

Objection in response to the supporting representation submitted by Mr Henry Bennett

Application: 2026/1478/TEL

Site: Land at Thomas Way Industrial Estate, Glastonbury

I submit this objection in response to the supporting representation made by Mr Henry Bennett. It addresses the principal points raised in support of the application.

The benefits of reliable mobile connectivity and the potential need for replacement infrastructure are recognised. However, the supporting representation does not resolve the material questions raised by this particular proposal, including its siting and appearance, the adequacy of the applicant's supporting information, its environmental effects and the assessment of site-specific public health evidence.

The applicable planning procedures must be followed, including consideration of the public health power contained in Annex I(B)(3) of the EEC. Those requirements must not be bypassed when determining this application.

The responses below address each supporting point and identify the evidence and assessment required for a properly informed decision.

1. Poor mobile reception in the town centre

Mr Henry Bennett: Mobile reception is poor inside shops on Glastonbury High Street, causing difficulties for businesses, staff, local people and visitors.

Response: This is evidence of an individual's experience of reception, but it does not demonstrate what improvement the proposed Thomas Way installation would deliver inside particular High Street buildings. On-street and indoor reception depend upon factors such as distance, frequency, power, building materials, antenna orientation and transmission characteristics, including whether beamforming or broader sector coverage is used.

The applicant should provide sufficiently detailed coverage maps and information showing:

- the existing coverage and capacity;
- the predicted loss when the existing installation is removed;
- the coverage expected from the proposed installation;
- the specific coverage and capacity benefits claimed for the proposed 4G and 5G services.
- whether the proposal would specifically and materially improve indoor reception within the High Street.

The general desirability of better connectivity does not determine whether this particular site, tower height and design are appropriate. The planning process must specifically identify and weigh the material considerations arising from this proposal.

2. Removal of the existing installation

Mr Henry Bennett: The existing installation approximately 120 metres away must be removed following a notice to quit, and failure to replace it would significantly reduce coverage and capacity.

Response: The existing mast is 17 metres high, and its removal was approved on 11 June 2025 under the linked planning record. This supports the need to plan for replacement infrastructure. It does not establish that the proposed 22.85-metre tower is the only suitable or least harmful means of maintaining service.

Somerset Council should still verify:

- the scope and status of the approved removal and its likely timetable;
- the existing installation's antenna configuration and operating frequencies;
- the extent and duration of any predicted coverage and capacity deficit;
- whether the existing and proposed installations would operate concurrently and, if so, the resulting cumulative exposure; and
- whether a lower tower, different design or different site could meet any demonstrated coverage and capacity need.

3. The risk of worsening coverage

Mr Henry Bennett: Loss of the existing installation without an effective replacement would worsen already inadequate reception.

Response: Avoiding a loss of service is a legitimate consideration. It supports the timely examination of an appropriate replacement, but it does not establish that this particular proposal is necessary or justify approval before the information required for a properly informed decision has been supplied.

4. National support for communications infrastructure

Mr Henry Bennett: National planning policy supports advanced and reliable communications infrastructure because of its economic and social benefits.

Response: National policy recognises those benefits. However, each proposal must still be assessed on its own merits, including its siting, appearance, cumulative exposure, supporting evidence and other material planning considerations.

Somerset Council must weigh the claimed connectivity benefits against the effects and unresolved questions associated with this particular site. General support for telecommunications infrastructure cannot substitute for that site-specific planning judgment.

5. Thomas Way Industrial Estate as a location

Mr Henry Bennett: Thomas Way is a sensible location because it is an established industrial setting outside Glastonbury's historic town-centre streetscape.

Response: An industrial-estate location does not make a 22.85-metre tower visually or environmentally neutral. The tower would rise substantially above surrounding buildings and vegetation and would be seen within the wider landscape setting of Glastonbury and the Tor.

The application does not appear to contain verified photomontages demonstrating the proposal from representative public viewpoints. These should be supplied before its visual effects are determined.

The assessment should address:

- the tower's height relative to surrounding buildings and trees;
- views towards and from the wider Glastonbury landscape;
- the lattice design, antennas, dish, cabinets and 2.4-metre palisade fence;
- the cumulative effect with other telecommunications infrastructure; and
- whether a lower, less prominent or differently sited installation could meet any evidenced coverage and capacity need while avoiding or reducing harm to nearby sensitive receptors and environmental features;
- the potential effects of the proposed development upon the ancient cypress tree directly opposite the site, recorded on the Woodland Trust Ancient Tree Inventory, including construction-related root damage and possible biological effects arising from radiofrequency exposure.

