



Application No.	S62A/2025/0133
Applicant	Cotham School
Address	Stoke Lodge Sports Ground Shirehampton Road Sea Mills Bristol BS9 2BH
Description	Application for Planning permission for Works to install 8no. CCTV poles and cameras.

Local Planning Authority Consultation Response pursuant to The Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013

Date: 5th December 2025

COMMENTS IN RESPECT OF THE MANNER IN WHICH THE APPLICATION IS TO BE DETERMINED

The Local Planning Authority considers that the application can be determined on the basis of representations in writing and that this would be proportionate to the scale of the proposal and would facilitate efficient decision making.

As will be noted from the planning history below, a previous application for the installation of CCTV at the site has been determined by the Local Planning Authority and that decision was refused under delegated powers.

SITE DESCRIPTION

The application site relates to part of Stoke Lodge playing fields in Stoke Bishop, an area of designated Important Open Space within the Local Plan that surrounds the Grade II listed Stoke Lodge. The site is leased to Cotham School for use as playing fields.

The Listing Description for Stoke Lodge reads as follows:

“House, now college. Dated 1836, altered 1889. Squared coursed Lias with limestone dressings, ridge stacks and slate roof. Tudor Revival style. 2 storeys; 4-window range. Double-depth plan. The front has 2 projecting shouldered gables, with a single-storey parapeted porch to the central section in between. The porch has a Tudor-arched doorway with foliate spandrels and a 2-leaf door; the gables have chamfered corners topped with square blocks, stepped gables with turned finials to the corners and tops, and scrolled panels inscribed AD and 1836, mullion and transom 4-light windows with Tudor-arched heads and labels, and decorative stacks with chamfered sides and octagonal caps, in ranges of 2 and 4. A right-hand angled block has 3 dormers. Similar gable to the left return. INTERIOR: a central hall with a polygonal plaster ceiling, a good Tudor-arched stone fireplace with Bristol Delft tiles, panelled walls and an open-well stair with turned balusters and panelled newels. (Gomme A, Jenner M and Little B: Bristol, An Architectural History: Bristol: 1979-: 287).”

PROPOSED DEVELOPMENT

The description of the proposed development is as follows:

“Works to install 8no. CCTV poles and cameras”

The applicant submits that the proposed camera installation is necessary to meet statutory safeguarding requirements for pupils and staff, and to deter vandalism. It is understood that the locations have been selected to ensure comprehensive monitoring and coverage of the sports grounds / pitches. In addition, the applicant states that the

cameras will provide comprehensive coverage of the perimeter fencing around the playing fields.

It will be noted from the planning history section below, that a previous planning application was refused in February 2023 by the Local Planning Authority for works to install a CCTV pole and camera adjacent to the gate behind the neighbouring Stoke Lodge Adult Learning Centre (planning application reference 20/01826/F). It is noted that Camera C5 as shown on the “Proposed CCTV” Plan in the submitted CCTV System Survey & Design Report is in a similar location to the camera previously refused. As a previous planning decision this is considered to be a material consideration in the assessment of this s62A application which the Inspector should have regard to. In comparison however, this application proposes eight CCTV cameras, as opposed to a single camera, with locations closer to boundaries with neighbouring residential properties.

RELEVANT PLANNING HISTORY

16/06304/F New perimeter fence to playing fields.

Date Closed	2 March 2017	WITHDRAWN
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17/00864/F Replacement changing room building and associated works (Use Class D2).

Date Closed	28 July 2017	REFUSED
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18/05206/A Retrospective application for installation of sign.

Date Closed	20 December 2018	REFUSED
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18/06369/VP T1 - Acer platanoides, T2 - Acer pseudoplatanus, T3 - Fagus sylvatica and T4 - Acer platanoides: reduce in length the lower branches by 3m (for all four trees up to a height of 8m) or to a suitable pruning point remaining Withdrawn in property boundary. Trees all subject of TPO 1192.

Date Closed	5 February 2019	REFUSED
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19/02046/VD White Poplar - fell -TPO 1192.

