



Our Ref: JB/O2/CS/11647

22 October 2009

Ms Jilly Frisch  
Secretary  
Shad Thames Resident Association

**Via Email**

Dear Ms Frisch

**PRE-APPLICATION CORRESPONDENCE**

**TELEFÓNICA O2 (UK) LIMITED / VODAFONE UK LTD - PROPOSED  
JOINT TELECOMMUNICATIONS RADIO BASE STATION LOCATED ON  
ROOFTOP OF TEA TRADE WHARF, 26 SHAD THAMES, LONDON, SE1  
2YG**

The Telefónica Group has formed a strategic partnership with the Vodafone Group to share mobile assets here in the UK and across Europe. In the UK this means Vodafone will be working closely together with O2. In essence this agreement allows both organisations to:

- Consolidate the number of base stations required through sharing which is in accordance with Government Policy
- Significantly reduce the environmental impact of network development

Vodafone and O2 will continue to compete in the telecoms market to retain and win customers and both will continue to differentiate themselves on the quality of the customer experience. Although they're sharing infrastructure, they'll operate entirely independently as businesses with separate network strategies. Accordingly the key focus will be on the joint build of new sites and consolidation of existing 2G and 3G sites.

The purpose of this letter is to invite the Shad Thames Residents Association to enter into pre application discussions with regard to our proposals prior to the submission of any formal application, should the Association have any questions or comments.

**PROPOSED SITE AND DEVELOPMENT**

As part of the infrastructure sharing, it is proposed to install a joint new site on the rooftop of Tea Trade Wharf, a seven storey building accommodating residential units overlooking the River Thames. Surrounding land use is primarily residential. Premises on the opposite side of Shad Thames are

listed. Tea Trade Wharf is not listed, nor are the buildings adjacent to it. It is within the St Saviour's Dock Conservation Area.

As you are aware from the Association's representation, an O2-only application for the installation of 3no. pole mounted antennas, 2no. equipment cabinets and development ancillary thereto (ref 09-AP-0407) was refused earlier this year on the grounds that the proliferation and positioning of the equipment on prominent corners of the upper roof of Tea Trade Wharf would result in a highly visible development of unacceptable appearance which fails to preserve the character and appearance of the conservation area. Amendments have been made to the proposed shared O2/Vodafone design, in order to address Council's concerns.

On behalf of both O2 and Vodafone, it is now proposed to pole mount 3no. antenna to the face of the building rooftop. One antenna will be pole mounted to the face of the brick pier at the southern corner of the rooftop. The remaining two antennas will be pole mounted to the face of the brick pier at the north western corner of the building. The poles and antennas will be painted to match their brick background. Please find attached drawings numbered 101, 102, 103 and 104.

The proposed O2 and Vodafone cabinets will be located within the existing rooftop compound; they will not impact upon the external appearance of the building.

Pole mounting the antennas to the face of the building so they do not protrude above the skyline, and painting them to match their brick backdrop means they will not be discernible. They will not attract attention in views from surrounding buildings, and will preserve the character and appearance of the conservation area. They will not interfere with the setting of nearby listed buildings. Their locations will not impact upon views from the River Thames and from across the river to the north. It is also noted that the use of a building, and that sharing a site, are in direct compliance with PPG8.

## **HEALTH CONCERNS**

It is noted that health concerns were raised by residents in response to the previous application at Tea Trade Wharf. I attach some information on the health effects of telecommunications equipment that I hope you will find useful and which I hope will allay yours and residents' concerns.

### **General**

Radio base stations (and handsets) utilise electromagnetic fields (or EMFs) to transfer information and make mobile phone communications possible. EMFs or radiofrequency fields (RF) occur naturally in sunlight and the earth's magnetic field.

EMFs are used for television and radio transmissions, by the police, fire and ambulance services, by taxi firms and public utilities and for a wide range of personal and commercial equipment from electronic car keys and baby monitoring devices to shop security tag systems. They are also produced by

household electrical appliances like the fridge, vacuum cleaner or electric shaver.

### **Consensus scientific opinion**

Mobile wireless telecommunications equipment is a relatively new feature of everyday life but the technology is not and research has been going on in this area for at least 70 years. After a thorough review of the available scientific findings, the World Health Organisation states: "*despite extensive research, to date there is no evidence to conclude that exposure to low level electromagnetic fields is harmful to human health.*" [Source: World Health Organisation, 'What are Electromagnetic Fields?' 2003].

The Stewart Report, that looked at evidence from a wide range of scientific bodies and interested individuals, confirmed that: "*The balance of evidence indicates that there is no general risk to the health of people living near to base stations where the exposures are only small fractions of the guidelines.*"

This was reiterated in a follow-up evaluation of the current science by the National Radiological Protection Board (now part of the Health Protection Agency) in January 2005. Their report, Mobile Phones and Health 2004 found that "*the widespread development in the use of mobile phones world-wide has not been accompanied by associated, clearly established increases in adverse health effects. Within the UK, there is a lack of hard information showing that mobile phone systems in use are damaging to health. It is important to emphasise this crucial point.*"

The World Health Organisation published a Fact Sheet - Base stations and wireless networks - Fact Sheet N°304 in May 2006. It concludes, "*from all evidence accumulated so far, no adverse short- or long-term health effects have been shown to occur from the RF signals produced by base stations.*"

*Considering the very low exposure levels and research results collected to date, there is no convincing scientific evidence that the weak RF signals from base stations and wireless networks cause adverse health effects".* A copy of the Fact Sheet 304 is attached.

