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EM Radiation Research Trust – NPPF Consultation Response

Organisation: EM Radiation Research Trust

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Consultation Response: National Planning Policy Framework – Proposed Reforms and Other Changes to the Planning System

Consultation webpage: <https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>

Introduction

The EM Radiation Research Trust (RRT) welcomes the opportunity to respond to the consultation on the National Planning Policy Framework (NPPF). Our charity has campaigned for over 20 years to raise awareness of the potential health and ecological risks from exposure to radiofrequency (RF) electromagnetic fields (EMF) emitted by wireless technologies, including mobile phones, Wi-Fi, smart meters, phone masts, small cells, and emerging 4G/5G infrastructure.

We are deeply concerned that the current planning system relies on **operator self-certification of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) compliance**, which addresses only short-term thermal effects, ignores long-term and cumulative exposures, and excludes vulnerable populations and sensitive environments. Planning authorities are currently discouraged from considering credible scientific evidence beyond ICNIRP guidelines. This removes the final layer of democratic oversight and public protection.

Planning policy also operates within a wider framework of public health protection. Local authorities have statutory responsibilities for improving public health under the Health and Social Care Act 2012. Ensuring that planning authorities are able to consider environmental exposures that may affect community health is therefore consistent with the broader public health responsibilities placed upon local government.

Reference

<https://www.legislation.gov.uk/ukpga/2012/7/contents/enacted>

1. Healthy Communities and Public Health (Question 70)

We strongly recommend that national planning policy explicitly recognise the role of planning in safeguarding **public health** from wireless exposures.

Key Points:

- Vulnerable populations include children, pregnant women, older adults, individuals with medical implants, and people reporting electrosensitivity. Research indicates that these groups are particularly at risk from chronic low-level RF exposure.
- Children absorb significantly higher RF doses due to thinner skulls, smaller head size, and higher water content ([RRT Children's Vulnerability Report, 2025](#)).
- **Behavioural pathways:** Technology addiction and increased screen time reduce outdoor play and movement, contributing to rising rates of obesity, neurological impacts, and associated chronic health conditions.
- **Cumulative exposure:** Current planning policy does not account for aggregate exposures from multiple sources, including Wi-Fi, small cells, EVs, radar, and phone masts including 4G/5G infrastructure.
- **Evidence base:** The Stewart Report (2000), EUROPAEM Guidelines (2016), BioInitiative Reports, and independent studies (e.g., Bamberg GP Study, 2007) document biological effects at levels far below ICNIRP limits.

Recommendation: NPPF should require planning authorities to assess potential public health impacts at planning stage, consider cumulative exposures, and apply the **precautionary principle**, particularly for children, homes, schools, hospitals, and care facilities.

This approach is consistent with the precautionary principle recognised in UK environmental policy, which supports preventative action where credible scientific uncertainty exists regarding potential risks to human health or the environment.

Reference

<https://www.gov.uk/government/publications/environmental-principles-policy-statement>

2. Planning Fees & Local Authority Autonomy (Q93–95)

Current fee structures and procedural guidance restrict local authorities' ability to conduct independent assessment of health and environmental risks.

- Local authorities require **adequate resources** to engage **independent experts** to measure RF exposure, assess cumulative risks, and enforce protective policies.
- Where self-certification is currently accepted, independent measurement should be **mandatory and funded**, as existing ICNIRP compliance does not provide sufficient public health protection.

Recommendation: Fees should enable local authorities to fully assess health, ecological, and cumulative exposure risks, rather than relying solely on operator-submitted ICNIRP declarations.

3. Environmental Protection

Wireless infrastructure can significantly impact **biodiversity, insects, and sensitive habitats**.

- SSSI sites and other ecologically sensitive areas host **rare insects, flora, and fauna**. Emerging research shows RF exposure may disrupt insect navigation, reproduction, and population dynamics ([RRT – Wireless impact upon insects](#)).

- Planning authorities should be able to apply the **precautionary principle** taking impacts upon insects and wildlife into account when assessing siting.
- Exclusion zones or setback distances (e.g., 500 m from homes, schools, workplaces as recommended by the New Hampshire Commission, 2020) should be adopted to protect both human and ecological health.

Recommendation: National policy must explicitly enable planning authorities to assess environmental impacts of RF exposure and take action to prevent harm to vulnerable ecosystems.