Date Closed 1 May 2019 GRANTED SUBJECT TO CONDITIONS

19/04039/VP Ash (T8) Remove the lowest 6 branches on the south side of the tree and crown lift by removing secondary laterals to give a minimum clearance of 1.5m branches above to clear both the side and the top of tower to allow for the installation of CCTV cameras. TPO 1192

Date Closed 30 August 2019 WITHDRAWN

20/01826/F Works are to install a CCTV pole and camera adjacent to the gate behind the neighbouring Stoke Lodge Adult Learning Centre.

Date Closed 23 February 2023 REFUSED

Reasons for refusal:

1. Insufficient information has been provided in order to adequately assess the impact of the proposed CCTV mast (in respect of its siting and overall scale and design) in its setting. There is no drawn or visual information to understand the extent to which the mast would project above sensitive areas to the adjacent Grade II listed Stoke Lodge including the curtilage listed walled garden or the summerhouse, nor how the structure may impact on the ornamental silhouette and roofscape of the historic house from within the parkland, or the visual impact of the structure on the historic parkland as a non-designated heritage asset. Furthermore, there is a lack of justification for any harm to the heritage assets being offset on the grounds of wider public benefit as no clear evidence to demonstrate that the function of the CCTV unit including its field of vision will suitably address areas targeted by vandalism. On this basis and because of the lack of alternative options that have been considered being presented, the proposals conflict with Sections 72 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the National Planning Policy Framework (2021), Bristol Local Plan comprising Core Strategy (Adopted June 2011) policies BCS21, BCS22 and Policies DM26, DM27 and DM31 within the Site Allocation and Development Management Policies (Adopted July 2014).

2. Owing to a lack of supporting information the proposal fails to adequately demonstrate that it would adequately preserve nearby protected trees, either through

adequate investigation of potential future requirements to manage trees as a result of the field of vision of the camera, or as a result of potential impacts on root protection areas to nearby trees as a result of any excavation and foundation works required to route services to the structure and to anchor it in place. Accordingly the proposal fails to comply with Section 11 of the NPPF, Policy BCS9 of the Bristol Core Strategy (2011) and Policies DM15 and DM17 of the Site Allocations and Development Management Policies (2014).

3. Owing to a lack of detailed information pertaining to the precise technical specifications of the proposed surveillance equipment as well as illustrative supporting information such as field of vision diagrams, there is insufficient supporting information by which it can be satisfactorily demonstrated that there would not be a detrimental loss of privacy or perception of overlooking experienced by surrounding residential properties and their private amenity spaces. Accordingly proposals conflict with the NPPF, Policy BCS21 of the Bristol Core Strategy (2011) and Policy DM29 of the Site Allocations and Development Management Policies (2014).

20/02228/VP Norway Maple "Crimson King" (NW1) Norway Maple (NW2) -light crown-lift and reduction (2m maximum) of the NE lower face of crown. TPO 1192.

Date Closed	24 July 2020	GRANTED SUBJECT TO CONDITIONS
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20/03288/VP Ash (T8 on plan, part of G7 on TPO 1192) Crown lift to 8m on the Pavilion side . Remove the basal shoot and any hanging branches or deadwood in the crown. Remove the three lowest limbs that overhang the footpath outside of the playing fields.

Date Closed	15 October 2020	GRANTED
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20/03697/VD T3 - English Oak - Reduce storm damaged limb. (See Associated Photograph) TPO 1192

Date Closed	18 August 2020	GRANTED
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20/05068/VP Beech (B) - Light crown-lift and reduction (2m maximum) of the NE lower face of crown (lower 4m North East quadrant of crown and no higher).

Date Closed	11 January 2021	GRANTED SUBJECT TO CONDITIONS
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20/05387/VP T11 Oak - Fell dead tree. TPO 1192

Date Closed 6 January 2021 REFUSED

20/05776/VP See attached document; Stoke Lodge TPO application identification of trees and description of works TPO 451, 1192, 1236.

