From: [redacted]
Sent: 12 July 2024 08:00
To: [redacted]
Subject: DC/24/0979, Fao Jacques Burrowes, Case Officer

Categories: Comments Received

TO: **Horsham District Council, Parkside, Horsham, West Sussex RH12 1RL**

Dear Sirs & Madams, Planning Officers & Councillors,

[redacted]

Of **74 Kempshott Road, Horsham**

Postcode: **RH12 2EY**……

on **12 July 2024**……formally **OBJECT** to Planning Application ref: **DC/24/0979** Install electronic communications apparatus to an existing telecommunications installation - Permitted Development Horsham AMC North Street (B219) Horsham West Sussex RH12 1RE

Application Letter
In the application letter it states:
"The proposal is not subject to an application for planning permission or prior approval, but if you do have any comments to make, require a meeting to discuss the proposal, or wish to have an accompanied visit to the site, please let us know within 14 days of the receipt of this letter".
Has the Council requested a meeting? I suggest this is very important for the following reasons, which also form my objection.

The reasons for my objection are:
Over Development
Under NPPF paragraph 115, "The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion."

According to Signal Checker, mobile reception for all UK Networks is good in this postcode therefore there is a Lack of Need and therefore this proposal is Over Development.

How many more roof tops are going to resemble pin cushions with increasing number and size of 'pins', with these applications being passed through the planning process as a delegated decision?

Other – 500m Setback and Exclusion Zone
Setback - The **New Hampshire Commission** requires wireless telecommunication antennas to be placed at least 1,640 feet (500m) from residents, parks, playgrounds, hospitals, nursing homes, day care centres and schools.

The **13-strong expert commission** was formed through legislation to include experts in: physics, toxicology, electro-magnetics, epidemiology, biostatistics, occupational health medicine, public health policy, business and law. This recommendation is evidence based, and such evidence is globally applicable. Transcript pertinent to the 500m setback Dr Kent Chamberlain: November 2021
https://www.youtube.com/watch?v=DWK74ie7krc

As this proposal is central to Horsham, there are a huge number of residential homes, places of work and recreation within 500m of this proposed installation including the HDC building of Park North.

Exclusion Zones These are areas around the mast which ICNIRP define as danger zones for RFR. The area where the RF field values radiating from the antennae exceed the ICNIRP Public reference levels is referred to as the public exclusion zone, and where it exceeds the ICNIRP Occupational reference levels it is known as the Occupational exclusion zone.

The applicant needs to outline the public exclusion zone of the proposed installation and the Council need to fulfil their duty to keep the residents of Horsham safe. My understanding is that a typical public exclusion zone is 30-50m. Many buildings, including your own building of Park North lie within this area.

Other - Health risks
In the application letter it states:
"The ICNIRP certificate can be provided on request". Surely it is of the utmost importance the Council obtains this certificate?

Although the applicant confirms that
"The installation of the apparatus has been designed and will be operated within the relevant ICNIRP guidelines on public exposure", who is going to check this? The Council needs to be made aware of the plans for continued monitoring of the radiation levels? How are the public to feel safe unless there is regular monitoring?

Please note ICNIRP does not say that there is no health risk associated with 5G. In its 2020 Guidelines (https://www.icnirp.org/cms/upload/publications/ICNIRPrfgdl2020.pdf) ICNIRP states
"However, some exposure scenarios are defined as outside the scope of these guidelines. 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)".

This means that the ICNIRP 'certificate' does not apply to people with any form of metal in their bodies. 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. And what about body piercings? There are very few of us that do not have some metal in our bodies and none of us know when we may need it in the future. As these people are not covered by the ICNIRP certificate of "safety", what measures are in place to protect them?

Considering this installation is central to Horsham, how is the Council to ensure that all vulnerable groups are protected?

There is plenty of evidence of harm below ICNIRP safety levels, please see International Commission of the Biological Effects of EMF's [icbeemf.org] or ehtrust.org or rfinfo.co.uk and note the following section on Health Studies

Health Studies
There are NO safety studies on the cumulative effects on health from exposure to these radiation emissions 24/7 over a lifetime, while over 2,000 studies show harms and risks to human health, wildlife, and the environment.

Please read this recent report from Hardell and Nielsen summarising seven of their recent studies on the effects of **adding 5G to clusters of antennas on roofs**.

https://www.degruyter.com/document/doi/10.1515/reveh-2024-0017/html

An extract from the report: "In our seven case studies, we found that persons who got 5G base stations or masts at various distances ranging from 3 to 538 m from their dwellings, developed a range of symptoms known as the microwave syndrome or radiofrequency sickness. In all seven case studies, antennas for 3G/4G were active before the change to 5G and most study persons appeared to have tolerated the

radiation from these previous generations. However, after the deployment of 5G most of the study persons rapidly developed **severe symptoms of the microwave syndrome**, which indicates that 5G is more harmful than previous generations of telecommunication."

