

**From:** [REDACTED]

**Sent:** 23 November 2025 14:31

**To:** Section 62A Applications Non Major

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**Subject:** Objection - Application reference number S62A/2025/0133

**I object to the application reference number S62A/2025/0133 for installing eight CCTV cameras and poles at Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH.**

My objections to this application are three-fold:

1. No credible justification in regard to safeguarding of pupils,
2. No demonstrated prevention of vandalism,
3. For reasons of clear breach of privacy of local residents in their houses/gardens and community users of the field, including local children using the play park area.

It is a documented fact that Cotham School's use of Stoke Lodge is minimal in comparison to the local community's use of the field.

The school's pupils are brought from 3 miles away, in small groups of between 30 to 60 pupils for well under one hour per visit, and for a maximum of eight times a week during school term time, depending on the weather and the condition of the field.

Cotham School uses the upper third of the site exclusively, and already have 6 CCTV cameras installed on the pavilion (at the West Dene end) and at the storage shed (located at the Parry's Lane end). Therefore I can see no justification for installing 4 additional towers in the upper third of the field. It seems like overkill.

The school makes minimal use of the wetter, lower half of Stoke Lodge, so again I see no justification for so many extra CCTV camera installations in that area if it is for the purposes of safeguarding pupils a handful of times.

Furthermore, The applicant's claim that pupils need continuous monitoring is unsubstantiated. They're never unsupervised during lessons. They're engaged in lessons and always supervised by school staff.

The alleged risks of assault or abduction are unfounded, especially so in BS9, and indeed other areas nearby, which has one of the lowest crime rates in Bristol.

It is my view that the applicant misled the Inspectorate by referencing paragraph 1.2 of the planning application to CCTV, stating it's 'necessary to meet statutory safeguarding requirements' and paragraph 6.10, stating it's a 'statutory requirement' for the same controls when students use the school playing fields. Ofsted states clearly that schools can comply with the Key Curriculum Standards for International Education and ensure children's safety without perimeter fences or comprehensive CCTV coverage, even on primary school sites, a statement which contradicts the school's position.

While CCTV enhances security, the area of BS9 has a low crime rate in general, with no known instances of theft, abduction, or assault at the Stoke Lodge playing field site.

Therefore the number of proposed cameras and positioning are disproportionate and unnecessary, serving only to disrupt the land's amenity use.

It is worth mentioning that the previously installed CCTV cameras in the upper part of the field (pavilion and storage shed) and also the temporarily installed mobile CCTV cameras in the lower and upper areas have not been successful in deterring alleged vandalism of the fence over the years. Therefore there is no reason to believe that more of them will produce a different result, except to negatively impact on the visual amenity of Stoke Lodge.

The school's alleged intention to monitor students under school supervision and to deter vandalism on a potentially relocated fence infringes on the privacy of adjoining residents, including families with young children, as it violates their rights under Article 8 of the European Convention on Human Rights regarding their private and family life and home.

Although the application mentions 8 CCTV poles, each pole contains triple cameras, resulting in 24 cameras in total. These cameras have a 360-degree field of view that extends beyond the fields to encompass the surrounding area not leased by the school. The proposed cameras' exceptional resolution of 5 megapixels allows them to observe the rear of adjoining houses, including bedrooms, and capture all details. This raises concerns about the intrusive nature of the CCTV capabilities, particularly the infra-red night vision, which could potentially access people's homes, gardens, and even extend beyond the Stoke Lodge fields. This is particularly intrusive in bedrooms, as unclothed bodies emit more heat.

It's concerning that local children playing in the play park outside the fence, unrelated to Cotham School, may be filmed due to the extensive CCTV camera coverage and have the footage stored by the school.

While there's no expectation of absolute privacy in a public space, many people object to having every movement recorded and potentially stored. This raises concerns about potential later review or misuse.

It has been documented that the school has in the past made use of covert cameras without permission, which was illegal and gave rise to concern about the storage of the images obtained.

The specifications of cameras have multiple privacy zone options:

1. What are these options, and which ones will be used?
2. Who will set them?
3. How accurately can they be set?
4. Will updates to software take the camera privacy zones settings to default? If so, how will the monitoring person be alerted to change the settings again?
5. Who will monitor the images obtained, and what provisions are in place under the General Data Protection Regulation (GDPR)?

The application does not cover the important questions above.

The applicant hasn't demonstrated that the extent and intensity of coverage are necessary or proportionate.

The installation of 24 CCTV cameras and 6-foot tall poles disrupts the parkland surroundings and creates a hostile, overdeveloped space. The proposal obstructs views, sightlines, and the building's relationship with the grounds, failing to preserve the listed building's setting and causing harm to its significance.

Visual amenity is crucial as this site is a non-designated heritage asset. Stoke Lodge has a higher visual amenity due to its diverse, well-maintained mature trees, which create parkland. Therefore, preserving the setting of the listed building is imperative.

The introduction of eight poles across the open space causes visual clutter, vertical intrusion, and an urbanising effect incompatible with the parkland's character. The poles, camera housings, and equipment are visible at close range and in medium-distance views, especially along open sightlines. This visual impact is exacerbated in winter when tree cover is reduced. Screening through planting alters the historic openness of the parkland and is not a suitable solution. The residual harm persists.

The proposed high level of surveillance at Stoke Lodge is inappropriate, unsettling, and intrusive. The school claims to monitor 100% of a 22-acre field, which is excessive and goes against the area's low crime rate and heritage parkland environment.

The proposed surveillance using additional CCTVs would cover four public rights of way, obstructing routes and detracting from the parkland's amenity and enjoyment. This would erode the sense of openness and calm associated with the parkland and discourage public use, which contradicts policies safeguarding public open space and rights of way.

The proposal hasn't assessed the amenity impacts on users or explored alternative siting that avoids surveillance of public rights of way. The applicant hasn't demonstrated that the extent and intensity of coverage are necessary or proportionate. For these reasons, the proposal would harm the significance of the listed building by affecting its setting, compromising the parkland's historic and landscape character, diminishing the amenity and enjoyment of public rights of way, and being unacceptably intrusive of local residents' privacy.

The applicant hasn't demonstrated overriding public benefits or explored less harmful alternatives to the proposed CCTV installation. Therefore, the application is contrary to the statutory duty to preserve the setting of listed buildings and relevant national and local planning policies on heritage, design, landscape, and public open space.

We respectfully request that this application be refused for all the above listed reasons.



