

To: Jaspreet Chana, Camden Planning Dept.

Cc: Ms Helen Masterson, Head of Camden Environmental Health Dept.

Cc: Ms Julie Billett, Director of Public Health for Camden and Islington

Dear Jaspreet Chana,

**Re: Application number 2020/1332/P. Installation of 2 (or 4?) additional antennae in church tower
Site Address: St Marys Vicarage 134A Abbey Road London NW6 4SN**

I am writing to strongly Object to this Application, both on the grounds of procedural irregularities and omissions, as well as conflicts between the two key submitted documents (the 'Floor Plans & Elevations' drawings on the one hand, and the 'Planning Statement' text document on the other), and finally also on the key grounds of risks to health of the children in two nearby schools as well as local residents with EHS conditions.

1) Wrong site address: The original notification email regarding this Planning Application gave the address where the installation is to take place as St Mary's Vicarage, 134A Abbey Road, as pasted-in below in blue, copied from that original email.

St Marys Vicarage 134A Abbey Road London NW6 4SN

The installation of 2 no. antennas located behind replacement glass reinforced plastic GRP louvres, 1 no. GPS module mounted on south east face of tower and ancillary works

Application number: 2020/1332/P

Application type: Full Planning Permission

[View Application](#)

However closer inspection of all the documentation revealed that the installation of the antennae was actually to be in the tower of St Mary's Church, 134 Abbey Rd, an entirely separate building from the St Mary's Vicarage. This was only quite recently corrected on your website portal, weeks after a local resident pointed out the mistake on 21st May, in the very first comment that you received.

2) How many new (5G?) Antennae are proposed to be installed? Is it 2, or is it actually 4?

The Application and the first page of the Planning Statement both state: "[The installation of 2 No. antennas located behind replacement Glass Reinforced Plastic \(GRP\) louvres](#)",

However in direct contradiction to these statements, the Site Plan drawing on Pg 3 of the Floor Plans & Elevations drawings document clearly shows 2 sets of 2 new Vodafone antennae- one pair of antennae on the North-West face of the tower, and a second pair of antennae facing South-West or South, so 4 in total. To add to the confusion, the North-West Elevation drawing on Pg 5 again only shows 2 proposed Vodafone antennae.

So, if the reality is that Planning Consent is actually being sought for 4 new Vodafone antennae, then the two written documents are defective and the drawing on page 5 of the "Floor Plans & Elevations drawings" document is also wrong. All these errors and inconsistencies need to be corrected to consistently reflect what is proposed, and the overall Planning Application 'timer' needs to be restarted.

3) How many existing antennae are already in place, and what power and technology do these support?

The Planning Statement makes no reference to any existing antennae on the church tower. However, close inspection of the drawing on Pg. 3 of the "Floor Plans & Elevations drawings" document, clearly shows that there are already 3 existing Vodafone antennae and 3 existing MBNL antennae, so 6 in total, before the proposed 4 additional 5G antennae are added, making 10 in total.

Please confirm that the 6 existing antennae are remaining in situ, and that the 4 new antennae will therefore bring the total to 10 active antennae?

It is also not clear whether these existing antennae are for 2G, or 3G or 4G. Please can this be clarified, and their frequency bands and their transmitter powers and antennae gains also be provided?

4) What technologies and transmitter powers will the 4 new antennae support?

It is also not clear which technology these 2 (or 4?) new antennae will support, but from a footnote on one of the diagrams, it can be inferred that this will be for 5G.

Please provide information as to which frequency bands these 4 (or 2?) new 5G antennae will be operating on, and what the transmit power is of each one, and whether they will have a static radiation pattern or whether they will be phased arrays of aerial elements, capable of dynamic 'beam steering' to focus the direction of the radiation in a narrow beam towards the user?

5) National Planning Policy Framework (NPPF) Compliance requirements

i) Requirement for ICNIRP statement addressing the total (cumulative) power that will be radiated by all 10 antennae (6 existing and 4 proposed) and diagram showing the exact shape and dimensions of the two "Exclusion Zones" one for the general public and another, laxer one, for network technicians.

Paragraph 115 of the NPPF requires that applications should be supported by the necessary evidence to justify the proposed development which should include:

"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"

There is no statement with the application on the planning website that cumulative exposure from the proposed 6 existing (2G or 3G or 4G?) antennae, plus the 4 new 5G antennae altogether will not exceed ICNIRP guidelines. There is no diagram showing the cumulative "Exclusion Zones" based on the aggregate output powers of all 10 antennae. Both must be provided on Camden's planning site, and adequate time given to consider this information.

ii) Requirement for evidence of outcome of consultations with organisations having an interest in the proposed development

Para 115 of the NPPF also provides that such evidence should include:

"a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area"

This Church has a Hall very close by (~40m) which houses a nursery school for 30 children between 2.5 years and 6 years of age. This is, therefore, a sensitive site. These children are in the most vulnerable age group in

relation to electromagnetic fields generated by these antennae, more below. In addition, there is also a Primary school on the next corner. The area in which the church is situated is also in the Priory Road Conservation Area.

