

Henriques, Roberta

From: Jessica Learmond-Criqui [REDACTED]
Sent: 07 July 2020 22:25
To: Planning
Subject: RE: Comments on 2020/2760/P have been received by the council.

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Dear Sir/Madam,

My comments are not shown on the planning website. Please let me know why this is by return. Many thanks.

Best Regards

Jessica

Jessica Learmond-Criqui
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-----Original Message-----

From: planning@camden.gov.uk <planning@camden.gov.uk>
Sent: 03 July 2020 16:55
To: Jessica Learmond-Criqui [REDACTED]

Subject: Comments on 2020/2760/P have been received by the council.

Application number 2020/2760/P

Site Address - Footpath outside Camden Town Tube Station/No.176 Camden High Street, opposite No.201 Camden High Street. London NW1 8QL

This is an application for the installation of 60 foot pole atop which will be 5G antennae just outside Camden Town tube station by the mobile operator for the '3' telecom brand.

The relevant documents can be seen here:

<http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:%222020/2760/P%22>

Comments are requested by 26 July, 2020 and can be made at the link below:

<https://planningrecords.camden.gov.uk/Northgate/PlanningExplorer/Generic/StdDetails.aspx?PT=Planning%20Applications%20On-Line&TYPE=PL/PlanningPK.xml&PARAM0=548998&XSLT=/Northgate/PlanningExplorer/SiteFiles/Skins/camden/xslt/PL/PLDetails.xslt&FT=Planning%20Application%20Details&PUBLIC=Y&XMLSIDE=/Northgate/PlanningExplorer/SiteFiles/Skins/camden/Menus/PL.xml&DAURI=PLANNING>

Please send comments via the link above or by email for the attention of Case Officer Sofie Fieldsend - planning@camden.gov.uk.

If you do send an objection by email, please open cc me to your objection at jessicalc@lawlcs.com so that I can keep track of objections being sent to Camden.

I have written the following objection to Camden. Please feel free to use any of the below in your own objection. Do make your objection personal to you because if Camden receives the same words in each objection, they will treat all that look the same as only 1 objection.

Dear Ms Fieldsend,

Application number 2020/2760/P

Site Address - Footpath outside Camden Town Tube Station/No.176 Camden High Street, opposite No.201 Camden High Street. London NW1 8QL

The application letter refers to the ICNIRP certificate but this is not on Camden's website. Please put this up so that it is available to the public.

The application is defective in a number of material respects listed below:

Major defects in the application

1. There is no information about the frequency or power to be used for the equipment or any other information to give interested parties information to be able to comment appropriately on the application. The Stewart Report on which Public Health England relies recommends that operators should provide information about the frequency and modulation characteristics and the power output of antennae. None of this has been provided.

2. None of the General Principles for Telecoms Development in the Code have been adhered to. The Code states:

"General Principles for Telecommunications Development

... Sensitivity to context of the proposed development should be considered. In particular, the following general design principles should be regarded as important considerations in respect of telecommunications development:

- Proper assessment of the character of the area concerned, especially in relation to designated heritage assets and their setting, where more sensitive design solutions may be required
- Design should be holistic and three dimensional showing an appreciation of context;
- Analysis of the near and far views of the proposal and to what extent these will be experienced by the public and any residents;
- Proposals should respect views in relation to existing landmarks and distant vistas;
- Proposals should seek to consider the skyline and any roofscapes visible from streets and spaces;
- Choice of suitable designs, materials, finishes and colours to produce a harmonious development and to minimise contrast between equipment and its surroundings.”

3. The height of the proposed structure is out of keeping with the character and setting of the area. The siting is not sensitive to the area. The structure will be able to be seen from many angles and will detract from the character of the area. The skyline of the area will be ruined as the structure will be prominent in this area.

4. Camden Town heaves with people during its busy times. This pole is to be sited with cabinets in the middle of what is a very busy pedestrian way. Just look at the size of the equipment which will be placed in the middle of the pathway. The size of the pole to hold up the weight of the antenna at 60 feet is considerable. The cabinets to make this work are massive. It is totally unacceptable that this monolith should be placed in the middle of a very busy pedestrian footway in a very busy environment where the crush of people coming out of the station all day on busy days is a real threat on a daily basis. This monolith is not sensitively sited at all.

5. The height of the nearest building, which is Camden tube station is 12m. This protruberance will be 8m more above the building and will be visible from every angle for miles.

6. There is no information on the kinds of 5G antennae to be placed on the pole and whether or not they are beam forming.

7. There is no information on the height of the “wrap around” cabinet to go around the base of this pole. There is no information on the diameter of the pole so that one can properly understand the visual impact.

8. It is not clear how many antennae will be placed on the pole.

9. There is no impact assessment for the impact on the disabled who may be blind and having to navigate this stretch of footway. Having such a big obstruction in the middle of the pathway is a health and safety hazard. Camden Council must carry out its public sector equality duty and do an impact assessment in relation to this application. The application should be refused in the meantime.

10. This is the largest structure of this kind proposed in Camden Town. It will be prominent against the skyline and be totally out of character with the area and will detract from it.

