

Objection PL/2026/01852 – Land South West of Cemetery, Holt Road, Bradford on Avon (BA15 1TS)

Introduction

The image below shows the installation as seen from approximately 300 metres away within the surrounding residential area.



The proposal involves the addition of further antenna equipment to the existing lattice tower, increasing its overall bulk.

However, the planning documents do not include any photographic visualisations or montages showing how the additional equipment will appear from surrounding viewpoints, including nearby residential properties.

While drawings are provided indicating the increase in equipment, they do not show how the development will appear in its real setting or from the perspective of nearby homes.

From my position, where the structure is already clearly visible, any increase in bulk will be noticeable. The same will likely apply to some of the other nearby residents including those in Benjamin Street and Niblet Street.

In the absence of visual evidence showing the effect of the proposed changes, it is not possible to properly assess the impact of the development on residential outlook or the character of the area.

I also operate a small-scale wellness retreat business from my home. This use is sensitive to the character and perceived environment of the location, including visual outlook and the presence of nearby infrastructure.

The proposed increase in the scale and visibility of the installation, combined with the absence of clear information about its operation and effects, has the potential to adversely affect the attractiveness of the property for this purpose.

In particular, the lack of transparent, site-specific information may give rise to uncertainty for prospective clients, which is material to the viability of this use. This is a further consequence of the absence of a properly defined and assessed proposal.

1. Site Context and Proximity to Sensitive Receptors

The submitted plans and mapping indicate the following spatial relationships:

Residential properties

Residential dwellings are located to the west of the site at an approximate distance of **40–60 metres**. These properties are positioned across open ground and have a clear line of sight towards the mast.

Allotments

Allotment gardens are located approximately **50 metres** from the site and extend to around **100 metres** and beyond. These areas are characterised by regular and often prolonged use by members of the public.

Play area

A public play area is located **immediately adjacent** to the proposed mast location, placing users — including children — in very close proximity to the installation.

Public access route

A public access route runs directly past the installation site, resulting in regular public presence in close proximity to the mast.

Employment use (AB Dynamics)

There are also nearby workplaces, including AB Dynamics, where individuals are present for extended periods during the working day.

Closest residential properties

Residents within **Benjamin Street and Niblet Street fall within a 500m radius**.

These relationships demonstrate that the proposed development is located within a **concentrated area of human activity**, involving both residential and public-use receptors at close range, as well as workplaces where individuals are present for sustained periods.

The site must therefore be understood as a **continuously occupied local environment with multiple nearby receptors**, rather than a location characterised by transient or limited human presence.

2. Uncertainty and Mischaracterisation of the Proposed Technology

The application documents, including the **Planning Statement.pdf** and the **Coverage and Capacity Information Sheet.pdf**, do not present a clear or consistent description of the technology being installed at this site.

A. Statements identifying the proposal as a 4G upgrade

The **Planning Statement.pdf** describes the proposal in terms of enhancement to existing 4G infrastructure. It states:

“Upgrade of existing site... including the deployment of the most advanced 4G spectrum currently available, providing increased network capacity...”

“The upgrade is required to... enhance existing 4G performance in response to increasing demand...”

These statements provide the clearest description of the proposal and indicate that the development is intended to improve 4G network performance.

A1. Antenna specification and technical capability

The antenna arrangements shown in the submitted drawings appear to comprise standard multi-band macro antenna configurations.

There is no indication within the drawings or accompanying documentation of any equipment or configuration specifically associated with standalone 5G deployment.

In particular, the application does not identify any infrastructure that would support the advanced capabilities described elsewhere in the **Planning Statement.pdf**, including:

“...5G can support monitoring systems for medication adherence, fall detection, and wellbeing checks...”

There is no explanation of how the specified equipment would deliver:

- low latency performance,
- high device density, or
- the network functionality required for such applications.

Applications of this type — including real-time monitoring, rapid response systems and high device connectivity — are typically associated with more advanced 5G architectures, particularly standalone (SA) 5G.

The application does not identify any such deployment at this site, nor does it explain how the proposed equipment would support these capabilities.

The Planning Statement itself acknowledges that:

“only a small proportion of mobile connections (about 2%) currently use 5G SA... This means that many users are still on non-standalone 5G...”