6. Height and alternative locations

Mr Henry Bennett: The height is required to reproduce existing coverage, alternative locations have been considered, and this is the closest suitable replacement site.

Response: The Planning Statement identifies and maps ten discounted locations, D1–D10, and gives reasons for rejecting them at pages 15–17. However, it does not provide comparative coverage information or a clear technical explanation demonstrating why a tower of 22.85 metres is required at this location to achieve the claimed replacement coverage.

The Planning Statement also records that Cornerstone no longer has visibility of VodafoneThree's full update plan. Somerset Council should therefore seek confirmation from VodafoneThree that the height and alternatives assessment reflects its current network information.

Somerset Council should assess whether the proposed height and location have been adequately justified and whether a lower, less prominent or differently sited installation could achieve the claimed coverage objective with less visual and environmental harm. This assessment should be undertaken alongside the requested EIA screening and consideration of the site-specific public-health and environmental evidence.

7. Screening by trees and vegetation

Mr Henry Bennett: Trees, boundary vegetation and the industrial surroundings will moderate the visual impact.

Response: Existing vegetation provides only partial and potentially seasonal screening. It cannot be treated as permanent mitigation unless its continued presence, health and management are secured.

The mature cypress opposite the site is an important feature of the immediate setting, but it would not conceal the upper part of a 22.85-metre lattice tower from wider viewpoints. Its presence also creates an environmental receptor requiring consideration; it should not be relied upon merely as visual screening.

8. Public and economic benefits outweighing visual effects

Mr Henry Bennett: The visual impact is outweighed by the public and economic benefits of improved connectivity.

Response: That is a planning judgment requiring reliable evidence on both sides of the balance. The supporting representation describes the benefits in general terms but does not quantify the predicted improvement arising from this installation or assess its actual visual effects.

Until the coverage evidence, representative visual material and reasonable alternatives are available, there is insufficient information to conclude that the asserted benefits outweigh the harm.

9. Flood Risk Assessment

Mr Henry Bennett: The application contains a Flood Risk Assessment.

Response: The existence of a Flood Risk Assessment does not by itself establish that flood risk has been satisfactorily addressed. Somerset Council must evaluate its assumptions and conclusions in the context of the site, including drainage, climate-change allowances, the fenced compound, equipment vulnerability and any displacement of floodwater.

10. ICNIRP documentation

Mr Henry Bennett: The application contains documentation addressing the recognised ICNIRP public-exposure guidelines.

Response: The portal contains a Declaration of Conformity dated 3 August 2026 within the document entitled *Clarification of the Declaration of ICNIRP Compliance Issued*. The accompanying clarification states that the March 2020 ICNIRP Guidelines are covered and that cumulative emissions from the proposed installation and nearby base stations have been taken into account.

The existence of that declaration is relevant, but it does not provide the information needed to understand and verify its application to this particular site.

1. Operating assumptions, calculations and exclusion zones

The application does not provide the complete operating assumptions, cumulative-exposure calculations or three-dimensional public exclusion-zone drawings underlying the declaration. Those

zones should be disclosed and mapped against publicly accessible land, buildings and foreseeable access.

The Council should be able to identify the frequencies, maximum powers, antenna configurations and beam directions used in the assessment and verify that emissions from all relevant existing and proposed sources have been included.

2. Localised pulsed-exposure and auditory-effects restriction

Recommendation 1999/519/EC contains the 1998 ICNIRP basic restrictions and reference levels. These include an additional restriction for localised pulsed exposure of the head between 0.3 and 10 GHz: specific absorption must not exceed 2 mJ/kg averaged over 10 grams of tissue, in order to limit or avoid auditory effects.

The applicant should confirm whether this restriction is applicable to the proposed frequencies and operating characteristics and demonstrate that it has been assessed. A general declaration of compliance does not show that this separate localised restriction has been considered.

3. Relationship between the 1998 and 2020 Guidelines, Recommendation 1999/519/EC and the EECC

The applicant's *Health and Mobile Phone Base Stations* document states that its installations comply with the ICNIRP public-exposure guidelines as adopted in Council Recommendation 1999/519/EC. That Recommendation reflects the 1998 ICNIRP Guidelines. The clarification accompanying the declaration, however, says that the March 2020 ICNIRP Guidelines are covered.

The applicant should therefore identify the edition, numerical limits, basic restrictions and reference levels actually applied and explain how its reliance upon the 2020 Guidelines relates to the 1998 ICNIRP restrictions contained in Recommendation 1999/519/EC.

That Recommendation remains directly relevant because EECC Annex I, Part B(3) expressly places measures protecting public health against electromagnetic fields within the general-authorisation framework, taking utmost account of Recommendation 1999/519/EC. The 1999 framework cannot therefore be displaced without explanation by a general reference to the 2020 Guidelines.

