

Dear Sirs & Madams, Planning Officers, Councillors & Head of Development and Building Control

Of 74 Kempshott Road, Horsham

Postcode: RH12 2EY.....

on 21 April 2026.....formally **OBJECT** to the following:

DC/26/0562

Installation of 1 No. Omni Antenna and support pole at 21.50m, 1 No. Modem, 2 No. enclosure, 1 No RCD Isolator with check meter and ancillary equipment works.

Telecommunications Mast 375250 Rookwood Golf Course Robin Hood Lane Warnham West Sussex

The reasons for my objection are:

[Incomplete Documentation regarding Safety ie No ICNIRP Declaration](#)

Even though this equipment appears to be proposed as a replacement to the existing 16m tree mast at this site, it is a **completely new and upgraded mast and antenna**. So why is there no ICNIRP Declaration of Conformity submitted with the notification as required under the NPPF?

Under the NPPF Dec 2024 Section 10 Point 122 (b) and (c)

b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or

c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

Why have the planning officers not obtained this document before it has been 'ticked off' No Objection to Notification?

Even if the new mast is deemed compliant with ICNIRP guidelines, Horsham District Council must understand that the 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. 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)".

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.

Within close range of the proposed new, upgraded mast there are members of the public walking and playing golf on Rookwood Golf Course. The Golf Clubhouse is close to the proposed site. What risk assessment has the council done to ensure members of the public not covered by the ICNIRP guidelines

will be safe? What measures are in place to protect them? How can the Council fulfil its obligations under the Health and Social Care Act 2012 and Equalities Act 2010?

Electromagnetic Radiation and Wildlife

ICNIRP limits were not developed to protect our flora or fauna. Wireless radiation "safety" limits for trees, plants, birds and bees simply do not exist. We are still waiting for ICNIRP to confirm whether their guidelines are protective for plants and animals in their natural environment. However there are many studies showing detrimental effects:

A paper by Alfonso Balmori titled 'Electromagnetic pollution from phone masts. Effects on wildlife' was published in 2009

www.researchgate.net/publication/24180316_Electromagnetic_pollution_from_phone_masts_Effects_on_wildlife

The paper looks at the impact of mobile base stations on house sparrows, rats, mice, bats, hamsters, guinea pigs, amphibians, insects, trees and plants.

Balmori did further research in 2021

Electromagnetic radiation as an emerging driver factor for the decline of insects, Balmori 2021

www.sciencedirect.com/science/

Environmental Health Trust 2018 Review: Electromagnetic Fields Impact Tree and Plant Growth

<https://ehtrust.org/electromagnetic-fields-impact-tree-plant-growth/>

There are many more papers on the effects of EMR on wildlife at <https://rfinfo.co.uk/environmental-footprint-of-rfr/>

And,

<https://ehtrust.org/environmental-effects-of-wireless-radiation-and-electromagnetic-fields/>

Rookwood is a vital Green Corridor for the neighbouring Warnham Nature Reserve. Warnham Nature Reserve highlights its biodiversity on their website.

"The 92 acre site, owned and managed by Horsham District Council, was designated a Local Nature Reserve in 1988. It includes a 17 acre millpond, marshes, grassland, reed beds, hedges and woodlands. The site provides a haven for a variety of wildlife with over 400 species of plants, and over 100 species of bird, including a thriving Heronry, wildfowl, and all three species of Woodpecker. The beautiful Kingfishers makes the most of the waters and are regularly seen from all four bird hides. The Reserve is also rich in dragonfly – over 21 species can be seen zipping around the different wetland habitats. There is a wide range of wildlife to be seen, from minute pond organisms to herons, deer and foxes. There is a feeding station which attracts a wide variety of birds, mammals and insects."

The precautionary principle must be applied towards 4G and 5G until further research is undertaken to ascertain the effect of this new technology on vulnerable people and wildlife.

500m Setback

The New Hampshire Commission recommends a distance of 500m setback for telecoms installations from residences, schools, and businesses. Rookwood Golf Club and the Warnham Nature Reserve fall within this limit.

New Hampshire Commission

The New Hampshire HB522 Commission on 5G (formed by legislation to explore the environmental and health effects of 5G technology) published their findings after a year-long study in Nov-2020. The commission found that wireless radiation is harmful and recommended 1,640 feet (500 metres) as a realistic protective setback distance against radiation from masts. Their recommendation was evidence based, and as such, is globally applicable.

Based on the Commission, the U.S. state of New Hampshire introduced a bipartisan bill (HB1487) in Dec-2023, requiring measures to be put in place to inform the public about the health risks of radio-frequency radiation (RFR) (including information online, public service announcements, notifications on poles carrying 5G antennae), wireless antennae to be placed at least 500 metres away from residences, businesses and schools, replacing Wi-Fi with wired technology in schools.

Also: <https://rfinfo.co.uk/new-hants-commission/>

Please note, DLA Piper - solicitors to Public Health England (PHE) now UK Health Security Agency (UKHSA), who themselves rely on ICNIRP guidelines say "A public body must determine how much weight to put on the PHE guidance. Equally that body must determine what other evidence from your client or other members of the public or interested parties to consider in making any decision. If it be alleged that a public body now or in the future acted unlawfully in placing reliance on the guidance, that cannot retrospectively taint the guidance with illegality." This underlines the fact that, if you rely on ICNIRP, you as a council - not the ICNIRP guidance or its issuer - are liable.

With kind regards