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[Contains topics of a financial nature >](#)

Gina Bellhouse
Planning Advisor
Local Review Body
City of Edinburgh Council

Dear Ms Bellhouse

RE: Planning Application: 23/02607/FUL
Name: EE UK Ltd & Hutchison UK Ltd.
Site: Proposed Telecoms Apparatus 35 Metres North Of 141 Newhaven Road
Edinburgh
Description: Proposed telecommunications installation. Proposed 20.0m high EE /
H3G
Phase 7 Streetworks Pole on root foundation and associated ancillary works.

We are getting in touch with you regarding the appeal for this application to confirm our continued strong objections to this proposed installation. As local residents who would be severely impacted by the proposed structure we are deeply concerned by the negative effects upon the character of Victoria Park as a historic conservation area, the intrusion it would pose to a highly public area of recreation and the additional clutter it would cause to a busy thoroughfare for school-children and residents alike.

As mentioned in our previous objection:

1. The proposed 20m telecoms mast and large 2m surrounding buildings lie within a conservation area, the heritage of which would be destroyed by this construction. The apparatus will be visible across the majority of the beautiful and much valued green space of Victoria Park, and will tower above the new play area for young children. The status of the park and surrounding roads as a historic conservation area would be greatly diminished by such an incongruous, modern and unsympathetic structure, visible from many angles.
2. The proposal has not satisfied planning requirements to suitably consider other sites, nor has any effort been made to make it visibly less obtrusive. The plans are purely driven by ease and cost to the developer at the expense of residents and park users. The proposed elevations are misleading and do not show other aspects that would indeed demonstrate that the structure benefits from no screening at all and

would dominate nearby dwellings.

3. Health and safety considerations have been ignored. The proposal is adjacent to a bus stop and will render the pavement unsafe for those using pushchairs or wheelchairs. These objections are detailed more fully in the letter attached, and I would urge you strongly to reject these proposals.

4. As a local resident I would also like to highlight that the structure would be placed at a distance deemed the bare minimum to be safe to local dwellings and that the output of the structure could cause harm and distress to those of us living so close by.

We note that in this appeal there has been no material change to the proposed structure, no attempt to mitigate the negative effects highlighted in the Council's rejection nor any attempt made to find a more suitable location.

We would be very grateful if you could take these thoughts into account in your considerations of this case and uphold the Council's rejection of the proposed plans. **Please note also our more detailed objection in the attached letter.**

Best regards,
Thomas and Shelly Sneddon
132 Newhaven Road



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Description: Proposed telecommunications installation. Proposed 20.0m high EE / H3G

Phase 7 Streetworks Pole on root foundation and associated ancillary works.

We have already written to note our objection to the proposed 5G mast outside our home and we request that you please up-hold the decision already made to REFUSE this planning application for two reasons.

1) The ICNIRP safety certificate which I have attached is invalid. The reason being is that one of the companies listed on the certificate as self-certifying the 5G telecoms mast is compliant with the ICNIRP guidelines CANNOT DO SO BECAUSE THE COMPANY LISTED WAS DISSOLVED IN 2015.

This is the link to the ICNIRP self-certification document:

https://citydev-portal.edinburgh.gov.uk/idoxpa-web/files/D4D3B9AE6C1D118E6A2966536AA85AFC/pdf/23_02607_FUL-ICNIRP-5889896.pdf

"Three UK Limited" is one of the companies which is self-certifying that the ICNIRP guidelines are being complied with.

This link to Companies House shows that this company was dissolved on 27th October 2015.

<https://find-and-update.company-information.service.gov.uk/company/03004157>

This is such a mistake that it cannot signify incompetence and must signify in my opinion intent. Possibly deceitful intent. Possibly fraud.

The Local Review Board has an additional reason to up-hold the REFUSAL of this planning application which the planning officer must not have been aware of. Indeed, there have been dozens of planning applications for 5G Telecom masts using this company name on the ICNIRP safety compliance self-certifications. The deceit goes far. ALL THE 5G MASTS WHICH HAVE BEEN APPROVED BASED ON THESE POSSIBLY FRAUDULENT ICNIRP SELF-CERTIFICATION DOCUMENTS SHOULD BE REVERSED.

2) The second reason is that EVERY planning application of 2023 for a 5G Telecoms Mast within a conservation area of Edinburgh has been refused by the planning officers. It has been decided that there are no material considerations that outweigh these decisions. This is the link to the report of handling with the recommendation and summary below:

https://citydev-portal.edinburgh.gov.uk/idoxpa-web/files/C336542E3DA2969A3489D8D0561AA6F9/pdf/23_02607_FUL-6135451.pdf

Recommendation

It is recommended that this application be **Refused** subject to the details below.