There is no evidence on the Camden planning site showing the outcome of consultations with “organisations with an interest in the proposed development”. This would include the nursery school very nearby, and the primary school nearby, the Conservation Area committee, or any neighbourhood forums or residents associations in the area. If such information exists on completed consultations, this should be placed on the site and time given for any further comments to be made, based on the consultation evidence.

6) Incorrect reference to school and query about which Ward Councillors have been consulted, and wrong statement about a ‘cabinet-only’ installation

A paragraph near the end of Pg 13 of the Planning Statement states that (key sections emboldened by me for emphasis):

“In relation to this paragraph (*ie. Para. 115 of the NPPF*), the proposal complies with policy. Consultations were sent to the **Ward Councillors**, MP and **Lady Margaret School**. To date no responses have been received. The proposal utilises an existing building and will provide upgraded coverage. No ICNIRP is submitted with this application **as the proposal is for a cabinet only**”

Q1) Which Ward Councillors have been consulted; is it those for the Swiss Cottage Ward or the Kilburn Ward, or both? The site appears to almost exactly straddle the boundary between these two Wards.

Q2) There is no school by the name of ‘Lady Margaret School’ anywhere within the vicinity of the Church. The nearest of this name seems to be in Parsons Green, Fulham, SW6, which is some 7 miles away! Which school(s), if any, have you in fact consulted? Please provide evidence of this consultation?

Q3) The proposal is most definitely not just for a cabinet (the clue is in the title of the Application!); on the contrary it is for 2 (or even 4?) additional 5G antennae. As such, ICNIRP Certification is indeed required- see also my comment in 5i) above.

7) Health Issues and Camden’s priorities when it comes to considering impacts on residents’ health

There is a conflict in the expectations of the roles and responsibilities of Local Authorities such as Camden between certain statements in the NPPF and Local Authorities’ legal obligations under section 2B of the National Health Service Act 2006:

The NPPF states that:

“116. Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

10. This states that local planning authorities should not “set health safeguards different from the International Commission guidelines for public exposure”.”.

It is, of course, accepted that Camden is not empowered to do that. However, Camden still has an obligation to safeguard the health of its residents as provided for in Section 2B of the National Health Service Act 2006:

“2B Functions of local authorities and Secretary of State as to improvement of public health

(1) Each local authority must take such steps as it considers appropriate for improving the health of the people in its area.

(2) The Secretary of State may take such steps as the Secretary of State considers appropriate for improving the health of the people of England.

(3) The steps that may be taken under subsection (1) or (2) include—

(a) providing information and advice;

(b) providing services or facilities designed to promote healthy living (whether by helping individuals to address behaviour that is detrimental to health or in any other way);

(c) providing services or facilities for the prevention, diagnosis or treatment of illness;

(d) providing financial incentives to encourage individuals to adopt healthier lifestyles;

(e) providing assistance (including financial assistance) to help individuals to minimise any risks to health arising from their accommodation or environment;

(f) providing or participating in the provision of training for persons working or seeking to work in the field of health improvement;

(g) making available the services of any person or any facilities.”

There is already evidence that some residents local to St Mary’s Church are suffering symptoms of EHS (Electro Hyper-Sensitivity) as a result of RF radiation from the existing 6 antennae on the Church tower.

As such, under Section 2B of the National Health Service Act 2006, surely Camden has an obligation to safeguard their health by taking health considerations into account in deciding whether these further 2 (or 4?) antennae should be permitted by Camden to be placed on the same site?

The papers listed at the end of this letter provide considerably more evidence on the potential adverse health effects on both children and adults of prolonged exposure to levels of RF radiation far below the ‘thermal heating-only’ effects that the ICNIRP Guidelines exclusively, but very misguidedly, address.

For all the reasons listed above, and as a local resident, I strongly Object to this Application and earnestly request Camden Planning Dept. to Refuse the Application.

Thanks for your consideration. and your earliest response would be appreciated.

Best regards

Mr E. Peel

Papers addressing adverse health impacts of prolonged exposure to high frequency RF radiation:

1) ICNIRP Guidelines: Unscientific and Not Protective. M. Bevington: <http://www.es-uk.info/wp-content/uploads/2020/02/03.11-ICNIRP-Guidelines-Unscientific-and-Not-Protective.pdf>

2) Effects of 5G wireless communication on human health- European Parliament Report: [https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/646172/EPRS_BRI\(2020\)646172_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/646172/EPRS_BRI(2020)646172_EN.pdf)

3) The 5G appeal to the European Union: <http://www.5gappeal.eu/scientists-and-doctors-warn-of-potential-serious-health-effects-of-5g/>

4) [Evidence-base](https://cdn.website-editor.net/2479f24c54de4c7598d60987e3d81157/files/uploaded/Early_Years_Inquiry_EY10062.pdf) for the link between adverse childhood experiences and long-term negative outcomes. Dr Sarah Starkey MSc (Neuropharmacology), PhD (Neuroscience)

5) On the clear evidence of the risks to children from smartphone and WiFi Radio Frequency radiation. Prof. Tom Butler, University College, Cork https://www.jrseco.com/wp-content/uploads/On-the-Clear-Evidence-of-the-Risks-to-Children-from-Smartphone-and-WiFi-Radio-Frequency-Radiation_Final.pdf