

# **The Hennys, Middleton and Twinstead Parish Council**

Clerk: Mrs Shelley Boydel  
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## **Response to application:- 21/01486/T56 Land At, Ryes Lane, Bulmer from Waldon Telecom**

### **HMTPC's stance on this phone mast proposal**

**Please be advised that on behalf of the parishioners of Little and Great Henny, HMTPC strongly object to the siting of new telecommunications equipment including the proposed 20m tower on the site NGR: 585423, 238659, close to the settlement of Little Henny as detailed in application 21/01486/T56 – Land At, Ryes Lane, Bulmer.**

The reasons for this objection are laid out in the following pages of arguments which link to relevant planning policy. Taken together, the arguments we provide show that the proposed site is inappropriate to place and contrary to planning policy at both national and local level. Thus the planning balance securely lies with refusal to confirm prior approval by the Local Planning Authority (the LPA), Braintree District Council.

In addition to providing the following argument for refusal, HMTPC also provide as appendix (2), a letter of objection from the Drs Smith of Lt Henny which we submit as evidence of residents' concerns and sources of concern that particularly relate to mental health and wellbeing impacts covered in our section labelled "Health Issues". This resident response was not available on BDC's Planning website at the time of writing. Also herewith, Bulmer Parish Boundary maps in Apendix (3) & (4) which indicate that the wrong address for the proposed site has been given in "21/01486/T56 – Land At, Ryes Lane, Bulmer".

## **Time frame and information available to enable and inform community responses to Waldon Telecom's informal consultation**

Clearly, a phone mast of 20 metres height in open countryside and located around 500 metres from the majority of inhabitants of the country settlement of Little Henny will deeply affect not just those in the immediate 500m zone from the proposed mast. It will affect all residents of the Little Henny community along with those in the closest adjoining settlements of Great Henny and Bulmer Tye. And yet the developers have sought responses from only a minority of households in the community. It is hard to understand why that might be. Henny residents are aggrieved at this failure to communicate the developer's proposals appropriately and comprehensively to affected households and again (and not for the first time in these parishes), this evidences the inadequacy of the developer's approach to the pre application consultative process.

Residents in and around Little Henny have complained at the lack of clarity within the drawings and documents supplied to them. This has been a common feature in consultations instituted by Waldon Telecom in the parishes covered by HMTPC. It is simply not appropriate for the developers to assume that documents prepared for administrative bodies such as the LPA with its professionally qualified planning officers will provide the level of accessibility to information to allow lay residents to acquire a clear and precise understanding of what is proposed.

This response is substantially the same as that provided to Waldon Telecom / EE Ltd. / Hutchinson 3G Ltd. (the Developers) and is again constrained by time limits to respond and the failure of the proposers to provide adequate information upon which to base a full response. Indeed, the surveying needed to fulfil the developers obligations in making an application for confirmation of prior approval has to the best of our knowledge not been carried out.

Furthermore, environmental and ecological surveys could not meaningfully be carried out during the period between the informal consultation and now due to the hibernation of species known to reside in and around the proposed mast site.

This indicates that the undue time constraints imposed by the developers were unreasonable and unnecessary and that a more sensible time frame would be to institute the consultation now with an end date 28 days after the community are provided with the outputs of all surveying required by the relevant planning decision making process.

## **Planning policy relevant reasons for this strong objection and for refusal by the LPA**

Note: The proposed site is outside any built up area boundary (BUAB) and therefore countryside policies apply.

### **Landscape character and visual impact.**

HMTPC hold that the proposed phone mast located at NGR: 585423, 238659 would be an inappropriate, alien, and out of scale addition to the landscape which could not be visually mitigated to any impactful degree, and which is therefore totally at odds with many aspects of countryside planning policy at both national and local level.

The site lies within a high sensitivity landscape character area within the Braintree District known as the 'Wickham Farmland Plateau'. The Wickham Farmland Plateau character area encompasses the rolling hills and valleys between Bulmer and Little Henny in the north, Twinstead in the east, Halstead in the south-west and Gestingthorpe in the west. The hills are known for having large arable fields on flat tops. The proposed site and its setting is an unspoilt example of such landscape.

