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24th March 2026
Sent via Email

From: Eileen O'Connor, EM Radiation Research Trust, Co-Founder & Charity Director

To: The Chief Planning Officer, Birmingham City Council
Hamzah Rehman, Planning Officer, Birmingham City Council

Cc:

Helen Spoors, MRTPI, Consultant Town Planner

Paulette Hamilton MP

Erdington Ward Councillors Robert Alden and Gareth Moore

Mrs Grice & Ms Ordidge, St Barnabas CE Primary School

Sir Andrew Mitchell MP

Brian Stein CBE, EM Radiation Research Trust Chairman

Planning Application 2026/01156/PA – Proposed 18-metre Telecommunications Mast, Rear of 59–61 Spring Lane, Erdington, Birmingham B24 9BY

Dear Sir/Madam,

I am writing to submit a formal objection to the proposed installation of an 18-metre telecommunications mast at Rear of 59 to 61 Spring Lane, Erdington, Birmingham B24 9BY. The mast is located in close proximity to St Barnabas School, Forest School, and surrounding residential properties, placing children and families in an environment of continuous radiofrequency (RF) radiation exposure. This is in direct conflict with long-standing precautionary advice provided by the UK Government's independent expert group chaired by Sir William Stewart and raises serious public health, safety, and visual amenity concerns.

This objection is based on a substantial and growing body of scientific evidence demonstrating biological and health effects from radiofrequency (RF) radiation at levels significantly below current guidelines. The proposed development raises serious concerns regarding public health, particularly in relation to children, residents, and other vulnerable groups, as well as visual impact and loss of residential amenity.

The concerns about siting telecommunications infrastructure in close proximity to schools are discussed in analyses of cell tower placements at school grounds, highlighting repeated community objections and documented risk perceptions: https://radiationresearch.org/why-are-cell-towers-being-placed-on-school-grounds/

Personal and Historical Context

I am Eileen O'Connor, Co-founder and Charity Director of the EM Radiation Research Trust (RRT) since 2003. Following the discovery of a cluster of cancer and other serious illnesses in Wishaw, Sutton Coldfield, in 2002 surrounding a T Mobile phone mast, I personally experienced illness and documented multiple cases affecting residents living within approximately 500 metres of the mast. Detailed local surveys across eighteen houses in the area showed that 77 per cent of residents reported serious health issues, including five women with breast cancer, one case of prostate cancer, one case of bladder cancer, one case of lung cancer, three cases of precancerous cervical cells, motor neurone disease, benign lumps, electro-sensitivity, severe skin rashes, sleep disturbances, headaches, dizziness, and low immune function following seven years of exposure. This work is collated in the **Radiation Research Trust – Political & Policy Advocacy Timeline:** https://radiationresearch.org/radiation-research-trust-political-policy-advocacy-timeline-2003-2025/

Independent Scientific Engagement

Our charity collaborates with independent scientists who support the RRT and provides independent scientific advice to inform communities, policymakers, and decision-makers about potential risks from electromagnetic radiation. I was also personally invited to participate in Sir William Stewart's UK Health Protection Agency EMF Discussion Group and in the European Commission's EMF Stakeholder Dialogue Group in Brussels over a number of years, contributing to multi-stakeholder discussions on public health, and precautionary policy approaches: https://health.ec.europa.eu/other-pages/health-sc-basic-page/workshop-electromagnetic-fields-emfand-potential-health-effects_en

Parliamentary and Expert Evidence

In the House of Commons debate on 28 January 2004, Sir Andrew Mitchell MP, then and still the Member of Parliament for Sutton Coldfield, highlighted the gaps in scientific knowledge on non-ionising radiation, asking:

"My first questions are on the guidelines of the International Commission on Non-Ionising Radiation Protection. Will the Minister concede that on its own, adoption of the ICNIRP exposure guidelines will not fully allow for current gaps in scientific knowledge, particularly the possibility of as yet unrecognised thermal or non-thermal adverse effects at lower levels of exposure? Secondly, the Stewart report stated at paragraph 5.59 that the biological effects can occur at energy levels too low to cause significant heating. According to paragraph 6.44, the possibility of harm from exposures insufficient to cause important heating of tissues cannot yet be ruled out with confidence."

