

1 December 2025

Your ref: S62A/2025/0133

Section 62A Applications Team
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Dear Planning Inspectorate

Your ref: S62A/2025/0133

Applicant: Cotham School (a Company Limited by Guarantee)

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

Proposal: 8no. CCTV poles and [##] cameras

Objection to Application

I write to strongly object to the above planning application which the applicant has chosen to submit direct to the Planning Inspectorate. This is a complex matter brought about by the schools failure to understand their lease and their failure to engage with the local community. As a Co-operative Academy, their apparent reluctance to co-operate with local stakeholders is amazing. It is also worth noting that whilst the school is the lease holder and applicant for the application, the school is around 3 miles from the location in question – this is not a typical scenario where a school playing field is next to the school or within the main school grounds.

I note that the school website¹ states that they "*care for others*", "*are empathetic and treat everyone as we wish to be treated ourselves*", "*are honest*", "*strive to become better listeners*", "*act in a courteous and respectful manner in our interactions with everyone*", "*are socially responsible*", "*care about being Safe and Happy*". Whilst not a planning consideration, it is unfortunate that the school has chosen to ignore all of these elements in the dealings with members of the public who have, for many years, enjoyed unfettered access across Stoke Lodge Fields. Their application for 24 cameras across the fields is further evidence of their determination to try to make the fields for sole use of the school rather than their being continued public use as determined in their lease.

1. Inaccurate information in application

Firstly, I would like to address an issue with regard to inaccurate information on the application.

1a. Number of Cameras

The application states that the application is for "*Works to install 8no. CCTV poles and cameras*". The implication from the description of the application is that it refers to eight poles for CCTV cameras and 8 cameras. I understand, however, that each of the eight poles will have three cameras and so the application actually relates to 24 cameras.

1b. Closed Circuit?

The application also refers to **CCTV cameras**. It is my understanding, however, that as well as being **Closed Circuit Television** cameras, the system behind the cameras will also enable images to be captured and recorded. Clearly the ability to record the images from the cameras is distinct to them just being available via a "Closed Circuit". From the information published, it is uncertain as to where the people will be that are monitoring the Closed Circuit images will be located, and whether or not various school personnel will be able to access the live feeds from the cameras. It is obvious, however, that the cameras will have a wider use than just being available via a closed circuit.

1c. Public Rights of Way

The biggest glaring error from the application is at question 6 of the application form, where the applicant states "*There are several **claimed** rights of way **adjacent** to the site, which are currently being contested by the school. These claims do not hold any legal status at this time and are not included within the scope of this application.*" At a minimum this statement is deliberately disingenuous, but more likely it is deliberately inaccurate and misleading.

Bristol City Council [BCC] has multiple roles with regard to the application site. Of most significance is the fact the BCC is the land owner (the applicant is the lease holder). BCC is also the relevant Surveying Authority as well as the public body responsible for education in the City of Bristol. BCC has determined that there **are** Public Rights of Way across Stoke Lodge; these are not "***claimed** rights of way **adjacent** to the site*" – these are long established and confirmed Public Rights of Way across Stoke Lodge Fields, not simply adjacent to the site.

I acknowledge that the applicant is challenging the decision to formally recognise the routes of the Public Rights of Way, but this does not change the current status. BCC (who you are reminded are both the land owner and the Surveying Authority) has determined that there **are** Public Rights of Way across the fields. I know the applicant is challenging the decision to amend to Definitive Map, but this neither affects the current rights of the public to use the Public Rights of Way nor overrides the decision of the landowner at this stage.

Additionally, it should be noted that even if a decision is subsequently made by The Planning Inspectorate that the formal Public Rights of Way do not exist across the fields, it would still be within the powers of the landowner [BCC] to decide to continue to allow members of the public to use Stoke Lodge Fields.

2. Use of Land

In question 14 of the application, the applicant states the site is "*School playing fields leased for sports/education use*". However, the school's lease makes very clear that the school use of the land is "*subject to all existing rights and use of the Property, including use by the community*". Community amenity use of this designated Important Open Space continues.

The only barrier to ongoing school or club use of the fields is the school's own decision not to use or hire out the fields.

The applicant omits that Cotham School is roughly 3 miles from the site. Its lease again confirms use is "*subject to all existing rights and use ... including use by the community*". Actual school use of the fields by the school is minuscule in proportion to the public use of the fields. On school days (around 50% of a year) the school brings small groups of pupils (30 to 60 pupils plus 2 to 4 staff) for 45 to 60 minute PE lessons up to eight times per week in term time, weather permitting. It typically uses only the top third of the field, where six existing CCTV cameras are already installed. Each time the school uses the field, it involves around a six-mile round trip. There is no justification for four additional CCTV towers in this area, and the school rarely uses the lower, wetter half of the field at all.

3. Applicant's Claims About Necessity

Although the applicant states that it need not demonstrate necessity, it nevertheless claims that pupils must be monitored "*100% of the time*". In reality, pupils are always accompanied by staff and never on breaks while on site, and the suggestion of abduction/assault risk is unfounded - particularly in BS9, which has one of the lowest crime rates in Bristol.

Reliance on CCTV to deter fence damage is also unsupported; the applicant's own evidence shows that existing cameras have not prevented damage in the upper field. In any event, both the Department for Education and Ofsted confirm there is **no requirement** for detached playing fields to be fenced, nor for students to be monitored by CCTV.

The applicant claims at para 1.2 that CCTV is "*necessary to meet statutory safeguarding requirements*" and 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. Safeguarding references do not constitute evidence of a "need" for additional 24 cameras - especially considering that the school use of the land is only minimal.

4. Applicant's Claims About Crime Deterrence

The fence at Stoke Lodge Fields was installed in 2019. The land was registered as a village green in August 2023, making enclosure a criminal offence, and most of the fence was subsequently removed. Although the High Court ruled in June 2025 that the test for registration was not met, Bristol City Council determined in November 2024 that four public rights of way cross the land.

The recently re-erected fence obstructs all four Public Rights of Way on Stoke Lodge Fields. Under its lease, the school's use remains "*subject to all existing rights and use of the Property*", and the High Court confirmed this includes rights of way—recorded or otherwise. Cotham School is currently objecting to their addition to the Definitive Map (Planning Inspectorate reference ROW/3363939).

The applicant's "schedule" of reported crimes consists almost entirely of incidents during or shortly after the 2020 lockdown, when the school unlawfully tried to exclude local residents from the open space despite lease conditions and political requests to keep it accessible. Several listed events, for example children playing football in June 2020, are not crimes. It is concerning that the school monitored and retained CCTV footage of such normal community use. No incidents are listed after June 2020.

BS9 has one of the lowest crime rates in Bristol, and there are no known instances of theft, assault, or abduction on the fields. Given this context, the proposed extent and placement of new cameras is disproportionate and intrusive. Some of the applicant's own listed incidents occurred within view of existing CCTV, undermining claims about deterrence.

The College of Policing² is not convinced of the merits of CCTV as a crime prevention deterrent, and acknowledges that *"CCTV was found to be more effective when it: ... involved the active monitoring of live footage"* and that *"There was no evidence of an effect [from CCTV] on violent crime and disorder."*

Taking into consideration all of the above, any the many other objections received by the Planning Inspectorate, I ask that the application be **refused**.

Please keep me informed of developments in this important matter.

Yours faithfully

Signature redacted

Name redacted

¹ <https://www.cotham.bristol.sch.uk/page/?title=About+Cotham+School&pid=149#respect>

² <https://www.college.police.uk/research/crime-reduction-toolkit/cctv>