From: Colette

Sent: 24 November 2025 10:59

To: Section 62A Applications Non Major

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Subject: OBJECTION S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton,

Bristol BS9 2BH Importance: High

S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol

Objection to Cotham School's planning application for 8 CCTV towers, each with 3 camera

I would like to object to the above application for the following reasons.

1. Impact on my personal privacy

I live next to the field in Parrys Grove and walk around the field daily. This exercise is extremely important to my mental and physical health. I object to being recorded in my peaceful use of the land in accordance with the rights for community use conferred by the lease and public rights of way.

There is no demonstrable need for what are additional cameras and/or they are excessive and disproportionate to the claimed benefit.

It seems to me that the cameras have a 360 degree field of view - not just on to the fields, with the 3 cameras on each pole, each pole will have a 360 degree view.

Camera 3 in particular is near Parrys Grove's only road exit onto Parrys lane and can capture my normal day to day access and egress from Parrys Grove on foot and by car and is entirely inappropriate. That is especially the case in winter when there are fewer leaves on the trees. I object strongly to this invasion of my privacy and ability to go about my day to day life without interference or disturbance. There would be no way for me to avoid being within the scope of the cameras area of capture at all. The presence of the cameras feels highly oppressive and intrusive to my private life. There is simply no need for the cameras to record activity outside the field on public and private land.

While the application suggests that privacy screening will be applied to mitigate the overlooking of private spaces, it fails to address the issue that the playing fields are subject to a lease which provides for shared use by the community. As a much-loved community amenity space, the proposed high level of surveillance (described by the school as monitoring 100% of a 22 acre field, 100% of the time) is inappropriate, unsettling and intrusive. It is also inappropriate for the area (which has one of the lowest crime rates in Bristol) and for the heritage parkland environment.

The proposal conflicts with policy BCS21 of the core strategy which requires new development to safeguard the amenity of existing development and create a high quality environment. Our understanding is that it is not possible to condition use of privacy screening as part of the planning process and in any case we have no confidence that Cotham School would abide by any promised restrictions, given its previous deployment of covert surveillance cameras on site, in breach of its own policy and in breach of legislation (the Information Commissioner's Office ordered these covert

cameras to be removed and data deleted following complaints from residents, councillors and our MP). The alleged benefits to the school of being able to monitor students who are already supervised and safeguarded by the presence of school staff, and deterring vandalism to a fence that may shortly be relocated by the school anyway, cannot outweigh the privacy impact on adjoining occupiers (including many families with young children) and their rights under Article 8 ECHR in respect of their private and family life and home.

While there is no specific expectation of absolute privacy in a public space such as the parkland, many people still object to having every movement recorded and potentially stored by the school, with the attendant potential for later review or misuse. Four public rights of way traverse the site and would be covered by the proposed surveillance. In addition to any obstruction of the routes, the presence of overt surveillance infrastructure in a heritage parkland setting would detract from the amenity and enjoyment of users. The effect would be to erode the sense of openness and calm associated with the parkland and discourage public use. This is contrary to policies safeguarding the quality and accessibility of public open space and the enjoyment of rights of way. The proposal has not assessed the amenity impacts on users or explored alternative siting that avoids surveillance of public rights of way. Nor has the applicant demonstrated that the extent and intensity of coverage is necessary or proportionate.

2. 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 (which I do not condone), 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.

3. 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 tranquility 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.

This is a beautiful and special place that requires sensitive treatment.

Visual amenity is particularly important as this site is a non-designated heritage asset. The applicant has attempted to argue that the site is not the heritage parkland of the listed building, and that it is 'largely without historic or architectural association with Stoke Lodge'. This is nonsense, as Cotham School is well aware. The High Court judge described the site in the recent village green decision as follows:

'Overall, the land looks like exactly what it is, namely, the former grounds of a large country house, now surrounded by modern urban development. For those who can see into it (whether from the roadway or from adjacent houses) it presents an attractive prospect of rus in urbe. It is easy to see why this land is important to local residents.'

An earlier assessment for the owner, Bristol City Council, stated:

'Stoke Lodge is far more enclosed than Redland playing fields because of the strong boundary that is formed by extensive trees and shrubbery... The Stoke Lodge site is characterised by its gentle topography, high level of enclosure, views into and out of the site and the parkland trees within the site... Stoke Lodge has a higher visual amenity due to the wide variety of trees that are in excellent condition spread throughout the site and as such represents parkland.'