Summary

The proposal is **contrary** to NPF4 and the LDP and is **unacceptable** with regards to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. The proposals will **not preserve** the character and appearance of the conservation area. It would not have an **unacceptable impact** on amenity. There are no material considerations that outweigh this conclusion.

Yours sincerely,

Mr & Mrs Ahmad
134 Newhaven Road
Edinburgh, EH6 4NR



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Planning Advisor
Local Review Body
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SECTION A – Application Background

I have also forwarded this email to people who live close to the proposed mast and I will attempt to share it with all those who objected to the planning application by distributing a hardcopy of this email to them door-to-door. As a result you may receive similar emails from others.

As I said, I would really appreciate if you could please possibly **REPLY TO ALL**, just with an acknowledgement that my email has been received and will be read. I know for a fact that many of my emails in the past to officials within the council have not been read. Thank you in advance. I have also cc'd Paul Lawrence.

Also, you can see from my P.S. that if neighbourhoods are properly notified about 5G Telecom mast planning applications in their neighbourhood that there is huge number of people who are not happy about their appearance and siting. These Telecom masts are very tall and over-bearing and they do not preserve the character and appearance of any residential area. It is unacceptable to a lot of people who do not live in conservation areas that there is almost a total lack of concern about the extent to which these masts also have an unacceptable impact on the amenity of their residential neighbourhood.

I would like to suggest to all the politicians reading this email that they consider that the proliferation of 5G masts in Edinburgh against the will of a very significant minority if not actually indeed the majority of people living in the neighbourhoods affected will very soon become an election issue. Votes are to be gained or lost by addressing or not addressing this issue in my highly educated opinion given that I have spoken to thousands of people face-to-face about their concerns.

One key issue is that as little as 2 properties are officially notified about the planning applications as was the case with Moredunvale Road V.1 and V.2 below. The Gilmerton Care Home which provides neurological care and rehabilitation to 60+ dementia patients refused to inform their residents and their families about a 5G mast going up within 20 meters of the boundary of the care home.

Many of those cc'd here may remember all my emails on the issue. The care home management itself had no idea about the mast because their mail is redirected to Four Seasons Head Office. They felt that if their residents being informed was a democratic right then it was not their job to enable it. They felt that it should be the job of the Council. After many emails the Council explained that they just do the absolute minimum required. They are not required to write to people to inform them about planning applications they only have to write to buildings. As they had written to the building they were satisfied that they had done the minimum required even when I informed them that the letter had been automatically forwarded on. It is this kind of behaviour which is disenfranchising people. They are not trusting almost all of their politicians. They are looking for a solution. My opinion is that there is huge pent up demand for an alternative to the current politicians.

A further point is that for the Moredunvale 5G mast as it the case other applications out with conservation areas the Council only had to give the two properties 14 days to comment.

Finally, 60 dementia patients living within a few meters of a 5G mast is not a good idea because many of them will have metal in their bodies. The idea of concern is that this metal could act as antenna thereby connecting to the signal from the 5G mast. As you can see from my earlier email ICNIRP safety guidelines do NOT apply to people with metal in their body.

Are the ICNIRP 5G Radiation Safety Guidelines FLAWED?

Is the Prior Notification planning process for Telecoms masts FLAWED in the eyes of the public?

Thanks a lot, Mr Choudhury, for forwarding me the reply you received from Mr Laurence's team.

Thanks a lot, Mr Laurence, for arranging for one of your team to reply to the questions from Mr Choudhury.

For completeness, I have pasted the original email from Mr Choudhury to Mr Laurence at the bottom of this email.

In Edinburgh, from 7th April to 25th August 2023 a total of **4000 objections** have been lodged by the public to 15 different planning applications for 5G Telecommunication masts (1 below). Many people object as they find them ugly. However, a huge number of people are objecting to these masts as they are anxious about the health benefits or otherwise of living continuously exposed 24/7/365 to 5G electromagnetic radiation.

This anxiety is made worse by the fact that more masts will be required for 5G compared to 4G. The 4G masts are typically every 1200 meters per operator whereas the 5G masts are already being built in Edinburgh by the same operator 411 meters apart. Based on this Pie R squared means **nine times more masts** will be needed for 5G compared to 4G.

With regards to addressing the health concerns people have about living near a 5G mast Alan Moonie (Team Planning Manager) has suggested looking at the recent advice from the Scottish Government: **5G and public health - position statement**. This replaces the previous statement from August 2019 and is dated 28th June 2023. Here is the link:

<https://www.gov.scot/publications/5g-and-public-health-position-statement/>

It is worthy of note that this has been published by the Digital Directorate which is comprised of Richard Lochhead MSP (Minister for Small Business, Innovation, Tourism & Trade), Shona Fraser (Deputy First Minister), Lesley Fraser (Director-General Corporate) and Geoff Huggins (Director of Digital).

