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**From:** Neda Izadi [REDACTED]  
**Sent:** 01 August 2023 16:53  
**To:** Planning Planning; Brendan Versluys  
**Cc:** Lorna Greenwood (Cllr); Nancy Jirira (Cllr); Richard Olszewski (Cllr)  
**Subject:** Planning Application Ref. 2023/2341/P

I wish to object to this application and hereby raise the following important points:

1- The proposed antenna and associated equipment will be obtrusive, ugly and incongruous with the surrounding character and appearance of the area, contributing to visual clutter resulting in detriment to the visual amenities of the surrounding area, as well as a harmful impact to the outlook of residential properties nearby.

Has the Council carried out any risk assessments, health and safety assessments, and/or formal Environmental Impact Assessments? The Council has a duty to ensure the safety and well-being of residents, if these assessments haven't been done - why not?

The National Design Guide states that any new developments should integrate into the surrounding area, which this proposal clearly does not. It qualifies as 'incompatible and unacceptable use of land'.

2- The proposed site is adjacent to a heritage asset site. Hampstead Cemetery by railings, mature trees will be causing immense damage to environmental aspects of the cemetery and its wildlife.

3- This mast proposal is sited immediately adjacent to residences and community spaces.

The site is densely populated and the proposed antenna will be obtrusive and cause harm to the amenity of the area.

4- The height would be an eyesore and overbearing to residents. It is out of character with the surroundings.

5- Close proximity to 'sensitive receptors' is another problem with this application: two nurseries and a children's play centre are used by many of the local primaries, opposite a residential home for elderly - all within 500m of the proposed mast - Children are more vulnerable to microwave radiation than adults, see for example, Prof Tom Butler, "On the Clear Evidence of the Risks to Children from Non-Ionizing Radio-frequency Radiation" - [www.radiationresearch.org/articles/on-the-clear-evidence-of-the-risks-to-children-from-non-ionizing-radio-frequency-radiation-the-case-of-digital-technologies-in-the-home-classroom-and-society/](http://www.radiationresearch.org/articles/on-the-clear-evidence-of-the-risks-to-children-from-non-ionizing-radio-frequency-radiation-the-case-of-digital-technologies-in-the-home-classroom-and-society/)

In close proximity to 'sensitive receptors': homes (within 500m) - Transmitter density required for 5G means that more people will be exposed to radio frequency

electromagnetic fields (RF-EMFs), and at levels that emerging evidence suggests, are potentially harmful to health, argues Professor John William Frank, Usher Institute, University of Edinburgh. 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. [www.bmj.com/company/newsroom/stop-global-roll-out-of-5g-networks-until-safety-is-confirmed-urges-expert/](http://www.bmj.com/company/newsroom/stop-global-roll-out-of-5g-networks-until-safety-is-confirmed-urges-expert/)

There are thousands of credible studies showing harm from this radiation. There are NO safety studies on effects to health or the environment and biodiversity of the cumulative exposure to this novel technology 24/7 over a lifetime. Lawsuits have proven that mobile masts cause health consequences. Please consider and provide risk assessments for both thermal and biological effects to include both wildlife and humans including foetuses, children, adults, elderly, the sick and those with metal implants. [icbe-emf.org](http://icbe-emf.org)

## **6- INVALID ICNIRP DECLARATION:**

i) The "Code of Practice for wireless network development in England" ('Code') provides the required ICNIRP Declaration in Annex C which states, immediately above the section to be signed:

"SHALL BE OPERATED TO BE IN FULL COMPLIANCE with the requirements of the radio frequency (RF) public exposure limit of the International Commission on Non-Ionizing Radiation Protection (ICNIRP)..."

However, a DISCREPANCY exists between the above 'Code' ICNIRP Declaration and

ii) The ICNIRP Declaration provided by the applicant which states:

"IS DESIGNED TO BE IN FULL COMPLIANCE with the requirements of the radio frequency public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection..."

The statement 'IS DESIGNED TO BE IN FULL COMPLIANCE' does NOT conform to the statement required by the 'Code' or the NPPF (also see 3) below) and is therefore INVALID.

iii) See 'Code' Annex D para 53:

"...mobile operators should certify that the installation WILL OPERATE in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP)"

THERE IS A VERY OBVIOUS DISCREPANCY BETWEEN THE APPLICANT'S ICNIRP DECLARATION AND THE NPPF/ 'CODE' REQUIREMENTS AND THEREFORE, I REPEAT, IT IS INVALID AND THIS APPLICATION SHOULD BE REFUSED!

