

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	The Dutch House	Site Address:	307-308 High Holborn London WC1V 7LL
NGR:	530946 181593		
Site Ref Number:	14637	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	No
If no explain why: The proposed development is for the installation of apparatus upon an existing base station		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why:		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	October 2009
Name of Contact:	The Chief Planning Officer
Summary of outcome/Main issues raised:	Whilst no direct response has been received with regard to the current rollout proposals, previously it has been noted that as with most authorities, Camden Council encourages the utilisation of existing masts and structures in the first instance. In the absence of such sites, any proposal should be sited and designed so as to minimise visual intrusion. It is of note however that at the time the Roll Out plans were produced the specific requirement that the development proposed in this case did not exist, it only became apparent with the ongoing development of Vodafone / O2's joint network coverage requirement.

¹ Macro or Micro

02 JUN 2010

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	14/05/2010	
Was there pre-application contact:	Yes	No
Date of pre-application contact:	No response	
Name of contact:	Chief Planning Officer	
Summary of outcome/Main issues raised: No response received		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green	Amber	Red
Outline Consultation carried out: Consultation letters to ward councillors			
Summary of outcome/Main issues raised: Only response was from Councillor Sue Vincent's office, who stated that she had received my letter and would see what happens with the planning application			

School/College

Location of site in relation to school/college: No Schools nearby
Outline of consultation carried out with school/college:
Summary of outcome/Main issues raised:

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No

Commission on Non-Ionising Radiation Protection (ICNIRP:1998) public exposure guidelines, as recommended on a precautionary basis in the Stewart Report, it should not be necessary for a planning authority, in processing an application, to consider health effects further. This message was re-stated by Nick Raynsford to all English MPs and local authorities in a letter, dated 29 June 2000.

The EU Recommendation is based on ICNIRP (1998) guidelines for limiting general public exposure to electromagnetic fields (radio waves). ICNIRP (1998) guidelines apply a 50-fold safety margin for continuous exposure of the general public to electromagnetic fields, providing a conservative public exposure guideline set at 2% of the level where replicated biological effects have actually been observed.

The UK mobile phone operators will, as a minimum, build base station sites to comply with the ICNIRP (1998) general public exposure guidelines in areas where the public spend a significant amount of time. These areas are those locations where antennas are accessible to the public without the use of climbing aids such as ladders, crossing barriers or other access controls.

Planning Policy Guidance Note 8 also makes reference to Health and Safety implications of telecommunications proposals and clearly states in paragraph 30 that:

"...it is the Government's firm view that the planning system is not the place for determining health safeguards. It remains central Government's responsibility to decide what measures are necessary to protect public health. In the Government's view, if a proposed mobile phone base station meets the ICNIRP guidelines for public exposure it should not be necessary for a local planning authority, in processing an application for planning permission or prior approval, to consider further the health aspects and concerns about them."

Although this quote comes from the PPG 8 published in August 2001, this message builds upon earlier Government statements. For example the Government's announcement on 16 March 2001 on 'Better public consultation on mobile phone masts' stated:

"It is the Government's responsibility to decide what measures are necessary to protect public health. It remains the Government's firm view that the planning system is not the appropriate mechanism for determining health safeguards... In the Government's view, if a proposed development meets the ICNIRP guidelines it should not be necessary for a local planning authority, in processing an application, to consider the health aspects further."

In a more recent report, HEALTH EFFECTS FROM RADIOFREQUENCY ELECTROMAGNETIC FIELDS: By the Independent Advisory Group on Non-Ionising Radiation (AGNIR), published on the 14th January 2004, AGNIR has stated that **"...exposure levels in the vicinity of mobile phone base stations are extremely low and the evidence indicates that they are unlikely to pose a health risk."**

Following on from this, the first part of the Danish Interphone study was published in January 2004. The conclusion reached from the first part of their study was that : **"On the basis of these first data from the Interphone Study, we conclude that there is no evidence for an association between use of cellular telephones and the risk of developing acoustic neuroma."**

The results of the second part of this study were published on the 13th April 2005 in 'The

Journal of the American Academy of Neurology'. The conclusions reached by this study was that **"In this nationwide population based case-control study of incident meningiomas and gliomas, we found no support for the hypothesis that use of cellular telephones increases the risk for these brain tumours."**