This is a statement about Public Health. Why has it been published by the Digital Directorate, which has no expertise in health. This will increase people's anxieties about 5G rather than reduce them. It is a short statement with only 3 links. One of which is to the WHO which explains as follows:

["What are the potential health risks from 5G?"](#)

"To date, and after much research performed, no adverse health effect has been causally linked with exposure to wireless technologies. Health-related conclusions are drawn from studies performed across the entire radio spectrum **but, so far, only a few studies have been carried out at the frequencies to be used by 5G.**

Tissue heating is the main mechanism of interaction between radiofrequency fields and the human body. Radiofrequency exposure levels from current technologies result in negligible temperature rise in the human body.

As the frequency increases, there is less penetration into the body tissues and absorption of the energy becomes more confined to the surface of the body (skin and eye). Provided that the overall exposure remains below international guidelines, **no consequences for public health are anticipated.**"

The other two links are to the ICNIRP guidelines. The International Commission on Non-ionizing Radiation Protection seems to have its primary objective to protect the telecoms industry rather than the people. The original guidelines were published in 1998. In 2009 they were restated as is. In 2020 after 22 years, they were finally updated. This ICNIRP article explains the differences between the 2020 guidelines and the 1998 guidelines: <https://www.icnirp.org/en/differences.html>

This is the 1998 ICNIRP

Guidelines: <https://www.icnirp.org/cms/upload/publications/ICNIRPemfgdl.pdf>

This is the 2020 ICNIRP

Guidelines: <https://www.icnirp.org/cms/upload/publications/ICNIRPrfgdl2020.pdf>

Every cell in our body has an electromagnetic field. Each cell's nucleus is positively charged, and its cytoplasm is negatively charged.

There are two flaws in the ICNIRP Safety Guidelines because both the 1998 and 2020 versions only consider the heating effects of exposure to electromagnetic radiation and they do not apply to anyone with metal implants.

FLAW ONE:

The 2020 ICNIRP guidelines have a single reference to the term "**non-thermal**" as follows:

"It is important to note that ICNIRP only uses operational thresholds to set restrictions where they are lower (more conservative) than those demonstrated to adversely affect health in the radiofrequency literature, or where the radiofrequency literature does not provide sufficient evidence to deduce an adverse health effect threshold. For the purpose of determining

thresholds, evidence of adverse health effects arising from all radiofrequency EMF exposures is considered, including those referred to as 'low-level' and '**non-thermal**', and including those where mechanisms have not been elucidated. Similarly, as there is no evidence that continuous (e.g., sinusoidal) and discontinuous (e.g., pulsed) EMFs result in different biological effects (Kowalczyk et al. 2010; Juutilainen et al. 2011), no theoretical distinction has been made between these types of exposure (all exposures have been considered empirically in terms of whether they adversely affect health)."

FLAW TWO:

The guidelines do not address medical implants in the context of harm from RF-EMF or therapeutic applications of RF-EMF. Following is the one reference to "implants."

"The main objective of this publication is to establish guidelines for limiting exposure to EMFs that will provide a high level of protection for all people against substantiated adverse health effects from exposures to both short- and long-term, continuous and discontinuous radiofrequency EMFs. However, some exposure scenarios are defined as **outside the scope of these guidelines**. Medical procedures may utilize EMFs, and **metallic implants** may alter or perturb EMFs in the body, which in turn can affect the body both directly (via direct interaction between field and tissue) and indirectly (via an intermediate conducting object). For example, radiofrequency ablation and hyperthermia are both used as medical treatments, and radiofrequency EMFs can indirectly cause harm by unintentionally interfering with active implantable medical devices (see ISO 2012) or altering EMFs due to the presence of conductive implants. As medical procedures rely on medical expertise to weigh potential harm against intended benefits, ICNIRP considers such exposure managed by qualified medical practitioners (i.e., to patients, carers and comforters, including, where relevant, fetuses), as well as the utilization of conducting materials for medical procedures, as beyond the scope of these guidelines (for further information, see UNEP/WHO/IRPA 1993)...."

Joel M. Moskowitz, Ph.D. (Director, Center for Family and Community Health, School of Public Health, University of California, Berkeley) maintains the following website for professionals full of information and links to papers on Electromagnetic Radiation Safety: <https://www.saferemr.com/>

Professor John Frank from The University of Edinburgh is calling for a STOP to the current 5G rollout in favour of the precautionary principle in his peer-reviewed paper in the Journal of Epidemiology & Community Health. I have attached the paper. This a review in the British Medical Journal of his paper. The BMJ article **STOP global roll out of 5G networks until safety is confirmed urges expert (BMJ 2021)** is well worth reading as it's a 2min read.