Date Closed 4 January 2021 GRANTED SUBJECT TO CONDITIONS

23/03588/VD Pine - Make fallen section safe and fell remaining tree - 5 Day Notice (TPO 1192).

Date Closed 14 September 2023 GRANTED SUBJECT TO CONDITIONS

RELEVANT PLANNING POLICIES

Relevant planning policies are considered to include:

- The National Planning Policy Framework (NPPF) (2025)

Bristol Core Strategy (2011)

- BCS9 Green Infrastructure
- BCS21 Quality Urban Design
- BCS22 Conservation and the Historic Environment

Site Allocations and Development Management Policies (July 2014)

- DM1 Presumption in favour of sustainable development
- DM5 Protection of Community Facilities
- DM14 The Health Impacts of Development
- DM15 Green Infrastructure Provision
- DM17 Development Involving Existing Green Infrastructure
- DM26 Local Character and Distinctiveness
- DM29 Design of New Buildings

- DM27 Layout and Form
- DM31 Heritage Assets

RESPONSE TO PUBLICITY AND CONSULTATION

Copies of responses from internal and non-statutory consultees are attached as appendices, however their position in summary is as follows:

- Bristol City Council Conservation Section: Object
- Bristol City Council Arboriculture: Object
- Crime Prevention Unit, Avon and Somerset Police: No Objection – Subject to comments

ASSESSMENT OF KEY ISSUES

The key issues relevant to the assessment of this s62A application are considered to include:

- Design and Heritage Impacts
- Tree Impacts and Biodiversity Net Gain
- Residential Amenity Impacts

The Local Planning Authority's assessment of these issues is set out below, and it is acknowledged that the Inspector may wish to address these and other planning issues in their decision.

1) Design and Heritage Impacts

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to

the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The Authority is also required (under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990) to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. The case of R (Forge Field Society) v Sevenoaks DC [2014] EWHC 1895 (Admin) ("Forge Field") has made it clear where there is harm to a listed building or a conservation area the decision maker "must give that harm considerable importance and weight." [48]. This is applicable here because there is harm to the listed building and conservation area caused by the proposals as set out below.

Section 16 of the national guidance within the National Planning Policy Framework (NPPF) 2025 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

Further, paragraph 214 states that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Finally, paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

In addition, Bristol Core Strategy (Adopted 2011) Policy BCS22 seeks to ensure that development proposals safeguard or enhance heritage assets in the city with Policies

DM30 and DM31 in the Site Allocations and Development Management Policies (Adopted 2014) expressing that alterations to buildings should preserve or enhance historic settings. Policy DM26 states that the design of development proposals will be expected to contribute towards local character and distinctiveness. Policy BCS21 also requires new development in Bristol to deliver high quality urban design and sets out criteria to measure developments against including the need for development to contribute positively to an area's character and identity, creating or reinforcing local distinctiveness.

With this s62A application, the applicant has submitted a Heritage Statement. In summary, this concludes that the development would not cause harm to the setting or significance of Stoke Lodge, however, the applicant considers that should the Local Planning authority disagree, the public benefits would be considered to outweigh any less than substantial harm. The applicant does not consider the playing fields to be a non-designated heritage asset.

Consultation has been carried out with the City Council's Conservation section. In summary, Conservation would recommend refusal of the application as insufficient information is considered to have been submitted and identified harm would not be outweighed by public benefits.

The heritage assets that would be affected by the proposal are considered to be as follows:

- Stoke Lodge, a Grade II listed building (and curtilage structures);
- Stoke Lodge parkland, a non-designated heritage asset.

Conservation consider that whilst the landscape setting of Stoke Lodge has not been identified as a locally listed landscape of historic importance close inspection of the site and the historic context demonstrate that the playing fields (assessed as formerly constituting a historic parkland setting for the house) meet the criteria to be considered as a non-designated heritage asset under the terms of the NPPF. The Planning Practice Guidance requires the identification of non-designated heritage assets to be based on sound evidence, and the Conservation comments include a detailed analysis having regard to Historic England's Heritage Values that underpin assessments of significance.

