

James Bibby

24 November 2024

To Whom It May Concern,

Reference Planning **Application No.: 24/03843/PINS**
Site Address: **Cotham School, Cotham Lawn Road, Bristol BS6 6DT**

I am writing to object to the above application to install 3 CCTV cameras and poles overlooking and directed towards private property.

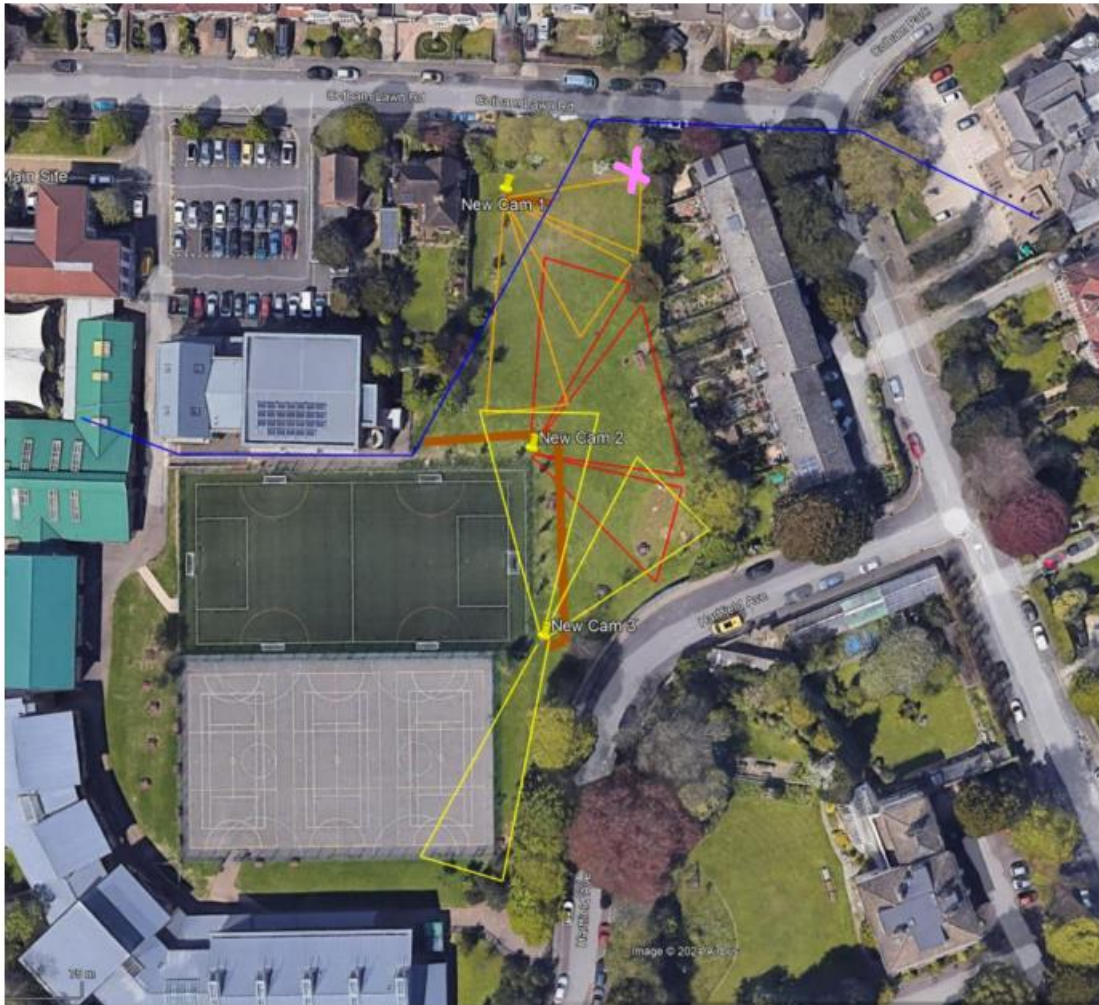
The application, as proposed, poses a significant impact on our expectation and right to privacy in the home, as protected under Article 8 of the Human Rights Act 1998.

The houses in our terrace are of a design that have large glazed doors on the first floor looking at approximately eye-level with the proposed CCTV masts which would be within 30 to 40 meters of the houses. Some of these rooms are bedrooms, the remainder are living rooms. These cameras are not overlooking a driveway or front garden on a public highway, but rather directly into our living spaces and private gardens. The installation of these masts will cause significant distress.

We feel the mitigation proposed of a software-based "privacy screen" is not appropriate for a potential transgression of a right to privacy within the home, especially considering the cameras will be facing into private bedrooms. Control of software is fallible, not regulated or externally monitored. Failure of this software by incorrect installation, poor maintenance or oversight is a material risk and would result in a grave invasion of privacy. Failures of software based privacy systems are known widely enough that many software operated cameras that people are familiar with now come with physical screens or covers to improve privacy.

The school is in a residential area and has a responsibility to consider the impact of its development on the neighbourhood, including privacy. Better location of mast "New Cam 1" (moving it to the northeast corner of the field shown by pink cross below) would allow it the same coverage and reduce the number of properties it is facing, reducing potential privacy intrusions. The proposed cameras on mast "New Cam 2" only cover private boundaries and areas already covered by cameras on the other two proposed masts.

4 COTHAM SCHOOL FIELDS CCTV PLANS



New Cam 1, New Cam 2 & New Cam 3 locations have been decided so as to take into consideration proximity to trees / roots, domestic residences, bat surveys etc. (Existing duct route indicated in Blue, proposed new cable routes indicated in Brown).

Image from “CCTV System Survey & Feasibility Report” provided by Cotham School as support for planning permission, edited to include pink cross to clarify proposed alternative location of mast “New Cam 1”.

The Government’s “Guiding Principles” in the Surveillance Camera Code of Practice as Amended November 2021 states “Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and **necessary** to meet an identified **pressing need**”. It is not necessary and there is no pressing need to record images of a private boundary for which there is already line of sight from the school premises. The fence-line forming the eastern boundary of the playing field back directly onto our private gardens and pose a far lower risk to school security than those adjacent to public highways.

The balance between privacy of residents and applicants intention to protect students from a private boundary is grossly unbalanced in the current proposal. Further, as a re-actively monitored rather than pro-actively monitored CCTV system (as stated in the CCTV System Survey & Feasibility Report) its use in actively preventing safeguarding and security issues at the school are limited, while other measures such as replacing the mesh/wire fencing along the remaining school boundaries along Hartfield Avenue and Cotham Lawn Road with solid fencing would be far more effective at achieving the stated aim of preventing illicit substances being passed into the school grounds.

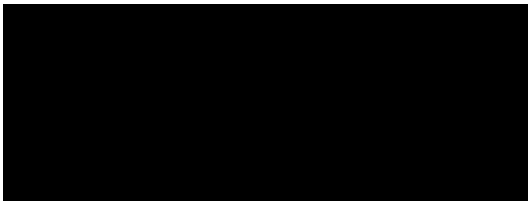
I also bring to the attention of the planning officer that the application has included no local consultation of the siting, safeguards, controls or alternatives prior to the application being submitted to mitigate any privacy concerns.

To summarise, I believe the application presents a disproportionate risk to privacy for all the properties along our terrace. There has been no consultation, suitable mitigation or consideration of alternative ways of achieving the applicant's aims. The privacy of residents within their gardens, living rooms and bedrooms has not been sufficiently protected.

I urge the planning officer to reject the application.

Should a hearing be scheduled I would like to be invited to speak.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

James Bibby