

From: [Graeme Hogg](#)
To: [Section 62A Applications Non Major](#)
Subject: Stoke Lodge planning application S62A/2025/0133 - Objection
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Dear sir,

RE Application S62A/2025/0133

Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

I object to the above planning application for the following reasons

1. Validity of submission

(a) Inconsistencies in application documents

The submitted plans and documents contradict each other in various key respects including the location of some of the cameras/poles and the route of the proposed cabling (the arboricultural report is invalid for the purposes of the application since it addresses an entirely different cabling route).

On the site location plan, there is a blue continuous line which is labelled as the school boundary. This is incorrect; the school boundary goes up to the boundaries of the site (i.e. the lease line which is marked as a dashed pink line). All the boundary trees are within the boundary of the land and within the school's leased area. This plan also shows a red line which is suggested to be the 'extent of the planning application area'. This red line broadly follows the route of the proposed cabling, although it has an outcrop in the centre of the plan which is an artificial measure to include proposed trees within the 'planning application area', while having in fact excluded all the actual trees on the site. There is well-established case law that the red line on the site location plan must clearly include all necessary land, including access points etc. The redline boundary marked on the plan provided by the applicant is neither accurate nor sufficient. The school's previous application for one CCTV tower (20/01826) correctly provided a redline boundary matching the lease line. The same must apply to this application since the whole site is affected in terms of visual and amenity impact. The applicant's site location plan is invalid for the purposes of the application.

Further, the baseline area for biodiversity net gain calculations must equal the redline area. The statutory metric calculation provided by the applicant shows it as 0.1ha. Based on a correct site location plan, the outcome of the BNG calculations would be very different. The applicant is required to include all the mature parkland trees around the site for the purposes of the baseline calculation (as well as the other habitats within the redline) and provide at least a 10% gain.

The cabling route at the back of the arboricultural report broadly follows the perimeter of the site, but it appears that the cabling route actually proposed is a zigzag formation across the field (as per the site location plan), so the arboricultural report does not address the actual proposal. The arboricultural and CCTV reports do not accurately show the school's perimeter fence (for example, in the north west of the site) and therefore do not show the location of each of the proposed towers accurately. The cabling route shown in the arboricultural report goes through the root zone of a protected walnut tree (T24), despite the report stating that open trench installation is likely to sever roots and harm trees.

(b) 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.

The National Planning Policy Framework and guidance on ‘Open space, sports and recreation facilities, public rights of way and local green space’ refers to [Defra Rights of Way circular 1/09](#) for guidance on the consideration of rights of way in association with development. Defra circular 1/09 states at paragraph 7.4 that ‘all public rights of way crossing or adjoining the proposed development site must be marked on the plan to be submitted with the full planning application’. The applicant has failed to do this. In addition, the Defra guidance is clear that the information supplied by an applicant must make clear ‘how the potential development will impinge on any rights of way’, and that planning decision-makers must identify and take into account any rights of way affected by the development, including applications for the addition of a path, the possible existence of any other rights of way and paths not yet recorded on the definitive map. Based on the information provided by the applicant, the Planning Inspectorate will be unable to properly assess this aspect of the proposal. This is a material issue that affects the planning judgement of the Inspectorate and should cause the application to be rejected.

The existence of these rights of way will materially affect the location and positioning of the fence and the way in which the school uses the land. If the Planning Inspectorate confirms the addition of these paths to the Definitive Map then the fence is likely to be relocated or removed. This application (a) cannot be considered without consideration being given to the impact of the proposal on those claimed rights of way and the amenity of users, and (b) is premature since it seeks to position CCTV poles by reference to a fence that may not be there in the longer term – this would affect the visual amenity impact of the proposal and also significantly weakens the applicant’s arguments about necessity.

(c) 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.

(d) 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.

In paragraphs 6.2-6.13 the applicant makes generic references to various pieces of legislation and guidance but none of these establish a need for CCTV monitoring. The references to specific sections of the Children Act 2004 appear to be incorrect or irrelevant. Very little weight can be attached to this material. However, the duty of care imposed by section 3(5) of the Children Act 1989 says that a person who does not have parental responsibility for a particular child but has care of the child, may ‘do what is reasonable in all the circumstances of the case for the purpose of safeguarding or promoting the child’s welfare’. The statutory duty is measured by what is reasonable and is responsive to ‘all the circumstances of the case’. At common law schools have been held to act ‘in loco parentis’ – it is of course not true to claim that parents only take their children to fenced-in, CCTV-monitored outdoor spaces. Parents do allow their children to go to parks and to play football etc on the Bristol Downs, which are (famously) unfenced and not subject to CCTV surveillance. This is particularly the case where secondary school-aged children are concerned, and reasonable parents do not require CCTV monitoring of their teenage children 100% of the time. Local residents have grown up, and brought their children up, using parkland without either fencing or CCTV, like millions of other prudent and reasonable parents (and schools) do around the UK.

(e) 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.

2. Visual impact

The school claims that its poles and cameras will not be visually intrusive, but they are wholly unsympathetic to the heritage parkland surroundings. At paragraph 3.1 the application notes previous applications 16/06304/F (New perimeter fence to playing fields); 18/05206/A (Retrospective application for installation of sign); and 20/01826/F (Works to install a CCTV pole and camera adjacent to the gate behind the neighbouring Stoke Lodge Adult Learning Centre). Each of these was refused (or withdrawn after officers recommended refusal in

the case of the perimeter fence application) for reasons that included the impact on the listed building, its setting and the heritage parkland character of the site.

Cameras 1, 4, 5, 6 and 8 will be particularly intrusive as they are not positioned at the edge of the land but in more open space and are three times the height of the existing fence.

Camera 4 is close to Stoke Lodge's famous 'Tree of Life', a sculpture that preserves a formerly majestic Cedar of Lebanon that came to the end of its natural life. It is nonsensical to claim that a 6 metre high metal pole and camera within metres of that feature would be unobtrusive. It is clearly detrimental to the amenity value of the parkland and close to a key designed focal point. Another much-loved tree close by, a TPO-listed Copper Beech, collapsed in recent months and is due to be replaced with another tree in its close vicinity to provide replacement visual amenity – a CCTV pole in this location would be entirely detrimental to that objective.

Camera 5 would obstruct a PROW – a CCTV camera in this location has previously been refused by BCC and that refusal was not appealed by Cotham School. It is wholly unsuited to the heritage environment. The school's perimeter fence was erected under permitted development and is also antithetical to the heritage environment but that should not be a gateway to further unsympathetic and detrimental development.

The location of camera 8 is unclear based on the application information. It is either free-standing in open space outside the fence or much further into the site than indicated, depending on which plan is looked at. Either way, it will clearly be visible to users of the listed building (the Adult Learning Centre) and detrimental to the visual amenity of the parkland.

The installations as a whole will harm the character and appearance of the area. The cumulative impact of eight additional poles and cameras (in addition to the existing cameras) will destroy the tranquillity of the open space environment and create a more hostile, overdeveloped space. By disrupting important views, sightlines, and the designed spatial relationship between the building and its grounds, the proposal would fail to preserve the setting of the listed building and would cause harm to its significance.

As such, I respectfully request that the application be refused.

Many thanks

Graeme Hogg