Planning application 20/01826/F for works to install a CCTV pole and camera adjacent to the gate behind the neighbouring Stoke Lodge Adult Learning Centre, was also assessed by the Local Planning Authority on the basis that the playing fields, as historic parkland would have constituted a non-designated heritage asset.

It is recognised that the applicant takes a different view, and the Planning Statement acknowledges that this is a subjective matter which the Local Planning Authority could reach a different conclusion on. It is considered that the Inspector will therefore need to consider these submissions and set out their own assessment of this issue.

Whilst the setting of the designated Grade II listed building should therefore be afforded great weight, a non-designated heritage asset requires only the impact to be weighed in the planning balance. Proposals affecting the historic open parkland setting and pastoral character of the landscape should be assessed in line with Bristol's Development Management policies DM26 (Local Character and distinctiveness) and DM31 (Heritage Assets), specifically : "Locally important heritage assets: Proposals affecting locally important heritage assets should ensure they are conserved having regard to their significance and the degree of any harm or loss of significance."

The Local Planning Authority's assessment of the proposals is therefore as follows:

The s62A submission is considered to lack sufficient detail. As the Conservation comments set out, there appears to be no drawn, or other visual information, showing the proposed height of the CCTV installations in relation to their setting. This is relevant to understand the extent to which the poles will project above the curtilage Listed walled garden and summerhouse adjacent to the site, how the proliferation of CCTV poles will be perceived, how much impact they will have on the ornamental silhouette of the main historic house from within and outside of the playing fields as historic parkland, and the visual impact on the land as a non-designated heritage asset.

The form and appearance is considered to stand in marked contrast to the natural materials of the listed building and curtilage structures, and the verdant tree-lined setting. The location of the posts appears to be unsympathetic to the heritage and landscape setting.

In assessing application 20/01826/F, the Local Planning Authority had requested further information to assist with the assessment of a similar nature to that described above, which was not forthcoming. As this appears to have also not been satisfactorily addressed in this submission, it is considered it would be appropriate for the Inspector to seek elevations or site sections showing these features in context with the listed structures and tree-backed setting, or photomontages from agreed viewpoints for assessment.

In the absence of this material, and based on the information available, the Local Planning Authority considers that harm would arise. The Inspector's attention is drawn to the Council's Conservation comments for a detailed assessment of this.

Concern is raised regarding the cumulative impact of the proposed CCTV cameras. The proposed CCTV cameras closest to the Grade II listed Stoke Lodge (and curtilage structures) would appear to be most harmful by reason of their proximity; this includes cameras in the locations C1, C4, and C5 as shown on the "Proposed CCTV" Plan in the submitted CCTV System Survey & Design Report. It is noted that Camera C5 is in a similar location to the camera previously refused (planning application reference 20/01826/F). The proposal would have a harmful impact on the land as a non-designated heritage asset.

Turning to the public benefits, the benefits listed in the Design and Access statement accompanying the s62A application are noted.

Great weight must be placed in the conservation of designated heritage assets. The degree of harm posed by development is considered to be less than substantial, but the Local Planning Authority does not consider this is sufficiently justified based on the information provided. It is not considered to be clear as to whether alternative options have been considered that would achieve the stated aims.

The Local Planning Authority acknowledges the important duty to safeguard and protect the schoolchildren in the applicant's care. It is considered that as an academy, the trust need to have regard to the law in relation to its safeguarding duties and to the delivery of the curriculum including sport. The Inspector's attention is drawn to both the judgement in the case of *Cotham School v Bristol City Council*, dated 10 June 2025, and

the consideration of matters relating to safeguarding in that case (for example, please see paragraphs 189-195 of the judgement), and the report to the Economy and Skills Committee which considered a request to explore the use of an Article 4 Direction to remove permitted development rights that allow fencing around Stoke Lodge Playing Fields. These documents are attached to this statement as background papers and are considered to be of relevance to this issue.

