[redacted]
3 Waterfield Close
Horsham
West Sussex
RH13 5RR

For the attention of Bethan Tinning

Planning and Development
Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

By email to planning@horsham.gov.uk

Your reference: DC/24/0825

Emailed 18 July 2024

Dear Ms. Tinning

RE: Objection by [redacted] to DC/24/0825 | Erection of 3 no. free standing 6m high columns with 5 no. WiFi Wireless Access Points.

I am writing to object to the application for the above application. Reasons for objection are as follows:

1. Siting

The proposed columns/masts are entirely out of keeping with the local environment in the designated conservation area of Steyning. Steyning is an historic market town and is an excellent example of this part of the heritage of this country. To destroy this by installing utilitarian equipment more suited to an industrial or highly urban landscape is at odds with the local aesthetic and ambience.

At a height of 6m – the equivalent height of a 2-storey building – each column/mast would create both a physical and visual intrusion causing disruption to the particular atmosphere and feel of the local area.

The proposed columns/masts would be located in very close proximity to each other and would individually and collectively amount to a significant and unacceptable increase in street clutter in this very small area of the high street.

This type of infrastructure is not innocuous. The growth of all types of street clutter needs to be kept to a minimum to preserve the atmosphere and aesthetic of all towns and settlements like Steyning. Otherwise, the slow creep of urbanisation destroys the very essence of the place.

Approving this proposal would set a precedent and open the door for telecoms companies to litter the streets with urban paraphernalia.

2. Proposed Locations

The proposed locations of each column/mast were clearly chosen remotely as a very basic desktop exercise and I don't believe that a site visit was undertaken. Had the applicant actually visited Steyning High Street (instead of working via Wi-Fi on a computer screen all day) certain site issues would have been obvious, and these locations would not have been chosen. The drawings provided with the application are missing such basic information as existing street furniture or exact co-ordinates so assessment is not straightforward.

The drawing – Proposed Block Plan 1 – shows 2 proposed columns/masts. One directly outside 88 High Street which is Steyning Grocer and one at the entrance to the carpark opposite 76 High Street. The drawing – Proposed Block Plan 2 – shows one proposed column/mast location outside 76 High Street.

Site 1: Outside 88 High Street

This proposed column/mast location is ill-advised because it would clash with the existing Belisha beacon and the awning extending from the business at no. 88. The Belisha beacon is not shown on any drawings.



Site 2: Outside Car Park entrance

A large and ugly CCTV pole exists at the proposed site already and the proposed column/mast would clash significantly if located anywhere in the proximity of this CCTV pole. An additional tall column/mast in this location is visually unacceptable.



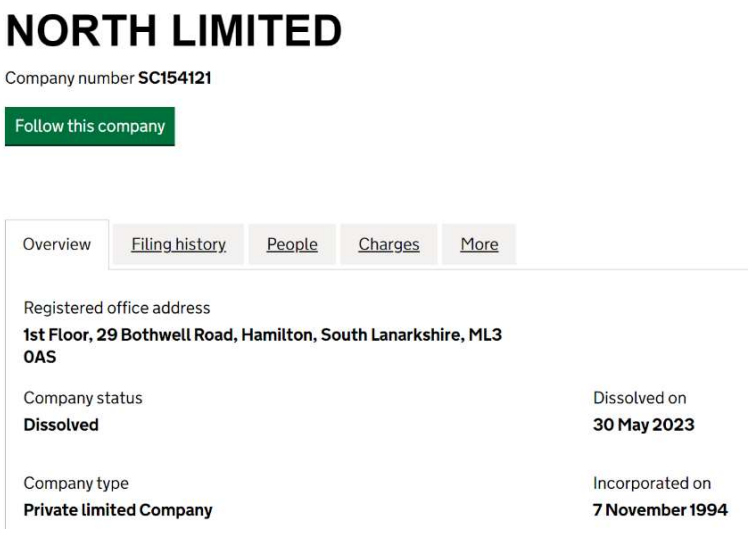
Site 3 – Outside 76 High Street

The proposed site is at a narrow point in the footpath and too close to the last step of the entrance to no. 76. It's an inappropriate location that would impede 2-way pedestrian flow, exit and entry to no. 76 which operates as the restaurant Mama Mia and would inevitably cause issues for people using wheelchairs and people using pushchairs/prams.