The officers who refused Cotham School's previous application for just one CCTV pole, partly due to its detrimental impact to a non-designated heritage asset, were entirely correct to do so. The applicant appears to have fallen into a basic error in assuming that where historic field lines are marked on Ordnance Survey maps, this necessarily means that those areas were in active use as separate agricultural fields. This is not the case: parcel numbers were included on 20th-century Ordnance Survey (OS) maps to identify land via Books of Reference for administrative and legal purposes such as tax/valuation and cross-references in property deeds. In particular, the records of land ownership and size were relevant to the calculation of tithe payments to the parish, subsequently replaced by tithe rentcharges. These were not abolished until 1936.

The Court of Appeal in Skerritts stated that 'the curtilage of a substantial listed building is likely to extend to what are or have been, in terms of ownership and function, ancillary buildings' – i.e. the Lodge cottages on West Dene. Until 2018 the Council considered the whole estate to be the curtilage of the listed building. It then took a decision (at the request of Cotham School) no longer to treat the playing fields as curtilage, but as a non-designated heritage asset and important parkland setting for the house.

The Heritage Statement states at paragraph 5.5 that 'Beyond the shared ownership of a single field which is today incorporated into the southeast of the Playing Field, there are no historical associations' between the application site and Stoke Lodge house. In fact, records from the Bristol archives and historic newspapers show the following:

- Successive owners of Stoke Lodge purchased fields to form and extend the estate, which was formerly much larger than it is now auction documents for the sale of the property in 1848 record that it was then 33 acres and that the estate on the northwestern side of the house had already been laid out as 'lawn and pleasure grounds'. A continuous stone wall was constructed around the boundary of most of the estate (Shirehampton Road, Parrys Lane and Ebenezer Lane); this wall continues to and encloses the Lodge cottages (see below).
- By 1861 the two Lodge cottages had been built and a carriage drive laid across the land to a gated entrance with two stone pillars (the gate and pillars are still present) on Ebenezer

Lane/West Dene. This drive becomes visible in the grass during prolonged hot weather. The cottages were built facing the main house and are enclosed within the same continuous stone wall that runs around much of the estate. Census entries from 1861 onwards show the Lodge Cottages as part of the Stoke Lodge estate on Shirehampton Road (not as unrelated housing on West Dene), and record their inhabitants (servants, gardeners, chauffeurs and their families) who lived and worked on the estate.

- In 1923 the estate was sold to its final private owners, the Butlin sisters, who in 1924 sold off outlying land to reduce the estate to its current size and layout. The land beyond the current north-west boundary was developed for housing (hence 'Stoke Paddock' Road). The suggestion that any of the retained estate was used for allotments or agricultural purposes at any date after 1923 is complete fiction.
- Historic maps in editions published from the early 1900s showed all areas of the Stoke Lodge estate apart from the northern quadrant shaded as 'wooded parkland' (as distinct from fields).
- The Butlin sisters leased an area in the northern part of the parkland to the Stoke Bishop Cricket Club on an annual basis from 1928 or earlier, subject to strict conditions to maintain the environment of the parkland. The sisters apparently built the belvedere/gazebo at the edge of the walled garden so that they could sit in comfort and watch the matches. There is a direct and inherent connection between this particular structure and the parkland it looks out onto.
- Two of the Butlin sisters died in the 1940s. The additional buildings noted on the post-war aerial photograph in the Planning Statement were Nissen huts constructed on the parkland to accommodate US troops who were stationed in Stoke Bishop and Sea Mills during the Second World War (particularly during preparations for D-Day). Following the end of the war, Miss Emily Butlin sold the estate, initially selling 5+ acres at the eastern end to Bristol City Council in 1946. The conveyancing documents for that sale include a requirement for the Council to erect a chestnut fence along the new internal boundary, so clearly no such fencing existed pre-sale. It is not clear that any fencing was in fact erected, because Miss Butlin sold the rest of the estate to the Council very shortly afterwards, in 1947. The Deed of Conveyance for the house and estate records the sale of 'a piece of land containing 22 acres or thereabouts situate at Stoke Bishop' not the house and grounds plus disassociated agricultural fields; the parkland was one estate with the listed building at its centre.
- The Western Daily Press reported on 10 October 1947:

'Stoke Lodge Estate, Druid Stoke, an estate of about 22 acres which represents the biggest single area in Stoke Bishop not yet covered by houses, has been purchased by the Bristol City Council for over £25,000, for the purposes of a combined school... The Mansion has been in the occupation of the Misses Butlin for many years... A feature of the property has been the lovely cedars and other trees which must have given pleasure to very many passers-by. It is to be hoped that a number of these can be retained in the Education Committee's proposals.'

