

Application No:	Consultees Name:	Received:	Comment:	Response:
2020/5130/P	Lesley Stevas	14/12/2020 11:28:58	OBJ	<p>This is application is for a new base station for Telefonica/02 for 5G and for 2G/3G/4G coverage. It is in an area where Telefonica/02 published coverage charts already show a good signal coverage of 2G/3G/4G and outdoor coverage of 5G.</p> <p>I strongly object to this planning application which states that antennas are to be installed as part of a 5G upgrade.</p> <p>On the planning statement Cellnex and CTIL say that two nearby nursery schools were consulted, and no response received, one of the schools is Casa Dei Bambini Montessori School is for 2.5 to 6 years old. The other school is Bright Horizons JW3 (formerly Active Learning JW3) provides care education for children aged 3 months to 5 years. There is also a rooftop garden providing outdoor learning activities.</p> <p>There has been little consultation with the residents and the schools in the area. Have the parents of the children who attend these schools been consulted? Have the teachers been consulted?</p> <p>Camden has an obligation to safeguard the health of its residents as provided for in Section 2B of the National Health Service Act 2006:</p> <p>“2B Functions of local authorities and Secretary of State as to improvement of public health</p> <p>(1) Each local authority must take such steps as it considers appropriate for improving the health of the people in its area.”</p> <p>5G is a newer type of telecommunication and should be a special case. It should not be lumped together with prior legislation which was relevant to previous types of masts for 2G, 3G and 4G. This application needs to follow the ‘full Planning Permission’ process, rather than GPDO Prior Approval Determination.</p> <p>Any change to an existing base station which increases its size, or the overall power radiated, should be subject to the normal planning process as if it were a new development.</p> <p>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.</p> <p>The consultation should be broadened to include concerned local residents rather than the limited public scrutiny which it has currently been afforded.</p> <p>5G has never been tested. Even the new Covid-19 vaccines are being put through rigorous tests before being released to the public. So why a frequency which will affect all life?</p> <p>“Because this is the first generation to have cradle-to-grave lifespan exposure to this level of man-made microwave (RF EMR) radiofrequencies, it will be years or decades before the true health consequences are known. Precaution in the roll out of this new technology is strongly indicated”.</p> <p>See 5G Wireless Telecommunications Expansion: Public Health and Environmental Implications. https://pubmed.ncbi.nlm.nih.gov/29655646/</p> <p>The mast mounted on a raised portion of the roofline, will be an eyesore with a colossal set of antennae mounted on it which will make them far more visible than those already there. They will protrude well into the skyline. They will be especially visible from the front of the building and on the left when seen from Finchley Road and up towards Hampstead.</p> <p>The two extra masts and associated clutter at the rear of the building will be protuberant and highly visible when viewed from the nearby West End Green Conservation Area, as well as nearby residents in Alvanley Gardens</p> <p>Just because a precedent is set with the masts already installed, it does not make it right to install more.</p> <p>Camden must refuse this application.</p>

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2020/5130/P	Mr E Peel	10/12/2020 11:35:47	OBJ	
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Dear Mr Dempsey,

I wish to object to this request for GPDO Prior Approval.

This is an application for a new base station site for Telefonica/O2 to provide not only 5G, but also 2G/3G/4G coverage infill in an area where Telefonica/O2 published coverage charts already show good signal coverage of 2G/3G/4G, and outdoor coverage of 5G.

Because it is a proposed new site for a Telefonica/O2 base station, near two schools, it should be subject to a full Planning Application and should not receive the benefit of the only limited public scrutiny, and reduced timescales that a GPDO Prior Approval Determination affords. The documentation provided with the application is inadequate and does not conform to either the NPPF or 'Code of Best Practice on Mobile Network Development in England' requirements and as such needs to be significantly enhanced before it can be given comprehensive consideration by Camden Planning and concerned local residents.

My objections are based on the following important points as follows:

1) Procedural shortcomings

The 'Planning Statement' document provided by the applicant (<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/8532878/file/document?inline>) refers in Section 7.1 (under the 'Health and Safety' heading) to a cover letter (which has not been provided) and to the Certificate of ICNIRP compliance (which has also not yet been provided). It goes on in Section 7.2 to state the reasons why an ICNIRP Certificate is needed, and yet the applicant has signally failed to provide it!

There is also no comprehensive SSSI document ('Site Specific Supplementary Information') provided, which almost all the other recent applications have provided, and which often can give some indications of radio coverage and relative signal strength.

Essentially the applicant is not following the guidelines in The 'Code of Best Practice on Mobile Network Development in England' (Code of Best Practice 2016: Edition Published: 24.11.2016). (https://uploads-ssl.webflow.com/5b7ab54b285dec5c113ee24d/5d5d4cd69a3f3827f30d06e9_Codes%20of%20Practice.pdf)

Whilst the applicant refers to this Code of Best Practice in their only substantive information document, they are not adhering to it.

It is only through the most detailed and closest possible scrutiny of the 'small print' on the engineering drawings that it is possible for an informed reader to deduce that the applicant is actually intending to install antennae not only for new 5G coverage, but also for a significant amount of 2G/3G/4G coverage infill. This despite the Telefonica/O2 coverage maps already showing good indoor 2G/3G/4G coverage in the surrounding area. This is an unnecessary further increase in the RF radiation in the area.

The ICNIRP certificate that must be provided by the applicant before Camden can consider the application, needs to address the cumulative RF radiation from all 4 sets of transmissions from the new antennae

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(2G/3G/4G/5G) as well as the existing (2G/3G/4G?) transmissions from the existing mobile antennae (EE?) already on the same building.

Given that this is a new site for Telefonica/O2, this application needs to follow the 'full Planning Permission' process, rather than the (relatively simplified) 'GPDO Prior Approval Determination', approach.

2) Visual intrusion

The mast mounted on an elevated portion of the roofline, visible against the skyline when facing the front of the building (on the left when viewed from Finchley Rd and up towards Hampstead) will be far more intrusive as it will have a more massive set of antennae mounted on it.

The additional two masts and associated clutter at the rear of the building will be prominent when viewed from the nearby West End Green Conservation Area, as well as nearby residents in Alvanley Gardens.

3) Nearby Schools consultation

Please can the applicant provide a copy of the notices they say have been issued to the two nearby nursery schools, and can they confirm that the notices have been seen by the schools?

One of these schools, in the JW3 Centre, is within 50m of the exchange building and in the light of considerable evidence on the harm done by constant RFR to young children this needs to be addressed in the full knowledge of the power being transmitted in that direction and the shape of the beams for each of 2G/3G/4G/5G.

Camden 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."

4) Proximity of upper floors of directly adjacent residential accommodation to the main beams of the antennae- risk of excessive RFR exposure.

The upper floors of the JW3 apartment block located immediately adjacent to the left side of the exchange building (viewed from the front) and the Mandeville Court mansion block immediately to the right of the exchange building are very close to the level of the proposed new antennae.

The applicant has not provided any diagrams showing the direction of the main beams from the new antennae and have not shown the 'occupational exclusion zone' or the 'public exclusion zone', as is considered essential good practice.

The applicant needs to prove that the upper floors of those two tall buildings are not within the 'public exclusion zone', as well as providing the ICNIRP declaration certificate which is still entirely missing.

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For all the above reasons, I would request Camden Council to refuse this application for GPDO Prior Approval. It needs to be re-submitted with all the correct documentation as a full Planning Approval request before it can be adequately considered by Camden Planning and by local residents.

Yours sincerely

Mr E Peel