Throughout this landscape, hedgerows and ditches delineate the large open fields and tall trees screen settlements from view. Little Henny and its surrounding countryside is one of the last unspoiled areas within the Wickham Farmland Plateau character area and both national and local planning policy is in place not only to protect such landscape but also to enhance it. The proposal for a phone mast at NGR: 585423, 238659 is totally contrary to both these policies and their objectives. Indeed, this location is particularly sensitive due to its very open, flat nature with no effective year round natural screening of the site that would mitigate the visual impact of so alien a structure as a 20 metre tall mast posturing as a highly non invite columnar faux conifer with complex rectilinear antenna atop, set on high yet predominantly open ground.

BDC's landscape character assessment identifies one of the main sensitivities to change for the Wickham Farmland Plateau landscape character area as being the open skyline which is sensitive to new development (in particular tall vertical development).

Proposed strategy objectives identified in the assessment include conserving and enhancing the integrity of the landscape and reinforcing its character. The proposed development is therefore contrary to this principle given its plateau top location and lack of sufficient vegetation for shielding. The assessment also sets out suggested landscape planning guidelines which include consideration of the visual impact of new development which seeks to maintain characteristic views of the valleys and hills, ensuring any new exposed development is small-scale. The assessment concludes that the Wickham Farmland Plateau has a relatively high sensitivity to change for these reasons and this should therefore carry significant weight in the overall planning balance and this therefore is a strong policy related argument for refusal of confirmation of prior approval in this case.

The NPPF makes reference to the protection of character areas and states that '*planning policies and decisions should support development that makes efficient use of land, taking into account... the desirability of maintaining an area's prevailing character and setting*'. The NPPF also states that '*planning policies and decisions should ensure that developments... are sympathetic to local character and history, including the surrounding built environment and landscape setting*'. The proposed development would therefore be contrary to the principles of the landscape character assessment and also the policy requirements set out in the NPPF.

At local level, Braintree District Council's (BDC) has in place Core Strategy objectives relating to the environment. An important objective being '*to protect, restore and enhance the natural habitats, biodiversity, landscape character, amenity and environmental quality of the countryside*'. It is therefore quite clear that the protection and enhancement of rural landscape character areas is of significant importance to the LPA, Braintree District Council, their stance being underpinned by national planning policy.

Local Plan policies also include such decision relevant statements as "*development outside development boundaries will be strictly controlled to uses appropriate to the countryside to protect the intrinsic character and beauty of the countryside*".

Recent reviews of planning policy by BDC have included assertions that include: '*development outside town development boundaries, village envelopes and industrial development limits will be strictly controlled to uses appropriate to the countryside, in order to protect and enhance the landscape character and biodiversity, geodiversity and amenity of the countryside*'. From this it is very clear that a key objective in BDC countryside planning policy is to protect the natural landscape from developments such as that which the developers through Waldon Telecom propose at Little Henny.

HMTPC also note that The 'Vision for North Essex' states '*the countryside and heritage assets will be protected and enhanced*'. This is a notion echoed in the 'Spatial Strategy' which states that '*areas outside of the development boundaries are considered countryside*'. The Spatial Strategy defines '*The Countryside*' as '*all other areas of the District, including hamlets and small groups of homes, which are outside development boundaries are considered to be within the countryside. In order to protect the intrinsic beauty of the countryside, development here is normally restricted to that which supports countryside uses*'.

## **Broader aspects of amenity impact**

HMTPC are cognisant of the fact that within the planning system, the term amenity covers not only visual aspects but also development consequent detriment to property values, along with detriment to the views residents enjoy both from their homes and whilst travelling to and from same. Property value reduction and impacts to view are not separately dealt with by the planning system and a right to a view has little or no standing in arriving at a planning decision.

Nevertheless, it is a fact that the community of Little Henny fear the detriment that would flow from a phone mast as proposed on their lives, wellbeing, their enjoyment of the place in which they reside and the potential detriment to their equity interests. We are advised by specialist country property agents that a phone mast located within the setting of rurally located residential property can reduce the saleability of property when marketed. This is a consequence of the mast reducing the size of the market for said property. The corollary is that in order to remediate that impact, the asking price must be reduced.

The broad assumption within the planning system is that the benefit of a phone mast is socialised across the entire community while the detriment is born by the few. However, that is not the case in this area and it is not even a majority of the community who have indicated that they would benefit from the proposed mast as they are not customers of the mast proposing companies. A mast located as proposed would exist to the detriment of all residents of Little Henny (amongst others) and yet the benefit would accrue to the few. Residents therefore hold that this is a wholly unfair imposition on them wherein they gain little socialised benefit but suffer a great cost to themselves and they seek to have the LPA consider this in reaching their planning decision with respect to this phone mast proposal.