This indicates that the advanced capabilities described elsewhere are not generally available in practice and are dependent on infrastructure not identified in this proposal.

The antenna configuration therefore appears consistent with a general capacity upgrade to existing infrastructure, including 4G and potentially non-standalone 5G, rather than a clearly defined deployment of advanced 5G capability.

B. Statements referring to 5G in general or policy terms

Elsewhere, the **Planning Statement.pdf** refers to 5G more generally, including in the context of national policy and future network development. For example:

“Planning policies... should support... next generation mobile technology (such as 5G)...”

“There are substantial benefits associated with the provision of 5G coverage...”

“4G and 5G are likely to require further network densification...”

These statements refer to 5G at a general level but do not specify that 5G capability is being delivered as part of this proposal.

C. Statements referring to future or advanced 5G capabilities

The **Planning Statement.pdf** also includes a number of statements describing advanced or future-facing applications associated with 5G technologies. For example:

“This proposal is made... to future proof the network...”

“providing reasonable capacity for future expansion...”

“5G is expected to broaden the role that mobile technology plays... enabling thousands more ‘smart’ devices...”

“...5G can support monitoring systems for medication adherence, fall detection, and wellbeing checks...”

These statements describe capabilities typically associated with more advanced network architectures and future deployment scenarios, rather than clearly defined functionality delivered by the proposed development itself.

D. Supporting statements from the Coverage and Capacity Information Sheet

The **Coverage and Capacity Information Sheet.pdf** similarly describes the proposal in general and open-ended terms. It states:

“Upgrading a site will increase the capacity of a base station... often by redeveloping the site to enable an increase in the number of technologies...”

“Mobile phone base stations are needed... as well as new connectivity solutions such as Internet of Things.”

“even after these upgrades... demand for services can still exceed the capacity of the local base station... we may need to look into developing a new base station...”

These statements do not identify specific technologies being deployed and instead refer to generalised capacity improvements and potential future development.

E. Internal acknowledgement of uncertainty

The **Planning Statement.pdf** also acknowledges uncertainty in network coverage and performance:

“there remains a gap... both in terms of coverage and the type of service available... [and] some reporting limitations and geographical uncertainty still exist in coverage modelling.”

This indicates that even the anticipated performance outcomes of the network are not defined with certainty.

Conclusion of Section 2

Taken together, the application combines:

- a clearly defined description of a 4G upgrade,
- general references to 5G in policy and network development terms, and
- forward-looking statements about future 5G capabilities and applications.

However, it does not provide a clear and consistent explanation of what technology is being installed at this site, nor what functionality will be delivered.

It is therefore not possible to determine with confidence:

- what level of service improvement is expected,
- whether the advanced capabilities described will be realised, or
- how the proposal should be assessed.

The proposal is therefore not sufficiently defined to enable a properly informed assessment.

3. Failure to Provide Site-Specific Evidence of Need (NPPF 122)

The application does not provide any site-specific evidence demonstrating that the proposed development is required at this location in Bradford on Avon.

The **Coverage and Capacity Information Sheet.pdf** states:

“Mobile network operators monitor call quality so they are aware of any necessary improvements.”

However, no such data has been provided.

The application does not include:

- coverage maps
- capacity data
- call quality data
- any before-and-after analysis

The **Planning Statement.pdf** includes generalised UK and Wiltshire datasets, but these do not provide any site-specific assessment.

The application also relies on general statements such as:

“Mobile phone base stations are needed in areas where people work and live...”

“Without ongoing improvements... areas will become digital black spots...”

These statements are not specific to the site.

The **Coverage and Capacity Information Sheet.pdf** also states:

“even after these upgrades... demand... can still exceed the capacity...”

The application therefore provides no evidence demonstrating that the development is required at this location.

4. Technical Inconsistency: Vegetation Screening vs Signal Propagation

The application relies on surrounding vegetation to reduce visual impact.

However, the **Planning Statement.pdf** states:

“trees... can block signals”

and:

“must be in clear view... without obstructions such as trees...”

No assessment is provided of how vegetation affects signal performance.

There is:

- no propagation modelling
- no coverage modelling

It is therefore not possible to determine whether the installation will function as claimed.

