

From: [REDACTED]
Sent: Monday, November 25, 2024 9:43 AM
To: Development Management <development.management@bristol.gov.uk>
Subject: Application 24/03843/PINS re-sent with address

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Planning application 24/03843/PINS

From:
Mr. R and Mrs. M Kelley

[REDACTED]
[REDACTED]

As a near neighbour to the above application site I have the following objections to the proposals:

1. The proposed camera towers will be visually obtrusive, being prominently in view from the first floor living rooms of the terraced houses in Cotham Park.
2. The proposed camera positions will infringe the privacy of the houses in Cotham Park. This is a very low risk boundary, no public access to the back gardens which are at least one metre lower than the school grounds and have fences or impenetrable hedges at the boundary.
3. In contrast to item 2. above the new cameras do not give adequate cover along the highest risk boundary in Hartfield Avenue, especially at the apex of the bend.
4. The arrangements to shield our properties in Cotham Park from the cameras are software based. This can be altered by anyone with the right passwords. The facility for the affected residents to make occasional checks on the range the cameras are recording has been offered by the school unofficially but we feel this should be enshrined in any planning conditions to guard against future staff changes.
5. The system does not need to operate continuously to maintain student safety. It only needs to be on when students are present plus a small overlap before and after. Where this involves hours of darkness in winter it should be a condition that any illumination is by infra red.

Copies of our correspondence with the school are attached.

Yours Faithfully, Mrs. M. Kelley, Mr. R. Kelley



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ACHIEVEMENT – DIVERSITY – RESPECT
Headteacher: Ms Jo Butler

19 November 2024

Dear Ms Kelly,

Thank you for taking the time to come and meet with us yesterday regarding the current planning application to install 3 CCTV poles onto the School Playing Field. We hope that the meeting was helpful and that you were reassured of the reasons why the school has decided to request planning permission to complete this installation. The fundamental reason for the application is to expand the coverage of CCTV across the whole school site to enable us primarily to fulfil our statutory duty of ensuring that children who are in our care remain safe whilst on the school premises.

The school has been working closely with a planning consultant from Rapleys regarding this project and has been guided by the planning consultants throughout this process on all actions.

We would like to reassure the local community that the school did not purposely disregard local residents in the process of submitting the application. The size and nature of an application for this reason alone would not normally involve a public consultation as a standard component of making the application. The notification to residents is completed, as a matter of course, through the planning process, and all representations made by third parties are properly considered by planning officers. The school and our consultants deemed this as sufficient in relation to this particular application. Thank you for advising us that local residents would in future welcome a greater level of interaction with the school in regard to these types of premises matters and for providing your views on how this can be achieved. We will take these views into consideration in future.

The proposal as discussed is to install three additional CCTV camera poles on the school playing field as shown on the planning application. The three yellow pins are the proposed locations of the poles and the field of view has been shown on the planning application by three triangles from each pole (as each camera has three lenses on it). The three cameras' fields of view have been shown in orange, red and yellow on the

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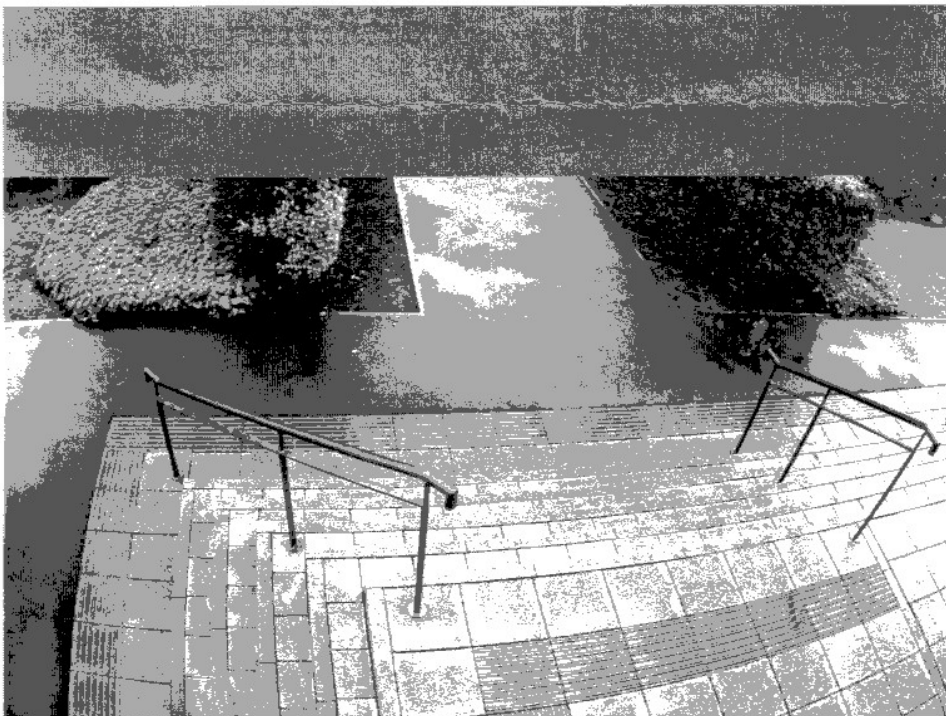
Registered Office: Cotham School, Cotham Lawn Road, Cotham, Bristol BS6 6DT