<https://www.bmj.com/company/newsroom/stop-global-roll-out-of-5g-networks-until-safety-is-confirmed-urges-expert/> (2021)

Another informative read is this paper in the journal Nature which is a meta-analysis looking at "107 experimental studies that investigated various bioeffects including genotoxicity, cell proliferation, gene expression, cell signaling, membrane function and other effects" as well as "31 epidemiological studies that investigated exposure to radar, which uses RF fields above 6 GHz similar to 5G."

5G mobile networks and health—a state-of-the-science review of the research into low-level RF fields above 6 GHz (Nature

2021) <https://www.nature.com/articles/s41370-021-00297-6>

The conclusions of this paper can be summarised as follows: 1) There are no epidemiological studies that have directly investigated 5G and potential health effects. 2) Given the low-quality methods of the majority of the experimental studies we infer that a systematic review of different bioeffects is not possible at present. 3) Future epidemiological research should continue to monitor long-term health effects in the population related to wireless telecommunications. 4) The majority of the studies employed low quality methods.

Given the above uncertainty it is understandable that the public is becoming anxious about a) living near a 5G mast and b) the sheer quantity of masts that will be required for 5G to actually work.

So much so, people are asking themselves: If things all go wrong will there be compensation by the Telecom Corporations' insurance policies. Can anyone prove 5G EMF insurance exists because this article includes dozens of links which show that it does not.

ELECTROMAGNETIC FIELD INSURANCE POLICY EXCLUSION ARE THE STANDARD

<https://ehtrust.org/key-issues/electromagnetic-field-insurance-policy-exclusions/>

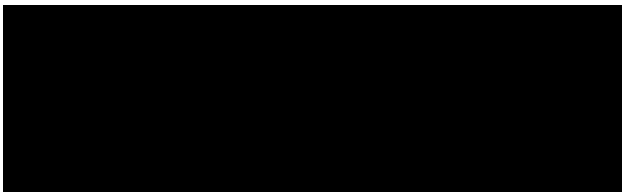
This article from August 2022 paints the same picture.

INSURANCE INDUSTRY: 5G IS AN EMERGING HIGH-RISK SITUATION ALONG WITH CLIMATE CHANGE

<https://mdsafetech.org/2022/08/26/insurance-industry-5g-is-an-emerging-high-risk-situation-along-with-climate-change/>

If the insurance industry is not prepared to insure Telecoms Corporations against the potential Health & Safety Risk of being exposed to 5G for a long time, then it is normal for parents to start looking at the actual published medical research.

Yours sincerely,



Fighting Censorship Locally - With People for People

P.S. 4509 TOTAL OBJECTIONS TO SEVENTEEN 5G PLANNING APPLICATIONS SINCE APRIL 2023

Johnston Terrace 160 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RQVX1HEWN2L00>

Whitehouse Loan V.3.0 113 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RQS7QUEWMNG00>

St Johns Road 311 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RTMACLEWM5C00>

Russel Road 266 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RTNU86EWM9P00>

Mayfield Salisbury Church 124 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RSJ3WFEWJMZ00>

Whitehouse Loan V.4.0 312 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RSKY7TEWJRZ00>

Randolph Crescent 281 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RVIRZYEWJJCZ00>

Grange Loan 292 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RW6KZBEWL1600>

Moredunvale Road V.1.0 384 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RUR0R1EWHDI00>

Newhaven Road 266 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RWAAA6EWLEK00>

Denham Green Terrace 72 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RXF0VLEWJ900>

Grange Road 368 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RXXJJREWHGA00>

North Bughtlin Road 301 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RXBBKGEWG8400>

Moredunvale Road V.2.0 391 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RXF0VSEWJJC00>

Ferry Road 299 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?>

[activeTab=summary&keyVal=RYCWMKEWIOB00](#)

Howdenhall Road 234 objections

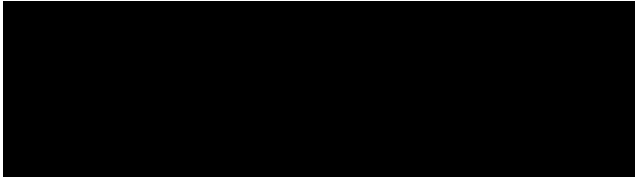
<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RYGANVEWIXR00>

Sandpiper Drive 335 objections

<https://citydev-portal.edinburgh.gov.uk/idoxpa-web/applicationDetails.do?activeTab=summary&keyVal=RYNGYBEWJB200>

P.S. 4509 TOTAL OBJECTIONS TO SEVENTEEN 5G PLANNING APPLICATIONS SINCE APRIL 2023

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Sheila Ahmad