## **Additionally, The Erroneous ICNIRP Declaration Certificate:**

The ICNIRP "safety" certificate is based on guidelines which categorically do not apply

to, or protect anyone with metal in their bodies. Here is the relevant statement from ICNIRP regarding its EMF safety guidelines: "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)".

Please also note ICNIRP's disclaimer on their website. They even say they're NOT accountable for their guidelines: "ICNIRP e.V. undertakes all reasonable measures to ensure the reliability of information presented on the website, but does not guarantee the correctness, reliability, or completeness of the information and views published. The content of our website is provided to you for information only. We do not assume any responsibility for any damage, including direct or indirect loss suffered by users or third parties in connection with the use of our website and/or the information it contains, including for the use or the interpretation of any technical data, recommendations, or specifications available on our website."

The fact that the ICNIRP certificate does not apply to a large proportion of residents with any form of metal in their bodies is an acute safety issue which needs to be taken seriously and addressed. Doing so would NOT result in setting health safeguards different from ICNIRP (as per NPPF) but is in fact applying ICNIRP exactly as stated from a safety perspective.

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. What about body piercings?

Read full document [ukstop5g.freeforums.net/thread/22512/erroneous-icnirp-declaration-certificate](http://ukstop5g.freeforums.net/thread/22512/erroneous-icnirp-declaration-certificate)

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On 7 March 2022, the Department for Digital, Culture, Media & Sport published a new Code of Practice for Wireless Network Development in England.

Para 20 on Siting and Design states that '...ensuring the impact of new network development is kept to a minimum'. This has clearly not been done in this application. It will dominate all of the structures around.

Para 22 states '...operators should make efforts to reduce visual impacts where possible.' I do not believe the application complies with this.

Para 28 states 'Protecting visual amenity - a comprehensive assessment of the area should be done to ensure that the design solution appreciates the context of its location by fitting with both the site and the wider context setting. Proposals should



take into account protected sight lines, landmarks and vistas.'

Para 38 under Planning and visual considerations states 'Mast positioning - all new masts should be sited, as far as is practicable, so as to minimise their impact on their setting, including the landscape and other buildings.' The application does not comply with this.

Environmental implications and climate change targets - Carbon footprint: Each 5G mast requires approximately 3 x more power than a 4G mast (as much as 73 typical homes). [www.spectrum.ieee.org/5gs-waveform-is-a-battery-vampire](http://www.spectrum.ieee.org/5gs-waveform-is-a-battery-vampire)

Local authorities are expected to safeguard the quality of the local environment and some have a statutory duty to help conserve biodiversity and species protection as part of the planning process. Councillors are in a position to help preserve the natural environment for the benefit of future generations and to promote sustainability.

With 5G's greatly increased mobile traffic, electricity usage from telecommunications could create up to 23% of global greenhouse gas emissions by 2030; power demand would be the equivalent of 36 nuclear reactors or 7800 massive offshore wind farms worldwide. - [www.mdpi.com/2078-1547/6/1/117/htm](http://www.mdpi.com/2078-1547/6/1/117/htm) - [www.wsimag.com/science-and-technology/64080-green-5g-or-red-alert](http://www.wsimag.com/science-and-technology/64080-green-5g-or-red-alert)

In France, Spain and California the Green Parties: the French Climate Change Council, and Greenpeace East Asia have all warned of the climate footprint of 5G. - [www.france24.com/en/europe/20201220-deploying-5g-will-lead-to-spike-in-co2-emissions-french-climate-council-warns](http://www.france24.com/en/europe/20201220-deploying-5g-will-lead-to-spike-in-co2-emissions-french-climate-council-warns)

The French Climate Council states that an extra 7 billion tonnes of carbon dioxide could be released into the atmosphere by 5G - [www.france24.com/en/europe/20201220-deploying-5g-will-lead-to-spike-in-co2-emissions-french-climate-council-warns](http://www.france24.com/en/europe/20201220-deploying-5g-will-lead-to-spike-in-co2-emissions-french-climate-council-warns)

Legal firm Client Earth and telecoms consultants Strand Consult have expressed concerns about greenwashing by providers. - [www.clientearth.org/media/wbglw3r3/clientearth-accountability-emergency.pdf](http://www.clientearth.org/media/wbglw3r3/clientearth-accountability-emergency.pdf)

#### WILDLIFE:

Research shows that manmade RF radiation (RFR) may be seriously harmful to wildlife, including vital pollinators such as bees.

