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Date: Tue, 28 Jul 2026 at 16:11

Subject: AWDM/0643/26 + AWDM/0644/26

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As a frequent visitor / resident, I object to these installations on the following grounds:

- Urbanised, unsightly blemish to the local area.
- Clutter on pavement contrary to any Clean Streets Charter.
- Obstacle for mobility impaired, sight impaired and push-chairs. Each installation could limit the flow of pedestrian movement.
- Designed to be deliberately distracting, together with the huge bulky, solidity of the structure, the hubs could cause problems for road safety with pedestrians, cyclists and drivers not having a clear view of each other.
- Unnecessary advertising, primarily an advertising hoarding with a cursory phone/ wifi/ etc attached.
- The proposals may bring free ultrafast public Wi-Fi, 5G small-cell mobile connectivity, free UK calls, free device charging, an emergency services button, environmental sensors, insight counting, and public messaging capabilities. Nowadays what is the usefulness? Most people have their own mobile phones for connectivity.

- The applicant has not provided sufficient justification that the Street Hubs are necessary.

- Excessively large illuminating screens that will disturb and negatively impact insects, moths, bats and birds, contrary to any 'Biodiversity Net Gain' plan.

- Constantly changing screens, an assault on the senses.

- There are plenty of studies now showing eye damage caused by the blue light on screens. Do we really need yet more?

- Designed to be stimulating, the installation has no regard to those with conditions such as autism, epilepsy or mental health conditions who may be overly stimulated by the rapidly changing displays. 70% of disabilities are invisible and common aspects include light/noise sensibility, susceptibility to over-stimulation and attacks are common when the environment itself poses a form of psychological distress.

- NOTE - All public authorities have an obligation and duty to act in the public interest and protect people from harm.

- The Public Sector Equality Duty (PSED) requires local authorities to have 'due regard' to the impact of any proposed policy – including planning decisions regarding the installation of illuminated advertising boards – on groups with protected characteristics, which includes light-disabled people and those susceptible to flickering digital screens.

- Like all screens, Street Hubs are deliberately designed to be addictive. Back in 2019, it was found that 1 in 4 children showed addictive behaviour wrt smart phones. "Smartphone Free Childhood" is an ever-growing group of concerned parents, and a debate in May-2024 at Westminster Hall looked at the clear and urgent need to ban smartphones in schools. Experts recognise the risks to children from screen time and tech overuse, which affects behaviour and mental health. Addictive tendencies are common in adults too. Adding such a screen in the public arena is just contributing further to the problem.

- Likely to attract graffiti and antisocial behaviour despite the promise of monitoring it. Who will pay for the security, cleaning, repairs and maintenance?

-The types of electronics in these hubs emit ultra-sonic frequencies which affect both wildlife and people who can hear outside of normal spectrums. These frequencies cause headaches and nausea in those who can hear them. There are no plans to monitor noise emission, nor how to regulate it.

- Energy consumption. Who pays for the power to support their running 24/7? How can the increase in energy be justified in view of Sustainability / Net Zero goals? The council should be aiming to reduce energy consumption, not adding energy guzzling Street Hubs at a time when many are struggling to heat their homes.

- Emissions from building and installing digital advertising screens, and running them, should be considered in planning decisions. Digital advertising screens use a great deal of electricity. Where is the evidence for claims of energy efficiency? The plans have no public benefit and the energy usage from the national grid will contribute to global heating. A conservative estimate is that one large digital advertising screen (6.4 metres x 3.1 metres) uses more electricity than 11 average UK households. This undermines the local authorities' net zero ambitions.

- No information provided to demonstrate how the proposed development would integrate sustainable technologies to promote sustainable design and construction. Without this information, it is difficult to accurately assess how the proposals would reduce energy demand in order to accomplish sustainable principles. Any Environment Statement should consider the implications of this infrastructure from extraction, processing, usage and disposal of the materials for street hubs, and include the effects of the radiation emitted from all the antennae on the proposed mast (which can be regarded as effluvia or as a pollutant) on public health.

- Please apply your decisions about advertising sites based on current priorities such as climate change, biodiversity and mental health.

- These Street Hubs are bringing ultrafast Wi-Fi, 4G & 5G antennas and small cell technology (ie millimetre wave technology) to the middle of our streets. Thus, they will bring microwave

radiation (or radio frequency radiation / electromagnetic field RFR EMF) ever deeper into our communities where people live, work and shop. There are NO human studies on the cumulative effects of exposure to this radiation over a lifetime. This is new technology, there should be robust safety studies.

- The ICNIRP certificate with this application, refers only to the "**design**" of the installation **and does not conform to the required statement provided in the 'Code of Practice for Wireless Network Development'** (<https://www.gov.uk/government/publications/code-of-practice-for-wireless-network-development-in-england/code-of-practice-for-wireless-network-development-in-england#annex-b--supplementary-information-template-and-annex-c-icnirp-declaration-and-rooftop-deployment-constraints-and-solutions>) where the 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-Ionising Radiation Protection (ICNIRP) for public exposure and UK legislation.***" (* also currently in use by a large number of telecoms applicants across the UK.)

By using the words '**is designed**', the Applicant is evading responsibility (liability) for the operation of the installation at the required ICNIRP levels and, thus, deflecting that liability which can have serious repercussions in the event of future adverse health claims from residents living in close proximity to these masts.

ADDITIONALLY, Ofcom states: "*A1.14 We do not agree that EMF risks can be appropriately addressed by only imposing obligations on manufacturers. Regardless of the steps a manufacturer takes to mitigate EMF risks, it is the user or operator of the equipment that is ultimately in control of how the equipment operates and any EMF levels that are produced by the equipment on an ongoing basis*" - <https://www.ofcom.org.uk/siteassets/resources/documents/spectrum/emf/general-notice-final-decision-emf-licence-variation.pdf> (Publication Date: 18 May 2021) *so how do we know that the hub operated within safe levels of radiation?*

The very nature of these street hubs is encouraging people to stand close to the screens, and dangerous levels of radiation.

- It raises questions over privacy, as each will have a video camera on top of the screen (for "future use"). What would be the range of the CCTV? What images would be captured? Would it capture and record biometric (facial recognition) data? With whom would the data being shared? Who has any individual's consent to store and process that data and how does

that sit with people's rights or even lawsuits around police use of facial recognition technology in the UK?

- It would, by reason of siting and size, result in unnecessary clutter resulting in visual harm to the character and appearance of the sites, detrimental to the visual amenity of this areas and would fail to contribute positively to the local areas.

5G uses much higher frequency radio waves than in the past and it makes use of very new- and relatively unevaluated, in terms of safety- supportive technology to enable this higher data transmission capacity, points out Professor

Frank. <https://www.bmj.com/company/newsroom/stop-global-roll-out-of-5g-networks-until-safety-is-confirmed-urges-expert/>

*A recent court case against Cheltenham Borough Council (CBC) has confirmed that lawful obligations extend beyond simply accepting the ICNIRP certificate.

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

The court made clear that risks to individuals with metal or medical implants—such as pacemakers, clips, plates, and shunts, etc. — are NOT assessed by the ICNIRP certification process, and that these risks MUST be taken into account by local planning authorities when deciding where masts are sited.

The Council claimed it was prohibited from considering health impacts, but the Court made clear that this position was incorrect. The longstanding mantra—“we cannot consider health”—can no longer be relied upon by any planning authority.

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