



www.radiationresearch.org

2nd July 2026

Sent via Email

Sent via Email

From: Eileen O'Connor, Director, EM Radiation Research Trust

For the attention of: Mr Gomm, Head of Planning, Cheltenham Borough Council

Cc: Tracey Birkinshaw, Director of Planning & Building Control; Nathan Coughlin, Independent Auditor; Brian Stein CBE, Chairman, EM Radiation Research Trust

Dear Mr Gomm,

Thank you for your email of 30 June 2026.

Your response states that the Council's only role was to determine whether a Tree Preservation Order (TPO) should be made and that it concluded a TPO was not necessary.

However, our letter of 9 June sought clarification of the factual and procedural basis upon which that conclusion was reached. Your response does not address those matters.

In particular, please explain:

- **Why** the Council determined the matter within seven days of the section 211 notification, rather than during the ordinarily applicable six-week statutory period for consideration of whether a Tree Preservation Order should be made;
- **What** assessment was undertaken before concluding that the trees did not merit protection by way of a Tree Preservation Order;
- **Whether** a Tree Officer inspected the trees or prepared a written assessment;
- **Whether** any delegated officer report, site notes, or internal assessment exists;
- **Whether** the Council assessed the trees' contribution to the character and appearance of the Conservation Area prior to reaching its decision;
- **Whether** any arboricultural, ecological, or conservation advice was obtained before determining the notification;

- **Whether** the Council has received or considered any proposals relating to the associated telecommunications mast upgrade;
- **Why** the application refers to clearance of an “occupational ICNIRP zone” in connection with a telecommunications mast upgrade without supporting technical information;
- **On what basis** the Council was satisfied that reducing mature trees for that purpose would not adversely affect public amenity or the character and appearance of the Conservation Area.

The application material on the public planning file refers to clearance of an “occupational ICNIRP zone” in connection with a telecommunications mast upgrade. As this forms part of the justification presented to the Council, it is reasonable to ask what evidence, if any, was required to substantiate that claim before the Council concluded that no Tree Preservation Order was necessary.

Cheltenham Borough Council’s response does not address our request for disclosure of the documents relied upon in reaching the decision, including any Tree Officer reports, delegated officer reports, inspection records, consultation responses, internal assessments, or correspondence.

Accordingly, we would be grateful if you would either:

- Provide the information and documents requested in our letter of 9 June 2026; or
- Confirm, for each item requested, whether the information is not held, is being withheld, or the Council declines to provide it, together with the statutory basis for that decision.

If any part of our request constitutes environmental information, please treat it as a request under the Environmental Information Regulations 2004.

As this matter engages the Environmental Information Regulations 2004, we look forward to your response within the statutory timeframe and in accordance with your obligations under those Regulations.

We look forward to your full response.

Yours sincerely,

Eileen O’Connor
Director

Brian Stein CBE
Chairman
Radiation Research Trust

Chetwode House,
Leicester Road,
Melton Mowbray,
Leicestershire,
LE13 1GA

EM Radiation Research Trust (RRT) is a UK registered charity established in 2003 (No. 1106304)