The Conclusion of the above report:
"Our seven case studies, comprising 16 persons, on health effects from real 5G RF radiation exposure, showed that the study persons developed the microwave syndrome after installation of 5G base stations in the neighborhood of their dwellings. Most prevalent were symptoms of the nervous system: sleeping problems, headache, fatigue, irritability, emotional symptoms and concentration/attention deficiency. Very high RF radiation levels, **although much lower than limits recommended by ICNIRP and the FCC**, were measured with the broad band meter. Some of the studied persons developed severe symptoms. Most persons could move to another settlement without 5G, whereby the microwave syndrome alleviated and disappeared within short."

The bold highlights are my own to emphasise vital points.

Other cases of Microwave sickness
Below are 3 other recent cases where people became unwell after the deployment of 5G. The research concluded that the guidelines for RFR exposure based only on tissue heating by ICNIRP are inadequate to protect human health and that 5G appears to provoke symptoms of microwave syndrome in previously healthy people.

https://www.researchgate.net/publication/368690391_Development_of_the_Microwave_Syndrome_in_Two_Men_Shortly_after_Installation_of_5G_on_the_Roof_above_their_Office

https://www.gavinpublishers.com/article/view/case-report-the-microwave-syndrome-after-installation-of-5g-emphasizes-the-need-for-protection-from-radiofrequency-radiation

https://www.acmcasereport.com/pdf/ACMCR-v10-1926.pdf

These case studies indicate that implementation of 5G cannot be done without the risk of harmful effects on human health. As Signal Checker indicates that reception for all mobile phone companies for 3G, and 4G is good in this locality, and as the applicant mentions 'next generation digital connectivity', I can only assume that the replacement and new installations specified in this application are for 5G.
How is the Council to meet its obligations to protect the health of its residents which they are obliged to do under the **Health and Social Care Act 2012, National Health Service Act 2006 and EECC 2018.**

International Agency for Research on Cancer
Radio Frequency Radiation (RFR) from mobile phone masts has already been classed by the World Health Organisation's International Agency for Research on Cancer as a Class 2b Possible Carcinogen.
Dr James Lin believes RFR will be reclassified as a Class 2a probable carcinogen at least. Dr James Lin is one of the world's most renowned scientists who has studied the effects of radio frequency (RF) radiation for decades. He is a distinguished former member of the two organisations that created the RF exposure limits, the International Commission on Non-ionizing Radiation Protection (ICNIRP) and the Institute of Electrical and Electronic Engineers (IEEE).

Electromagnetic Hypersensitivity
There have been legal cases where Electromagnetic Hypersensitivity (EHS) has been recognised as disabling.
See: https://phiremedical.org/wp-content/uploads/2022/08/Press-Release-EHS-Social-Worker-granted-long-term-ill-health-pension-UK-Named-further-detail-included.pdf

[redacted] Local Authorities must consider EHS in their decision to approve mobile phone electronic communication installations. As areas become more saturated in radio-frequency radiation, it is likely that people's health will deteriorate, with an increasing number who cannot function normally.

You are bound by your Public Sector Equality Duty under s. 149 of the Equality Act. Equality Impact Assessments should be undertaken before permitting the installation of infrastructure. You cannot rely

solely on the ICNIRP's exposure guidelines, which are not safe for people who suffer Electromagnetic Hypersensitivity or who have become disabled because of such radiation. Does the Council have any Equality Impact Assessments for 5G or EMF's?

Insurance

Lloyds of London has refused to insure against health effects from all wireless technology since 2010 (Exclusion 32) and there are currently no insurers in the world who will cover this.
Insurance companies will not insure against harm caused by EMF's, yet the UKHSA make councils liable. What Insurance Policy does the Council have in place against health and environmental harm caused by a technology for which there have been no long-term independent health or environmental impact studies?

Liability

The Council could be vulnerable to liability costs both from future claims from residents suffering harmful effects of wireless radiation and from Judicial Review proceedings.

- Costs of £13k were recently awarded against Brighton and Hove City council when they failed to address the health impacts of a proposed mast and to obtain adequate evidence of the assessment of the proximity of the mast to the school and the amended proposal. *(Consent order 4/11/2021). Ref BH2021/01639*

- Mendip Planning Board applied the procedural standard within the EECC and set an example of a positive decision by rejecting a 5G mast upgrade on health grounds on March 16th 2022. They concluded that the threshold of evidence was sufficient as a Material Planning Consideration to counter the ICNIRP self certified submission, and merit a precautionary refusal. *Ref 2021/1951/FUL https://rfinfo.co.uk/mendip-council-health-impact-based-mast-refusal/*

Please note:

Under, 999/519/EC: Council Recommendation of 12 July 1999 on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz) (OJ L 199 30.07.1999, p. 59,
ELI: **http://data.europa.eu/eli/reco/1999/519/oj**)

Council Recommendation (19) states "recent science needs to be accounted for and precaution applied"

A case was filed on 12th September 2023 (case number Z2309835) challenging the government's failure to enact the public health imperative within the EECC. It is EECC article 45 2) which refers specifically to 1999/519/EC p19.

The council has an obligation to establish its jurisdiction as a competent authority under the EECC.

Additionally, Public Health England solicitors DLA Piper confirmed in August 2019 that Local Planning Authorities are required to decide what weight to put on the ICNIRP guidelines and what weight to put on evidence submitted with objections.

I urge you to REFUSE this application.

Thank you for reading my submission.