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**Sent Via Email**

**11th December 2025**

**To:** Sefton Council Chief Legal and Democratic Services Officer, Bill Esterson MP, Sefton Councillors

**Cc:** Brian Stein, EM Radiation Research Trust Chair

**From:** Eileen O'Connor, EM Radiation Research Trust Director

Dear all,

In addition to previous engagements and correspondence with Sefton Council, the EM Radiation Research Trust (RRT) writes to urge Sefton Council to adopt robust measures for the planning, installation and management of wireless communications infrastructure, drawing on the positive and precautionary example set by Castle Point Council.

Castle Point Council's guidance provides a useful model, particularly in its approach to risk assessment, consultation outcomes, cumulative impacts and recognition of vulnerable groups within Policy Infra6 – Communications Infrastructure (see pages 154–155 of the Castle Point Plan).

**1. Satisfactory Risk Assessments**

- Inclusion of consultation outcomes with residents, businesses, schools, colleges and residential institutions within 500 metres of installations.
- Identification of risks to individuals potentially affected by EMF levels below ICNIRP thresholds, with these risks clearly addressed in the assessment.
- Consideration of cumulative impacts and exclusion zones, applying the agent of change principle where appropriate.

**2. Recognition of Vulnerable Groups**

- Attention to individuals with medical devices or other vulnerabilities, consistent with case law (for example, Thomas v Cheltenham Borough Council [2024]).

**3. Robust Public Consultation**

- Ensuring that operators, contractors and the Council undertake meaningful consultation prior to any planning application, consistent with the Code of Practice for Wireless Network Development in England.

RRT welcomes Castle Point's commitment to considering health concerns even below ICNIRP thresholds, and we urge Sefton Council to adopt similar measures to protect all residents, especially vulnerable groups. Biologically based safety recommendations are necessary, according to many independent doctors and scientists, to safeguard public health comprehensively. ICNIRP guidelines address only thermal effects, whereas biological effects can occur at much lower exposure levels. For example, a peer reviewed paper by Henshaw and Philips reviews mechanisms by which environmental RF and EMF exposures may affect health and documents effects such as electromagnetic hypersensitivity occurring at exposures well below current limits. ([Henshaw and Philips 2024](#))

### **Scientific and community context**

Independent research and global warnings have repeatedly highlighted potential health risks from long term RF and EMF exposures, including associations with cancer, neurological effects and other outcomes documented in peer reviewed literature. Early community evidence, such as the Wishaw mast cluster in Sutton Coldfield, illustrates how residents living within 500 metres of masts reported multiple cancers and other serious health concerns. This evidence underscores the importance of precautionary risk assessment, biologically based safety recommendations and community involvement in planning decisions. ([RRT – Wishaw Mast Cluster](#))

We therefore request that Sefton Council:

- Implement mandatory public consultation for all wireless infrastructure within 500 metres of homes, schools and care facilities.
- Require full risk assessments that consider cumulative EMF exposure, exclusion zones and potential effects on vulnerable groups.
- Ensure planning decisions are guided by precautionary principles and independent scientific evidence, not solely ICNIRP thermal limits.
- Provide a clear process by which residents can raise concerns and receive formal consideration prior to approvals being granted.

### **For reference**

- Castle Point Plan – Policy Infra6 (pages 154–155): [https://consultation.castlepoint.gov.uk/planning/the-castle-point-plan-pre-submission-regulation-19/user\\_uploads/castle-point-plan---regulation-19-draft---consultation-version---july-2025.pdf](https://consultation.castlepoint.gov.uk/planning/the-castle-point-plan-pre-submission-regulation-19/user_uploads/castle-point-plan---regulation-19-draft---consultation-version---july-2025.pdf)
- RRT Full Submission (18 pages): <https://radiationresearch.org/castle-point-consultation-5g-and-wireless-tech-could-be-a-game-changer-for->
- PHIRE Consensus Statement (Non Ionising Radiation Consensus, 2020): <https://phiremedical.org/wp-content/uploads/2020/11/2020-Non-Ionising-Radiation-Consensus-Statement.pdf>
- Early European Warnings – The Wishaw Mast Cluster: <https://radiationresearch.org/early-european-warnings-the-wishaw-mast-cluster/>

- Henshaw and Philips, International Journal of Radiation Biology, 2024: <https://www.tandfonline.com/doi/full/10.1080/09553002.2024.2435329>

Given the Council's statutory duties and the public's growing concern about EMF exposure, we trust Sefton Council will take immediate steps to adopt these safeguards and align its policies with best practice. We look forward to your formal response detailing how the Council intends to strengthen protections for residents and vulnerable groups.

Yours sincerely,

**Eileen O'Connor**

Co-founder and Charity Director

EM Radiation Research Trust

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