Application 2021/1593/P Pavement on West End Lane outside Bishopsdale House ~~Kilburn~~ Vale Place, London, NW6 4QX. Installation of 18m high telecoms tower with wrap around base cabinet & 3 x free standing cabinets to pavement.

Visual Impact

Bishopsdale House is 150 m away from the Priory Road Conservation Area. Installing this proposed monolithic 18 meter monopole on the pavement just outside the building will blight resident's views and will be very visible from the ground and from afar against the skyline and so will inevitably harm the character and appearance of both the Conservation Area and the area in general.

Fig 1.

At twice the height of Bishopsdale House, towering 9 meters above the roof, the monopole would be out of scale, unsightly and overbearing. The pavement cabinets would be obtrusive to the residents in the ground floor apartments and the width of the supporting pole would be ugly and obtrusive to those in all the apartments of that building, as well as to the residential properties opposite.

The 18 meter monopole would not "preserve or enhance the character or appearance" of this residential area. It would be at least a story higher than the taller building across the road [Fig 1]. there is no visual justification for its huge scale; nor would it 'blend in' with the other "street furniture" [SSSI].

It is noted that the drawings are missing the real roof height of the building directly opposite Bishopsdale House at approx 15 m, the 9m and 12 m roof heights are indicated on the plans. This is important regarding the exposure to residents on the top floor.

Health and safety

Schools/ Colleges/ Nurseries/ Health Centres

UK Government Research in the Stewart Report (2000) identified that Children are more susceptible to telecommunications radiation, and recommended "that particular attention should be paid initially to the auditing of base stations near to **schools** and other sensitive sites" [1.40] such as "**residenal areas** and **hospitals**" [1.30]: https://webarchive.nationalarchives.gov.uk/20100712173653/http://www.iegmp.org.uk/report/text.htm. On the basis of the Stewart Report the NPPF carries forward the principle of the 'consideration of the siting of masts close to schools through the requirement for developers to pre-consult with local schools'.

Within 0.3 miles [482.8 meters] of the site there are three schools/ colleges/ nurseries and a Health Centre which the applicants have not consulted, which need to be consulted with before this application can be determined [Fig 2].

Langtry Children's Centre — 250 meters
St Eugene de Mazenod Primary School — 275 meters
St Mary's Maria Montessori School — 350 meters
The Belsize Priory Health Centre — 300 meters

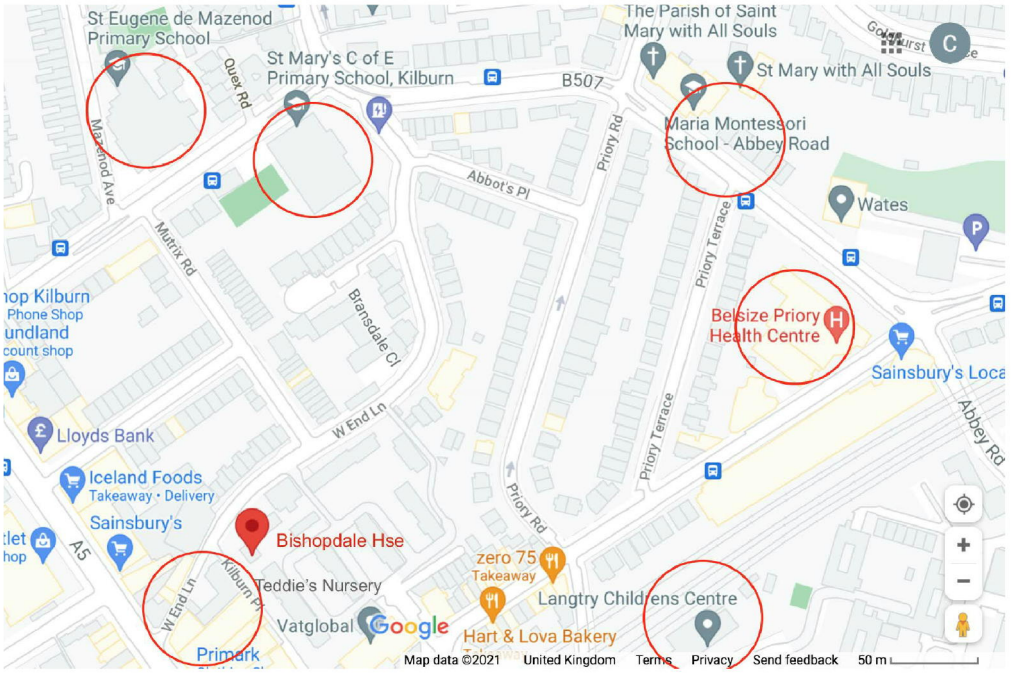

Fig 2.

