

## Objection

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

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### **ICNIRP Compliance, Scientific Evidence, and Precautionary Weighting**

ICNIRP compliance is relied upon in the application as if it resolves the question of exposure and public health. It does not do so in itself.

As confirmed in legal advice provided on behalf of Public Health England, the decision-maker must determine what weight to give to ICNIRP guidance and what other evidence is relevant.

The question is therefore not simply whether compliance has been asserted, but whether the available evidence is sufficient, in this case, to support a conclusion that the proposal is acceptable.

This approach has also been reflected in planning decision-making, including consideration of telecommunications development by Mendip District Council Planning Committee, where ICNIRP compliance was not treated as determinative and the available evidence was considered as a whole.

In that case, it was explained that the evidential threshold was high, particularly in light of national policy and reliance on ICNIRP guidance. However, the planning committee reached a different view and concluded that the available evidence did not provide sufficient confidence in safety.

In the present case, there is uncertainty both as to the technology proposed and, as set out below, in the scientific evidence. Taken together, these factors limit the ability to reach a properly informed view as to exposure and its implications.

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### **Current Scientific Evidence and Ongoing Uncertainty**

The scientific position on radiofrequency (RF) exposure, and in particular 5G-related exposure conditions, is not settled. There is ongoing and active disagreement within the scientific community.

A March 2026 peer-reviewed study published in *Environmental Health*, drawing on the U.S. National Toxicology Program (NTP) cancer study, applied established U.S. Environmental Protection Agency risk assessment methods and concluded that current RF exposure limits may be significantly higher than levels protective against cancer and reproductive effects under typical exposure conditions (Environmental Health, 2026).

Reviews aligned with the current regulatory position, including Karipidis et al., conclude that:

“This review showed no confirmed evidence that low-level RF fields above 6 GHz such as those used by the 5G network are hazardous to human health.”

However, this conclusion is limited in scope. The review considers RF fields above 6 GHz only and does not address lower and mid-band frequencies (such as 700 MHz and 3.4 GHz), which form a significant part of current 5G deployment.

It therefore does not provide a comprehensive assessment of real-world 5G exposure conditions across the full range of deployed frequencies.

Weller et al. (2022), in a critique of the Karipidis review, conclude that it does not provide a reliable basis for assurance of safety. They note that no studies have investigated actual 5G frequencies and modulations and identify limitations in the completeness and evaluation of the evidence base.

Further, analysis of the current research landscape indicates that evidence specific to 5G exposure remains limited. As reported by [Moskowitz \(University of California, Berkeley\)](#), of more than 39,000 publications on electromagnetic fields, only a limited number relate specifically to 5G, and only a small subset involve biological or health-related testing under 5G exposure conditions.

This reflects a broader issue: 5G introduces different exposure characteristics, including frequency variation, modulation patterns, and beamforming, meaning that exposure conditions are dependent on how the technology is deployed in practice.

In these circumstances, the scientific position cannot be regarded as settled. The existence of credible, peer-reviewed evidence raising uncertainty is sufficient to require that such evidence is weighed alongside ICNIRP compliance, particularly where no site-specific assessment has been provided.

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### **Assumptions Underlying Exposure Limits**

Further, peer-reviewed research has challenged the assumptions underlying current exposure limits.

The International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF), in *“Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G”* (Environmental Health, 2022), identifies that existing exposure limits are based on assumptions that biological effects arise only from tissue heating and that no effects occur below a defined threshold.

The paper further notes that these assumptions are subject to ongoing scientific challenge and that the evidence base has developed significantly since the limits were originally established.

It also identifies that newer forms of radiofrequency exposure associated with 5G involve conditions for which there is limited direct health evidence.

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## **Conclusion**

The 1999/519/EC Recommendations are intended to operate as a progressive and evaluative framework, requiring account to be taken of developing scientific knowledge.

In this case, recent peer-reviewed evidence is directly relevant and should be taken into account. If it is not given weight, clear reasons should be provided.

ICNIRP compliance is not determinative in itself. The decision-maker must evaluate the adequacy of the evidence in the context of this specific proposal.

In the absence of site-specific assessment, and in the presence of ongoing scientific uncertainty, there is insufficient evidence, on the information provided, to support a conclusion that the proposal is acceptable

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## **Environmental Health (2026)**

**Exposure limits to radiofrequency EMF do not account for cancer risk or reproductive toxicity assessed from data in experimental animals**

<https://link.springer.com/article/10.1186/s12940-026-01288-6>

**Karipidis et al.**

**5G mobile networks and health: a state-of-the-science review of the research into low-level RF fields above 6 GHz**

**Weller et al. (2022)**

**Comment on 5G mobile networks and health – a state-of-the-science review by Karipidis et al.**

<https://www.researchgate.net/publication/365748429>

**Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G**

<https://link.springer.com/article/10.1186/s12940-022-00900-9>