In determining this application, the decision-maker is required to give considerable importance and weight to the desirability of preserving the setting of the listed building. The applicant has failed to address – in fact has attempted to deny – the heritage status of this land and has provided a misleading Heritage Statement which is so inaccurate that it should be dismissed in its entirety. To the extent that the Planning Statement relies on the Heritage Statement, no weight can be attached to that either. The applicant has provided no information or visuals to assess the impact of the proposed eight 6m poles and cameras on this tranquil, historic parkland environment. In the absence of accurate and relevant evidence, the presumption should be to refuse the application.

The applicant's previous application for just one CCTV pole was refused because officers required 'Further heritage appraisal, and explanation of the heritage values that underpin the understanding of the significance. A reassessment of the heritage significance of the walled garden and gazebo as curtilage listed structures as opposed to "overflow carpark" described in the documents. Assessment of the impact of the proposal on the roofscape and walled garden features identified as significant. Consideration of the significance of the wider landscaped parkland setting to the north of the Listed building.' The applicant has made no attempt to address any of these requirements. The introduction of eight poles distributed across the open space would result in cumulative visual clutter, vertical intrusion, and an urbanising effect that is fundamentally at odds with the character of the parkland. The poles, camera housings, and ancillary equipment would be visible at close range and in medium-distance views, particularly along open sightlines across the park and toward the listed building. The visual impact would be exacerbated in winter months when tree cover is reduced. Screening through planting would itself alter the historic openness of the parkland and is not an appropriate solution. The residual harm would remain significant.

4. Planning policy

From a planning perspective, the site is designated as Important Open Space with a role and value for recreation, leisure, community use, townscape, landscape or visual amenity quality (and was proposed for designation under the next Local Plan as Local Green Space although this is currently pending final adoption). Bristol's current policy DM17 states that development on part or all of an Important Open Space will not be permitted unless the development is ancillary to the open space use. 100% 24/7 CCTV monitoring cannot be described as being ancillary to the open space use of the land.

No drawn or visual information has been provided to understand the extent to which the mast would project above sensitive areas to the adjacent Grade II listed Stoke Lodge including the curtilage listed walled garden or the gazebo/summerhouse, nor how the structures may impact on the ornamental silhouette and roofscape of the historic house from within the parkland, or the visual impact of the structures on the historic parkland as a non-designated heritage asset. There is a lack of justification for any harm to the heritage assets being offset on the grounds of wider public benefit as there is no evidence to demonstrate that the existing six CCTV units have successfully addressed any perceived issues prior to June 2020, and the application includes no reported incidents after that date. On this basis and because of the lack of information about any alternative options that have been considered, the proposals conflict with Sections 72 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the National Planning Policy Framework (2021), Bristol Local Plan comprising Core Strategy (Adopted June 2011) policies BCS21, BCS22 and Policies DM26, DM27 and DM31 within the Site Allocation and Development Management Policies (Adopted July 2014).

The utilitarian design and finish of standard CCTV poles do not meet local plan requirements for high-quality design that is sensitive to context, nor national policy for conserving and enhancing the historic environment. The cumulative number (eight), distribution, and height of the poles compound the harm. The application fails to demonstrate compliance with relevant design, heritage, landscape, and open space policies, including those requiring development to be sympathetic to local character and to sustain heritage significance. No clear and compelling need case has been provided that would justify the scale of intervention within a highly sensitive heritage landscape; nor has any assessment been offered of alternative solutions limiting coverage to a smaller area of the site to achieve a more proportionate outcome.

5. Other matters

The applicant has not highlighted in its application that its lease includes a prohibition on erecting new structures on the land. This is a pure prohibition, not something that is 'subject to landlord consent, not to be unreasonably withheld'.

Near camera 3, the applicant's proposed cabling route crosses in two places an easement strip which is 6 metres wide, centred on two gas main pipes that run from the eastern to the southern edges of the land. No activity is permitted on or under the Easement strip, as set out in a lease dated 8 April 2011 between Bristol City Council and Wales and West Utilities Limited.

Conclusion

For the reasons set out above, the proposal would cause harm to the significance of the listed building through adverse effects on its setting, would compromise the historic and landscape character of the parkland, would diminish the amenity and enjoyment of four public rights of way and would be unacceptably intrusive of the privacy of local residents and to me personally.

The applicant has not demonstrated overriding public benefits or explored less harmful alternatives. The application is therefore contrary to the statutory duty to preserve the setting of listed buildings and to relevant national and local planning policies on heritage, design, landscape, and public open space.

I respectfully request that the application be refused. If, notwithstanding the above, the Inspectorate is minded to grant permission, it should only do so on a temporary and time-limited basis and subject to stringent conditions including the prohibition of illumination or additional equipment without separate consent,

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