

From: [Olivia Orford](#)
To: [Section 62A Applications Non Major](#)
Subject: Objection to Planning Application S62A/2025/0133
Date: 16 November 2025 21:37:02

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Hello,

Please find below my objections to Planning Application **S62A/2025/0133** relating to site address Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH.

As a member of the local community for 15 years, I find the proposal excessive, unnecessary and an invasion of privacy.

Public rights of way

The applicant acknowledges at Q6 that there are several claimed rights of way 'adjacent to the site' but has not included any reference to or consideration of the impact of the proposal on these rights of way within the scope of the application. In fact, the four rights of way are on the site, not adjacent to it, and have been approved by the Council as landowner and are awaiting consideration by the Planning Inspectorate (ROW/3363939). At least one of the proposed CCTV poles (camera 5 and possibly camera 4) would obstruct a right of way.

Use of land

In Q14 of the application form (Existing use of the site) the applicant states 'School playing fields leased for sports/education use'. The school's lease of the site is expressly 'subject to all existing rights and use of the Property, including use by the community'. Community amenity use of this designated important open space is ongoing. Sports club use was ongoing until the school refused to hire pitches to local clubs from September 2025. The only factor preventing ongoing sports club or school use is the school's decision not to use or hire out the fields.

The applicant has failed to make clear that Cotham School is some 3 miles away from the site. The school's lease of the site makes clear that its use is 'subject to all existing rights and use of the Property, including use by the community'. The school's use of the site is minimal compared to community use. It brings pupils in small groups (typically 30-60 pupils plus 2-4 staff) to the site for periods of 45-60 minutes, a maximum of eight times per week during term time, depending on the weather and ground conditions. The school typically only uses the top third of the site, not the whole fenced area, and as such it already has six CCTV cameras mounted on the pavilion and the storage hut at the top of the field. There is no basis to argue that four additional CCTV towers are required in this top half of the field, and the school scarcely uses the bottom (wetter) half of the field in any case.

Applicant's claims about necessity

The applicant states that it does not need to demonstrate necessity for the CCTV, but has gone into some detail about the alleged need to monitor pupils 100% of the time. However, pupils are never unsupervised or on break time while at the site, they are engaged in lessons and supervised by accompanying staff. The alleged risks of assault/abduction of pupils are completely unfounded, particularly in BS9 which has one of the lowest crime rates in Bristol.

To the extent that the applicant relies on the need for CCTV coverage to deter damage to the fence, it is clear based on its submissions that this has not been successful in the upper part of the field to date. In any event, both the Department for Education and Ofsted have confirmed that there is no requirement for detached playing fields to be fenced (still less any requirement for students to be CCTV-monitored 100% of the time). In relation to the document 'Keeping children safe in education' cited by the applicant, Ofsted's School Inspection Handbook states that 'We expect schools to meet the other requirements of Keeping children safe in education, but have no additional or separate expectations of schools with respect to taking any specific steps with regard to site security; in particular, inspectors do not have a view about the need for perimeter fences or lockdown alarms'. In other words, Ofsted's position is that schools can comply with KCSIE (and therefore keep children safe) without having perimeter fences (even on their main school site) or 100% CCTV coverage. The applicant has attempted to mislead the Inspectorate by referring at para 1.2 of the planning application to CCTV being 'necessary to meet statutory safeguarding requirements for pupils and staff' and stating at para 6.10 that 'it is a statutory requirement that the same controls are in place when students are using the school playing fields'. These statements are untrue. The mere mention of safeguarding does not provide an evidence base justifying a 'need' for eight CCTV cameras and poles in addition to the existing six cameras, in important open space that for the vast majority of the time is not used by the school.

Applicant's claims about deterrence of crime

The history of the fence is that it was erected in 2019. The land was registered as a village green in August 2023; it is a criminal offence to enclose a village green and most of the fence was removed following registration. The High Court ruled in June 2025 that the legal test for village green registration was not met and the school has recently reinstalled a fence under permitted development rights, despite the fact that in November 2024 Bristol City Council found that four public rights of way had been established across the land. The fence obstructs each of these rights of way. Cotham School's lease provides that the school's use is 'subject to all existing rights and use of the Property, including use by the community'. The High Court decision confirmed that this includes rights of way, whether recorded on the Definitive Map or not. Cotham School is objecting to the rights of way being added to the Definitive Map and this matter is due to be considered by the Planning Inspectorate at a public hearing next year (ROW/3363939).

The applicant has provided what it describes as a schedule of the reported crimes. All but one of these dates from the lockdown period or shortly afterwards, when Cotham

School took the decision to lock local residents out of this important open space, despite the terms of its lease and pleas from local and national politicians to allow the community to exercise close to home in this important open space. Several of these incidents do not appear to be crimes at all: the incidents in June 2020 relate to young children playing football – i.e. the community simply using the fields (it is not clear why this was reported to the police). It is troubling that the school has monitored and retained CCTV of this activity. This level of intrusiveness is unacceptable and clearly does not achieve the school's objective. No alleged incidents are listed after June 2020.

While CCTV can increase security, BS9 is one of the lowest crime rate areas in Bristol and there are no known instances of theft, abduction or assault on the playing fields. The extent and positioning of cameras is disproportionate or unnecessary and an intrusion on the amenity use of the land. It is also notable that some of the incidents listed took place within view of CCTV, demonstrating that the deterrent effect of cameras is overstated by the applicant.

Kind Regards,

Olivia Orford

Sent from my iPhone