## **Detriment to a significant cultural heritage landscape asset**

Local and more widely held knowledge indicates that the 18th century painters John Constable and Thomas Gainsborough were active in and around Little Henny and that the landscape there has inspired important works by these internationally revered artists. That these artists were of pivotal influence in the development of British Landscape Painting Movement is irrefutable in the view of art academia.

The Little Henny hamlet located around 500m from the proposed mast site hosts a number of listed buildings (See appx. 1), the nearest of which is the Barn at Lodge Farm, now a dwelling. The listed heritage asset Ryes Hall which also lies in close proximity to the proposed phone mast site is essentially the manor house and epicentre of Little Henny. In the 18th century, the Hall hosted acclaimed landscape painter, John Constable. Thomas Gainsborough was a resident of nearby Sudbury. The land from Ballingdon up to and including the Hennys was in their time owned by a close friend of Thomas Gainsborough and various landscape features (eg barns, churches, etc.) on this land appear in the “masterpieces” by Gainsborough, a masterpiece being a very “cut and paste” amalgam of landscape features in a landscape painting of that era.

John Constable has been long known to have painted topographical views and "Stour Valley and Dedham Village" is a well known example. However, until the 21st century the art world held that Gainsborough's works were not topographical. This notion was overturned when it was recognised that the painting that is held at Sudbury's nationally significant Gainsborough's House Museum known as "*Wooded Landscape with Herdsman Seated*" is a topographical view from a now public footpath through Ryes Farm, Little Henny looking across the valley floor toward St Mary's Church, Great Henny.

The view was recognised because whilst over the centuries the fields within the landscape have been flattened by agriculture, the relationship between the church and Thornycroft Farm seen below it have remained the same. For reference, this is the church that appears in some of the most highly treasured Gainsborough landscape paintings that are hosted by some of the most prestigious public art galleries in the world. Also pertinent is the fact that the owners of the land seen in the foreground of the painting are committed to allowing it to revert to its natural uncultivated form and thus deliver to the joint objectives of enhancing both the cultural heritage landscape asset and the role of this countryside as high quality habitat for protected and other species.



Wooded Landscape with Herdsman Seated Courtesy of Gainsborough's House Museum, Sudbury (Current day image of same view inset)

The import of this view in our cultural heritage was hugely impactful in National Grid's decision to avoid detriment to the Stour Valley landscape in the vicinity of the Hennys by proposing to invest an additional £150 million in the undergrounding of their new proposed high voltage electricity grid connection in this area. That project is expected to go ahead in the coming years in keeping with the plan to include the undergrounding with a projected completion date on record as being 2028.

The proposed phone mast site at NGR: 585423, 238659 lies within the setting of this specific landscape. The setting provides the context within which the asset is approached and perceived. Due to the very limited highways access to this heritage asset, the setting of the proposed mast is the very landscape through which this heritage asset must be approached in any manner other than on foot.

It is therefore the case that a structure as alien to the natural landscape as the proposed 20 metre tall mast set on the plateau above and across from this cultural heritage landscape must be deemed unacceptably detrimental. The degree to which the mast's height together with the elevated nature of its plateau location indicates that the mast would impact views both into and out of this valuable landscape and renders the amenity impact for a so located phone mast beyond mitigation.

## **Wildlife and protected species**

As no ecological survey appears to have been conducted by the developers it falls to the local community to provide local knowledge on this matter. The local farmers, being the predominant custodians of the countryside around Little Henny can attest to the presence of protected species across the area. Along with very rare and more common species of bats, it is known that badgers are a widespread protected species for which the site and surrounding countryside provides habitat. Whilst the arable fields that provide the immediate setting for the proposed farmland site are open and are in current use, nearby farmland is being allowed to revert to the more natural uncultivated state seen in the above mentioned painting, *Wooded Landscape with Herdsman Seated*. This means that in keeping with national planning, environmental and ecological objectives, local initiatives are being implemented to enhance wildlife habitat in and around Lt Henny and such initiative is actively supported by word, action and resource deployment by members of the community of Little Henny.

It is therefore the case that the proposed mast would be wholly incompatible with the wildlife supporting commitments and policies of central and local government and is also incompatible with the commitment of the local community to improving wildlife habitat across a sensitive landscape that hosts a culturally significant asset.