5. Speculative and Non-Site-Specific Benefits

The application relies on generalised and forward-looking benefits.

The **Planning Statement.pdf** also refers to wider economic and social benefits associated with mobile connectivity and next generation technologies. For example:

“There are substantial economic and social benefits associated with the provision of 5G coverage...”

However, this statement is expressed at a general and national level and is not supported by any site-specific evidence in relation to this proposal.

As set out in Section 2, the application does not demonstrate that such capabilities or benefits will be delivered at this site and as noted in the Introduction, this may adversely affect my business, which depends on a calm and stable environment and on clients having confidence in the conditions at the property, including in relation to nearby infrastructure

The **Planning Statement.pdf** states:

“...5G can support monitoring systems...”

“digital health inequality...”

As set out in Section 2, the application does not demonstrate that such capabilities will be delivered at this site.

It also acknowledges:

“reporting limitations and geographical uncertainty...”

The **Coverage and Capacity Information Sheet.pdf** refers to IoT and benefits to vulnerable people but provides no site-specific evidence.

These benefits are speculative and are not supported by site-specific evidence.

6. Failure to Assess Site-Specific Exposure and Proximity

The application includes an ICNIRP declaration of compliance statement, but does not provide the public exclusion zone (PEZ) diagrams or the underlying calculations on which that statement is based.

No site-specific assessment is provided of how the development relates to nearby receptors or how exposure conditions may arise in practice.

A. Reliance on ICNIRP declaration

The application relies on ICNIRP compliance as evidence that the proposal is acceptable in terms of electromagnetic field (EMF) exposure.

While this provides a general indication of compliance with guideline limits, it does not constitute an assessment of how the installation interacts with its specific surroundings.

In particular, the declaration is not supported by:

- any publicly available PEZ diagrams,
 - any underlying calculation data, or
 - any information showing how compliance has been assessed in relation to the layout of the site and surrounding uses.
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B. Absence of site-specific assessment

As set out in Section 1, the site is located in close proximity to multiple receptors, including:

- residential properties at approximately **40–60 metres**,
- allotments at approximately **50–100 metres**,
- and a **public play area immediately adjacent** to the site.

These are locations where individuals are present for **prolonged and repeated periods**, rather than transient use.

Despite this, the application does not include:

- any assessment of exposure at these locations,
- any analysis of how individuals may experience the environment over time,
- or any publicly available **PEZ diagrams or underlying calculations** identifying areas of compliance or non-compliance around the installation.

In particular, no information is provided to indicate:

- whether any exclusion zones extend into the adjacent play area,
- whether any exclusion zones extend towards nearby residential properties,
- or how close members of the public may be to areas of highest emission.

No information is provided to demonstrate that the installation has been designed or positioned in a way that takes account of these spatial relationships.

In addition, the application does not include any assessment of potential effects on the surrounding environment, including insect life. This is of particular relevance given the proximity of working allotments and areas of vegetation which support pollinators.

Published research indicates that interactions with insect populations may be dependent on frequency characteristics and exposure conditions. Despite this, the application does not provide sufficient technical detail or site-specific assessment to enable any consideration of potential effects in this regard.

C. Relevant considerations arising from *Thomas v Cheltenham Borough Council*

In *Thomas*, the Court considered evidence of interaction between electromagnetic fields and a medical implant at a distance of approximately 17 metres from the installation. That evidence had not been raised or considered as part of the original planning decision.

At paragraph 45 of the judgment, the Court accepted that, had such evidence been brought forward and properly considered, it was capable of being material to the planning decision and could have affected the outcome, including in the context of section 31(2A) of the Senior Courts Act 1981.

This demonstrates that where receptors are located within comparable proximity, and where such considerations may arise, there is a need for site-specific assessment to ensure that potentially material factors are not overlooked.

Despite this, the application does not include:

- any assessment of proximity in relation to such considerations,
 - any evaluation of how nearby receptors may be affected in practice, or
 - any attempt to identify whether additional factors arise in this specific location.
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Conclusion of Section 6

The application relies on an ICNIRP declaration of compliance but provides no site-specific assessment of how the development relates to nearby receptors or how exposure conditions may arise in practice.

In particular, it does not provide:

- PEZ diagrams,
- underlying calculations, or
- any analysis of how exclusion zones or areas of highest emission relate to the surrounding pattern of use.