In his presentation, Andrew Mitchell cited a letter dated 5 June 2003 from Emrys Jones, then Chief Planning Officer of Birmingham City Council, to the Office of the Deputy Prime Minister:

"I am writing as Chief Planning Officer of the largest local planning authority in the country in response to concerns being expressed to me regarding the lack of clarity in Government guidance on the health implications of telecommunication development.

As Chief Planning Officer, I find myself in a difficult position. Whilst Government guidance makes it clear that health issues can be a material consideration, PPG8 states that it is the Government policy 'to facilitate the growth of telecommunications systems' and that 'the

planning system is not the place for determining health safeguards. It remains central government's responsibility to decide what measures are necessary to protect public health'."

He went on to say: "With respect this advice, allied with the inconclusive nature of the Stewart Report, provides little help to local planning authorities at the front line in dealing with the increasing number of telecommunication proposals being submitted. I believe that there is a pressing need for urgent further research into the health aspects of telecommunication development together with a review of the existing guidance and regulations on how such proposals should be considered."

Sir Andrew Mitchell MP said: *"That is the opinion of the chief planning officer of the largest local authority in Britain, and I hope that his words will weigh heavily on the Minister and her colleagues."* https://hansard.parliament.uk/commons%E2%80%8F/2004-01-28/debates/2db2621c-9510-4f3f-88ae-fd96a0d7d70c/MobilePhoneMasts

1. Objection to Proposed Mast

Since the publication of the Stewart Report in 2000, the scientific evidence on the health effects of radiofrequency (RF) radiation has grown considerably. Major international studies, including the US $30 million National Toxicology Program and the Italian Ramazzini Institute, together with numerous peer-reviewed publications, have consistently reported biological effects such as cancer-related findings, DNA damage, oxidative stress, neurological impacts, and reduced fertility.

These effects occur at exposure levels far below current regulatory limits. Real-world cases within the United Kingdom demonstrate these risks, with measurable health impacts documented in areas near schools and residential communities. Despite this, the proposed development relies on ICNIRP compliance, which does not reflect the full body of scientific evidence and does not provide adequate protection for long-term, cumulative exposure, particularly for children.

In addition to health concerns, the proposed 18-metre structure is visually intrusive, adversely affecting the character of the area and the amenity of nearby properties.

2. Government Policy Context

The planning documents reference statements from the Prime Minister promoting fast-tracking of planning approvals for infrastructure, including mobile masts, to stimulate economic growth. While infrastructure development is important, such **policy cannot override statutory duties to protect public health and vulnerable populations.** Councils must assess risk, consider independent scientific evidence, and apply precautionary guidance regarding EMF exposure, particularly near schools and residential areas.

2A. Expert Guidance from Sir William Stewart – Ignored by Government

The Stewart Report (2000), chaired by Sir William Stewart, former Chairman of the UK Health Protection Agency and scientific adviser to Prime Ministers Margaret Thatcher and Tony Blair, provided clear precautionary guidance for the siting of mobile phone base stations. It explicitly warned of potential health risks, particularly for children, in the absence of long-term scientific certainty. Key recommendations included:

- **The beam of greatest intensity should not fall on school grounds or buildings unless explicitly agreed by the school and parents**.

- Revocation of permitted development rights for mobile phone base stations.
- All new base station developments, including those under 15 metres, should be subject to full planning processes, especially near schools or sensitive sites.

Sir William Stewart reiterated these concerns publicly:

- 2007 BBC Panorama: "... there may be changes, for example in cognitive function... some indications that there may be cancer inductions... molecular biology changes within the cell..." https://www.bbc.co.uk/pressoffice/pressreleases/stories/2007/05_may/21/panorama.shtml
- **2008 EM Radiation Research Trust Conference Presentation, Royal Society, London:** "... populations are not genetically homogeneous and people can vary in their susceptibility to environmental hazards... dependence on age may affect sensitivity." https://radiationresearch.org/wp-content/uploads/2018/06/010920_stewart.pdf

Despite these repeated warnings, schools and other sensitive sites continue to be exposed to wireless RF radiation particularly with the densification of wireless infrastructure and 5G rollouts.

2B. ICNIRP – Limited Scope, Criticism, and Conflicts of Interest

The ICNIRP exposure guidelines rely on outdated assumptions, considering exposure safe as long as it does not produce immediate heating effects, such as shocks or burns to biological tissue.

