**Objection to Planning Application 2020/3958/P : Installation of 6 antennae & 3 support poles & 3 dishes at Taplow tower, Chalcots Estate, Adelaide Road, NW3 3NU**

Dear Mr Lawlor,

I wish to object to this Planning Application request and request the Camden Planning Team to insist that it be taken through the full Planning Approval process rather than bypassing any part of it by use of the General Permitted Development Process (under Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015).

This is an application for a completely new base station site in an area where Telefonica/O2 already has some 3 or 4 other base station sites within a 250m-300m radius, and as a result it must be closely scrutinised by Council Officers and local affected residents to determine whether it is necessary.

My objections are as follows:

**1) Visual intrusion**

The three masts carrying the 6 antennae (2 on each mast) will elevate the top of the antennae to project an extra 3.25m above the 65m existing height of Taplow, which currently has a very clean and uncluttered form at roof level, when observed from the ground. Because the 3 antennae masts are situated right at the edge on 3 sides of the roof, they will be particularly visually intrusive and will also destroy the symmetry of the roof lines of Taplow compared with the other 3 Chalcots Estate towers nearby.

The adverse visible aesthetic impact of the masts is made worse by having both the smaller, 5G-only, antenna as well as the larger, 2G/3G/4G multiband, antenna (stated by Telefonica/O2 to be for reception in-fill) mounted on each of the 3 tripod masts. It is not clear how Telefonica/O2 can justify needing to provide this level of 2G/3G/4G in-fill in the small area around Taplow, given that they already have at least 3 other 2G/3G/4G base stations within a radius of no more than 300m of Taplow (please see a subsequent point of injection). If, following further investigation by Telefonica/O2, it is determined that the 2G/3G/4G infill form Taplow is actually not required, then 3 of the 6 antennae can be dispensed with and the visual intrusion can be significantly reduced.

This would also have the added benefit of reducing the total RF radiation power (the RF radiation flux 'soup') from the Taplow base station by up to 75% compared with having both antennae on each mast.

**2) Strong exposure of Visage residents immediately to the West side Taplow tower**

The tall 'Visage' building of private apartments on Winchester Road housing private apartments, is only some 50m to the west of Taplow tower. Any residents in The 'Visage' building with windows facing east in the Visage building (and particularly those on higher floors) will potentially be receiving a huge dose of constant RF radiation from the two antennae facing due West and therefore pointing directly at the Visage building. The relatively elevated position of the apartments on the higher floors will mean that they will directly catch the strongest part of the west-facing radiation from the two antennae.

(Reference- see page 3 of the engineering drawings at: <http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/8357019/file/document?inline> )

Related to this, please ask the applicant to provide drawings of the shaped radiation beam (plan and elevation) that clearly shows the total cumulative 'safety exclusion zone' for each pair of antennae per sector (ie. where neither operator staff or public must access during normal operations) and the larger 'safety exclusion zone' (where the public must not be allowed to go)? Please also ask the applicant to provide information on the power emitted by each of the transmitters (RRUs)?

**3) Does the ICNIRP 'compliance statement' encompass all the additional RF radiation from the new site (ie. the aggregate of all the new 2G/3G/4G, as well as 5G, RF radiation?)**

**4) Evidence of consultation with all the schools in the area and visibility of their responses, and the 6 local Councillors (Belsize and Swiss Cottage Wards), to be provided**

In the Industry Site Specific Supplementary Information (ISSSI) document (ref: <http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/8419973/file/document?inline> ) it is stated that these consultations did take place back in March 2020, but no responses have been received.

Please can the applicant provide evidence of this consultation and now exceptionally re-confirm with each school consulted, that they really do have a nil return of comments or objections. Please note that mid-March is exactly the period of time when the national coronavirus lockdown was imposed, and schools were closed down at very short notice. It is therefore entirely possible that such letters went astray in the mid-March close down rush. It is well-understood that prolonged exposure to RF radiation at 2G/3G/4G/5G frequencies can particularly adversely affect young children, and many countries specifically limit children's exposure to WiFi in schools (which uses a similar frequency to 4G (2.4GHz)).

