers, neurostimulators, cochlear implants, insulin pumps etc.) **MUST NOT enter the installation's ICNIRP public exclusion zones.**

However, the applicant has not supplied the designated public exclusion zones which underpin the ICNIRP compliance certificate.

Without this information, AIMD users CANNOT comply with UKHSA advice.

The same applies to school children and visitors to Durrington Community Centre with orthodontic braces and individuals with metal surgical implants. These interactions fall outside ICNIRP standard assumptions and must be evidenced.

Thomas v Cheltenham BC (2024) confirms that impacts relating to:

- metal implants,
- medical devices, and
- orthodontic appliances

are **material considerations** when raised before determination, because they fall **outside ICNIRP's generalised assumptions.**

PLEASE REFUSE THIS APPLICATION.

Yours Sincerely,

C. Coverdale

Kenilworth Rd

St. Leonards-on-sea TN38 0JL