In weighing the benefits, it is also noted that the NPPF requires great weight to be given to the need to create, expand or alter schools through decisions on applications. Furthermore, the aim for planning decisions to achieve safe places and to promote public safety and take into account wider security requirements have also been taken into account. It is understood that the applicant is utilising some temporary CCTV equipment at the site at present. Images have been shared with the Council and it is alleged that vandalism of fencing has occurred.

Insofar as the benefits set out by the applicant would constitute public benefits that would deliver social objectives as described in the National Planning Policy Framework and therefore relevant to the planning assessment, the Local Planning Authority does not consider that these would be sufficient to outweigh the less than substantial harm that would arise from the proposals to the designated heritage asset. However as noted above, some of the proposed cameras are closer to the designated heritage asset than others, and the Inspector therefore may consider it appropriate to take a differentiated approach between those locations that may be considered to have a more direct impact.

In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Based on the information provided and undertaking the balanced judgement required, the Local Planning Authority considers that the proposals would result in unacceptable harm to the non-designated heritage asset.

The proposal is therefore considered to conflict with Sections 72 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the National Planning Policy Framework (2021), Bristol Local Plan comprising Core Strategy (Adopted June 2011) policies BCS21, BCS22 and Policies DM26, DM27 and DM31 within the Site Allocation and Development Management Policies (Adopted July 2014).

2) Tree Impacts and Biodiversity Net Gain

Section 11 of the NPPF (Conserving and enhancing the natural environment) states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible.

Policy DM17 (Development Involving Existing Green Infrastructure) of the SADMP outlines that development should integrate important existing trees. It is suggested that where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided in accordance with the standard set out within Policy DM17. Development which would result in the loss of Ancient Woodland, Aged trees or Veteran trees will not be permitted.

With the s62A application, the applicant has submitted an arboricultural report from Bosky Trees. It is noted that a revised report dated 21st November 2025 was received following the validation of the application to correct an error. The Council's Arboricultural Officer has reviewed this and provided comments. The application is to install some CCTV posts and cable runs in a green space which has many valuable trees on it, many of them protected by Tree Preservation Orders (Four TPOs in total [relating to individual trees and groups], numbered 1192, 1236, 451 and 1457). The Council's Arboricultural Officer considers that the Tree Constraints Plan, Tree Protection Plan and other elements of the arboricultural report are not adequate and the application cannot be supported on several grounds, as follows:

1. The tree constraints plan does not show the Root Protection Areas (RPAs) of the significant groups of trees around the green space, even though some of the proposed poles are close to them. This is particularly important for G7, but potentially G5 too.
2. It seems that the poles are to be mounted on concrete bases, but the exact size and locations of these bases is not clear on the plans we have, even where the base is right next to T43, a protected oak. We need to have more detailed plans where bases are close to trees, alongside carefully plotted RPAs of all trees including groups.
- 3 The Tree Protection Plan (TPP) does not include ground protection for T11 and T13, but it seems likely there will be vehicle movements close to these trees. The

TPP should ensure that no vehicle movements can happen within unprotected RPAs.

4. No attempt has been made to predict future tree growth and place poles in order to minimise the need to prune the protected trees in the future.

5. The poles should have been placed to minimise work to protected trees at time of installation, preferably avoiding the need for work altogether. The work proposed to the protected oak T43 in particular is more than we would expect to see for such minor development.

It is not considered that there is sufficient information regarding the work required to protected trees. Nor is it clear that the proposal has sought to minimise any impact on the protected trees.

Some new tree planting has been proposed, which is welcome. It is noted that this would achieve the necessary net gain in biodiversity as per the statutory requirements.

It is however considered that the Inspector should seek further details of the proposed planting before approving it. This should be proposed after consultation with the Council as landowner and Council parks tree officers. The trees on this site are managed by the landlord, Bristol City Council, and are expected to be in keeping with the heritage landscape.

It is therefore considered that the application should also be refused, on the grounds of insufficient information and harm and risk to the valuable trees on site, which would be contrary to comply with Section 11 of the NPPF, Policy BCS9 of the Bristol Core Strategy (2011) and Policies DM15 and DM17 of the Site Allocations and Development Management Policies (2014).

