

**From:** Thomas Dove [REDACTED]  
**Sent:** 01 December 2025 18:05  
**To:** Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>  
**Subject:** OBJECTION: S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

Attention:  
Section 62A Applications Team  
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**OBJECTION reference: S62A/2025/0133**  
Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

From  
Thomas Dove  
[REDACTED]  
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I do not wish to make a verbal statement.

I object to the application to install 8 CCTV cameras on Stoke lodge playing fields for the reasons below.

**1. 'Need' for such cameras not demonstrated**

a. Stoke Lodge Playing Fields are a large open area. Any time that pupils are present there are also a number of members of staff who have full view over all the area that pupils may be and the staff are directly supervising their activities - that is the point of the PE: they are supervised, managed activities and the staff are actively watching the pupils in these activities. Therefore CCTV adds nothing in this regard.

b. There is a vanishingly small risk of danger to pupils. Crime is extremely low in the Stoke Bishop area of Bristol and the crime figures show zero incidents of actual or threatened or perceived threat of assault/abduction of Cotham School pupils.

c. None of Ofsted, the DfE, the Council, nor any other relevant education-related body requires CCTV to safeguard school pupils (and nor likewise a fully fenced area for PE).

In this regard the application by Cotham School is clearly untrue when it states that CCTV is 'necessary to meet statutory safeguarding requirements'.

**2. Lower/bottom half of field (towards Cheyne Road) is unused - zero need to monitor**

a. The playing fields divide naturally into two halves:

- the 'upper' half, adjacent to Parry's Lane
- and the 'lower/bottom' half, adjacent to Cheyne Road

The upper half is largely flat; the lower half slopes significantly.

b. The last full year that the school made use of Stoke Lodge fields it made no use of the lower half

other than a few times. The reasons are obvious:

- the slope is substantial so is not very suitable for ball games (and other activities)
- it is a long walk for pupils to the lower half from the entrance adjacent to Parrys Lane (whereas this is not the case for the upper half)
- there is no reason at all to use the sloping lower half as rarely are all the pitches and space used on the upper half of the fields.

c. Given the above, there are simply no pupils on the lower half to 'safeguard' with CCTV.

So CAM5, CAM6, CAM7 and CAM8 are totally redundant - they will virtually never have any pupils within their field of view so what safeguarding function could they possibly perform? None.

(The only exception is a few rare occasions in a year, when perhaps there are many sports taking place and the lower half is also used - but at that time there are many members of staff, in which case there is also no reason for CCTV.)

### **3. Lease agreement signed by school protects community use - 24 additional cameras clearly intended to intimidate**

a. Use of the fields is contended by the Cotham School, despite the fact that the school signed a lease which makes the school's use subject to all existing [prior] use by the community and the school is clearly in contravention of this legal document.

It is not the case that the school needs to give permission in any way to the community: in fact, use by the school is only permitted if the school does not interrupt such community use.

The school is ignoring these lease commitments and clearly the school wishes to grab the land wholly for itself.

b. There are already multiple CCTV cameras that cover the playing fields.

Installing yet more CCTV - in fact a total of 24 additional high resolution cameras (3 on each of the 8 poles) - on the over-bearing and intimidatory towers, is clearly meant to bully and pressurise the local community to 'stay away'.

Bullying and intimidation of the local community are not valid reasons for installing CCTV.

c. The software features with the camera system clearly allows the school to monitor, recognise and track any/every local person, not only when they are on the field but in large swathes outside that are within the field of view of the cameras - which includes many gardens, downstairs rooms and bedrooms which adjoin the fields.

The school has in the past used covert cameras - illegally installed - to 'recognise' a local person and allege criminal activity: the case was dropped after it was shown that the 'original' video footage provided by the school as evidence was not actually the original footage and had been edited, with video frames omitted.

### **4. Supporting document from Global MSC Security contains materially incorrect information (and omits vital information)**

Background: I have worked in the video industry for over 30 years; I have been the CEO of two different video analysis companies for over 10 years and have been granted 3 patents in video analysis.

a. The document talks about the 8 CCTV poles and but in fact each pole has three cameras, i.e. the school wishes to install a total of **24** additional high resolution cameras (3 on each of the 8

poles).

Section 7, page 13 lists for each pole 'Avigilon 15C-H5A-3MH' which includes 3 x 5 megapixel cameras.

b. The document gives the location of each pole and draws circles indicating what can be seen, the red circle being 'recognition of persons'.

Based upon my experience, with 5 megapixel cameras which have a technical feature 'High Dynamic Range' [HDR], I am sure that 'recognition' will be possible way outside the red circle.

c. The red and yellow circles are not drawn concentric to the camera positions for:

- Cam1: this shows the circles less over-lapping of the rear gardens that it should

- Cam3: ditto

- Cam4: ditto

- Cam5: ditto - this is the most egregious as the yellow circle has clearly been drawn to pretend the coverage is well short of the 'cottages' that join Ebenezer Lane: if drawn correctly the yellow circle would actually completely go over these houses - see pic below.

