

From: [REDACTED]

Sent: 01 December 2025 15:16

To: Section 62A Applications Non Major

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Subject: Application reference number S62A/2025/0133 at Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

From [REDACTED]

This is to register comments and objections to the application.

Alleged purposes of the cameras

The alleged purposes of Cotham School's proposal to install what appears to be an additional 24 CCTV cameras mounted on 8 6m poles around Stoke Lodge include:

- A need to monitor pupils 100% of the time – when they are already supervised by staff at all times;
- A risk of assault / abduction of pupils – as above, plus the estate is in an area with a very low rate of crime, and there are no known instances of theft, abduction or assault on the playing fields in all the history of the site;
- A need to deter damage to the fence – when (a) the Department for Education and Ofsted both specify that there is no requirement for a fence, and neither common law nor the Children Act 2004 makes any such demand, and (b) **anyone with criminal intent would use a mask or some other form of identity concealment**. The courts have only ruled that Cotham School has a right to erect a fence, and not that a fence is necessary. No fence, no damage. It is also noted that Cotham School has made inaccurate and misleading claims relating to damage to the fence.

On all counts, the School has not established any need to erect cameras or any benefit from doing so. An earlier application was rejected without appeal from the School.

Intrusive and excessive surveillance

The estate has been designated by the City Council as an Important Open Space, and the presence of the fences is already clearly at odds with this. It is also stated to have “a role and value for recreation, leisure, community use, townscape, landscape or visual amenity quality”, something that the community enjoyed with unfettered access to this cherished open parkland for generations.

To quote from the High Court, [Stoke Lodge] ...” presents an attractive prospect of *rus in urbe*. It is easy to see why this land is important to local residents.”

To quote from Bristol City Council, “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.”

Rejection of an earlier application for just one CCTV pole was partly due to its detrimental impact to a non-designated heritage asset.

- Community enjoyment of this valuable amenity would clearly be further degraded by the proposed surveillance and recording of this heritage parkland environment by an additional 24 CCTV cameras on 8 poles (making a total of 30 cameras) operated by a private organisation with no oversight. This would be unsettling, intrusive and

excessive, and have considerable potential for misuse. The actions of Cotham School over the last few years have not inspired any trust, quite the opposite.

- The proposal is also in conflict with the reasonable expectations of privacy of the owners of many neighbouring properties, into whose gardens and uncurtained windows the cameras would be able to see, day and night.

Procedural failures with the application

- The terms of the lease specify that Cotham School's use of the site is expressly 'subject to all existing rights and use of the Property, including use by the community'. However, in Q14 of the application form (Existing use of the site) the applicant simply and misleadingly states 'School playing fields leased for sports/education use', without mentioning the '**subject to**'. Cotham School, which has only ever had a low usage of only about a third of the site and even that only during term-time, appears to be trying to deny the rights of the local community. The only possible purpose for the fence and gates and application to erect cameras is to exclude the public, and in contravention of the lease the School has already terminated decades-long use of the site by local sports clubs. It is clearly not wanting to share the site with anybody and is acting against the common interest. This is consistent with the School preferring to use a site nearer than Stoke Lodge for an extended period rather than share Stoke Lodge. Installation of the cameras is an element of the School's strategy further to contravene the terms of the lease, and so the application should be rejected.
- The lease also 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'. The application misleadingly fails to mention this.
- The application misleadingly mentions that there are several "claimed" rights of way "adjacent to" the site. In fact these rights of way have been approved by the City Council as landowner, and are entirely within the Stoke Lodge site. My understanding is that the footpaths are already being obstructed by the presence of the fence and gates, and Cotham School is implicitly claiming the right to close the footpaths, which even for periods of a few hours is contrary to law. The application includes no other reference to or consideration of the impact of the proposal on these rights of way. 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 application does not do this. Defra guidance also states 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 application also misleadingly fails to mark correctly the boundaries of the site, or the perimeter fence, or the locations of the cameras, or the areas affected by the application.

Summary

- Cotham School has failed to establish any need to erect cameras or benefit from doing so;
- The cameras would constitute excessive and intrusive surveillance, with no oversight and a potential for abuse. This would detract significantly from the amenity of the site and community enjoyment of it;
- There are very significant procedural failures with the application, including misleading representations, failure to consider obvious contraventions of the lease, and failure to comply with established procedures for such applications.

As with the vast majority of local people, I am incensed at the actions of a school based in another part of the city that has no interest in this area or the people living in it, and clearly does not even need to use the land. It has already caused considerable detriment to the peaceful and crime-free enjoyment of the full extent of the attractive Stoke Lodge parkland by generations of the community around it. In particular it has significantly diminished the community rights specified in the lease, is obviously intending to block approved rights of way, and is now proposing to go even further by introducing unnecessary and intrusive video surveillance and recording with potential for abuse and with no oversight.

It is an irony that the first result of installing cameras could be recording evidence of illegal blocking of public rights of way by Cotham School.

I demand that the application be refused. I wish to reserve the right to speak at the hearing, but do not currently have any intention of doing so.

Yours faithfully,