4. Governance, Accountability & Responsibility

- Self-certification shifts responsibility away from operators and regulators, leaving **no clear accountability** if long-term health or environmental harm occurs.
- Planning authorities must retain the power to consider emerging science and enforce precautionary measures.
- Independent measurement, post-installation verification, and cumulative impact assessment should be **legally required**.
- The consultation should clarify **who is responsible** if precautionary measures are ignored or if harm arises from widespread RF deployment.

Recommendation: NPPF should explicitly define the **role of local authorities** as the final safeguard for public health and environmental protection, and require transparent accountability for decision-makers and operators.

While ICNIRP guidelines provide limits for short-term thermal effects for tissue heating, they do not consider long-term, cumulative, or non-thermal biological effects. Reliance solely on ICNIRP compliance therefore does not guarantee that planning decisions fully protect public health or the environment. Planning authorities should retain the discretion to consider credible independent scientific evidence and cumulative exposure when making decisions, particularly in sensitive locations such as homes, schools, hospitals, care facilities, and protected ecological sites.

Reference

<https://www.icnirp.org/en/activities/news/news-article/rf-exposure-guidelines-update.html>

5. Practical Planning Measures

To operationalise the above principles, we recommend:

1. Mandatory **independent RF exposure surveys** for new telecommunications infrastructure.
2. **Setback distances** from schools, hospitals, homes, and SSSI sites (minimum 500 m where evidence supports).
3. **Cumulative exposure assessment** in urban areas and sensitive environments.
4. Prefer **hard-wired/Ethernet connections** in schools and workplaces.

5. Adoption of **EUROPAEM Guidelines** as a precautionary benchmark, replacing reliance on ICNIRP thermal limits.
6. Recognition of **behavioural and indirect health pathways** (screen addiction, reduced activity) under healthy communities guidance.

6. References

- **IARC 2B Classification on Non-Ionizing Radiation, 2011**
https://www.iarc.who.int/wp-content/uploads/2018/07/pr208_E.pdf
- **EUROPAEM EMF Guidelines, 2016**
<https://www.degruyter.com/document/doi/10.1515/reveh-2016-0011/html>
- **Stewart Report, UK Government, 2000**
<https://www.geocities.ws/ResearchTriangle/9884/stewartsummary.htm>
- **Bamberg GP Study, 2007**
https://www.powerwatch.org.uk/news/20050722_bamberg.asp
- **BioInitiative Report, 2012**
<https://bioinitiative.org>
- **RRT – Millstead Primary School Report**
<https://radiationresearch.org/response-to-uk-health-security-agency-from-the-em-radiation-research-trust-calling-for-a-full-investigation-into-the-phone-mast-near-millstead-school-following-the-deaths-of-the-two-children/>
- **RRT – Wireless Impact on Insects**
<https://radiationresearch.org/category/wireless-impact-upon-insects/>
- **Children’s Vulnerability Report, 2025**
<https://radiationresearch.org/up-to-10x-more-radiation-are-our-children-the-unseen-victims-of-wireless-technology/>
- **New Hampshire Commission 5G Report, 2020**
<https://gc.nh.gov/statstudcomm/committees/1474/reports/5G%20final%20report.pdf>

Conclusion

The EM Radiation Research Trust urges the UK Government to:

- **Reinforce the planning system** as the final safeguard for public health and environmental protection.
- **Apply the precautionary principle** in siting wireless infrastructure, particularly near vulnerable populations and sensitive environments.
- **Ensure accountability** by requiring independent assessment and post-installation verification.
- Adopt **science-based, health-protective benchmarks** (EUROPAEM, New Hampshire Commission guidance).
- Recognise **cumulative exposures and emerging risks**, including behavioural pathways affecting children and adults.

Providing planning authorities with clear guidance and tools not only safeguards public health and the environment but also enables councillors to make well-informed decisions with confidence and accountability.

The NPPF should explicitly empower planning authorities to consider all relevant health and environmental factors. Without these measures, planning policy fails to protect the public and future generations from escalating RF exposure and its documented risks.

Clear national guidance and robust planning tools are essential to ensure that local decisions protect both public health and councillors from uncertainty, while maintaining public trust in the planning system.

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