Thousands of peer-reviewed studies demonstrate health effects at levels well below ICNIRP limits, including evidence compiled by:

- **Safer EMR** – Over 30 years of research with 2,500+ abstracts on biological and health effects of electromagnetic fields: https://www.saferemr.com/2018/02/effects-of-exposure-to-electromagnetic.html
- **BioInitiative Report** – Comprehensive review of 4,000+ studies on EMF and RF radiation health effects: https://bioinitiative.org
- **ICBE-EMF** – International Commission on Biological Effects of Electromagnetic Fields: https://www.icbe-emf.org
- **EMF-Portal** – Global database of 48,631 publications on EMF exposure and biological/health effects: https://www.emf-portal.org

ICNIRP also demonstrates inconsistent application across the electromagnetic spectrum:

- Its 2010 guidelines for extremely low frequency (ELF) fields acknowledge biological sensitivity, including nerve stimulation and measurable effects on the nervous system.
- By contrast, RF exposure from telecommunications infrastructure is assessed only for short-term heating effects, disregarding extensive evidence of biological impact at lower levels.

This represents a scientifically outdated, legally questionable, and ethically indefensible reliance on ICNIRP compliance, particularly for developments near schools and residential communities.

Conclusion

- The siting of this mast is in direct conflict with established precautionary recommendations from the Stewart Report and independent scientific evidence.
- It exposes children and vulnerable populations to levels of risk explicitly identified over two decades ago.
- Government and local authorities have a duty of care to uphold these recommendations and protect public health.
- The application disregards decades of independent scientific evidence compiled by Safer EMR, BioInitiative, ICBE-EMF, EMF-Portal, and the Radiation Research Trust regarding exposure risks near schools and homes.

3. Statutory Duties, Legal Discretion, and Misrepresentation of Safety

Local planning authorities have clear responsibilities when assessing telecommunications infrastructure. Since 2018, the European Electronic Communications Code has provided a harmonised framework for the UK, which allows local authorities to consider public health, safety, and environmental factors, including potential impacts on vulnerable populations, when determining planning applications.

Reliance solely on ICNIRP guidance does not guarantee protection of public health. Authorities retain discretion to weigh official guidance against credible evidence submitted by the public or other interested parties. Solicitors to PHE/UKHSA advised that public bodies must exercise judgment about how much weight to give ICNIRP-based guidance and other evidence, and that any legal risk from decisions rests with the public body, not with ICNIRP or the guidance itself: https://aches.international/wp-content/uploads/2025/01/Letter-to-Minister-for-Digital-Culture_5G-liability.pdf

Local authorities also have statutory duties under UK law. These include obligations under the Health and Care Act 2012 to take steps appropriate to improve public health, under the Town and Country Planning Act 1990 to consider all material considerations including emerging scientific evidence and health risks, under the National Planning Policy Framework 2021 to promote healthy and safe communities, particularly for vulnerable groups, and under the Equality Act 2010 to consider impacts on individuals with protected characteristics, including children, pregnant women, older adults, people with medical implants, and those with electromagnetic hypersensitivity.

Authorities must ensure that public information, reports, and decisions are accurate, balanced, and not misleading. Reliance on incomplete or poorly evidenced claims by applicants cannot override credible independent scientific evidence or the precautionary principle.

ICNIRP guidelines do not account for long-term or cumulative exposure, do not specifically protect vulnerable groups including children, and do not reflect real-world exposure conditions from masts operating continuously near homes and schools, including multiple frequencies and multiple operators' equipment. ICNIRP has also been subject to independent scrutiny and criticism from scientists, medical professionals, and courts regarding conflicts of interest and

lack of independence. Assertions that there is no credible evidence of harm below ICNIRP limits are completely out of line with independent research.

WHO / IARC Classification

♦ In 2011, the World Health Organization International Agency for Research on Cancer (IARC) classified RF electromagnetic fields as Group 2B, possibly carcinogenic to humans. Official IARC press release and summary: https://www.iarc.who.int/wp-content/uploads/2018/07/pr208_E.pdf

Independent Research Evidence

♦ The $30 million National Toxicology Program (USA, 2018) – Male rats developed heart schwannomas and other tumours following mobile phone RF exposure: https://ntp.niehs.nih.gov/research/topics/cellphones

♦ Ramazzini Institute (Italy, 2018) – Long-term RF exposure linked to tumour formation: https://pubmed.ncbi.nlm.nih.gov/29530389/