11. The supplementary information sheet has mentioned other operators in the area which means that there will be other equipment with other antennae in the area. 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”

12. There are likely to be other masts or base stations in the area. There is no statement with the application on the planning website that cumulative exposure from this antennae with all the other antennae in the area will not exceed ICNIRP guidelines.

13. The area where this massive pole is proposed to be installed is also a residential area. It may be helpful to set out some of the guidance of the Stewart Report in relation to its advice to the UK government.

You can see the summary and recommendations below:

<https://webarchive.nationalarchives.gov.uk/20100910162959/http://www.iegmp.org.uk/report/text.htm>

Planning issues

1.31 ...

Adverse impacts on the local environment may adversely impact on the public's well-being as much as any direct health effects.

1.34 We perceive a lack of clear protocols to be followed in the public interest prior to base stations being built and operated and note that there is significant variability in the extent to which mobile phone operators consult the public on the siting of base stations. We have heard little specific criticism of most of the network operators, apart from Orange. The Department of the Environment, Transport and the Regions and the National Assembly for Wales (DETR, 1998) produced a Code of Best Practice: Telecommunications prior approval procedures as applied to mast/tower development. We understand that consideration is being given to extending this to include health concerns (paragraphs 6.104–6.109). We support this development.

1.35 Overall we consider that public concerns about the siting of base stations demand changes in the planning process. Thus:

...

1.37 We recommend that, at national Government level, a template of protocols be developed, in concert with industry and consumers, which can be used to inform the planning process and which must be assiduously and openly followed before permission is given for the siting of a new base station (paragraphs 6.58–6.62). We consider the protocol should cover the following issues.

...

- The operator should provide to the local authority a statement for each site indicating its location, the height of the antenna, the frequency and modulation characteristics, and details of power output.

1.38 We recommend that a robust planning template be set in place within 12 months of the publication of this report. It should incorporate a requirement for public involvement, an input by health authorities/health boards and a clear and open system of documentation which can be readily inspected by the general public (paragraphs 6.55–6.62).

1.39 We recommend that a national database be set up by Government giving details of all base stations and their emissions. This should include the characteristics of the base stations as described in paragraphs 6.47

and 6.48 and should be an essential part of the licence application for the site.

1.40 We recommend that an independent random, ongoing, audit of all base stations be carried out to ensure that exposure guidelines are not exceeded outside the marked exclusion zone and that the base stations comply with their agreed specifications. If base station emissions are found to exceed guideline levels, or if there is significant departure from the stated characteristics, then the base station should be decommissioned until compliance is demonstrated (paragraphs 6.53 and 6.54).

1.43 We recommend that in making decisions about the siting of base stations, planning authorities should have the power to ensure that the RF fields to which the public will be exposed will be kept to the lowest practical levels that will be commensurate with the telecommunications system operating effectively (paragraphs 6.55–6.62).

14. There is no information about the exclusion zone which will apply to these antennae. The propagation of waves of 5G masts are different to 2G – 4G masts and have a wider exclusion zone. It is important to see the diagram with the propagation of waves from these antennae.

15. This mast is above the roofs of Camden High Street tube station and HSBC bank. It will be important to know whether the exclusion zones for these antennae impact the roofs of these buildings because it means that workmen on these roofs will be subject to excessive levels of radiation if they are within the exclusion zones for these antennae. There is no information in the application about this potential health hazard.

16. Apart from the Code, there is no proper guidance to a local council about how to consider applications for masts. At present, the information which is being presented by all operators is inadequate to permit a proper consultation with the public through the planning permission structure. The lack of information is systemic and pervasive.

17. There is insufficient information to determine this application and we would invite Camden to refuse this application at present.

Issues about health

18. I now turn to the issues of health. The documents provided by the Applicant are untrue.

19. The NPPF states the following:

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.

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

21. We appreciate that Camden cannot do that. But, Camden has an obligation to safeguard the health of its constituents by virtue of s. 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.
- (4) The steps that may be taken under subsection (1) also include providing grants or loans (on such terms as the local authority considers appropriate).
- (5) In this section, “local authority” means—
- (a) a county council in England;
 - (b) a district council in England, other than a council for a district in a county for which there is a county council;
 - (c) a London borough council;
 - (d) the Council of the Isles of Scilly;
 - (e) the Common Council of the City of London.]

22. This is a positive duty on Camden Council. This is in conflict with the NPPF. Where there is a conflict, the health considerations take precedence.

23. So, while Camden may not “set health safeguards different from” the International Commission guidelines, it can take health into account in relation to considering whether these antennae are permitted by Camden to be placed around the area.