3. Discrepancies on the application form

It is not clear who the applicant is. The application form sates that the applicant is Mr. Mike Jones of North Ltd. The company North Ltd. does not exist. It was dissolved on 30th May 2023 as per below:



NORTH LIMITED

Company number **SC154121**

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Registered office address
1st Floor, 29 Bothwell Road, Hamilton, South Lanarkshire, ML3 0AS

Company status
Dissolved

Dissolved on
30 May 2023

Company type
Private limited Company

Incorporated on
7 November 1994

The address provided in the application form for "North Ltd." is:
North House
Carlton Court
St. Asaph business Park
BN44 3RD

The address is St. Asaph in Wales but the postcode is for Steyning High Street.

The agent's Company Name provided on the application form is KS Town Planning which is not a registered company.

4. Quality of Application

The following two paragraphs are taken from the 'Code of Practice for Wireless Network Development in England (2022)', with which all wireless infrastructure providers, their agents and contractors, and local planning authorities should be well acquainted:

> *74. High-quality applications are essential and this includes ensuring the information provided in the application is of a good standard. The application information should be complete and straightforward.....*
>
> *95. The quality of information submitted as part of an application for telecommunications development is very important. It should always be clear, accurate and complete.....*

Source:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1057999/Code_of_practice_for_wireless_network_development_in_England.pdf

The application lacks integrity in terms of unclear applicant information, lack of exact siting information and poor analysis of the existing site and is therefore neither 'high-quality', 'clear' or 'accurate'.

5. Establishing and defining 'need'

Has HDC conducted any meaningful and valid local consultation regarding free WiFi or are we simply following a government directive to capitulate to the telecommunications industry? Everyone loves something free but what price is being paid here in other ways?

6. Bonus Scheme?

Can HDC confirm whether or not they have signed up to any government 'bonus'-type scheme for rolling out free WiFi within a certain timeframe or on any other basis? This would represent government interference in the planning process and potentially skew decision makers' conclusions on any column/mast/pole applications such as Planning Case Officers or Planning Inspectors.

7. Risk to Public Health

Mental and Physical Health

In 'Scenario D' of the government's scenarios analysis of public service demand for wireless connectivity in 2030 they state:

"Scenario D: Seamless Citizen - Citizens and industry embrace full digitisation and demand facilitates the rollout of advanced network infrastructure throughout the UK. This new quality and ubiquity of connectivity unlocks opportunities for prosperity but is ***demanding of people's data, energy and mental health".***

Source: https://www.gov.uk/government/publications/wireless-2030/wireless-2030

The government recognises and acknowledges the impact a rollout of wireless connectivity would have on people's energy and mental health. Do the people of Steyning really demand all this?

IARC Class 2B Carcinogen

RF stands for Radio Frequency, and an RF signal refers to an electromagnetic wave used to transmit information wirelessly. This is how WiFi works.

In 2011 RF microwave radiation was declared a Class 2B 'possible' carcinogen by the International Agency for Research on Cancer (IARC). This classification is currently under review with results expected in 2025. Once included in the IARC Classification system, no substance has ever had its risk profile downgraded or declassified by IARC. Many scientists are now urging that it should be upgraded to a Class 2A (probable) or Class 1 (known) carcinogen. Is HDC happy to approve this application knowing the harms it will inevitably bring?

No Insurance Available

Since IARC declared the Class 2B status, no insurance company in the world will provide insurance for harms caused due to RF microwave radiation which is very telling indeed. This means that HDC cannot protect its liability should they approve this application knowing full well the inherent risks of such a decision. To approve this application would be at odds with UKHSA (UK Health Security Agency) guidelines.

In her letter of 27 February 2020, to the minister at the Dept. of Digital Culture Media and Sport (DDCMS), Wera Hobhouse MP quotes DLA Piper who are solicitors to Public Health England (PHE) - now UK Health Security Agency (UKHSA) as saying:

"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 HDC would be liable for any harms caused if this application is approved**.** And, as pointed out above, HDC are unable to access any insurance to protect their liability.

Planning Staff Training

Can HDC confirm what training planning staff have received in respect of having the best knowledge and understanding of wireless technology planning applications?

The purpose of planning control is to protect the interests of the public. I hope I have demonstrated ample reason why the public need to be protected in this instance.

Thank you for reading my letter. I hope HDC will decline approval for these proposed columns/ masts.

Kind Regards,

[redacted]

CC Councillor Victoria Finnegan victoria.finnegan@horsham.gov.uk
Councillor Nicholas Marks nicholas.marks@horsham.gov.uk