♦ Henshaw and Phillips 2025 – Mechanistic evidence describing the biological processes by which exposure to electromagnetic fields can lead to Electromagnetic Hypersensitivity: https://www.tandfonline.com/doi/full/10.1080/09553002.2024.2435329

Balmori 2022 – Review of 38 studies near base stations reported:

♦ 74% health effects, ♦ 77% cancer outcomes, ♦ 75% biochemical or physiological changes

Balmori Conclusion

"In the current circumstances, it seems that the scientific experts in the field are very clear about the serious problems we are facing and have expressed this through important appeals (Blank et al., 2015; Hardell and Nyberg, 2020). However, the media, the responsible organizations (World Health Organization, 2015) and the governments are not transmitting this crucial information to the population, who remain uninformed. For these reasons, the current situation will probably end in a crisis…" : https://pubmed.ncbi.nlm.nih.gov/35843283/

Thousands of research publications demonstrate effects occur at exposure levels well below ICNIRP limits.

In simple terms:

♦ The so-called safety limits are set far above the levels where biological harm has already been observed.

♦ Or put another way: This is equivalent to setting a speed limit at 1000 mph and claiming that anything below it is safe.

This does not represent a precautionary approach. It represents a failure to protect public health.

4. Real-World Exposure Risks and Vulnerable Populations

Children absorb significantly more RF radiation than adults due to anatomical differences in skull and brain tissues. Studies show that exposure in brain regions such as the hippocampus and hypothalamus can be **1.6–3 times higher in young children**, **and bone marrow in a child's skull can absorb up to ten times more RF radiation than in adults** because of higher tissue conductivity (**Christ et al., 2010a**: Publications– Non-ionizing Radiation, Part 2: Radiofrequency

Electromagnetic Fields - page 74: https://publications.iarc.who.int/Book-And-Report-Series/Iarc-Monographs-On-The-Identification-Of-Carcinogenic-Hazards-To-Humans/Non-ionizing-Radiation-Part-2-Radiofrequency-Electromagnetic-Fields-2013

Eye exposure is also higher in children, and the relative position of brain regions to the skull and ear further increases absorption. These findings confirm biological effects at exposure levels well below ICNIRP guideline limits (IARC 2013 Monograph, Volume 102: https://www.ncbi.nlm.nih.gov/books/NBK304630/

Research by Lee & Choi (2023) further confirms age-dependent specific absorption rates (SAR) in child and adult brain and body models for environmental RF exposures (Environmental Research 2023 PDF: https://ksp.etri.re.kr/ksp/article/file/67357.pdf).

The proposed mast would be immediately adjacent to residential properties and within metres of schools, resulting in continuous, round-the-clock exposure. Vulnerable populations include children, pregnant women, older adults, people with medical implants, and individuals with electromagnetic hypersensitivity (EHS). Failure to adequately consider these groups could breach statutory duties under the Equality Act 2010.

In summary: Even at exposure levels below current ICNIRP limits, there is credible evidence of measurable biological effects, particularly in children and other vulnerable populations, underscoring the need for extreme caution in mast placement.

Real-World Evidence: 5G Exposure and Concerns for a School in Liverpool

Liverpool now hosts the largest 5G Stand Alone network at street level in Europe. During the EM Radiation Research Trust investigation, we recorded readings of 1,554,932 $\mu W/m^2$ outside a school that experienced an outbreak of illness, alongside reports of the deaths of two young children. We called for a full investigation into these incidents. Recorded levels were comparable to those identified by Mona Nilsson and Lennart Hardell in their 5G investigations in Sweden. These levels are exceptionally high for a residential and school environment and warrant urgent precautionary consideration.

For full details, see:
◆ The EM Radiation Research Trust Call for Immediate Investigation into Phone Mast near Millstead Primary School Following the Deaths of Two Children
https://radiationresearch.org/the-em-radiation-research-trust-call-for-immediate-investigation-into-phone-mast-near-millstead-primary-school-following-the-deaths-of-two-children/

Peer-reviewed case studies by Hardell and Nilsson document real-world health effects associated with 5G base station exposure, including neurological and cardiovascular symptoms that improved when exposure ceased. These include a compilation of seven case reports involving adults and children exposed near base stations:
https://pubmed.ncbi.nlm.nih.gov/38889394/

Watch the first documentary investigating real-world 5G health effects, following peer-reviewed scientific case studies: YouTube documentary - **5G The Untold Story**:
https://www.youtube.com/watch?v=7-4NaHu9Eo4

5. Policy Guidance and Setbacks The 2020 State of New Hampshire 5G Report recommends a minimum setback of at least 500 metres from schools, hospitals, and homes:
https://gc.nh.gov/statstudcomm/committees/1474/reports/5G%20final%20report.pdf.