## **Health issues.**

HMTPC have received representations from Little Henny residents about the mental health impact of the developers phone mast proposal at this initial response, pre-application stage of the planning process. This impact on mental health can only be expected to be exacerbated by an actual mast located in the proposed proximity to the dwellings in Little Henny and at Bulmer Tye.

It is well understood that phone mast developers turn to government documents which state that there is no scientific basis for concern about health impacts that are consequent of phone masts. Waldon Telecom have in their letters to councils and a limited number of Little Henny residents stated that the proposed mast is compliant with current guidelines on emissions and health impacts.



However, there is a significant body of evidence indicating that the guidance and legislation is out of date. This body of evidence is readily and publicly available and influences public responses to phone mast proposals. This evidence generates fear from the perception of health impacts. This issue is covered in legal case law from the High Court of Justice, Queens Bench Division who in May 2003 determined that *“FEAR or the PERCEPTION by the local community with respect to the installation of a telecommunications tower being injurious to health is a REAL factor that MUST be taken into account by planning authorities. To say that health is not a material planning issue is factually incorrect. Any decision made which fails to take the real fear of people with respect to health into account will be a decision made contrary to law.”*

It is therefore already clear that the mental health impact that would flow from the erection of a phone mast at the proposed site at Little Henny would have unacceptable mental health impacts on community members based on real worries about wider health impacts and that this must by law be considered in making any decision about the confirmation of prior approval for the proposed mast.

## Conclusion

For all of the above outlined reasons, HMTPC consider the proposed phone mast located at NGR: 585423, 238659 to be:-

- contrary to a large number of local and national planning policies protecting the countryside
- contrary to the national and local interest with respect to preserving the historical record as represented by a unique cultural heritage asset and its setting
- wholly unwelcome by the communities who would be subject to the amenity detriments that would be consequent of the mast
- detrimental to the wildlife of the area and the habitat improvement initiatives that are current and ongoing around the site
- and highly detrimental to the health and wellbeing of members of the community.

**For these reasons HMTPC call on the LPA to refuse to confirm prior approval for the mast proposed in 21/01486/T56 – Land At, Ryes Lane, Bulmer.**

## Notes:

HMTPC acknowledge the socialised and economic benefits of good telecommunications and do not oppose appropriately located phone masts. This Council does not see its role to be to find suitable sites for phone masts for developers. However the Council is aware of previously explored and rejected sites which the telecoms industry has considered in these parishes and is confident that an appropriate site can be found in a location that has yet to be considered by the telecommunications industry. Indeed, we are aware of at least one such suggestion from a resident being forwarded to the developers.

HMTPC provide this response as a limited response pending the outputs of necessary site surveying and other information from the Developers. This Council will provide a more comprehensive response to both the Developers and the LPA after considering that further information.

## ENDS

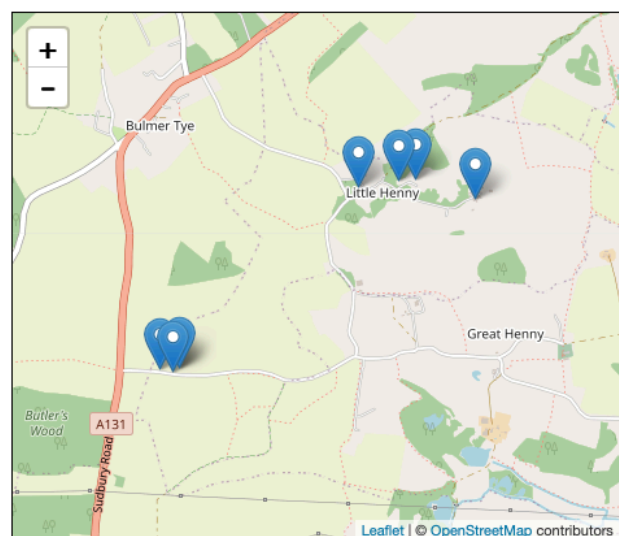
Appendix 1

### Listed buildings in Little Henny

Image from: <https://britishlistedbuildings.co.uk/england/little-henny-braintree-essex#.X8TqvS2l1Tb>

### Listed Buildings in Little Henny, Braintree, Essex

1. **II Barn at Lodge Farm**  
Little Henny, Braintree, Essex, CO10
2. **II Barn, 20 Metres South West of Gentry's Farmhouse**  
Little Henny, Braintree, Essex, CO10
3. **II Cart Lodge at Gentry's Farmhouse**  
Little Henny, Braintree, Essex, CO10
4. **II Gentry's Farmhouse**  
Little Henny, Braintree, Essex, CO10
5. **II Outbuilding at the Ryes**  
Little Henny, Braintree, Essex, CO10
6. **II Ryes Hall**  
Little Henny, Braintree, Essex, CO10
7. **II The Ryes**  
Little Henny, Braintree, Essex, CO10



## Appendix 2

Copy of letter of Objection from Dr R M Smith & Dr R L Smith of Henny Lodge, Little Henny.

