

The Planning Inspectorate

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OBJECTION TO SECTION 62A PLANNING APPLICATION

Address: Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol, BS9 2BH
Reference: S62A/2025/0133
Proposal: Installation of 8no. CCTV poles and cameras

To Whom It May Concern,

We write on behalf of the 'We Love Stoke Lodge Community Group' to formally object to the proposed application for the installation of 8no. CCTV poles and cameras validated on the 5th November 2025 (ref. S62A/2025/0133).

THE APPLICATION SITE

The application relates to Cotham School's leased playing fields at Stoke Lodge, located between Sea Mills and Stoke Bishop on the northern edge of Bristol. The land consists of long-established playing fields owned freehold by Bristol City Council and leased for 125 years to Cotham School for sports education.

The site is immediately bordered by residential properties, with numerous homes backing directly onto the fields. Mature trees, including several protected by Tree Preservation Orders (TPOs), frame the site boundaries and contribute significantly to landscape character.

A public footpath runs along the north-eastern boundary, while Shirehampton Road and Parry's Lane lie to the southwest and southeast respectively. There are four further footpaths across the site. Although not formally adopted these are due to be considered for formal confirmation and adoption as public rights of way at a Hearing by the Planning Inspectorate in 2026.

THE PROPOSAL

The application seeks consent for the installation of eight CCTV poles and cameras at multiple points around the playing fields.

APPLICATION DOCUMENTS

call
email
visit



Planning Ventures Ltd

Registered in England and Wales
Company Number 8820095



Registered office: 61 Macrae Road, Pill, Bristol, BS20 0DD
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This objection letter has been based on the following documents submitted by the applicant in support of the application:

- Application forms;
- AW1545-BAS Datasheet v4.5;
- BNG Statutory Metric V3;
- Camera Pole Elevation;
- Ecology Briefing Note;
- Planning Statement inc. Appendices;
- Stoke Lodge CCTV – Tree Constraints Plan – TCP1A;
- 2025 CCTV P01-CCTV Site Location Plan;
- 2025 CCTV P02-CCTV Existing Site Plan;
- 2025 CCTV P03 – CCTV Proposed Site Plan;
- 7741 100 Baseline Habitats Plan;
- AH Heritage Statement;
- AIA TPP – Stoke Lodge CCTV 25.9.25; and
- Cotham School Playing Fields – CCTV System Specification Technical Design – v1.8 06.10.2025.

RELEVANT PLANNING POLICY CONTEXT

Statutory Duty

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework's (2024) ("NPPF") planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The current Bristol Local Plan comprises the following documents and relevant policies:

Bristol Core Strategy (2011)

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

Site Allocations & Development Management Policies (2014)

- DM1 – Presumption in Favour of Sustainable Development;
- DM5 – Protection of Community Facilities;
- DM14 – Health Impacts of Development;
- DM17 – Development involving Existing Green Infrastructure;
- DM26 – Local Character and Distinctiveness;
- DM27 – Layout and Form; and
- DM31 – Heritage Assets.



NPPF (2024)

Key relevant chapters:

- **Chapter 8** – Promoting healthy and safe communities
- **Chapter 16** – Conserving and enhancing the historic environment

Emerging Local Plan Review (2024–25)

The emerging Bristol Local Plan Review (LPR) has not yet been adopted. Under NPPF paragraph 49, weight should be afforded to emerging policies where consistent with the Framework.

National Guidance – Surveillance Camera Code of Practice (2015)

The Code sets 12 guiding principles relating to necessity, proportionality, privacy protection, data limitation, accountability, and technical standards.

Site Designations

The site has the following land designations:

- Stoke Lodge is a Grade II Listed Building (#1202564);
- The wider grounds are designated as an 'Important Open Space' (Policy BCS9 and DM17); and
- The site is located within Flood Zone 1 (lowest risk – no further assessment required).

OBJECTIONS

The following section sets out the key objections to the proposals.

Lack of Policy Compliance & Insufficient Justification

The description of the proposed CCTV infrastructure significantly understates the true scale, visual impact, and physical intrusion associated with the works. Each element of the proposal raises serious concerns.

