

Dear Sirs & Madams, Planning Officers & Councillors

I, [REDACTED]

Of 74 Kempshott Road, Horsham

Postcode: RH12 2EY.....

on 14 May 2026.....formally **OBJECT** to the following:

DC/26/0720 Removal and replacement of 3no antennas and 1no equipment cabinet with other associated ancillary works thereto. Horsham Police Station Hurst Road Horsham West Sussex RH12 2DJ

The reasons for my objection are:

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

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

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;

To conform to the above NPPF guidance, the planning officer would be advised to gain an ICNIRP Declaration of Conformity for the proposed installation. As there are serious concerns about the safety of this technology, surely it is in the Council's interest to ensure that every bit of equipment in the district is covered by a properly completed ICNIRP certificate by the company installing and responsible for these installations. This would seem to be your responsibility towards the residents of Horsham and your Duty of Care towards them.

In addition to the self-certified ICNIRP Declaration of Conformity surely it is also necessary to gather technical information to properly evaluate the safety of the proposed antennas (as would be done with a building certificate for example). This information might include:

Field strengths,
Operating parameters,
Near-field or far-field modelling outputs,
Power-density calculations,
Exclusion zone diagrams,
Power outputs of the antennas concerned and the power drop off over distance calculations so as to fully assess the power of the main beam and the side lobe beams,
or a site-specific explanation of how compliance would be achieved.

Also, a Risk Assessment on cumulative levels of Electromagnetic Radiation exposure to include all sources of background radiation and combined or overlap with other local masts and rooftop antennas, and show all exclusion zones. It is impossible to properly evaluate the safety of the proposed antennas without the required technical information and drawings showing the Public Exclusion Zones etc.

The applicant has submitted this notification in accordance with Regulation 5 of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 however also under Regulation 5 of this Code:

(3) Where a code operator has given notice under paragraph (1), the planning authority may, within one calendar month of the receipt of that notice, give the code operator written notice of conditions with which the planning authority wishes him to comply in respect of the installation of the apparatus.

This appears to give the planning department full authority to ascertain criteria about the installation and its safety rather than allowing them without question as has happened historically.

Even if the new antennas are deemed compliant with ICNIRP guidelines, Horsham District Council must understand that the ICNIRP Declaration does not say that there is no health risk associated with the Electromagnetic Radiation from such installations. 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 cover 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 for joint replacement of knees and hips.
- Also cardiovascular implants – implantable heart loop recorders, stents and pacemakers.
- Magnetic cerebral spinal fluid shunts.
- Cochlear implants for hearing loss.
- Dental work – braces, implants, metal crowns, pins, denture arches, mercury amalgam fillings.

There are very few of us that do not have some metal in our bodies.

What measures are in place to protect these people, and those with EHS (Electro Hypersensitivity)

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.

I urge you to obtain an ICNIRP Declaration of Conformity and other technical information so that Horsham District Council can be absolutely certain that you are fulfilling your Duty or Care and abiding by the Equalities Act before allowing this notification.

With kind regards