### **OBJECTION - to Planning Application 21/01486/T56, Tree Mast at Ryes Lane.**

**This planning application contains several factual errors, fails to meet many aspects of the Braintree Planning Policy and risks the health and well-being of the local residents, the majority of whom live within 500m of the proposed site. It should be firmly rejected.**

At the outset it is important to note that Waldon Telecom, on behalf of EE, initially proposed to relocate the Dove House Farm mast to Pelham Hall, Twinsted. The pre-application consultation brought strong opposition from the local community and the Parish Council and although this was obviously the preferred site, it receives no mention in this new attempt at relocation. Here in Little Henny the pre-application consultation undertaken by Waldon generated similar almost unanimous condemnation of the proposal with an almost 100% response from local residents. Indeed Cllr. Holland, the chair of the Parish Council Planning Committee, acknowledged that “a far greater proportion of the community have responded than is normally the case in my experience” and this after his personal involvement in the consultation in his own local community.

Our objections to this planning application fall into essentially two categories: (A) the factual errors in the information supplied on the application form and (B) planning policy considerations and especially the health and welfare issues for residents living within the 500 metre zone from the mast.

#### **A – The application form**

1. It is very disappointing to note that this application has been submitted without waiting for the response from Braintree DC. Despite all the warm words that Waldon and their sponsors EE espouse about consultation and social good, this action is a strong indication of the true values of EE and their contempt for local democracy and the representatives of our community.
2. It is clear that the views expressed in written responses to Waldon by almost every local resident and by the Little Henny Parish Council have been roundly ignored. The only concession has been to reduce the height of the ‘tower’ by 5 metres (although the overall height will still reach 25m) and change the structure from a ‘lattice’ to a ‘cypress tree’ – not something that is indigenous to this part of the world!

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3. The ineptness of the Waldon consultation and their lack of serious engagement with the local community is further demonstrated by their reference to having tried to consult with Ryes School but “having as yet received no response.... lines of communication will remain open throughout the application process” – It shows they have not undertaken the most basic research on the community which would have revealed that Ryes School closed in 2010 and the building was sold in 2012!
4. Waldon states no airfield exists within 3km of the site....Not entirely accurate as within the 3km range is the airstrip on Shalford Meadow, from which the two adjacent residents fly their helicopter and light aircraft.
5. Lack of diligence in the application continues to be shown in section 4.1 and the spelling ‘Great henRy’ and ‘SudbRy’.
6. With regard to alternative sites, Waldon refer to their “thorough search and detailed investigations” – this is highly questionable. They fail to reference the potential site at Twinsted and, most importantly, they have completely ignored and failed to investigate and report on the alternative site suggested by the community. The proposed alternative site is located only a few hundred metres to the north-east at OS ref. 864394. It is at the same elevation and distance from the A131 as the Ryes Lane site but, most crucially, would take all residents out of the dangerous 500m zone. **This was an attempt by the residents to make a serious and positive contribution but we have been completely ignored.**
7. Reasons given for the rejection of two of the other sites alongside the A131 are simply bizarre and again show that the environment in which the local residents live has been completely misunderstood and dismissed. The A131 already has key infrastructure along it, most notably the very high pylons – everyone accepts this and many proposed that the new tower should be located where the pylons are, thus keeping all the ‘intrusive’ structures together. It seems that Waldon place a higher value on the visual impact to road users than the negative visual impact to everyone of placing a mast in the middle of a pristine section of landscape. Again, local views ignored!
8. Even more disturbing is their reference to the proposed site being below the A131 – they state “the site is below the landscape plateau formed by the A road which makes it less prominent”. The Ordnance Survey shows the proposed site to be at an altitude of between 84m-85m whereas the closest spot heights on the A131 at Armsey farm, Bulmer Tye Junction, and Parsonage Wood are at heights of 81m,

77m and 83m respectively. CONTRARY to the evidence supplied by Waldon, the proposed site is HIGHER than the road, it is the centre of the plateau landscape and therefore MORE VISIBLE and a very clear intrusion into the landscape.

