

**From:** [REDACTED]  
**Sent:** 30 November 2025 17:08  
**To:** Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>  
**Subject:** Fwd: Objection to planning application S62A/2025/0133 at Stoke Lodge

Dear Sir/Madam

**Re: Planning application ref S62A/2025/0133 at address cited as Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH**

I would like to object to the above planning application on the following grounds:

### **1. Impact on privacy**

The application fails to mention that the playing fields are subject to a lease which provides for shared use by the community (see further issues in point 2 below). As a much-loved and well used community amenity space, the proposed high level of surveillance (described as monitoring 100% of a 22-acre field, 100% of the time) is inappropriate, unsettling and intrusive. It is also inappropriate for the area and for the heritage parkland environment.

The application suggests that screening will be applied to mitigate the overlooking of private spaces, however with proposed 3 cameras per pole providing a 360-degree view, these cameras are capable of overlooking several adjacent residential properties, including potentially into private spaces such as gardens and bedrooms. This is not acceptable under Article 8 ECHR in respect of private and family life and home.

Additionally, the impact on community members using Stoke Lodge for recreational activities would be significantly intrusive and would all be caught on camera by the applicant – my children learnt to ride their bikes on SL, children take part in family games, young people play cricket informally as well as group activities such as yoga, running etc in addition to use of the public rights of way across the site. This is not acceptable. While there is no specific expectation of absolute privacy in public spaces, I and many others object to having every movement recorded and potentially stored by the applicant, with the attendant potential for later review or misuse.

Previous deployment of covert surveillance cameras on site by the applicant does not instil confidence, these were in breach of its own policy and in breach of legislation (the Information Commissioner's Office ordered these covert cameras to be removed and data deleted following complaints from residents, councillors and our MP).

### **2. Issues with the application**

The applicant appears to ignore various salient facts:

#### **2.1 Use of the land –**

- (a) In Q14 of the application form (Existing use of the site) the applicant states 'School playing fields leased for sports/education use'. The school's lease of the site is expressly 'subject to all existing rights and use of the Property, including use by the community'. Community amenity use of this designated important open space is ongoing.
- (b) The applicant's use of the site is minimal compared to community use. It brings pupils in small groups (typically 30-60 pupils plus 2-4 staff) to the site for periods of 45-60 minutes, a maximum of eight times per week during term time, weather dependent. The school typically only uses the top third of the site, not the whole fenced area, and as such it already has six CCTV cameras mounted on the pavilion and the storage hut at the top of the field. There is no basis to argue that additional CCTV towers are required.

- (c) The applicant has not highlighted in its application that its lease includes a prohibition on erecting new structures on the land. This is not something that is 'subject to landlord consent, not to be unreasonably withheld' but is a pure prohibition.

**2.2 Public rights of way** - The applicant acknowledges at Q6 that there are several claimed rights of way 'adjacent to the site' but has not included any reference to or consideration of the impact of the proposal on these rights of way within the scope of the application. In fact, the four rights of way are on the site, not adjacent to it, and have been approved by the Council as landowner and are awaiting consideration by the Planning Inspectorate (ROW/3363939). At least one of the proposed CCTV poles would obstruct a right of way.

**2.3 Necessity** - The applicant states that it needs to monitor pupils 100% of the time. However, pupils are never unsupervised or on break time while at the site, they are engaged in lessons and supervised by accompanying staff. The alleged risks of assault/abduction of pupils are completely unfounded, particularly in BS9 which has one of the lowest crime rates in Bristol.

To the extent that the applicant relies on the need for CCTV coverage to deter damage to the fence, it is clear based on its submissions that this has not been successful in the upper part of the field to date. In any event, both the Department for Education and Ofsted have confirmed that there is no requirement for detached playing fields to be fenced (still less any requirement for students to be CCTV-monitored 100% of the time).

### **3. Visual impact**

The applicant claims that its poles and cameras will not be visually intrusive, but they are wholly unsympathetic to the heritage parkland surroundings. At paragraph 3.1 the application notes previous applications 16/06304/F (New perimeter fence to playing fields); 18/05206/A (Retrospective application for installation of sign); and 20/01826/F (Works to install a CCTV pole and camera adjacent to the gate behind the neighbouring Stoke Lodge Adult Learning Centre). Each of these was refused (or withdrawn after officers recommended refusal in the case of the perimeter fence application) for reasons that included the impact on the listed building, its setting and the heritage parkland character of the site.

### **4. Planning policy**

From a planning perspective, the site is designated as Important Open Space with a role and value for recreation, leisure, community use, townscape, landscape or visual amenity quality (and was proposed for designation under the next Local Plan as Local Green Space although this is currently under review). Bristol's current policy DM17 states that development on part or all of an Important Open Space will not be permitted unless the development is ancillary to the open space use. 100% 24/7 CCTV monitoring cannot be described as being ancillary to the open space use of the land.