In the absence of this information, it is not possible to understand how the proposal interacts with its immediate environment or how the presence and proximity of nearby receptors has been taken into account.

7. Failure to Apply the Required Evaluation Framework (1999/519/EC and EEC Annex I(3)(b))

The status and role of ICNIRP guidance within the planning framework has been addressed at government level.

Legal advice provided through DLA Piper on behalf of Public Health England (8 August 2019) makes clear that ICNIRP guidance is not determinative, but a matter for the decision-maker's judgment:

“the Guidance is not maintained and revised by PHE for the explicit purpose of any other body undertaking any other statutory function... it must determine what weight to place on the Guidance. Equally, that body must determine what other evidence to consider in making any decision.”

This establishes that compliance with ICNIRP does not in itself constitute a complete assessment, and that the decision-maker must evaluate what weight to give to that guidance, and what additional evidence is relevant in the circumstances of the case.

Council Recommendation 1999/519/EC establishes a framework which is not static, but must be applied in light of evolving knowledge and precaution:

“The Member States should take note of progress made in scientific knowledge and technology... taking into account the aspect of precaution... with an assessment being made at regular intervals...”

It further provides that measures may be implemented in circumstances where exposure is relevant in practice:

“implement measures... in respect of sources... when the time of exposure is significant...”

And that, in assessing exposure, decision-makers may take into account:

“criteria, where appropriate, such as duration of the exposure, exposed parts of the body, age and health status of the public.”

Taken together, these provisions establish that the framework is evaluative in nature, requiring consideration of exposure in context, rather than reliance on limits alone.

This evaluative framework is reinforced by the legal structure identified by the Court of Appeal in *R (Thomas) v Cheltenham Borough Council* [2025] EWCA Civ 259:

“THE LEGAL FRAMEWORK IN OUTLINE

15. Directive EU 2018/1972 of the European Parliament and of the Council, (which is part of EU retained law since the UK withdrew from the European Union) established the European Electronic Communications Code.

The Directive contains in Annex 1 a long list of conditions which may be attached to general authorisations for electronic communications networks. They include ‘measures for the protection of public health against electromagnetic fields caused by electronic communications networks in accordance with Union law, taking utmost account of Recommendation 1999/519 EC’.”

This confirms that the assessment of electromagnetic field exposure, and the reconciliation of infrastructure deployment with public health considerations, forms part of the legal framework to be applied by the decision-maker, including through the exercise of planning judgment and the consideration of conditions where appropriate.

In the absence of any site-specific evaluation of exposure, proximity, or receptor characteristics, the application does not engage with this framework.

8. The Authority is Not in a Position to Determine the Application

The application does not provide sufficient information to enable a properly informed assessment.

As set out in Sections 1–7:

- the nature and capability of the proposed technology is not clearly defined,
- no site-specific evidence of need or benefit has been provided,
- the claimed benefits are generalised and not demonstrated at this location,
- no assessment has been provided of how the installation will function in its surroundings,
- and no site-specific evaluation has been undertaken of electromagnetic field exposure, proximity, or receptor characteristics.

The legal and policy framework requires that these matters are considered through the exercise of planning judgment, taking into account exposure in context and the characteristics of the surrounding environment.

In the absence of this information, the authority is not in a position to:

- understand what is being proposed,
- assess the extent to which any benefits will be realised, or
- evaluate how the development interacts with its surroundings.

As a result, it is not possible to undertake a lawful planning balance.

In particular, I request that the authority gives specific weight to the absence of any assessment within the surrounding area in which people live, work and spend time, including within a radius of up to 500 metres. I reside approximately 300 metres from the site, with a direct line of sight to the installation, placing my property within this range.

Published [evidence](#) and policy approaches, including the [New Hampshire Commission](#) to Study the Environmental and Health Effects of Evolving 5G Technology (2020) and planning frameworks such as Castle Point Local Plan Policy INFRA6, recognise distances in the order of 500 metres as relevant to the assessment of telecommunications infrastructure.

In the absence of any assessment of conditions within this range, this omission should be given material weight in the determination of the application.

The application should therefore be refused due to insufficient information and failure to enable a lawful assessment.