**This littyany of factual errors in the information supplied by Waldon should alone be sufficient to determine that the application lacks validity and should be rejected.**

## **B – Planning Policy Considerations**

The National Planning Policy Framework is constantly revised, the latest revision occurring in 2019. This is the key document which all respectable developers will adhere to and which all Local Authorities will set at the core of their decision making process. Cllr Holland, the lead councillor for our parish on planning issues, has very strongly identified in his communication with me that his observations and those of Braintree District Council on the proposal and any objections received will be guided by planning policy. However, planning policy does not exist in a vacuum and the final response of the Council will be determined within the framework of its overarching duty of care and therefore, by definition, must incorporate issues wider than just planning, such as the safety, health and well being of its residents.

It is immediately evident that the proposal submitted by Waldon Telecom on behalf of EE falls short of many of the policy requirements. It is also clear that recent scientific evidence suggests that the health risks to the community and especially those living within 500m of the mast are significantly more serious than previously recognised.

The most recent information from HM Government 5G Mobile Technology Guide March 2020, states ‘that they take full account of 5G operating at higher frequencies. In relation to 5G, Public Health England has said that “the overall exposure is EXPECTED to remain low relative to guidelines and, as such, there SHOULD be no consequences for public health.”

The words ‘**expected**’ and ‘**should**’ give no comfort to those residents of Little Henny who live inside the 500m zone. Their perception of the level of health risk, let alone the real and undeniable risk is a major cause of concern and one which Braintree District Council must reflect in the decision it reaches.

**Unless the Council can provide mitigation against the transmission of radiation from the mast, it should strongly reject the EE proposal.**

Section 113 of the National Policy framework, places the burden of proof on the Proposer and it is for them to prove that the residents of Little Henny ‘the consumers’ want and need the mast in our area. They have failed to provide this evidence. The necessity for the EE mast is not an absolute. Fibre optic cable can be laid to provide high speed internet access to every household and indeed Gigaclear has already begun this work in Little Henny.

Subsection 1b requires they also have to prove that they have surveyed the area for the *“Use of existing masts, buildings and other structures for new electronic communications capability (including wireless).”* No substantial evidence has been submitted. Subsection 1c states *“equipment should be sympathetically designed and camouflaged where appropriate.”* Despite the concession by EE to change the structure from a lattice design to a ‘cypress tree’, the insertion into the open landscape of such a non-indigenous tree design 25m high will still loom out of the surrounding hedgerows as an architectural monstrosity with no amenity quality. It simply fails to meet the policy requirements.

In reference to Section 114 article 4 has relevance and should be invoked as the community have identified this area as one of heritage and feels it should be protected, a position already endorsed by the Parish Council in its desire for the area to be incorporated into the AONB.

Section 115 identifies the International Commission on Non-Ionizing Radiation Protection (ICNIRP) as the gatekeepers for ‘safe levels’ of exposure to radiation and references their standards as sufficient for the operators to meet. This must be seriously challenged.

**The ICNIRP 1998 Guidelines:** these guidelines are still used by the UK government both for short-term exposures, as from mobile phones calls, and for long-term exposures, as from radiation zones around mobile phone masts. These ICNIRP 1998 guidelines are only for preventing the heating of the body by more than one degree averaged over 6 minutes. They are therefore not relevant to long-term non-thermal exposures, such as working or living near a mast. This means that the UK effectively has no appropriate safety guidelines for long-term exposure and health effects from masts.

The Chairman of ICNIRP states:

*“Mobile telecommunication systems are brought on the market with the assumption, based on available knowledge at the time of introduction, that they are safe. If they have not been tested specifically, this inference is made from general knowledge of effects of exposure to EMF... I think it is not correct if one considers the monitoring of possible health effects resulting from exposure to RF EMF from mobile telecommunication systems as a human health experiment. It is not an experiment, since it was never the intention to expose people and see what happens. The exposure is a by-product of the system, which, as I explained, was considered to be safe at the time of introduction, for which the monitoring of any effects is a useful (and indeed necessary) thing to do.”*

This quote CLEARLY STATES that the very body that hands over control of radiation levels from EXPERIMENTAL TECHNOLOGY that is proposed in Little Henny is their best guess. Simply, they don’t know what the effects will be over the long term, but they will be conducting studies into what happens in the community.