If the Inspector does not agree with the Local Planning Authority's comments regarding this issue, conditions regarding the Tree Protection Plan, an Arboricultural Method Statement if work is to happen within RPAs, and to detail the new tree planting would be recommended.

3) Residential Amenity Impacts

Core Strategy Policy BCS21 outlines that all new development within Bristol will be expected to strive to achieve high standards of urban design. With regards to amenity it is outlined, that new development is expected to safeguard the amenity of existing development. In particular, development should give consideration to matters of privacy, outlook and natural lighting. Policy DM29 of the Site Allocations and Development Management Policies (2014) states that existing and proposed development achieves appropriate levels of privacy, outlook and daylight etc.

Planning application 20/01826/F for works to install a CCTV pole and camera adjacent to the gate behind the neighbouring Stoke Lodge Adult Learning Centre was refused for the following reason:

“Owing to a lack of detailed information pertaining to the precise technical specifications of the proposed surveillance equipment as well as illustrative supporting information such as field of vision diagrams, there is insufficient supporting information by which it can be satisfactorily demonstrated that there would not be a detrimental loss of privacy or perception of overlooking experienced by surrounding residential properties and their private amenity spaces. Accordingly, proposals conflict with the NPPF, Policy BCS21 of the Bristol Core Strategy (2011) and Policy DM29 of the Site Allocations and Development Management Policies (2014).”

It was previously considered that in the absence of information such as a field view diagram it could not be concluded that the installation would avoid creating detrimental conditions for surrounding residents owing to overlooking and loss of privacy.

With this s62A application, the applicant has submitted a “CCTV System Survey & Design Report”. The report explains that the applicant has engaged the services of a specialist security consultant to undertake a survey and feasibility study associated with the installation of new CCTV cameras and columns in the playing fields at Stoke Lodge. The objective is to establish outline specifications including performance specifications for the new cameras and integration within the existing CCTV system.

The report includes details regarding privacy considerations and notes that due to the proximity of the cameras to neighbours, the use of privacy screening will be necessary. The camera that has been specified includes privacy options. It is understood that privacy screens are set by the system manager and involve ‘drawing’ a box around the

area where there is concern to privacy, this box will then appear opaque on the system effectively screening the area from the system and its users.

Plans have been submitted showing the location of the proposed CCTV cameras. Additional information also shows the areas where the recognition of persons is achievable under good lighting conditions, where persons can be detected and observed, and hatched areas denoting the extent of privacy screening. The areas to be covered by privacy screening appear to include neighbour properties and gardens.

The report also recommends that a full data protection impact assessment should be carried out.

Based on the technical details and plan provided, it is considered that the details provided of the proposed privacy screening would go some way to addressing concerns that were raised previously in the refusal of planning application 20/01826/F, although how the satisfactory implementation, monitoring and enforcement of such measures could be secured is of concern and the extent to which neighbouring residents would be satisfied that their amenity is being protected as a result is questioned. The Local Planning Authority considers this to be unacceptable however should the Inspector take a different view, consideration should be given to imposing conditions securing the implementation of appropriate privacy screening measures and subsequent monitoring.

However, given the number of cameras proposed in this s62A application, their height, siting and proximity to boundaries with neighbouring properties, it is considered that the perception of being overlooked by the cameras would remain notwithstanding the privacy measures functioning as indicated – this would be experienced by occupiers of neighbouring residential occupiers and their private amenity spaces which would be detrimental to their amenity.

This would be experienced cumulatively and as a result of cameras in the locations C1, C2, C3, C6, C7 and C8 as shown on the “Proposed CCTV” Plan in the submitted CCTV System Survey & Design Report in particular, by reason of their siting.

It is therefore considered that the proposal would be unacceptable in terms of neighbour amenity impact. The proposal is considered to conflict with the NPPF, Policy BCS21 of the Bristol Core Strategy (2011) and Policy DM29 of the Site Allocations and Development Management Policies (2014).

