

To: Planning Inspectorate (Section 62A Applications Team)

Ref: S62A/2025/0133 – Stoke Lodge Playing Fields, West Dene, Shirehampton Road, Bristol, BS9 2BH

From: [REDACTED]

1. Introduction and Summary

I submit this representation objecting to the installation of eight 6-metre CCTV poles with triple-sensor 5MP cameras across Stoke Lodge Playing Fields.

My objection is grounded in:

- planning policy (NPPF; local plan policies on amenity, heritage, trees, and landscape);
- the legal status of public rights of way;
- statutory protections for TPO trees and wildlife;
- human rights and data protection law relating to intrusive surveillance; and
- procedural and heritage concerns.

The application is materially deficient, factually incomplete, and produces significant, unacceptable harm that is not outweighed by the limited and unsubstantiated benefits claimed.

2. Trees, Biodiversity & Landscape Character

Planning / Legal Relevance

- Damage (including risk of damage) to trees protected by TPOs is a material planning harm.
- The NPPF requires great weight to be given to the conservation of irreplaceable habitats, including veteran trees (NPPF 180(c)).
- Development must be sympathetic to local landscape character and protect public amenity (NPPF 130, 180, 185).

Key issues

a. TPO Trees, Root Protection Areas and Biodiversity Risk

The site contains numerous TPO-protected trees and several veteran specimens. Previous works undertaken by or on behalf of Cotham School (including the erection of fencing and trenching) have demonstrably disturbed or passed through RPAs, as documented by Bristol Tree Forum's detailed submission (17 November 2025).

The proposed CCTV poles require concrete bases and underground cabling. These locations fall within or immediately adjacent to RPA zones identified on arboricultural constraint plans. The risk to these trees is therefore not hypothetical but foreseeable.

This concern is amplified by the school's prior unauthorised works to protected trees, including the felling of a TPO tree and the pruning of others without permission. The Council's limited enforcement action has not prevented recurrence.

Given this track record, it is reasonable to conclude that the risk of further damage is high and that mitigation relying on operator compliance is completely inadequate.

b. Landscape Character and Visual Amenity

The poles are industrial in form, visually intrusive, and incongruous in a landscape characterised by mature trees, green open views, and the setting of a historic house.

The development provides little to no landscape enhancement or compensatory measures, and no attempt has been made to assess or mitigate visual harm (e.g., LVIA).

The proposal therefore conflicts with national and local policies requiring development to be appropriate and sensitive to its setting.

3. Public Rights of Way (PROWs) & Public Access

Key issues

Planning / Legal Relevance

- Public rights of way are a material planning consideration.
- DEFRA guidance (Rights of Way Circular 1/09) requires that existing or claimed PROWs be identified, mapped and taken into account before development proposals are determined.
- Development must not obstruct a PROW unless formally diverted or extinguished under the Highways Act 1980.
- Surveillance on public highways raises planning, amenity and human rights concerns.

a. The School Acknowledges the Four PROWs

The applicant has formally objected to the four PROW claims before the Council's Public Rights of Way & Greens Committee, which confirms their knowledge of the routes. They cannot therefore claim ignorance.

b. DEFRA Guidance Has Not Been Followed

Despite being aware of the routes, the applicant has proceeded with a proposal that:

- fails to map them;
- fails to assess the impact upon them;
- and disregards DEFRA guidance requiring such assessment prior to any development decision.

These are significant procedural irregularities.

c. One Pole Directly Obstructs a PROW

The pole proposed near the Adult Learning Centre sits directly in the line of one of the claimed paths.

If the PROW is confirmed (as recommended by the Public Rights of Way and Greens committee), this would constitute a physical blockage of a public highway.

d. The Fence Will Have to Be Relocated

If the PROWs are added to the Definitive Map, the existing fence will need to be realigned. If, as the school argues, the layout of CCTV poles is essential for safeguarding, those poles will then be in the wrong place.

This demonstrates fundamental prematurity and poor design, contrary to the NPPF requirement that development be “well-considered” and “coherent.”

e. Impact of Surveillance on PROW Users

These poles provide overlapping 360-degree surveillance across public footpaths. Users of PROWs are entitled to walk without intrusive, high-resolution monitoring. Such surveillance has a recognised chilling effect on public amenity.