**There is considerable cause for concern on this specific issue.** Over the last decade, detrimental effects of human exposure to electromagnetic radiations have received widespread attention. One of the most recent papers by Michael Bevington, December 2017, Electrosensitivity UK (ES-UK) succinctly summarises much of this work.

*(a) Adverse health effects: humans*

**Harmful radiation:** electromagnetic (EM) radiation from mobile phone, TV, radio and TETRA masts and similar antennas causes adverse health effects, according to studies since 1996.

**80% of these studies** found adverse health effects arising from the radiation from mobile phone masts, according to a review by Khurana et al. 2010

**Distance:** most surveys find measurable aspects of adverse health within a distance of about 500 metres.

**Dose-response pattern:** adverse health effects occur in a dose-response pattern, with people living and working closer to the mast having greater adverse health effects.

**Neurological effects** often include: headaches, fuzzy thinking and memory lapses.

**DNA damage:** especially significant in females, within 300m of masts, cumulative with mobile phone usage.

**Cancer risks are increased** by up to five times after about five years' residence **within 500 metres.**

**Cancer risk classification:** The radiation from mobile phone masts was classified as a 2B possible human carcinogen by the World Health Organization's IARC in 2011. Many leading experts now state, in peer-reviewed studies, that new evidence after 2011 requires that radio frequency radiation is raised from a 2B cancer classification to 2A probable or 1 certain human carcinogen. The reason this has not yet happened is that the World Health Organization (WHO) and the ICNIRP have many conflicts of interest, as explained by Professor L. Hardell, one of the world's leading experts in this field ("The WHO, RF radiation and health - a hard nut to crack," 2017).

**Other physiological problems from this radiation:** heart problems, skin effects, respiratory problems, diabetic effects, digestive problems, muscular problems, sinus problems, food and other allergies, etc.

**Genetic sensitivity to EM energy:** Many of these established adverse health outcomes also relate to specific sensitivity symptoms to this type of radiation, including those who suffer from electromagnetic hyper-sensitivity (EHS). Such people often have specific genetic variations which predispose them to being especially sensitive to this radiation. Some of these genetic haplotypes are in common with those for cancer initiation. Such people may be unable to continue residing or working in proximity to a mast.

**Implants:** Some people with passive metallic implants can be affected adversely by radiation as from masts.

**Studies:** Over 40 studies showing ill health from masts and mobile phone radiation, including cancers and neurological effects, are listed in his paper.

*(b) Adverse health effects: plants and wildlife*

**Harmful radiation:** many studies show that radiation from mobile phone masts has an adverse effect on plants and wildlife.

**Adverse effects:** destruction of trees, disorientation and some forms of colony collapse in bees, insect and bat reduction, bird reproduction reduced or eliminated, bird migration disorientated, etc..

**Masts should be banned**, according to leading experts in this field of bioelectromagnetics, to save (i) trees and (ii) birds across the planet.

(i) Because trees are always stationary in relation to mast radiation, they suffer more cumulative damage than moving wildlife which is not always exposed in the same place and at the same angle.

(ii) Species of birds which rely on migration for breeding may become extinct, if they cannot maintain migratory routes because of the blocking effect of mast radiation on their ability to navigate using the Earth's magnetic field.

**Studies:** over 30 studies are listed in his paper as supporting evidence.

The conclusions from many recent reputable scientific studies are concerning and communities who are being expected to live and work in proximity to telecommunication masts should be made fully aware of the risks. If, on the basis of all the evidence, the Council officers who are influencers in planning decisions consider that residents' safety, health and well being could be adversely affected, they must morally and legally ensure that those views of the residents are fully and correctly communicated, understood and taken into account by the elected members.

