

From: Sarah Greet [REDACTED]
Sent: 23 November 2025 13:14
To: Section 62A Applications Non Major
<section62anonmajor@planninginspectorate.gov.uk>
Subject: S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton,
Bristol BS9 2BH

To: Planning Inspectorate

My name: Sarah Greet

My address: [REDACTED]

I do not want to make an oral submission if a hearing is arranged.

Re: S62A/2025/0133 Planning Application for Installation of Eight CCTV Towers at Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

I am writing to register a formal objection to the above application for the installation of eight CCTV towers at Stoke Lodge Playing Fields. This proposal is inappropriate, contrary to relevant planning policies, and harmful to the lawful and established use of this important public green space. My reasons for objecting are set out below.

1. Mischaracterisation of the Applicant's Rights Over the Land

The applicant, Cotham School, asserts that the playing fields are leased to it for "sports/educational use". This does not reflect the full legal and factual position.

The school's 2011 lease expressly states that the tenancy is "*subject also to all existing rights and use of the property including use by the community*" (clause 3.3). The playing fields have never been the exclusive domain of the school; they have always been shared with the wider community, which retains an equal right to enjoy this historic and cultural open space.

The site is also crossed by four Public Rights of Way (PROWs), which members of the public may use freely and at all times. These established rights are a material consideration and should be properly reflected in the assessment of this application.

2. Privacy and Unlawful Intrusion

Users of the fields — including the general public, sports clubs, dog walkers, and those using the PROWs — have a legitimate expectation of privacy.

Article 8 of the European Convention on Human Rights (as implemented by the Human Rights Act 1998) protects the right to private life, which includes freedom from unwarranted surveillance. Any interference must be necessary, proportionate, and justified.

This proposal fails that test.

The erection of eight CCTV towers, each supporting multiple cameras capable of full 360° surveillance, is a disproportionate and intrusive response. The applicant has not demonstrated any exceptional circumstances that could justify such a significant infringement of users' privacy.

The proposal would subject lawful users — including children, families, and community groups — to round-the-clock surveillance without adequate justification. This is neither necessary nor proportionate.

3. Conflict With the Terms of the Lease: Prohibited New Structures

The lease contains an absolute prohibition against erecting new structures on the land (clause 3.5.2). There is no exception to this clause. Furthermore, the usual obligations for repair and maintenance of boundaries and trees remain with the Council as landowner, making clear that the school is not authorised to alter the fabric or fixed structures of the site.

It is therefore highly questionable whether the applicant even has the legal ability to carry out the proposed works. This must be considered a material planning matter, particularly where the landowner's obligations and prohibitions are explicit.

4. Non-Compliance With Policy DM17 (Important Open Space)

Stoke Lodge Playing Fields are designated as an Important Open Space (IOS) under Site Allocations and Development Management Policies (SADMP) DM17. The policy states: *"Development on part, or all, of an Important Open Space will not be permitted unless the development is ancillary to the open space use."*

The proposed array of eight CCTV towers is not ancillary to any recognised open space function. The community's lawful use of the land — including informal recreation and use of PROWs — does not require such structures, and the proposal does nothing to enhance those uses.

In fact, the installation of intrusive surveillance infrastructure runs counter to the purpose of protecting and supporting open space uses.

5. Conflict With Bristol's Parks and Green Spaces Strategy (2024)

Stoke Lodge Playing Fields are identified within the 2024 Parks and Green Spaces Strategy. The strategy emphasises:

- Community participation,
 - Health and wellbeing, and
 - Improvement of quality and accessibility,
- with a commitment to fostering collaborative management and equitable enjoyment of green spaces.

The unilateral installation of an extensive surveillance system — imposed despite significant community opposition — is wholly inconsistent with these aims. It undermines community participation, alienates users, and negatively affects the enjoyment and wellbeing benefits the strategy seeks to protect.

The proposed development therefore conflicts with the Strategy, which forms part of the Local Plan's delivery framework.

6. Conflict With Proposed Local Plan Policies (Local Green Space / Protected Open Space)

While still undergoing examination, the emerging Local Plan identifies the site either as:

- Local Green Space (LGS32011), or
- Protected Open Space (policy GI2), per more recent suggested modifications.

Under both designations, development must be ancillary, proportionate, and must not harm the appearance, character, role or function of the space.

The proposed CCTV towers would:

- introduce visually intrusive structures,
- alter the character of what is currently open, tranquil green space,

- create an environment of surveillance inconsistent with recreational enjoyment, and
- harm the appearance and role of the site as a community open space.

As such, the proposal conflicts with both the draft LGS and Protected Open Space policies.

7. Visual Impact and Harm to the Character of the Site

Eight metal towers, each supporting multiple cameras, would have a very substantial visual impact. They would introduce industrial-looking structures into a green, open, and otherwise undeveloped landscape.

This is fundamentally at odds with the established open character of the fields and constitutes avoidable harm.

Conclusion

For the reasons set out above, this proposal:

- fails to comply with DM17 (Important Open Space)
- conflicts with the 2024 Parks and Green Spaces Strategy
- is inconsistent with proposed Local Plan policies for Local Green Space or Protected Open Space
- is intrusive, disproportionate, and harmful to users' rights to privacy
- is incompatible with the applicant's lease and established community rights
- would cause demonstrable harm to the site's character, appearance, and public function

The installation of eight CCTV towers at Stoke Lodge Playing Fields is inappropriate, unjustified, and contrary to planning policy. It should therefore be refused.

With kind regards,

Sarah Greet