plan provided on the planning portal. The blue line shows the existing infrastructure route between the Main School Site and Charnwood House.

The school as part of the process has been considerate of the local landscape and the fact that there are neighbouring properties nearby and in doing so has requested of the CCTV company and the planning consultant that we apply for planning permission for CCTV poles which have a maximum height of four metres only. The existing CCTV poles within the school grounds are a standard height of six metres. This is a preventative measure designed to be considerate of the proximity of neighbouring properties and the school's objective of protecting residents' privacy.

The CCTV cameras on the poles will be positioned in such a way that they do not cause an invasion of privacy. Where there are concerns that a lens may not be physically adjusted in such a way to successfully achieve that aim, the camera has built-in "privacy zoning" which enables an area of an image to be blocked out. The block can only be removed or adjusted by a limited number of system administrators. CCTV operators who have access to the school CCTV system do not have the ability to change these settings. An example of how this would look and function is shown below for your information.



The top of the image is a fixed grey bar which blocks any images of neighbouring premises and the grey bar prevents this area from being recorded or viewed by any user.

As we discussed we would be happy to invite you into the school to review the images being captured. This would be at the end of the school day when students have left the school site. This will enable you to view for yourselves that the CCTV does not impact your privacy.

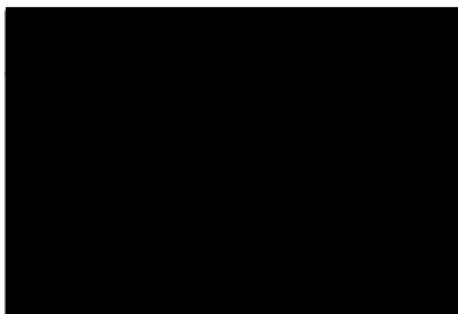


The CCTV cameras have built-in infrared which enables footage to be recorded during dusk hours. We would not be installing lighting on the CCTV poles. Apologies if the application gave you that impression.

I can confirm that this application does not seek planning permission for flood lighting.

Should you have further concerns about flood lighting, please provide details of those concerns in a separate communication as that would be treated as a separate matter and not related to this particular planning application. I would then pass them on to the Headteacher for her consideration.

Yours sincerely



Dear [REDACTED],

Thank you for your letter of 19 November and for our meeting. To be clear, we are in total agreement regarding the need to protect your students. That said, there can be numerous ways to achieve the same objective and we feel this further CCTV proposal misses the target while being prejudicial to the wellbeing of your neighbours.

When we moved here the site behind was a playing field and gradually the infrastructure has closed in on us as the school has grown. We have been gradually hemmed in and these CCTV masts, at "only" 4 metres tall, will be highly intrusive. There is a visual impact and also an emotional one. I note with some bemusement that you submit both an ecological and aboriginal report in support of the planning application; but what of the social and psychological implications for the residents? The bats and the trees seem more important than us.