There are obligations to protect health and wellbeing via planning law as summarised below. A map from another plan is supplied below for your reference [Fig 3] from which it is deduced that residents at A B and C may be severely at risk and could well be inside the exclusion zones.

Residents/ Exclusion Zones

The Stewart Report also recommend(s) [1.40]: "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)".

[1.45] Each exclusion zone should be defined by a physical barrier and a readily identifiable nationally agreed sign with a logo. This should inform the public and workers that inside the exclusion zone there might be RF emissions which exceed national guidelines. We recommend that the design of the logo should be taken forward by the British Standards Institute and implemented within 12 months (paragraphs 6.49–6.52).
https://webarchive.nationalarchives.gov.uk/20100712173653/http://www.iegmp.org.uk/report/text.htm

Please consider that the residents living at a similar height to the transmitting antenna may well be inside the areas designated as "no entry zones" or "8 hour maximum" zones. The proposed plans delineating these areas are prepared with the ICNIRP certificate but are missing from the planning application. Please can you ensure you have access to, and examine and post up the drawings of the exclusion zones and verify whether these dwellings are clear of the zones be fore making a recommendation on this application [Figs 3, 4 & 5]

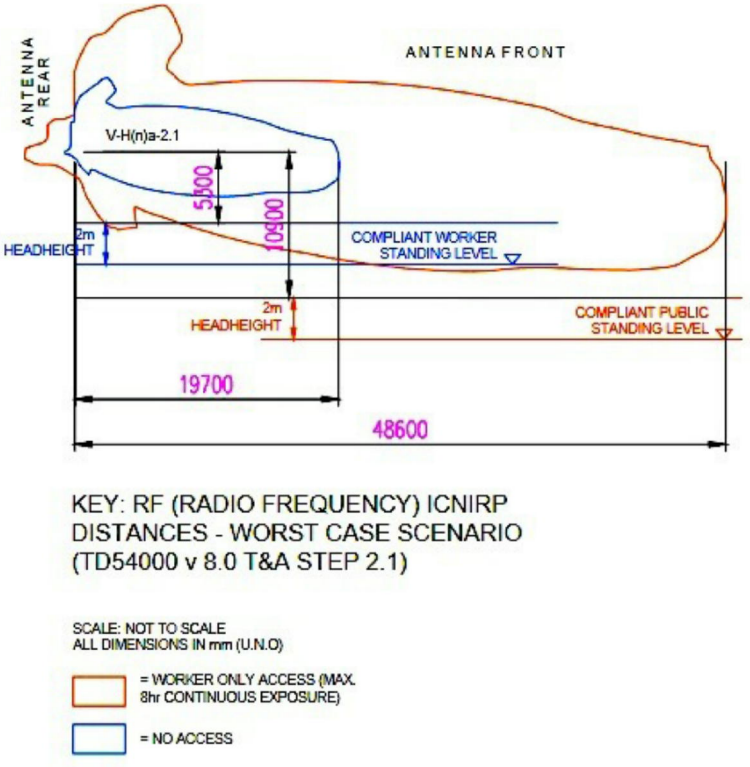

Fig 3. Radstock Exclusion Zones.