Recommendation 1999/519/EC also establishes a wider evaluative process. Section III(c) states that account may be taken of "duration of the exposure, exposed parts of the body, age and health status of the public." This is directly relevant to children and other potentially vulnerable people near the proposed site.

Recital 19 requires developing scientific knowledge to be kept under review while taking account of precaution. Sections IV and VI call respectively for risks and benefits to be considered when deciding whether action is required and for relevant research to be reviewed from the widest possible range of sources. Compliance with general ICNIRP limits is therefore part of the assessment, rather than an exclusive test determining every public health question.

Matters not determined by the declaration

An ICNIRP declaration addresses compliance with specified human-exposure limits. It does not determine every potentially material public health or environmental risk associated with a particular site.

The wider framework described above requires site-specific evidence concerning children and other potentially vulnerable people to be examined and a decision made on whether precautionary siting, mitigation, monitoring or other conditions are justified.

Nor can a human-exposure declaration determine separate questions concerning active medical devices and metal implants, electrohypersensitivity, or possible effects upon insects, pollinators, plants and wildlife. The scientific evidence cited below on matters within and outside ICNIRP should be considered on its own merits rather than treated as answered by the declaration.

11. Continuing relevance of Glastonbury Town Council's precautionary work

Glastonbury Town Council adopted its precautionary position after six months of investigation. Central government has not identified or provided the studies and findings referred to in its 2020 response. GTC's questions therefore remain unanswered.

The full legal case, receptor information and scientific evidence are set out in *Thomas Way Telecommunications Proposal: Applying Glastonbury Town Council's 2019 Precautionary Resolution*, submitted to GTC in September 2026 and attached to this objection. That submission includes Melnick et al. (2025), listed as source S1. I ask Somerset Council to consider the submission and its supporting sources as part of this objection.

Since that submission was prepared, the ICNIRP Declaration of Conformity has been located within the portal document entitled *Clarification of the Declaration of ICNIRP Compliance Issued*. The request for the declaration itself has therefore been met. The outstanding requests for the technical information and site-specific assessment needed to understand and verify its application remain unchanged.

An additional peer-reviewed review by Theodora Scarato, published in *Frontiers in Public Health* in December 2025, was not included in the attached submission. Together, Scarato and source S1 identify continuing gaps and uncertainty requiring assessment before this mast is authorised.

Somerset Council should:

- carry out a formal, site-specific risk assessment using the frequencies, maximum powers, antenna configuration, cumulative-exposure information and exclusion-zone details requested in section 10;
- assess the risks to children and other potentially vulnerable people within 500 metres, including people with active medical devices or metal implants;
- issue a reasoned EIA screening opinion addressing the ancient cypress, the Somerset Levels, bees, insects, pollinators, birds and other wildlife;
- assess Scarato, source S1 and the unresolved scientific uncertainty, giving reasons for the weight afforded to them; and

- identify the authority responsible for giving practical effect to EECC Annex I(B)(3) and decide whether further evidence, mitigation, monitoring, a public health condition, different siting or refusal is required.

An ICNIRP declaration does not answer these site-specific questions. Annex I(B)(3) cannot operate in practice if no identified authority takes responsibility for assessing them before authorisation.

GTC has been asked to await the site-specific assessment and reasoned EIA screening opinion before making its recommendation. Somerset should provide both in sufficient time for GTC and the public to consider them.

Additional reference: Scarato T, “U.S. policy on wireless technologies and public health protection: regulatory gaps and proposed reforms”, *Frontiers in Public Health*, 13, 1677583 (19 December 2025). [Full paper and DOI](#).

Conclusion

The initial notification supplied to Glastonbury Town Council did not accurately describe the nature and status of the application. This delayed proper scrutiny and reduced the time available to GTC and the public.

For the reasons set out above, I maintain my objection. Somerset Council should acknowledge and address the inaccurate initial notification, extend the consultation and determination timetable, obtain and publish the requested evidence and assessments, and allow GTC and the public sufficient time to consider them.

The proposal should be refused if the applicant fails to demonstrate that its siting and appearance are acceptable and that the material planning, public health and environmental issues have been adequately addressed.

Thanks for your consideration,

Karen Churchill

September 11 2026

Note: *The official link to the New Hampshire Commission report cited in the attached submission is currently unavailable. The report can also be accessed within the [City of Keene committee papers \(PDF\)](#). The Commission’s final report begins at PDF page 212, and Recommendation 7 concerning setbacks appears at PDF page 227. The committee papers discuss the supporting material identifying a 500-metre setback at PDF pages 245–246.*