

From: Emma Geale [REDACTED]
Sent: 24 November 2025 09:30
To: Section 62A Applications Non Major
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Subject: Objection to Planning Application S62A/2025/0133 – Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

Objection to Planning Application S62A/2025/0133

Dear Sir/Madam,

I am writing to object to the planning application by Cotham School for the installation of eight 6-metre CCTV poles, each fitted with three cameras, at Stoke Lodge Playing Fields. I regularly walk through this site using the public rights of way that cross the land, and I am deeply concerned about the impact of this proposal on privacy, amenity, and the character of this important open space.

1. Impact on Public Rights of Way and Amenity

The playing fields contain four public rights of way, approved by Bristol City Council and awaiting confirmation by the Planning Inspectorate (ROW/3363939). These paths are not “adjacent” to the site, as the applicant claims, but run directly across it. At least one proposed pole (Camera 5) would obstruct a right of way, contrary to Defra Rights of Way Circular 1/09, which requires applicants to identify and address impacts on rights of way. The application fails to do this.

As a walker, the presence of eight tall poles with surveillance cameras will significantly erode the sense of openness and tranquility that characterises this heritage parkland. The National Planning Policy Framework and local policy DM17 protect the amenity and enjoyment of public open space. Continuous monitoring of every movement across these paths is disproportionate and will discourage public use.

2. Privacy and Intrusiveness

Government guidance and the Information Commissioner’s Office (ICO) Code of Practice on Surveillance Cameras emphasise that CCTV must be necessary, proportionate, and respect privacy. This proposal fails on all counts:

- Each pole contains three high-resolution cameras, providing 360° coverage and the ability to recognise individuals and view into adjoining homes and gardens. This goes far beyond monitoring pupils and constitutes intrusive surveillance of the public and private spaces.
- The applicant suggests “privacy hatching” will mitigate intrusion, but this relies entirely on operator compliance and cannot be enforced through planning conditions. Software updates can reset privacy zones, and there is no independent oversight.

- The playing fields are a shared community space, not a school site. Monitoring 100% of a 22-acre field, 24/7, is excessive and incompatible with the ICO principle of proportionality.

As someone exercising my legal right to walk these paths, I should not be subject to constant recording by a school that uses the site only intermittently. This undermines Article 8 ECHR rights to respect for private and family life.

3. Lack of Justification and Alternatives

The applicant claims CCTV is “necessary” for safeguarding, but Ofsted guidance confirms there is no statutory requirement for detached playing fields to be fenced or monitored by CCTV. Pupils are always supervised by staff during visits, and BS9 has one of the lowest crime rates in Bristol. The school already has six cameras on the pavilion; adding eight more poles is unjustified and disproportionate.

4. Visual and Heritage Impact

The poles will be highly visible, three times the height of the existing fence, and positioned in open areas, including near the Tree of Life sculpture and other heritage features. This is contrary to local and national policies requiring development to respect the character of heritage landscapes. The cumulative effect of eight poles will urbanise this historic parkland and harm its visual amenity.

Conclusion

This proposal conflicts with:

- Defra Rights of Way Circular 1/09 (failure to address rights of way impacts)
- ICO Surveillance Camera Code of Practice (lack of necessity and proportionality)
- Local Plan Policy DM17 (protection of Important Open Space)
- Policies BCS21, BCS22, DM26, DM27, DM31 (heritage and design)
- Article 8 ECHR (privacy rights)

For these reasons, I respectfully request that the application be refused. If permission is granted, it should be temporary and subject to strict conditions, including independent oversight of privacy measures.

Yours faithfully,

Emma

Emma Geale

