

Planning Application 21/2151/FUL, 02 17774 Telecommunication Mast, Front Street Chirton

Statement received from F Casey of Simpson Street, Chirton:

Thank you for giving me opportunity to voice my concerns over the proposed larger telecommunications mast which will be replacing the existing mast on Front Street. I think there are other locations close by where this could be placed which will have less impact on views from people's houses, one of which is included in a photograph I have sent you and is located on Silkeys Lane. There is already a large mast there with a CCTV camera mounted. This site is a larger area and isn't as close to people's houses.

There is also a space at the top of Ripley Avenue, which is just off Front street that also has a larger area where the mast could be placed and also already has a monopole structure situated there. Again, this site is further from people's homes and will have less impact on the area and people's views.

My objections to this new mast concern not only the appearance but also, as a siting issue, the harmful, cumulative, polluting effects from the proposal. I refer to NPPF paragraph 185, which is in conflict with paragraph 118, and with government policy to rely on ICNIRP certification.

185. Planning policies and decisions should also ensure that the new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

I have good reason to believe that this proposal would cause harm to nearby residents and wildlife at radiation levels well below the ICNIRP guidelines, and I ask that evidence contained in this objection be properly assessed by the Director of Public Health, Pollution Control Officer or someone with the expertise to evaluate it, so that an evidence-based determination of the material planning consideration "incompatible and unacceptable use of the site" can be determined.

PHE guidance states that radiofrequency radiation is regulated through planning policy. Further, the European Electronic Communications Code (EECC) that was brought into UK law in late December 2020 has clauses on public health. This means that local planning authorities should make human public health imperative and reconcile environmental and public health concerns under the code. Your Competent Authority status derives from EU Directive 2014/61/EU and requires the application of EECC Recitals 106 and 110 as they apply to planning applications.

An evidence-based decision about the material planning consideration "unacceptable use of land" due to polluting effects under NPPF 185 and your EECC 2018 role needs to be made despite the conflicting instruction to rely on ICNIRP in NPPF para 118.

1.0 ICNIRP certification

The scope of ICNIRP Public Exposure Guidelines does not cover environmental harms as a pollutant or effluvia, neither does it cover children being exposed to nearby EMF-RF radiation for prolonged periods. To protect children World Health Organisation recommends against allowing this to happen. Please consider children's health.

The Council will be aware of its Statutory Duty of Care to protect human health including that of school children, and Government - Department for Education - issuing "Keeping children safe in education 2021 - Statutory guidance for schools and colleges Sept. 2021" (Statutory guidance for schools and colleges Sept. 2021, DoE)

An ICNIRP certificate is effectively an evidenced claim of compatible use for the siting of a radio mast on land or on a building presented by the Telecom applicant, and the planning authority has to remain open and objective in how it takes into account contrary claims (i.e. objections) presenting evidence of incompatibility.

The Council has the statutory duty of "preventing impairment to children's health or development" (ref. 6) The application deviates from Council's City Plan and NPPF paragraphs as noted. Taking this into account and BHCC's statutory duty and current scientific reports on the ill-effects suffered by children, I urge refusal.