The proposed mast is far closer than this recommended minimum safe distance, creating unnecessary risk to public health and wellbeing.

6. Real World UK Cases

♦ In Velma Lyrae v Somerset West & Taunton Council, the High Court quashed the council's decision, recognising the applicant's health concerns due to electromagnetic hypersensitivity: https://www.localgovernmentlawyer.co.uk/housing-law/397-housing-news/99387-high-court-quashes-decision-that-homeless-application-was-not-fresh-application.

♦ In Thomas v Cheltenham Borough Council, health effects from RF exposure for a person with medical implants: https://www.casemine.com/judgement/uk/67d3242e8e5e96188bafa060.

♦ Further UK cases of electromagnetic hypersensitivity **include a child with a special education plan** and a woman who took early retirement with income support due to EHS: https://phiremedical.org/news/.

♦ Tragic individual cases such as that of **Jenny Fry**, whose story and the circumstances surrounding her illness are documented on the EM Radiation Research Trust website at: https://radiationresearch.org/%F0%9F%99%8F-in-loving-memory-of-jenny-fry-marking-ten-years-since-her-passing-in-june-2015/

These examples demonstrate that RF exposure from base stations has documented health and legal consequences.

7. Socio-Economic Impacts

♦ Evidence demonstrates measurable effects on property prices and community wellbeing: https://link.springer.com/article/10.1007/s11146-017-9600-9. Residential property values decrease significantly near masts, creating long-term financial and community impacts. Residents face uncertainty and have no guarantee of protection or compensation for potential harms. In previous cases, families living near a mobile phone mast were awarded compensation, highlighting the real financial stakes. Real-world examples, such as communities near masts in Wiltshire, show heightened concern and tangible economic consequences: http://news.bbc.co.uk/1/hi/england/wiltshire/3041309.stm.

This raises a critical question for the proposed Erdington mast: **who will be responsible for compensating homeowners and safeguarding community wellbeing?**

8. Impacts: Critique of Official RF Safety Reviews and Visual/Environmental Concerns

Independent scientific analysis raises serious concerns about the reliability of official RF safety reviews relied upon by Cornerstone in support of this application. A peer-reviewed article by Dr Sarah J. Starkey, ***Inaccurate official assessment of radiofrequency safety by the Advisory Group on Non-ionising Radiation***, demonstrates that the AGNIR 2012 report, which informed Public Health England and UK Government advice, **contains incorrect and misleading statements, omissions of relevant studies, and conflicts of interest with guideline-setting bodies such as ICNIRP.** The report's executive summary and conclusions did not accurately reflect the scientific evidence available, making it unsuitable as a basis for determining safe public exposure levels: https://www.degruyter.com/document/doi/10.1515/reveh-2016-0060/html?lang=en

Official safety reviews, such as AGNIR, and ICNIRP guidance primarily rely on short-term thermal effects to define safety limits, ignoring the now extensive body of evidence demonstrating non-thermal biological effects, cumulative exposure, and the astronomical increase in man-made radiofrequency electromagnetic radiation in the environment. These shortcomings directly undermine the applicant's claims that the proposed development is safe.

Visual and Environmental Impacts
The proposed 18-metre mast will be highly visible above low-rise residential and school buildings, creating a dominant and intrusive feature in the streetscape. Industrial structures placed adjacent to playgrounds and classrooms adversely affect children's sense of safety and wellbeing. Mast infrastructure, including cabinets and ancillary equipment, will reduce visual amenity and negatively impact neighbourhood character. The failure of official safety reviews, combined with the significant visual and environmental intrusion, reinforces the need for rigorous precaution.

The exponential increase in environmental exposure to man-made radiofrequency radiation, far exceeding natural background levels, is not addressed by ICNIRP compliance alone and must be considered in evaluating the public health implications of this proposed mast.