**5) Inadequate/flawed justification of the need for the three 2G/3G/4G multiband antennae, providing legacy network 'in-fill' reception.**

The publicly available O2/Telefonica coverage charts (at: [https://www.o2.co.uk/coveragechecker](https://www.o2.co.uk/coveragechecker?cm_mmc=affiliate-_-204909-_-blank-_-blank&awc=3235_1601557287_0f58374fca131107aca010b5dbc959f3) - insert the local post-code of NW3 6JG, and then press the "Masts" button in the filter section to show the location of all the existing masts) show that there is already very good coverage in the whole Swiss Cottage/Belsize Park area for 2G/3G/4G, but obviously not for 5G.

This publicly available chart does not yet seem to show the new O2/Telefonica site at the Centre Heights building (137 Finchley Road, NW3 6JG) which the ISSSI document mentions in the table on Page 15. This will surely will massively further boost the quality of 2G/3G/4G reception in the area allegedly needing in-fill (shown in green on the less public coverage map on Page 5 of the submitted ISSSI document).

The table on page 15 of the ISSSI document also reveals that Telefonica/O2 have another existing base station also very nearby at Langhorne Court, Dorman Way, NW8 0RU. Each of Centre Heights and Langhorne Court are probably no more than ~250m from Taplow tower, so why do Telefonica/O2 need yet another 2G/3G/4G site at Taplow when they have for many years served their customers well with the existing arrangement, with even a third nearby base station at the Primrose Hill Rd/Fellows Rd intersection.

The public coverage chart ( [https://www.o2.co.uk/coveragechecker](https://www.o2.co.uk/coveragechecker?cm_mmc=affiliate-_-204909-_-blank-_-blank&awc=3235_1601557287_0f58374fca131107aca010b5dbc959f3" \t "_blank)) even seems to suggest that there is a mast somewhere above roughly where Bradleys restaurant is in Winchester Rd. If this is correct, then that is yet another reason why no more 2G/3G/4G in-fill is needed from Taplow. But even if it is a mistake, then coverage from both Centre Heights and Langhorne Court should be perfectly adequate, particularly noting the next point:

All the coverage charts are probably of an age where the previous large 5-storey high 100 Avenue Rd building still existed, casting a 'radio shadow' at ground level to its East side over the Swiss Cottage green space and east of that towards Taplow. However, now that 100 Avenue Rd has been demolished (about 15 months ago), and with no early plans for its replacement, the coverage of the Swiss Cottage 'green space' and areas eastward of this from the Centre Heights and Langhorne Court 2G/3G/4G antennae, will have been significantly improved.

In the interests of capping/reducing the increase in overall RF radiation levels to the minimum necessary (as per the 'Precautionary Principle'), O2/Telefonica must be asked to re-justify why they need 2G/3G/4G in-fill from Taplow as well, noting the 3 nearby existing sites at Centre Heights, Langhorne Court and the one near the Primrose Hill Rd/Fellows Rd intersection, as well as a fourth one on the building above Waitrose near Finchley Rd station.

If this cannot now be justified, then the three 2G/3G/4G antennae can be dispensed with, thus reducing the visual clutter and reducing the RF' soup' in the area.

**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 (National Planning Policy Framework) 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.”

Camden also needs to be sensitive and responsive to the concerns of the approximately 1%-2% of all residents in the vicinity who have medically diagnosed EHS (Electro-Hyper-Sensitivity) condition which would be aggravated by the increased RF radiation from the two antennae in each sector that the Taplow installation would entail.

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 6 (or 3?) antennae should be permitted by Camden to be placed on this new 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. I should be grateful if you could place this objection on your planning website in PDF format, at your earliest convenience.

Best regards

Eric Peel

4th October 2020

Goldhurst Terrace, NW6

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>  
  
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 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 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>