

LONDON  
NW3

5<sup>th</sup> November 2021

Planning Dept  
LB Camden

Dear Sir/Madam

## **OBJECTION TO PLANNING APPLICATION - 2021/3621/P**

### **Incomplete and misleading Application**

1. There is nothing in the application documentation about radio coverage and relative signal strength, or beam shape or trajectory. This is essential information.
2. There is no description of which generation mobile technology is being proposed; whether or not the antenna would be 4G or 5G. This is not in keeping with the Code of Best Practice on Mobile Network Development - 1916, which advises that Operators give a "brief description" of their proposal, e.g. to "provide new 4G coverage": <https://www.gov.uk/government/publications/code-of-best-practice-on-mobile-phone-network-development>
3. There is no comprehensive Site Specific Supplementary Information (SSSI) document which would normally cover the above points. This needs to be provided.
4. The Detail description only lists one antenna to be installed in the church spire, whereas the drawing of the Proposed Antenna Plan shows four antenna [see Fig1]. Please clarify.

### **Inadequate Consultation**

6. UK Government Research in the Stewart Report (2000) identified that children are more susceptible to telecommunications radiation, and so the National Planning Policy Framework (NPPF) Paragraph 115 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': <https://webarchive.nationalarchives.gov.uk/ukgwa/20100910162959/http://www.iegmp.org.uk/report/text.htm> [See also: [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](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)]

7. In their [Planning Statement 2.0](#), the applicant claims that “Consultation was carried out with the Local Planning Authority, ward councillors, MP and St Mary’s School for the initial application. As there were no responses to the previous consultation, no further consultation has taken place for this scheme which reduces the number of antennas”. There is no evidence that these consultations took place.
8. The applicants have not considered the Montessori School and the Under Fours club in the Church Hall that are well within 50 meters\* of the Church spire. Neither school teachers or parents were consulted by the applicant.
9. The objection from the Montessori School to the initial consultation Application 2020/1332/P is solely due to local residents having informed them of the consultation. See their response here [and Fig.2]:  
<http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/8260456/file/document?inline>

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10. Altogether There are four nurseries, two primary schools and one student accommodation in close proximity to St Mary with All Souls Church [Map: Fig 3].
11. For the sake of transparency and in accordance with the Code of Best Practice - 2016, copies of consultation letters clearly describing the type of antenna being proposed should be available to view on the council’s planning website. By the same practice, community letters and Site Notices should also identify the type of antenna being proposed so that all those concerned are properly informed.

## **Visual impact**

12. **St Mary All Soul is a Grade II listed building in a Conservation Area**
13. Replacing the original slate louvre windows with glass reinforced plastic (GRP), is not replacing like for like, as the applicant claims in their planning statement, and is inconsistent with the Church being grade II listed and in a conservation area. To allow this would set a negative precedent for what could be approved in the future.

14. Mounting a GPS module on the south east face of the tower is inconsistent with the Church being grade II listed and in a conservation area. Though relatively small, the device will still be in full view. In addition, a cable running up to the spire would be unsightly.

### Health and safety

15. 'Under the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines, a 5G transmitter might need an exclusion zone of 50m or more from the front of the antennae and also a small area to the rear' [fwi.co.uk](http://fwi.co.uk). \*Since the antenna would be within 50 metres of the Montessori School and the Under Fours Club [Fig.3], they would be inside the exclusion zone. For more on exclusion zones see: <https://ignir.org/wp-content/uploads/2020/10/IGNIR-Guidelines-Issue-1.3-June-2020.pdf>

16. Whilst NPPF paragraph 116 states that local planning authorities “should not set health safeguards different from the international commission guidelines for public exposure”, Camden Council still has an overriding 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.”** 17. Please view these peer reviewed studies on the effects of radio frequency radiation:

- Thousands of scientific studies from the 1930s to 2020 (including NASA in 1981 and the 2020 Ecolog Report commissioned by T-Mobile) show significant harm to humans, animals, trees, plants from radio frequency radiation (RFR):
- <https://www.emfresearch.com/ecolog-study/> [full paper available on request]

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- In 2011 WHO (World Health Organisation) classified radio frequency radiation as a Group 2B possible carcinogen to humans: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5504984/>
- In 2019, at a US Senate hearing on 5G's future, the telecoms industry representatives admitted to Senator Richard Blumenthal that they have

done ZERO health & safety studies on 5G technology:

<https://www.takebackyourpower.net/senate-hearing-wireless-industry-confesses-no-studies-showing-5g-safety/>

- This 2020 Science Direct study asserts that “Neither 4G nor 5G have been tested for safety in credible real-life scenarios. Alarming, many of the studies conducted in more benign environments show harmful effects from this radiation. The present article overviews the medical and biological studies that have been performed”: <https://www.sciencedirect.com/science/article/abs/pii/S037842742030028X> [*full paper available on request*].

**Terence Ewing**