To: Ms Sofie Fieldsend, Camden Planning Dept.

To: Camden FoI/EIR team

Cc: Ms Rebecca Whitehouse, Head of Camden Environmental Health Dept.

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

Dear Sofie Fieldsend,

**Re: Application number 2020/2760/P. Proposed 5G telecoms installation: 20m high Streetpole with 3no cabinets and ancillary works located within adopted Public footpath**

**Site Address - Footpath outside Camden Town Tube Station/No.176 Camden High Street, NW1 7BP**

I am writing to strongly Object to this Application, both on the grounds of the misleading overall description in the Planning Application compared with what is evident on the drawings, and the visual intrusion of such a tall mast in a low-rise retail area, and finally also on the key grounds of risks to health of the large number of people who pass through, and live in the close vicinity, each day.

This Application is for a large, major installation in a sensitive and very heavily-populated area and as such it must be submitted via the ‘Prior Approval’ planning process and not simply waved through by the Council under ‘Permitted Development Rights’.

There are many detailed issues to be addressed:

**1) How many new 5G Antennae are proposed to be installed, and are there also 3G/4G antennae proposed to be installed? If there are also 3G/4G antennae planned, why are they not referenced in the Planning Application?**

The drawing of the mast on page 5 of the Plans document, together with the ‘Proposed Antenna & RF Equipment Schedule’ on Pg 6 of the Plans document, strongly suggest that are to be a total of six new antennae installed, and only three of these are for 5G (the 3 at the very top).

It appears that the other three antennae (the lower set on the mast) are ‘multiband’ antennae capable of operating at a number of 3G and 4G frequencies (800/1400/1800/2100MHz). As such, the Applicant (H3G) appears to be using this mast also to ‘infill’ for coverage of their 3G and 4G services, as well as to introduce new 5G services.

Please can Camden confirm, or ask the applicant to confirm, that the applicant is actually intending to install 6 antennae in total, and please can they require the applicant to re-submit their application making this very clear.

Please can Camden also request the applicant to clarify exactly what the three non-5G antennae are for? Assuming that H3G already have adequate 3G/4G coverage in the area from one or more other existing masts, why is any further 3G/4G signal radiation level also required from this new mast?

**2) What is the proposed aggregate radiated power of all 6 antennae, and in which frequency bands will these 6 antennae will be radiating and what type of 5G antennae are they?**

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. Camden has the right to insist on this information from the applicant. **Under the FoI and EIR regulations I am formally requesting that Camden obtain this information form the Applicant and provide me with it within 20 days.**

From close examination of the ‘Proposed Antenna & RF Equipment Schedule’ on Pg 6 of the Plans document, it would seem that there are to be no less than 9 Remote Radio Units (Huawei RRUs) in total for the 3 multiband antennae, with three RRUs per sector feeding into each of the multiband antennae serving each sector. It is understood that each RRU can provide up to 2 x 40 Watts of power, so 9 of these units would provide an aggregate radiated power for 3G/4G signals of 720 Watts.

For the three 5G antennae, it is assumed that the RRU equivalent transmitters would also have a power output of 2 x 40W per sector. So, a total power of 240W for 5G across the three sectors.

From the above, it can be inferred that the total radiated power by all 6 antennae on the new mast will be 960W (720W + 240W).

Please can Camden ask the applicant to confirm/clarify/correct these details as necessary (ref. the FoI/EIR request formally made above)?

Are the 5G antennae ‘massive MIMO’ devices (detailed research, based on the information in the schedule on Pg 7 of the plans, suggests that they are), and will they enable ‘beamforming’ and dynamic steering of the focussed signal? Are these operating in the 3.4GHz band or the 26GHz band?

Does the ICNIRP Certificate cover the aggregate RF Radiation effects of all the 3G/4G antennae, **plus** the beam-formed radiation emitted by the 5G antenna? If Camden are not aware of the answer to this question, then the Applicant must be asked to provide this information.

**3) Provide a diagram showing ‘Exclusion Zone’ for telecom workers and the larger zone for the general public**

Are any of the nearby buildings or their roof areas within the safety exclusion zone as specified by ICNIRP principles (and based on the aggregate total radiated power of 3G/4G/5G signals, not just the 5G radiated power)?

If so, have the owners of the properties where people could be exposed to levels above those recommended for telecom workers, and the general public, been notified to avoid the risk of harm to their staff, and consulted? Is there evidence of this consultation please?

**4) Unacceptable Visual Intrusion**

The Code of Best Practice on Mobile Network Development in England (2016 version) should be familiar to the applicant who should be well aware of this Code and is bound to comply with best practice in the industry. It appears that a number of the General Principles for Telecoms Development in the Code have not 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.”

The 20m height of the proposed structure is completely out of keeping with the character and setting of the area.  The siting is not sensitive to the area context.  The structure will be able to be seen from many angles and will detract from the character of the area.

Camden Town Tube station exit and the surrounding pavement area gets extremely busy with people during peak times.

This proposed new antenna pole is to be sited together with 3 very large and bulky cabinets in the middle of what is a very busy pedestrian thoroughfare.  The diameter of the pole needed to support the weight of the nine 3G/4G/5G antennae, plus 3 more dish antennae, at 20m is considerable.  The cabinets housing the electronics are massive.  It is not acceptable that this large set of obstacles should be placed in the middle of a very busy pedestrian footway in such a busy environment, where pavement space is already at a premium. The crush of people coming out of the station at busy times of day is already a potential station/pavement crowd safety issue.

This proposal displays absolutely **no** ‘Sensitivity to the context of the proposed development’, and is therefore in contravention of the Code requirements. On the contrary, this proposal demonstrates visual brutalism and practical obstruction to heavy pedestrian traffic on a grossly unacceptable scale.

The heights of the nearest buildings are Camden tube station at 12m and the HSBC branch building at 8m.  This mast will protrude a further 8m above the former and a full 12m above the latter, and will be painfully prominent from all around.

**5) Requirement for evidence of outcome of consultations with individuals and 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”

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 clearly include Transport for London/London Underground, as well as the HSBC branch right next door, and any neighbourhood forums or residents associations in the area. If such information exists on completed consultations, then this should be placed on the planning website and time given for any further comments to be made, based on the consultation evidence.

Have any local Ward Councillors been consulted? There is no evidence of this on the website.

**6) 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 absolute 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 may be some residents local to this site that will suffer symptoms of EHS (Electro Hyper-Sensitivity) as a result of all the new RF radiation coming from this new mast.

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 9 antennae, radiating some 960Watts, 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, I strongly Object to this Application and earnestly request Camden Planning Department 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](http://www.es-uk.info/wp-content/uploads/2020/02/03.11-ICNIRP-Guidelines-Unscientific-and-Not-Protective.pdf%202)

2) [Effects of 5G wireless communication on human health](https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/646172/EPRS_BRI%282020%29646172_EN.pdf)- 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%282020%29646172_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) <https://cdn.website-editor.net/2479f24c54de4c7598d60987e3d81157/files/uploaded/Early_Years_Inquiry_EY10062.pdf>

5) [On the clear evidence](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) 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>