As noted above, if the Inspector does not agree with the Local Planning Authority's comments regarding this issue, it is recommended that conditions are imposed securing the implementation of appropriate privacy measures.

4) Conclusion

The Local Planning Authority considers that the proposal would give rise to harm to designated heritage assets which would not be outweighed by public benefits. In addition, the Local Planning Authority considers that it has not been demonstrated that impact on the non-designated heritage asset and several protected trees has been minimised and that the level of harm proposed is necessary and justified.

Whilst the details provided regarding CCTV privacy screens would have the potential to mitigate potential neighbour amenity impacts, given the number of cameras proposed, their siting and proximity to boundaries with neighbouring properties, it is considered that the perception of overlooking would remain which would be detrimental to neighbour amenity. How the satisfactory implementation, monitoring and enforcement of privacy measures could be secured is of concern and the extent to which neighbouring residents would be satisfied that their amenity is being protected is questioned

5) Recommendation

It is recommended that planning permission be refused for the following reasons:

1. Insufficient information has been provided in order to adequately assess the impact of the proposed CCTV cameras (in respect of their siting and overall scale and design) in their setting. There is no drawn or visual information to understand the extent to which the poles and cameras would project above sensitive areas to the adjacent Grade II

listed Stoke Lodge including the curtilage listed walled garden or the summerhouse, nor how the structures may impact on the ornamental silhouette and roofscape of the historic house from within the parkland, or the visual impact of the structures on the historic parkland as a non-designated heritage asset. Furthermore, there is a lack of justification for any harm to the heritage assets being outweighed by public benefits. On this basis and because of the lack of alternative options that have been considered being presented, the proposals conflict with Sections 72 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the National Planning Policy Framework (2021), Bristol Local Plan comprising Core Strategy (Adopted June 2011) policies BCS21, BCS22 and Policies DM26, DM27 and DM31 within the Site Allocation and Development Management Policies (Adopted July 2014).

2. Owing to a lack of supporting information the proposal fails to adequately demonstrate that it would adequately preserve nearby protected trees, either through adequate investigation of potential future requirements to manage trees as a result of the field of vision of the cameras, or as a result of potential impacts on root protection areas to nearby trees as a result of any excavation and foundation works required to route services to the structures and to anchor them in place. Accordingly the proposal fails to comply with Section 11 of the NPPF, Policy BCS9 of the Bristol Core Strategy (2011) and Policies DM15 and DM17 of the Site Allocations and Development Management Policies (2014).

3. Notwithstanding the information provided pertaining to the technical specifications of the proposed camera equipment as well as illustrative supporting information, there is insufficient supporting information by which it can be satisfactorily demonstrated that there would not be a detrimental loss of privacy or perception of overlooking experienced by surrounding residential properties and their private amenity spaces. Accordingly proposals conflict with the NPPF, Policy BCS21 of the Bristol Core Strategy (2011) and Policy DM29 of the Site Allocations and Development Management Policies (2014).

In the event that the Inspector considers that planning permission should be granted, conditions referred to above should be considered by the Inspector together with other conditions to mitigate the potential impacts as considered necessary – these should include matters relating to the details of the design and appearance (including colour); securing appropriate privacy measures; protection of trees; ecology and BNG.

APPENDICES

Contents

Non-statutory consultation responses	
1	Bristol City Council Conservation Section
2	Bristol City Council Arboriculture
3	Crime Prevention Unit, Avon and Somerset Police
Background papers	
1	Cotham School v Bristol City Council, [2025] EWHC 1382 (Ch), dated 10 June 2025 (relating to the registration of land as a town green in August 2023)
2	Report to Economy and Skills Committee, 22 nd September 2025 - Stoke Lodge Playing Fields – access and fencing
3	Report to Public Rights of Way and Greens Committee – Stoke Lodge Highways Act Section 130A Notice enforcement report
4	TPO 451 Plan
5	TPO 1192 Plan
6	TPO 1236 Plan
7	TPO 1457 Plan