**This application fails on so many policy grounds and should be firmly REJECTED.**

**Braintree District Council, in its formal response, must demonstrate its duty of care to the residents immediately impacted by the proposal to construct a mast and, most specifically, to those residents living within the 500m risk zone.**

**The planning application submitted by EE contains numerous factual errors, ignores the objections of almost the entire local community and the many people who use this area, dismisses the forthright objection of the Henny, Middleton and Twinsted Parish Council and demonstrates an incredible disregard for local democracy by progressing their application without incorporating the views of Braintree District Council, our elected and accountable representatives.**

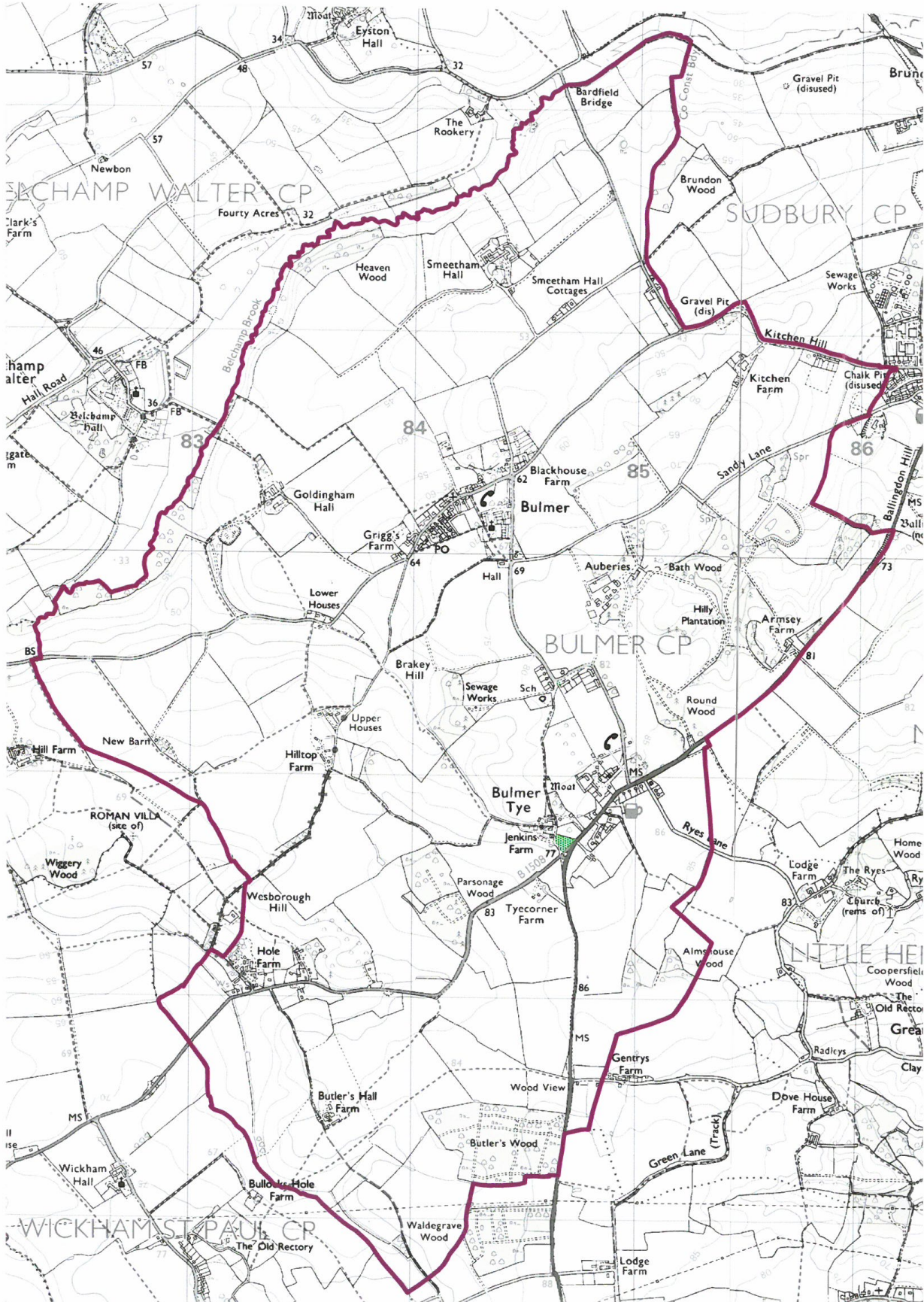
**This part of Little Henny is a very small hamlet of only eight families and it would be a travesty if the Council allows the intrusion of a goliath company to destroy this community.**

**The application fails in its accuracy and fails to meet policy requirements and for those reasons we object and ask Braintree DC to reject the application.**

**Dr R M SMITH & Dr R L SMITH  
Henny Lodge, Little Henny.**



Appendix 3 Bulmer Parish Map sourced from Bulmer Parish Council website



Appendix 4 Detail from Appx 3 showing that the site is not located in Bulmer