Cotham School has grown and the estate is generally well-secured. Your application proceeds on the premise that "there is a risk that school children may leave the school grounds via the boundary walls, there is a risk that unauthorised persons may enter the school playing fields via the boundaries, or illicit substances may be passed into the school grounds, or school property may be passed out of the school grounds across the boundaries". Simply put, students and things going in and out.

On the basis of these perceived risks you now seek to place the land adjoining the residents of Cotham Park under CCTV surveillance, while not addressing the obvious area of Hartfield Avenue. You must please bear in mind the extremely important point that the run of houses backing on to the playing fields from Cotham Park is a single terrace of numerous houses forming a secure barrier. Access to the back gardens and so to the playing fields is only possible through the houses and over the back fences – or from one or other end of the terrace.

I would make the following points:

1. In your letter to me of 19 November you state that the fundamental reason for this is student safety. If that is so, will the system be de-activated outside school hours?
2. The written submission from your advisers contains no "key" to explain the images. But now you have explained it you tell me that you cannot place Hartfield Avenue under greater surveillance due to data protection issues - but then you say that you can blank off our properties. That seems inconsistent; perhaps it has more to do with the consultants selling you a system which seems already to be struggling for power? I note the references to finding a way to overcome the 90m Ethernet cable route issue. It seems likely that positioning cameras along the more vulnerable Hartfield Avenue perimeter would present greater challenges in terms of power supply and/or cost. That does not justify an unnecessary alternative.
3. If you walk the school perimeter, the Cotham Lawn Road frontage is extremely well-secured. There is fencing for example around the caretaker's house which is too narrow easily to pass things through.
4. In contrast along Hartfield Avenue the fencing is low enough to pass things over the top and the bars are wide enough to put one's hand through. I know that sometimes the land adjacent to the fence is locked off, but I can assure you this is where the students (and others) loiter. It would be so easy to get people and/or things over the fence- in either direction. We often see students hanging around in these areas. The obvious first action would be to raise the fence height and place a wire mesh behind it.
5. When we asked you why the focus of your cameras would not be in Hartfield Avenue you cited data protection legislation. We challenged you and you recanted and said this was your "policy". With respect I don't feel that a policy decision on the school's part has the force of legislation.

6. If, as you say, you can blank off the cameras so as not to view our properties, why can you not do that along the public perimeter of Hartfield Avenue which is the obvious risk area?
7. You confirmed that the cameras would not be actively monitored. That means they will only ever be used to search for evidence after an event. That is not safeguarding. It might be "postguarding". You may say that the cameras will serve as a deterrent, but as your application makes clear, you are already covered with nearly 200 cameras, so with nine new cameras the 4.3% (i.e. 9/209) increase is marginal.
8. Your confirmations regarding floodlighting are helpful, thank you.

In assessing the balance of need and impact of this proposal, you must please bear in mind that the houses that back on to the school mainly have their sitting rooms at first floor level facing the playing fields. While the pendant style of CCTV is better to look at than a standard camera, the fact is these columns will be looming up pretty much parallel to where we spend most of our time, whether indoors or on our balconies. Even if we think they are turned off or blanked we cannot be sure. It will be very disturbing and we say the impact on us is wholly disproportionate to the very marginal perceived safeguarding benefit.

We ask you please to reconsider this proposal. If cameras need to be trained at ground level along the perimeter, can they be repositioned? But, as I have tried to explain, I think you are looking in the wrong place. Given your extensive CCTV coverage surely you must have enough footage?

Alternatively, you should pick up the bend on Hartfield Avenue. That's where the mischief takes place; that is where local residents frequently have to clear up nitrous oxide canisters and empty bottles and takeaway cartons (I am not saying those are due to Cotham students). This area is heavily shaded, not overlooked and the obvious place to get up to mischief. More to the point you could not give me any data to show that you have had issues which these cameras might have addressed.

I suspect we will be overruled and you will get the outcome you seek but if nothing else, given the stated priority is student safeguarding, could you at least operate things so the cameras will only operate during and within a one-hour window of school hours or events? Accordingly, could they be switched off at night, at weekends and during all holidays?

I am finally grateful for the confirmation that we can view the CCTV coverage to verify that it is not catching our homes. Perhaps you can propose some form of protocol as to how this might reasonably work.

Yours sincerely

Mrs M Kelley