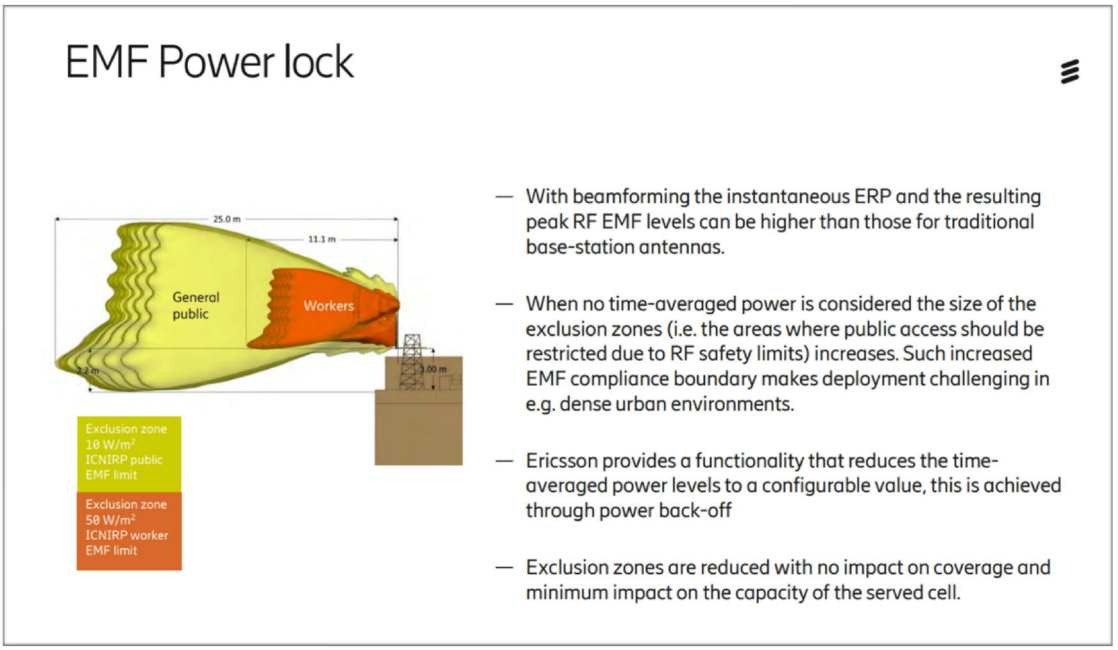

Fig 4. **Beamforming** - How does it work | Frank Henschke Ericsson AG | 2019-11-26
https://www.emf.ethz.ch/fileadmin/redaktion/public/downloads/3_angebot/veranstaltungen/AA_Henschke.pdf

Please would you also ask the applicant to provide detailed drawings to describe whether this antenna would be beamforming or emanate a diffuse ray, and what direction and reach would the beams or ray have.

Fig 5.

Further please consider the scientific papers referenced below which show that all residing within 500m of this mast will be at an unacceptable level of risk of damage to their health and wellbeing. At the very least they will be at risk of more headaches, changes in their sleep, reduced learning abilities and poor concentration. It is possible their fertility will be reduced, and they will have an increased chance of developing cancer.

Having looked at this evidence, please can you make the fitting decision that this is an unacceptable and incompatible use of this site and refuse this application.

In terms of the Council's legal responsibilities in regard to its role in regulating the exposure to wireless radiation the following is relevant:-

- PHE (Public health England) guidance paragraph 4 states that radiofrequency radiation (RFR) is regulated through planning policy.
- The 2018 EECC recital 105 refers to Directive 2014/61/EU which states planners are competent authorities.
- 2018 EECC code recitals 106 and • 110 states that competent authorities should reconcile the risks and make public health an imperative.

Having considered the research papers below, an evidence based decision about the material planning consideration "unacceptable use of land" due to polluting effects under NPPF 180 needs to be made despite the conflict with NPPF 116 and the policy of relying on ICNIRP for safeguardng health as instructed in NPPF 116.

Please ensure that Camden Council make a fully competent decision with regard to this application.

REFERENCES

An independent review concludes 8/10 studies show increase in neurological symptoms or cancer within 500m at RFR levels well below PHE/ICNIRP safety levels .

This independent review looked at ten epidemiological studies: "We found that eight of the 10 studies reported increased prevalence of adverse neurobehavioral symptoms or cancer in populations living at distances under 500 metres from base stations. None of the studies reported exposure above accepted international guidelines, suggesting that current guidelines may be inadequate in protecting the health of human populations."

Khurana et al. *Epidemiological evidence for a health risk from mobile phone base stations 2010*

There is enough medical and scientific evidence for liability of telecoms companies to be an issue

As use of mobile phones increases, both the density of base stations and their power output is expected to increase the global human RFR exposure. Although direct causation of negative human health effects from RFR from cellular phone base stations has not been finalized, there is already enough medical and scientific evidence to warrant long-term liability concerns for companies deploying cellular phone towers.

Pearce, J Limiting liability with positioning to minimize negative health effects of cellular phone towers 2019

I look forward to being informed of any updates.

Thank you in advance for your consideration on this very important matter.

Kind Regards

Janine Sachs
[redacted]

[Please be sure to post this on Camden's website as a PDF and not as a TIFF or JPG, otherwise only the first page will show up.]