24. I have set out in the document below concerns about 5G and the health impacts.

<https://www.scribd.com/document/460615982/JLC-Note-Re-5G-Health-Impact-Briefings-4-11-19>

The Schedules to the note are below:

<https://www.scribd.com/document/460616041/JLC-Note-Re-5G-Health-Impact-Briefings-Schedules-4-11-19>

25. Based on this note, it is clear that there are substantial adverse health impacts from EMFs which would include 5G.

26. One of the recent articles (Mar 2020) setting out the adverse health effects of 5G is below:

<https://www.scribd.com/document/463599697/Adverse-Health-Effects-of-5G-Mobile-Networking-Technology-Under-Real-life-Conditions>

27. EMFs are particularly dangerous for children and the route immediately next to this building is used by thousands of children going to and from school every day. A statement from Professor Anthony Miller is at Schedule 1 to this note. Please note his comments as regards children:

“Of particular concern are the effects of RFR exposure on the developing brain in children. Compared with an adult male, a cell phone held against the head of a child exposes deeper brain structures to greater radiation doses per unit volume, and the young, thin skull’s bone marrow absorbs a roughly 10-fold higher local dose.”

28. There are a lot of children who visit Camden Town and who live there.

29. See also this article on the Clear Evidence of Harm to Children from radiofrequency radiation which is produced by the type of antennae to be erected in this application:

https://www.gr3c.com/wp-content/uploads/2019/02/On-the-Clear-Evidence-of-the-Risks-to-Children-from-Smartphone-and-WiFi-Radio-Frequency-Radiation_Final.pdf

30. On the basis of the above and the wholesale failure of the Applicant to comply with the Code of Best Practice, this application must be refused and we call on Camden to refuse this application.

SCHEDULE 1

Statement on 5G by Anthony B. Miller, MD, FRCP, CM. Professor Emeritus, Dalla Lana School of Public Health, University of Toronto, Toronto, ON, Canada.

Radiation exposure has long been a concern for the public, policy makers and health researchers. Beginning with radar during World War II, human exposure to radio-frequency radiation (RFR) and associated technologies has grown more than 100,000-fold. In 2011, the International Agency for Research on Cancer (IARC) reviewed the published literature and categorized RFR as a ‘possible’ (Group 2B) human carcinogen. A broad range of adverse human health effects associated with RFR have been reported since the IARC review, including brain cancer. In addition, two large-scale carcinogenicity studies in rodents exposed to levels of RFR that mimic lifetime human exposures have shown significantly increased rates of Schwannomas and malignant gliomas, as well as chromosomal DNA damage.

Of particular concern are the effects of RFR exposure on the developing brain in children. Compared with an adult male, a cell phone held against the head of a child exposes deeper brain structures to greater radiation doses per unit volume, and the young, thin skull’s bone marrow absorbs a roughly 10-fold higher local dose. Recent reports also suggest that men who keep cell phones in their trouser pockets have significantly lower sperm counts and significantly impaired sperm motility and morphology, including mitochondrial DNA damage, as well as an increased risk of colon cancer.

Based on the accumulated evidence, I believe that if IARC were to re-evaluate its 2011 classification of the human carcinogenicity of RFR, it would be categorized as Group 1, i.e. carcinogenic to humans. Thus, current knowledge provides justification for governments, public health authorities, and physicians/allied health professionals to support measures to reduce all exposures to RFR to As Low As Reasonably Achievable, something we learnt was necessary for exposures to ionizing radiation (e.g. X-rays) many years ago.

The Telecom industry’s fifth generation (5G) wireless service will require the placement of many small antennae/cell towers close to all recipients of the service, because solid structures, rain and foliage block the associated millimeter wave RFR. 5G technology is being developed as it is also being deployed, with large arrays of directional, steerable antennae, operating at higher power than previous technologies. 5G is not stand-alone – it will operate and interface with other (including 3G and 4G) frequencies and modulations to enable diverse devices under continual development for the “internet of things,” driverless vehicles and more.

This novel 5G technology is being rolled out in several communities, although potential chronic health or environmental impacts have not been evaluated. The range and magnitude of potential impacts of 5G technology are under-researched, although important biological outcomes have been reported with the associated millimeter wavelength exposure to RFR. These include oxidative stress and altered gene expression, effects on skin and systemic effects such as on immune function, all of which highlight the need for research before population-wide continuous exposures occur.

An individual, if appropriately informed, can reduce her or his exposure to radiofrequency radiation from devices inside their home, but in the case of cell towers and small cell transmitters of 5G the exposure they receive is outside their control. With the people who manufacture these devices and those who promote small cell technology in front of homes failing to issue adequate health warnings, we are reaching a situation where homes, schools, and workplaces are being saturated with radiofrequency radiation. Thus, to avoid a potential epidemic of cancer caused by radiofrequency radiation from small cell

transmitters and other devices, and heart damage, brain damage and infertility, we should introduce means to reduce such exposures to As Low As Reasonably Achievable, something we learnt to do many years ago for ionizing radiation (X-rays). Instead use fiber-optic connections to the home, place small cell transmitters away from residential neighborhoods and schools and strengthen the rules that are meant to protect the public.

Those who support the introduction of 5G should recognize that no insurance agency (including Lloyds of London) will cover them against liability from ill health effects caused by radiofrequency radiation. A moratorium on the roll-out of 5G is essential.

February 12, 2020

Comments made by Jessica Learmond-Criqui of 14A Redington Road, London NW3 7RG Phone
[REDACTED] Preferred Method of Contact is Email

Comment Type is Object and Notify of Committee Date