- Cam6: ditto for the yellow circle and in this case, for the red circle also

- Cam7: ditto (yellow circle)

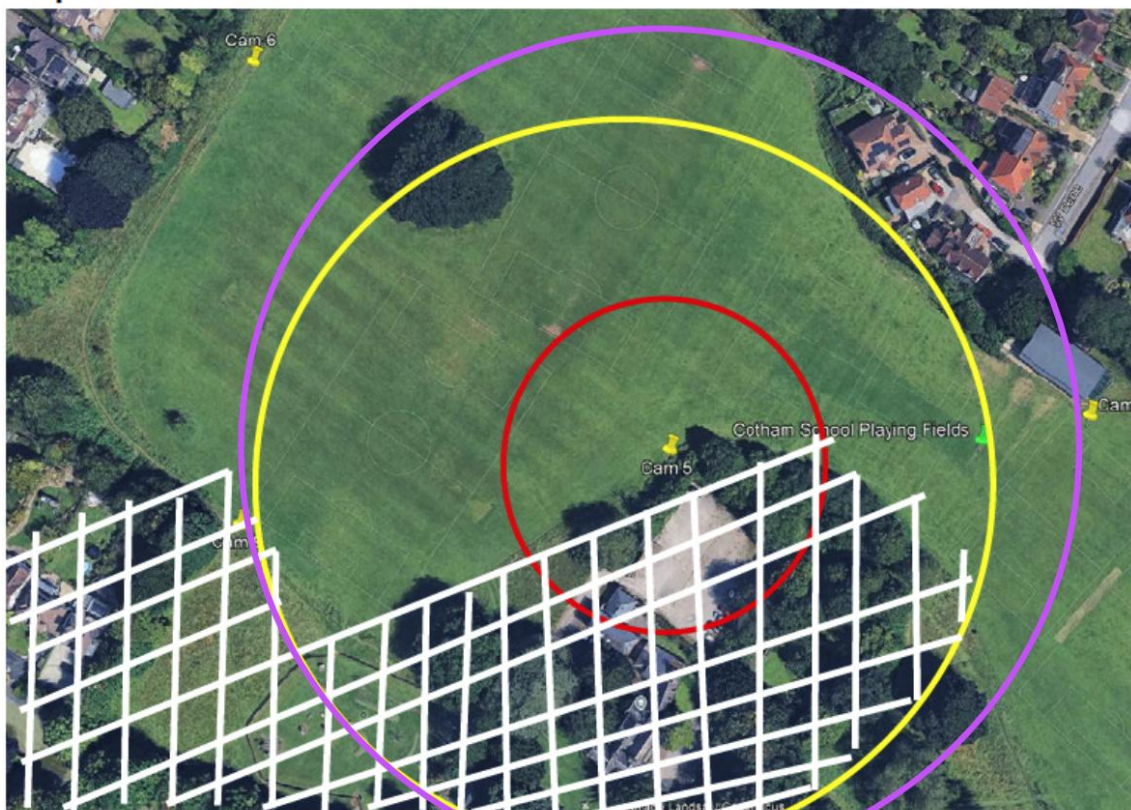
It appears that if one is generous one might say that not enough care was taken when drawing these circles: if one was cynical, considering how many of the circles are drawn off-centre - actually shown less overlapping residents' houses than would actually be the case - one might think that these were drawn deliberately that way.

Even assuming that the circles were for the most part incorrectly drawn due to lack of care, one exception to this is for Cam5, where the circle is so far off-centre it is hard to understand how it could be a mistake. Below is a drawing which shows a concentric circle drawn in purple, centred on the camera location.

As can be seen the view from Cam5 will easily cover the 'cottages' and the two houses to the north-east of the cottages, including the bedroom windows, and in fact, through the gaps between these houses, some houses beyond in West Dene will also be visible.

*Purple circle denotes CORRECT field of view of CAM5*

## Proposed New CAM 5



(Red circle denotes area where recognition of persons is achievable under good lighting conditions, yellow denotes area where persons can be detected and observed, white hatch denotes privacy screening).

d. The document does not mention the zoom capabilities that the Avigilon system has: all 24 cameras selected have electronically/remote controllable zoom. This also extends the 'red circle' and would make it feasible without doubt for the cameras to see into bedroom windows; and easily discern if a person is clothed or not, what colour clothes they are wearing, etc.

e. Further, the technical document provided by the camera manufacturer shows that the software of the Avigilon system includes advanced tracking capabilities, including such things as:

- face detection - including 'watch lists' ('person of interest', as the school did previously with their illegally installed covert cameras)
- accessories such as a bag
- specific colours, e.g. of someone's coat
- line crossing [i.e. going past a specific point/place]

So Cotham School could easily decide they want to track e.g. 'a person of interest' in a yellow coat and trigger every time that person is seen anywhere - perhaps following that person as they leave the fields and head to their house.

Or whenever someone goes on a PROW.

Such tracking does not need the same resolution as face detection.

Or, potentially - worst case - start recording when movement is seen in someone's bedroom window - perhaps in the house of 'a person of interest'

f. The 'privacy screens' cannot be relied upon. It requires correct setup - who will actually check this? Such screens can easily be switched off by an operator. Often, such zones are 'cleared' with a software update. So it must be assumed that there will be no privacy zones.

## **SUMMARY**

The proposed cameras will do nothing to 'safeguard' pupils that is not already done by staff members directly supervising those pupils.

At virtually no time will there will be any pupils on the lower half of the field, so almost never will CAM5, CAM6, CAM7 or CAM8 be able to 'safeguard' any pupils as there will be none there.

So the 'safeguarding' gain to the school is nothing from any of these cameras.

Yet installing the 8 poles with their 24 cameras will seriously infringe the privacy of anyone using Stoke Lodge playing fields, anyone walking around the perimeter, and in many houses surrounding the fields.

Yours sincerely,

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Thomas Dove

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