4. Privacy, Home Environment & Data Protection

Planning / Legal Relevance

- Privacy and residential amenity are material planning considerations.
- Article 8 ECHR requires that interference with private life be proportionate and justified.
- UK GDPR requires necessity, proportionality, data minimisation, strict governance, and transparency for any surveillance system.

Key Issues

The technical documents confirm that each pole contains three 5MP cameras, producing 24 cameras with 360° coverage and capability for recognition-level resolution at distance.

Several cameras can see directly into private homes, gardens and upper-storey windows — including bathrooms with no frosted glazing - currently private due to topography.

Privacy “masking” is software-based and dependent on operator configuration, which:

- can be easily altered;
- is vulnerable to software resets;
- offers no enforceable guarantee of compliance; and
- is not subject to any independent audit.

The planning application offers no credible governance framework, no transparency, and no enforceable safeguards.

This constitutes a significant and unjustified intrusion on residential amenity and public space privacy.

5. Need, Justification & Proportionality

Planning / Legal Relevance

- Under the NPPF, harm must be weighed against public benefit.

- Security/safeguarding claims must be demonstrated with evidence and proportionate to actual risk.
- Less intrusive alternatives must be considered.

Key Issues

a. The Playing Fields Are Not Part of the Main School Campus

Children attend only for short, timetabled PE sessions (typically 45–60 minutes), under staff supervision.

They do not roam unsupervised as they do during breaks on the main campus.

Therefore, the safeguarding context here is materially different and significantly less acute.

b. No Evidence of Crime or Threat

The stated incidents used to justify this infrastructure date largely from 2020.

Several were not crimes; none resulted in prosecution.

One - ‘a football match’ - refers simply to young children playing football, an activity permitted on this land.

There is no recent or credible evidence of risk warranting permanent, industrial-scale surveillance.

c. Less Intrusive Alternatives Ignored

The applicant has not demonstrated why targeted, temporary, or monitored alternatives (e.g., smart sensors, mobile CCTV for short-term risk periods, enhanced supervision, community engagement) would not be sufficient.

The proposal therefore fails the tests of necessity, subsidiarity, and proportionality.

6. Heritage & Curtilage Concerns

Planning / Legal Relevance

- The NPPF requires recognition of the significance of heritage assets and their settings.
- Development affecting the setting of a listed building requires assessment of harm.
- Ambiguity regarding curtilage must be resolved through transparent and lawful process.

Key Issues

The Heritage Statement accompanying the application is based on misleading information from the applicant and makes only minimal reference to Stoke Lodge House (Grade II listed), it provides no assessment of the visual or functional relationship between the proposed poles and the historic landscape.

There is longstanding community concern - supported by historical mapping and expert commentaries - that the parkland does indeed form part of the original curtilage of the listed house.

The Council's prior determination that it is not curtilage was made:

- without public consultation;
- without publication;
- based on legal advice that remains undisclosed;
- without the statutory 28-day consideration period normally afforded.

Given this opaque process, the Inspectorate should treat heritage impact as insufficiently assessed and therefore unresolved.

7. Procedural and Transparency Issues

- No public consultation has been carried out on this proposal, despite significant privacy, amenity, heritage and ecological impacts.
- The application omits key information about PROWs, wildlife, historic setting, and privacy governance.
- Previous unauthorised works, including covert CCTV and tree works, undermine confidence in the applicant's compliance with conditions.

8. Planning Balance and Recommendation

The development produces substantial harm:

- to protected trees and their root systems;
- to the landscape character and heritage setting;
- to privacy and residential amenity;
- to public rights of way and public access;
- to community trust and lawful governance of surveillance.

The claimed benefits - largely unquantified safeguarding assertions - do not outweigh this harm, and are not supported by credible evidence.

Conclusion

I respectfully request that the Planning Inspectorate refuse this application.

It should have:

- formal mapping and protection of PROWs;
- a revised heritage assessment considering the setting of the listed building.

PINS cannot amend this so this application must be refused.

If permission is granted despite the above, it must be subject to stringent, enforceable conditions including:

- full arboricultural protection, supervision, and post-construction monitoring;
- independent privacy auditing with publicly available reports;
- strict data governance conditions and retention limits;

Thank you for considering these representations.