According to Carpenter and Bandara (The Lancet Planetary Health, 2018), human exposure to radiofrequency electromagnetic radiation around the 1 gigahertz band has increased roughly **10^{18} times** above natural background levels. As the authors state, "Unprecedented human exposure to radiofrequency electromagnetic radiation from conception until death has been occurring in the past two decades. Evidence of its effects on the CNS, including altered neurodevelopment and increased risk of some neurodegenerative diseases, is a major concern considering the steady increase in their incidence. Evidence exists for an association between neurodevelopmental or behavioural disorders in children and exposure to wireless devices, and experimental evidence, such as the Yale finding, shows that prenatal exposure could cause structural and functional changes in the brain associated with ADHD-like behaviour. These findings deserve urgent attention."
https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(18)30221-3/fulltext.

These findings directly contradict claims by the applicant and associated agencies that public exposure from base stations and wireless networks is harmless. Reliance on thermal effects alone, as emphasised in Cornerstone's health summary and ICNIRP guidance, fails to account for non-thermal biological effects, cumulative exposure over time, and the unprecedented rise in environmental RF radiation. It is critical that policymakers take immediate action, as failure to address these changes could have serious and lasting consequences for human health and for the planet.

9. Critique of Coverage, Capacity, Consultation, and Public Health Justification

9.1 Application Deficiencies and Lack of Transparency

The redacted application form confirms that this proposal is submitted under permitted development rights (Schedule 2, Part 16, Class A). However, the information provided is **incomplete, inconsistent, and lacks the transparency required for proper public scrutiny.** The applicant is identified as Cornerstone, a site management company, yet no specific mobile network operator is named. Without disclosure of the operators, the claim of ICNIRP compliance cannot be independently verified. The application form indicates that a declaration of compliance with ICNIRP guidelines has been made by ticking a box. No signed declaration, or

supporting calculations, appears to be available within the planning documents. A tick-box assertion does not constitute evidence of compliance. The proposal involves a substantial installation, including an 18-metre lattice tower supporting six antennas and two transmission dishes, along with associated cabinets. Despite the scale and sensitive location immediately adjacent to a school and residential properties, key technical information remains absent.

The Community Information Sheet provided by Cornerstone asserts that the mast is required to meet network demand, prevent so-called "digital blackspots," and support economic and social activity. However, this document is generic and provides no site-specific evidence demonstrating a deficiency in coverage or capacity at St Barnabas School or the surrounding area.

9.2 Consultation Claims

Pre-application consultation letters were sent by Cornerstone and United Infrastructure Connected Limited (a registered telecommunications infrastructure contractor, not a mobile network operator) to local MPs, school representatives, ward councillors, and planning officers. The letters are primarily informational, stating that the proposed mast "may be installed" and inviting comments. The correspondence indicates that Cornerstone/United Infrastructure Connected Limited is acting as a contractor on behalf of mobile operators (VMO2, and potentially others), but the identity of the operator(s) responsible for the site is not disclosed. This prevents verification of ICNIRP compliance, accountability, and proper consultation.

9.3 Public Health and Technical Concerns

The justification focuses exclusively on network convenience and service quality, rather than any public health or safety consideration. Even if network capacity improvements were needed, this does not mitigate the documented risks of continuous exposure to radiofrequency radiation, particularly for children and vulnerable residents living immediately adjacent to the site. Approval of this development would place network convenience above the precautionary principle in public health policy. Reliance on generic coverage claims, redacted information, and tick-box ICNIRP declarations cannot override credible scientific evidence of potential harm. Approval raises serious accountability concerns: who will be responsible if children, families, or vulnerable individuals suffer adverse effects as a result of this mast? Public authorities have a clear duty to act with caution when there is credible scientific evidence of harm. Failure to do so risks not only public health but also institutional accountability and the confidence of the local community.

9.4 EECC – Competent Authority and Public Health Considerations

♦ Under the European Electronic Communications Code (EECC) (part of UK law), mobile network operators are legally duty-bound to consider public health, safety, and environmental factors when deploying or operating networks.

♦ The planning process should therefore assess whether there are credible public health concerns, especially where vulnerable populations such as children at nearby schools are affected. An application should not be accepted on the basis of a tick-box ICNIRP declaration alone when there are unresolved scientific and community concerns regarding environmental exposure.

♦ A genuine public health assessment under EECC duties would need to consider potential cumulative exposures, vulnerable groups, and emerging scientific evidence, not merely thermal compliance with ICNIRP exposure limits.

When these regulatory failures, omissions, and unresolved public health concerns are considered alongside the actual siting of the proposed mast, it becomes clear that this is not a theoretical risk but a real and immediate exposure scenario affecting children, families, and the wider community.

