

**From:** [REDACTED]

**Sent:** Saturday, November 23, 2024 1:38 PM

**To:** Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>

**Subject:** Representations on application 24/03843/PINS

**OBJECTION and ALTERNATIVE PROPOSAL to 24/03843/PINS Application for Planning Permission for Works to install 3no. CCTV poles and cameras.**

This application should be refused because of the adverse impact on neighbouring properties from the visual intrusion and loss of privacy.

The negative impacts of the proposal include

- Impact on character and appearance of the area
  - Huge adverse impact on the appearance of a green space in a conservation area
  - Terribly ugly solution that is unnecessary
    - A visual representation of the entire pole and camera has not been provided as it would highlight the terribly ugly and imposing structure that is in direct sight lines of main living areas. The hugely imposing poles and cameras will destroy any sense of space and open-ness. This green through area is listed in the Conservation Area appraisal as a local area feature of importance.
    - The cumulative visual impact of the 3 proposed poles has not been demonstrated to allow adequate assessment.
- Alternative solutions would be far less intrusive
  - Camera 1 is unnecessary as it over-sees an area bounded by a 3 metre close mesh fence and so the area could be considered secure
  - Camera 2 – if needed at all can be installed on the corner of the adjacent building (K block)
  - Camera 3 – if needed could be installed on the adjacent sports hall
- Impact on neighbouring properties
  - No evidence has been provided that the impact on neighbours has been considered
  - No evidence provided of alternative locations that were considered
  - All neighbours that we have spoken to about this issue are unhappy with the proposals.
- Privacy impact on neighbours
  - The proposed software based screening does mean that private areas of neighbouring houses will have cameras pointed at them. The cameras pointed at bedrooms, living areas and rear balconies/gardens will remove privacy – any assurance that nobody is watching or recording does not stop the sense of loss of privacy.
  - Software based screening is subject to change at will by the operator, it is also prone to change during any updates to the system or repositioning of the cameras. A physical visible screen can be placed within the camera module (or the dome be blacked out) to visibly demonstrate the restricted fields of view to the cameras. Without physical restrictions the cameras are wholly inappropriate.
  - Pointing cameras at private houses creates GDPR issues, conflicts with the CCTV act and destroys the privacy that neighbours are entitled to .
  - Loss of privacy for neighbours means this application should be refused.
- Consideration of alternatives to proposed poles and/or locations of cameras have not been demonstrated
  - Locating cameras on surrounding school buildings removes the need for the poles
  - Cameras should not be pointed at neighbouring houses

- A more secure fence bordering Hartfield Avenue would seem to eliminate the need for these cameras entirely
- The cameras would seem to be to gather evidence to support action after any event – this is not a justification for the loss of privacy.
- Given the numerous better alternatives this application should be refused
- The planning application does include a document titled “Planning and Heritage Statement”. The document is wholly biased and demonstrates no evidence of a rounded consideration of the impact on neighbours. The stance of the report is demonstrated by the footers to the report stating “Planning Supporting Statement”. This document should be a balanced review of the impact and fails to identify any concerns or proposing any mitigation, without any balanced statement this application should be refused.
- There is no demonstrable need for the CCTV. The school site is patrolled by teachers and support staff. The field is used at break times and during sports lessons. At all these times the children are supervised by school staff – therefore there is no benefit to the presence of the cameras to outweigh the considerable adverse impact.
- A condition needs to be included to forbid any lighting on the poles as the impact has not been considered.
- The proposals breach the school CCTV policy by failing to adhere to Para 3.1 namely Cameras will be sited so they only capture images relevant to the purposes for which they are installed.
  - Cameras are pointing directly at neighbouring houses
- The School CCTV policy as mentioned in the Planning and Heritage Statement, has several flaws that are at odds with some of the assurances given in the planning application. Without prior amendment the application should be refused. Specifically
  - Neighbours are being told they should be assured they can attend to check what the cameras see – however this is specifically excluded by numerous paragraphs within the school CCTV policy (Para 6.2 excludes images being provided to third parties, Para 1.10 restricts access/disclosure etc).

The many and varied adverse impacts of the proposal far outweigh the dubious and questionable purported benefits. Therefore, the application should be refused.

The alternatives suggested above provide a means for hugely lessening the impact on the site neighbours whilst still achieving CCTV coverage, therefore the scheme if necessary should be amended.

Yours sincerely

P Cox