### **Ongoing research**

Whilst the national and international scientific consensus is that there are no proven health effects within ICNIRP guidelines levels it would be complacent to assume there is nothing new to learn about radio frequency fields. There are a range of studies known collectively as the Mobile Telecommunications and Health Research (MTHR) programme which are ongoing. The latest information on this research can be found at [www.mthr.org.uk](http://www.mthr.org.uk). In addition to this there are also private studies taking place all over the world.

### **ICNIRP guidelines**

In terms of exposure to the general public from base stations, on 8 June 1999, the European Union (EU) Health Council agreed a recommendation for limiting exposure of the general public to electromagnetic fields (0 Hz to 300

GHz). The recommendation was based on the exposure limits laid down by the International Commission on Non-Ionising Radiation Protection (ICNIRP) for public exposure. The international guidelines are there to protect all sectors of the public, wherever they are in relation to an installation, 24 hours a day.

In recent months, a number of protest groups have expressed concern regarding their belief that exposure guidelines are out of date. ICNIRP published a statement on 13 August 2009 reconfirming the 1998 EMF exposure guidelines. The ICNIRP statement concluded:

*"it is the opinion of ICNIRP that the scientific literature published since the 1998 guidelines has provided no evidence of any adverse effects below the basic restrictions and does not necessitate an immediate revision of its guidance on limiting exposure to high frequency electromagnetic fields."*

*"Therefore, ICNIRP reconfirms the 1998 basic restrictions in the frequency range 100 kHz-300 GHz until further notice."*

On base stations the statement concluded:

*"Epidemiological data on possible health effects of chronic, low-level, whole-body exposure in the far-field of radiofrequency (RF) transmitters are poor, especially because of lack of satisfactory individual exposure assessment. The few studies with adequate exposure assessment did not reveal any health-related effects."*

ICNIRP also published a review of science on 14 July 2009 that will be part of the World Health Organisation's (WHO) risk assessment of high frequency electromagnetic fields and health expected to be completed within the next two years.

ICNIRP Statement on the "Guidelines for limiting exposure to time-varying electric, magnetic, and electromagnetic fields (up to 300 GHz)" is available from ICNIRP's website <http://www.icnirp.de/> as a pdf: <http://www.icnirp.de/documents/StatementEMF.pdf>.

The review "Exposure to high frequency electromagnetic fields, biological effects and health consequences (100 kHz-300 GHz)" is available from ICNIRP's website <http://www.icnirp.de/> as a pdf: <http://www.icnirp.de/documents/RFReview.pdf>.

Every O2 installation is designed to be fully compliant comply with the European Union recommendation for general public exposure. In fact, surveys on installations built since this date have proved that they are typically hundreds, and sometimes thousands, of times below these guidelines. The same now applies to the shared O2/Vodafone site which is proposed for Tea Trade Wharf. An ICNIRP certificate will be submitted with the planning application to demonstrate compliance with the ICNIRP guidelines.

This is reinforced by the Office of Communication's (Ofcom) Audit programme, a continuing independent audit of radio waves produced from mobile installations, has demonstrated that emissions are typically small

fractions of international health and safety radiofrequency public exposure guidelines. The results of the audits can be found at <http://www.ofcom.org.uk/sitefinder/audits/> if you would like further information.

### **Where can the public go for objective information?**

The Health Protection Agency provides advice to the general public on such issues. It has a number of free leaflets available on request. Their web address is [www.hpa.org.uk](http://www.hpa.org.uk). Other useful addresses are:

[www.who.int/peh-emf](http://www.who.int/peh-emf)

World Health Organisation International EMF Project Home Page

[www.icnirp.org](http://www.icnirp.org)

The International Commission on Non Ionising Radiation Protection (ICNIRP)

[www.hpa.org.uk](http://www.hpa.org.uk)

The Health Protection Agency incorporating the National Radiological Protection Board

[www.mcw.edu/gcrc/cop/cell-phone-health-FAQ/toc.html](http://www.mcw.edu/gcrc/cop/cell-phone-health-FAQ/toc.html).

Moulder, J E *Cellular Phone Antennas and Human Health*. Dr John Moulder is Professor of Radiation Oncology at the Medical College of Wisconsin, USA

[www.iegmp.org.uk](http://www.iegmp.org.uk)

Independent Expert Group on Mobile Phones (Stewart Report)

[www.ofcom.org.uk](http://www.ofcom.org.uk)

Ofcom which runs Sitefinder, a map-based database giving details of all operating cellular base stations and their emissions.

[www.mthr.org.uk](http://www.mthr.org.uk)

Information on the current government/industry-backed research programme.

[www.doh.gov.uk](http://www.doh.gov.uk)

Department of Health

[www.mobilemastinfo.com](http://www.mobilemastinfo.com)

Mobile Operators Association

[www.powerwatch.org.uk](http://www.powerwatch.org.uk)

Powerwatch UK (campaigns on EMF issues)

I hope this information addresses any concerns you may have regarding health and the proposed O2/Vodafone scheme.

If you require more information please contact Telefónica O2 UK Limited Help line on 01753 564306 or write to:

Network Consultation Help Desk  
PP1E3  
1 Brunel Way  
Slough  
Berkshire  
SL1 1XL

You may also find it useful to look at information on the following websites:

- The Mobile Operators Association: [www.mobilemastinfo.com](http://www.mobilemastinfo.com)
- The Department of Health: [www.doh.gov.uk](http://www.doh.gov.uk)
- The World Health Organisation (WHO): [www.who.int/en](http://www.who.int/en)

We would very much appreciate any feedback you may have on our plans for your local area, and in order for us to progress the proposal would request that this is within 14 days of the date of this letter.

Yours sincerely

Jenny Bye  
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**On behalf of Telefónica O2 UK Limited**

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