- [www.sciencedirect.com/science/article/abs/pii/S0048969720384461?dgcid=author](http://www.sciencedirect.com/science/article/abs/pii/S0048969720384461?dgcid=author)

- [www.emfdata.org/en/studies/detail&id=566](http://www.emfdata.org/en/studies/detail&id=566)

- [www.mdpi.com/2075-](http://www.mdpi.com/2075-4450/12/8/716?&ml_subscriber=1772077450675623693&ml_subscriber_hash=s0w7)

[4450/12/8/716?&ml\\_subscriber=1772077450675623693&ml\\_subscriber\\_hash=s0w7](http://www.mdpi.com/2075-4450/12/8/716?&ml_subscriber=1772077450675623693&ml_subscriber_hash=s0w7)

The British Ecological Society has identified RFR as one of the top emerging issues that could affect global biological diversity and conservation. -

[www.cell.com/trends/ecology-evolution/fulltext/S0169-5347\(17\)30289-6](http://www.cell.com/trends/ecology-evolution/fulltext/S0169-5347(17)30289-6)

Physicians for Safe Technology have stated that wireless radiation is being increasingly recognised as an environmental pollutant. -

[www.sciencedirect.com/science/article/pii/S0013935118300161?via%3Dihub](http://www.sciencedirect.com/science/article/pii/S0013935118300161?via%3Dihub)

Experts have warned that RFR encourages drug resistance in microbes. - [www.ieeexplore.ieee.org/document/8665432](http://www.ieeexplore.ieee.org/document/8665432)

Please see this list of studies regarding potential harm to wildlife compiled by the Environmental Health Trust, a US foundation run by the Nobel lead author and eminent environmental oncologist Dr Devra Davis - [ehtrust.org/science/bees-butterflies-wildlife-research-electromagnetic-fieldsenvironment/](http://ehtrust.org/science/bees-butterflies-wildlife-research-electromagnetic-fieldsenvironment/)

A field monitoring study spanning 9 years involving over 100 trees found trees sustained significantly more damage on the side of the tree facing the antenna, leaving the entire tree system prone to degradation over time - [www.ncbi.nlm.nih.gov/pubmed/27552133](http://www.ncbi.nlm.nih.gov/pubmed/27552133)

#### ICNIRP:

The ICNIRP standards are mainly based on acute warming effects, with more than one degree of temperature increase. By now, in several thousand studies, biological effects such as DNA damage have been demonstrated to occur at exposure levels FAR BELOW these standards.

#### Criticism of ICNIRP by the Council of Europe:

"Both the European Parliament (in its resolution 2008/2211(INI)) and the Council of Europe recommend lowering the exposure limits based on the ICNIRP opinions. The Council of Europe in its Opinion of 6 May 2011 on health risks associated with electromagnetic fields (12608):

29. The rapporteur underlines in this context that it is most curious, to say the least, that the applicable official threshold values for limiting the health impact of extremely low frequency electromagnetic fields and high frequency waves were drawn up and proposed to international political institutions (WHO, European Commission, governments) by the ICNIRP, an NGO whose origin and structure are none too clear and which is furthermore suspected of having rather close links with the industries whose expansion is shaped by recommendations for maximum threshold values for the different frequencies of electromagnetic fields.

30. If most governments and safety agencies have merely contented themselves with replicating and adopting the safety recommendations advocated by the ICNIRP, this has essentially been for two reasons:

- in order not to impede the expansion of these new technologies with their promise of economic growth, technological progress and job creation;

- and also because the political decision-makers unfortunately still have little involvement in matters of assessing technological risks for the environment and health." - [www.jrseco.com/problems-with-official-icnirp-exposure-limits-for-electromagnetic-radiation/](http://www.jrseco.com/problems-with-official-icnirp-exposure-limits-for-electromagnetic-radiation/)

Best Wishes,  
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