From:

Sent: 28 November 2025 23:57

To: Section 62A Applications Non Major

<section62anonmajor@planninginspectorate.gov.uk>

Subject: Objection to application reference number: S62A/2025/0133

Re Application reference number: S62A/2025/0133

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

I do not wish to speak at a future hearing, should there be one.

I am writing to lodge my strong objection to the above planning application. I am grateful to the Planning Inspectorate for considering all representations submitted and I hope the following concerns are taken fully into account.

Validity of and inconsistencies in the application

The applicant has failed to fulfil the obligation outlined in Defra Rights of Way Circular 1/09 to mark on the plan as part of their submission all Public Rights of Way (regardless of whether they are recorded on the definitive map or not) which cross / adjoin the site. The applicant completely omitted to say that there are four PROWs actually ON the site (indicating only that there are a number of PROWs adjacent to it) and that between one and three of the proposed camera poles would obstruct a PROW (e.g. camera 5). In the spirit of transparency, it is appropriate that I mention that whilst these PROWs have been approved by the Council, the outcome of a review by the Planning Inspectorate is outstanding. Importantly, if the addition of these paths to the definitive map is confirmed then the perimeter fence will very likely be relocated or removed, which because the applicant positions its proposed cameras in reference to this fence line, meaningful assessment of the submission cannot be made.

I believe that there are contradictions in the application, including the location of some of the camera poles and the proposed cabling. For example, I believe that the Arboricultural report addresses a different route for the cables, thus making its assessment irrelevant to the proposals.

The application misrepresents how the land is used by pupils. Groups of 30–60 are transported from the school (three miles away) for short sessions of no more than one hour, up to eight times per week during term time (39 weeks a year). Only the top third of the field is generally used, and this already contains six CCTV cameras. The bottom half is rarely used. Hence there is no case for there being a need for any more cameras. The applicant's assertions that the cameras are needed because the pupils need to be monitored 100% of the time do not make sense in that the pupils are already continually monitored by the accompanying members of staff. And their insistence that the cameras are needed owing to the risk of assault/abduction of pupils is simply unfounded, being as how there aren't even any known instances of theft on the site and the crime statistics for BS9 are consistently low. In the submission, the applicant has provided details of a number of purported crimes, all of which were before June 2020.

Several of them relate to CCTV footage (that has, worryingly, been retained by the applicant) of children simply using the site and playing football. Since some of the incidents were captured on CCTV this only goes to demonstrate that the deterrent effect of cameras is ineffective. To be clear, neither DfE and Ofsted require that playing fields detached from a main school site have either a fence or cameras, so the statements in the application inferring that cameras are a safeguarding requirement are, at best, misleading. As a parent of children who have not long left school, I am very clear that the safeguarding of children, particularly teenagers, does not require such measures, be that in PE lessons or in their own leisure time and, of course, this is the case across BS9, Bristol and the whole UK. The extent and positioning of cameras is excessive and unnecessary and an encroachment on the community's use of the land.

The applicant has failed to highlight that its lease prohibits the erection of new structures on the land. Eight 6m high camera poles without question constitute 'structures'.

Visual Impact & Heritage Considerations

It simply cannot be argued that cameras on 6m poles would not be visually intrusive in what is fabulous non-designated heritage parkland. There is much evidence, going back as far as 1848 and running up to The High Court judge's summary in June 2025, to indicate that the space is of historical importance and that is why local residents, past and present, have felt and will continue to feel the need to retain it as a wonderful place to pass the time of day. Until 2018 the Council considered the whole estate to be the curtilage of the Grade II listed building. It then took a decision (at the request of Cotham School) to no longer to treat the playing fields as curtilage, but as a non-designated heritage asset and important parkland setting for the house. However, in its submission, the applicant denies the heritage status of this land and has seemingly decided that it is therefore unnecessary to provide any information to assess the impact of the proposed poles and cameras.

It is not without good reason that previous applications (for a CCTV pole and camera, for a perimeter fence and for a sign) have each been unsuccessful in the past. The position of proposed camera 4 is particularly offensive to me, because it would be located near to a focal point of 'The Lodge', famous across Bristol, the gorgeously carved Cedar of Lebanon "Tree of Life'. And as an occasional user of the Adult Learning Centre, I would find looking out onto camera 8 really unattractive and depressing, especially compared to my current view. The utilitarian design of the proposed poles is far from being in keeping with a heritage site and I do not believe meet local plan requirements for high-quality design, nor national policy for conserving and enhancing a historic environment.

The school's perimeter fence was erected under permitted development and, like the camera poles, is completely out of keeping with its heritage environment but this should not be allowed to open the door still wider to more detrimental and unsympathetic development. I have walked through/around Stoke Lodge 3-4 times a week for at least the last 8 years and it has been my happy space. Without doubt, the

installation of 8 new CCTV poles would ruin the serenity of this open space, it would make it feel unwelcoming and the area would somehow lose its character. It would be devastatingly sad to lose those beautiful lines of sight between listed building, trees and other features on the site. I can hardly bear to imagine no longer being able to take a minute to enjoy the wonderful wavering shadows thrown by some of the bigger trees (instead having them interrupted by rigid shadows of the man-made towers).

Privacy Concerns

I do not live in any of the properties lining the perimeter of the site, but I do walk in/around the space 3-4 times a week. The existing cameras already make me uncomfortable, not that I'm doing anything wrong. The proposed additional surveillance cameras will doubtless make me feel even more uneasy, and anxious in fact. To be made to feel this way, in my leisure time, feels very unjust. The space is subject to a lease which provides for shared use by the community so why should my privacy and that of other local people be adversely affected so unnecessarily? I understand that there is no right to absolute privacy in public spaces, but I really object to being recorded and to the recordings potentially being stored by the school, for use, or should I say misuse, at a later date.

Along with other BS9 residents, I have many reservations about the installations of 24 new extremely hi-tech cameras. One such concern relates to the fact that there would inevitably be software updates, which could result in the devices going back to their factory settings, which could mean the privacy of the people living in the houses adjacent to Stoke Lodge would be severely compromised (bedroom windows etc). At the very least, if the application goes through, I feel that recording should not be permitted to commence until all relevant residents have been given the opportunity to personally see what the coverage is, and that they should be automatically and regularly be sent copies of 'their' recordings and that robust legal agreements should be drawn up between the residents and anyone with access to the recordings, be that at the school or a third party.

Conclusion

The number, height, and placement of the proposed poles represent a level of intrusion wholly disproportionate to any demonstrated need. The application contains inaccuracies, omits crucial information, conflicts with its own supporting documents, and disregards both the heritage and community value of this cherished landscape. No alternative solutions have been proffered. For all these reasons, I respectfully urge a decision to reject this application is made.

Regards