10. Site Photographs and Final Observations

The following photographs illustrate that the proposed mast site is situated close to St Barnabas CE Primary School and within a densely populated residential area. The images clearly demonstrate the potential for direct exposure to children and local residents. The installation would also be located near trees and residential buildings, which could further exacerbate risks associated with the site's physical and environmental context. It is evident from the images that the installation would occur without the consent of residents, the school, or parents, raising serious concerns regarding procedural propriety and public accountability.

♦ These images, when viewed alongside the extensive scientific evidence presented in this objection, underscore the potential for harmful biological and neurological effects from prolonged exposure to radiofrequency radiation, even at levels below current ICNIRP guidelines.

Existing Site Photograph

Photomontage showing proposed new telecoms installation

Scientific evidence indicates that exposure to man-made electromagnetic fields has increased enormously over the past decades. Carpenter and Bandara and Henshaw & Phillips (2025) demonstrate that environmental levels of radiofrequency radiation have risen by many orders of magnitude compared to natural background levels, and these exposures are set to increase further with the proliferation of 5G, IoT devices, and other wireless infrastructure. The claim by Cornerstone and UKHSA that low-level exposure poses no risk is **untenable** in light of this exponential increase.

Key References

♦ Carpenter and Bandara, *The Lancet Planetary Health*, 2018 – https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(18)30221-3/fulltext
This study illustrates the enormous increase in man-made RF radiation and its potential biological impact.

♦ Henshaw & Phillips, 2025 – Mechanistic evidence describing the biological processes by which exposure to electromagnetic fields can lead to Electromagnetic Hypersensitivity: https://www.tandfonline.com/doi/full/10.1080/09553002.2024.2435329

Fire Safety and Electrical Hazard Concerns

Telecommunications masts contain electrical infrastructure, backup power systems, batteries, and cabling, all of which present real fire hazards. Independent records show mast fires have occurred in the UK, sometimes requiring evacuation and major firefighting responses. The EM Radiation Research Trust has documented multiple incidents, highlighting the risks of placing such infrastructure near schools, homes, and densely populated areas. Fires at or near masts can spread rapidly and cannot be safely extinguished until electrical supplies are isolated, as confirmed by qualified fire service professionals. The current planning application provides no fire risk assessment, consultation with the Fire & Rescue Service, or mitigation strategies, despite the site's proximity to St Barnabas School, homes, and pedestrian routes.

Telecommunications approvals must consider all plausible hazards, including fire, electrical failure, and emergency response implications, particularly where vulnerable groups such as children and older adults are present. Planning authorities should require a full fire risk

assessment and consultation with the local Fire & Rescue Service before any approval to ensure safeguards, maintenance protocols, and emergency response measures are in place.

EM Radiation Research Trust Fire Report: https://radiationresearch.org/5g-phone-mast-fire-london-8th-november-2024/

Request for Further Information – Equality Act 2010 and ICNIRP Compliance

♦ Any assessment of potential impacts on people with protected characteristics under section 149 of the Equality Act 2010, including children, pregnant women, older adults, people with medical implants, and those with electromagnetic hypersensitivity (EHS).

♦ Copies of all calculations and supporting data used to produce the ICNIRP compliance certificate, including assumptions on exposure levels, cumulative effects, and worst-case scenario methodology.

♦ In addition, the EM Radiation Research Trust recommends that a full Environmental Impact Report be provided, assessing potential public health, safety, and environmental effects of the proposed mast. This aligns with the duty of mobile network operators under the European Electronic Communications Code (EECC) to consider health and environmental factors prior to deployment.

♦ In conclusion, the evidence presented in this objection – both scientific and visual – demonstrates that the proposed development is unsuitable for this location. Approval would constitute a foreseeable risk to public health, particularly for children and other vulnerable populations, as evidenced by a substantial body of published research and would represent a failure to uphold the Council's statutory duties under the Health and Social Care Act 2012, the Equality Act 2010, the Town and Country Planning Act 1990, and the obligations on mobile network operators under the EECC to consider health, safety, and environmental factors.

In light of the clear evidence and documented research on health risks, fire hazards, and visual impacts, and given its proximity to homes and schools, the EM Radiation Research Trust strongly objects to this telecommunications mast, calls for the application to be refused, and submits this letter as a formal record of notice for inclusion on the planning file.

Submitted by:
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