In their Factsheet (No.304) entitled ' Electromagnetic Fields and Public Health – Base Stations and Wireless Technologies' of May 2006 the World Health Organisation concluded; **" Considering the very low exposure levels and research results collected to date, there is no convincing scientific evidence that the weak RF signals from Base stations and Wireless Networks cause adverse health effects."**

This was further substantiated in the findings, of the recent Danish study, of the "Cellular Telephone Use and Cancer Risk: Update of a Nationwide Danish Cohort" published on the 8th December 2006, in the "Journal of the National Cancer Institute". This is a follow-up to the 2001 paper from the same study group. The study group was over 400k private Danish mobile phone users (as of 1982-1995) has been monitored for cancer incidence and statistics prepared to investigate the association of disease with various agents including mobile phone use. Overall, this study should be seen as reassuring for our customers in that it is the first such study to make strong reassuring statements about long-term mobile phone use not being associated with an increased risk of cancer. The report concludes that: ***"We found no evidence for an association between tumor risk and cellular telephone use among either short-term or long-term users. Moreover, the narrow confidence intervals provide evidence that any large association of risk of cancer and cellular telephone use can be excluded"***

Cancer Research UK have recently stated; **"Many research studies have failed to find an increased brain cancer risk to mobiles. Mobile phone base stations are unlikely to increase your cancer risk either. The exposure you would get from a base station is usually a hundred times or more below international guidelines. And it is much less than the exposure you would get from a phone."**

The Irish Government published a report from an Expert Group on the Health Effects of Electromagnetic Fields in March 2007 which concluded **"So far no adverse short or long-term health effects have been found from exposure to the radiofrequency (RF) signals produced by mobile phones and base station transmitters. RF signals have not been found to cause cancer."**

In relation to the continued operation of the site in relation to the ICNIRP guidelines all base stations are designed so as to operate well within these guidelines. Under the terms of the mobile operators operating licence "a person authorised by the Secretary of State" can take measurements at any time to confirm that maximum permissible levels are not being exceeded. Generally random unannounced audits are undertaken by OFCOM on behalf of the DTI. These random tests can also be requested via the Mobile Operators Information (MOA).

It is also of noted that Research into Radio Frequency has been undertaken globally for the past 50 years or more, the consensus of which is that there is no substantiated link between mobile technology and adverse health effects.

The Stewart report goes on to state **"Some people propose that new developments**

should only be permitted when they have been shown to be completely safe, but this is unrealistic. Science can never provide a guarantee of Zero risk."

The House of Commons Science and Technology Committee in its report Mobile Phones and Health further expands on this; **"No matter how much research is done, it will never be possible to prove that something is not harmful. Scientific research can say that there is no evidence of risk or it can demonstrate that any risk is very low, but it cannot produce evidence of no risk."**

One of the key recommendations of the Stewart Report published in 2000 by the Independent Expert Group on Mobile Phones (IEGMP) was that an independent research programme be established in the UK. The Mobile Telecommunications and Health Research Programme (MTHR) commenced in 2001, with the purpose of co-coordinating and scientifically managing a research programme on the possible impact on health from mobile telecommunications. The programme, established by the UK Government, and funded jointly by Government and industry, was conducted under the direction of an independent scientific management committee, free of any influence from the government and industry that funds it. The report concludes "none of the research supported by the programme and published so far demonstrates that biological or adverse health effects are produced by radiofrequency exposure from mobile phones." The report also notes that measurements of radio signals from base stations show that exposures are well below international guidelines.

These MTHR interim findings are consistent with the conclusions that no adverse health effects from mobile phone use have been established reflected in the significant number of independent scientific reviews published in the UK and around the world during the past six years. Equally reassuring, the MTHR report recognises that no further research is required in certain areas.

In the summation of the recently released largest study carried out to date, no link was shown between mobile phone use and the occurrence of brain tumours. The INTERPHONE study was co-coordinated by the International Agency for Research on Cancer (IARC) in 13 countries including the UK. The findings are consistent with many previous studies that have found no health risk from using mobile phones.

It can be seen that the site subject of this application has been sited and designed in line with current Local, National and International guidelines.

Conclusion

It can be seen that the development as proposed within this application has been sited and designed in line with all local, national and international guidelines as well as the telecommunication industries Code of Best Practice. There is a clear and demonstrable need for the proposal, due consideration has been given to all practicable solutions for providing the required telecommunications service and this proposal has been designed in such a way as to minimise its visual impact upon the surrounding area.

Given the above, we request that due consideration is given to the planning application and we look forward to your determination in due course.