

Objection to Planning Application 2020/1732/P: Installation of telecommunications equipment at roof top level to include 12 antennae, dish antenna, cabinets etc. at Highstone Mansions, 84 Camden Road, NW1 9DG

To: Mr Joshua Ogunleye, Camden Planning Services Dept

Dear Mr Ogunleye,

I wish to object to this Planning Application request.

This is an application for a completely new base station site in an area where Telefonica/O2 and Vodafone already have some 3 - 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, and a number of questions must be answered by the agents/Cornerstone before a decision can be made.

My objections are as follows:

1) Visual intrusion

This building is within the Regent Canal Conservation Area, itself a designated heritage asset. It is noted that the bridge to the immediate south of the site which provides a road and pedestrian crossing of the Regent Canal is Grade II listed.

The three masts carrying the 12 antennae (4 on each mast) will elevate the top of the antennae to project an extra 3.20m above the 20.2m existing height of the Highstone Mansions building, so elevating the top of the antennae to 23.40m. The building currently has a very clean and uncluttered form at roof level, when observed from the ground. Because the 3 proposed antennae masts are situated right at the edge on 3 sides of the roof, and with 4 bulky antennae on each, they will be particularly visually intrusive and will destroy the current clean and uncluttered lines of the building roof when viewed from the ground.

The 2016 Code of best practice on mobile network development in England calls for:

- 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

This is a conservation area and in the Best Code of Practice 2016 p.30 it states "In conservation areas, special attention should be paid to the desirability of preserving or enhancing the character and appearance of the conservation area".

The adverse visible aesthetic impact of the masts is made worse by having both the two smaller, 5G-only, antenna as well as the 2 larger, 2G/3G/4G multiband, antenna (stated by Telefonica/O2 and Vodafone to be for reception in-fill) mounted on each of the 3 masts.

It is not clear how Telefonica/O2 and Vodafone can justify needing to provide this further level of 2G/3G/4G in-fill coverage in the small area around this site, given that they already have at least 3 other 2G/3G/4G base stations within a radius of no more than 300m of Highstone Mansions (please see a subsequent point of objection). Certainly the publicly-available coverage maps of both Telefonica/O2 and Vodafone show perfectly adequate 2G, 3G and 4G coverage right across this area, with only 5G having a coverage gap.

Camden Council should require Conerstone or their agents to justify specifically per operator and per frequency band why more in-fill coverage is needed. **If the 2G/3G/4G infill coverage from the Highstone Mansions site is actually not required, then 6 of the 12 antennae can be dispensed with and the visual intrusion on each mast can be significantly reduced.**

This would also have the added benefit of reducing the total extra RF radiation power (the RF radiation flux 'soup') emitted into the environment from the Highstone Mansions site Taplow base station by up to 75% compared with having four antennae on each mast. Thereby following the 'precautionary principle' to be applied when adverse health effects have not been adequately ruled out.

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

The published coverage charts of both O2/Telefonica and of Vodafone both show very good existing 2G/3G/4G coverage and reception in the vicinity of this proposed new mast. Please see the respective coverage maps (insert the NW1 9DY postcode in each case to see the local area in question):

O2 coverage checker:

https://www.o2.co.uk/coveragechecker?cm_mmc=affiliate-_-204909-_-blank-_-blank&awc=3235_1601557287_0f58374fca131107aca010b5dbc959f3 enter postcode: NW1 9DY

Vodafone coverage checker:

<https://www.vodafone.co.uk/network/status-checker> enter postcode: NW1 9DY

This being the case, why does the Site Specific Supplementary Information (SSSI) document somewhat disingenuously say the following on page 2?: "As part of Vodafone and Telefónica's continued network improvement program, there is a specific requirement for a new installation at this location to provide improved 2G, 3G, 4G and new 5G coverage and capacity, ensuring that this area of Camden has access to the latest technologies".

However on looking closely at the SSSI document, I can only see an attempt at justifying in-fill of

the existing Vodafone 4G signals - see the '2100MHz LTE' coverage maps that are provided on pages 7 & 8 of the SSSI document.

Cornerstone or their agents must be asked by Camden Council to justify why such significant extra 2G/3G/4G infill coverage is required by both operators, given that the existing coverage arrangements have been in place for several years, and must have been of acceptable quality:

- Vodafone 2G (800MHz band) & 3G (2100MHz band)

- Telefonica/O2 2G (800MHz band) & 3G (2100MHz band) & 4G (at whatever band Telefonica operate their 4G)

Why does coverage for legacy 2G/3G/4G networks that have been functioning perfectly well in the area for 5 to 20+ years, have to be brought up to the level of 'Dense Urban' as opposed to 'Urban' or 'Suburban' for each of 2G and 3G as well as 4G? Surely if people have seriously high, and prolonged, data usage needs, then they will be much better-advised to resort to in-house broadband/WiFi connections, rather than using even 4G, let alone trying to use the legacy 2G or 3G with slower data rates?

3) ICNIRP Certificate- which operators and which signals does it refer to?

The agent has provided the following ICNIRP Certificate to give a 'Clarification of the Declaration of ICNIRP Compliance issued as part of the Notification attached for Telefonica Site 78560- Highstone Mansions, NW1 9DY'

<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/8178051/file/document?inline>

However, on inspecting this ICNIRP Certificate, it does not make clear which RF emissions are being addressed by it. The Certificate only refers to 'Telefonica Site 78560'.

Information that Camden must seek and receive from the agent/Cornerstone regarding the scope and coverage of the ICNIRP Certificate, before the application can be progressed:

- 1) Does the Certificate refer to the aggregate radiated power of each of the 4 Telefonica/O2 transmitters (2G/3G/4G/5G) as well as each of the 4 Vodafone transmitters in those bands (so 8 transmitters in total per sector), or does it only refer to a small subset of these? If only a subset, then an ICNIRP Certificate must be provided for each of the other cases.

- 2) Does it also include an estimate of the existing 2G/3G/4G signals being received from all the other Vodafone and Telefonica base stations in the area to produce an overall cumulative value?

- 3) Does it also include an estimate of existing 2G/3G/4G/5G signals from EE and Three (Hutchinson3G) in the same area?

- 4) Please can they provide any computations or diagrams that support this complex assessment

of ICNIRP compliance (ie. 2 separate operators radiating over 4 bands each)?

4) 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 12 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 or at least suggest that no 2G/3G/4G in-fill coverage should be provided, in the interests of not gratuitously increasing the RF radiation 'soup' in the area.

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

14th October 2020

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 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.irseco.com/wp-content/uploads/On-the-Clear-Evidence-of-the-Risks-to-Children-from-Smartphone-and-WiFi-Radio-Frequency-Radiation_Final.pdf