The application provides no meaningful evidence that CCTV on eight poles is:

- Necessary;
- Proportionate; or
- The least intrusive option available.

This conflicts with:

- Policies DM1, DM14, DM26, DM27, BCS21; and
- The multiple principles of the Surveillance Camera Code of Practice.



The absence of a clear evidence base should prevent the appointed Planning Inspector from concluding that this is a justified or sustainable intervention.

Heritage Harm (BCS22, DM31, NPPF Chapter 16)

Stoke Lodge is a Grade II Listed Building (#1202564). The wider grounds are designated as an 'Important Open Space' (Policy BCS9 and DM17).

Bristol City Council as Local Planning Authority refused Cotham School's previous application for just one CCTV pole (application ref. 20/01826) partly due to its detrimental impact on the parkland as a non-designated heritage asset. Officers required a further heritage appraisal, and explanation of the heritage values that underpin the understanding of the overall significance. The applicant has not addressed the need for these requirements within the submission material.

The applicant's heritage interpretation is selective and does not accurately reflect either the historic significance of the Stoke Lodge estate or the implications of the proposed development on its curtilage, setting, and associated heritage features.

Contrary to the applicant's implication, the absence of explicit reference within the formal listing description does not exclude these elements from curtilage protection. Listing descriptions are not exhaustive; the relevant test is historic and functional association at the date of listing. The fields have always formed part of the Stoke Lodge estate. Stoke Lodge was listed in 1994, at which point the Council confirmed the wider grounds formed part of the curtilage of the house and therefore the listing. Their position changed in 2018, when the Council stated the grounds were separate from the house and could no longer be considered part of the curtilage. Irrespective of the Council's recent change in position regarding whether or not the fields fall within the curtilage of the listed building, they can still be considered as curtilage to the listed building as historically and functionally they have always been connected.

Stoke Lodge and its surrounding landscape form part of a historic setting that includes:

- Locally valued heritage assets;
- Long-established mature tree boundaries; and
- A recognised historic landscape character.

The introduction of tall, modern, engineered camera columns will:

- Harm the setting of the listed building;
- Intrude into key views;
- Erode the open historic character of the site;
- Diminish the setting of nearby non-designated heritage assets; and
- Conflict with the NPPF requirement to conserve local heritage significance.

Under DM31, heritage assets and their settings must be preserved or enhanced. The proposal fails to demonstrate:

- An understanding of significance;



- An assessment of harm; and
- Any public benefit sufficient to outweigh heritage impact.

Each 6-metre pole requires a substantial concrete foundation (1.1m x 1.1m x 0.55m), meaning eight reinforced blocks will be buried across the historic landscape. This represents permanent, irreversible alteration of the ground—contradicting the applicant's portrayal of a low-impact development.

Such large bases will scar the subsoil structure and compromise any archaeological interest within the curtilage of the listed building. They also introduce hard engineering structures entirely out of keeping with the character of the grounds. Once installed, these foundations cannot simply be “removed” without further damaging the land.

Painting a galvanised steel surveillance mast green does not mitigate its impact. A 6-metre industrial steel column remains visually intrusive regardless of colour choice. In open recreational fields, with long sightlines and little screening, these poles will stand out starkly against the landscape.

The suggestion that colouring the poles helps them “blend” is cosmetic and does not address the fundamental incompatibility of tall, engineered structures within a historic setting.

The introduction of eight poles distributed across the open space, in conjunction with security fencing that is understood to have been erected under permitted development rights, would result in cumulative visual clutter, vertical intrusion, and an urbanising effect that is fundamentally at odds with the character of the parkland. The poles, camera housings, and ancillary equipment would be visible at close range and in medium-distance views, particularly along open sightlines across the park and toward the listed building. The visual impact would be exacerbated in winter months when tree cover is reduced. Screening through planting would itself alter the historic openness of the parkland and is not an appropriate solution. The residual harm would remain significant due to the alien and intrusive impact of these towering modern poles and ground cabinets, with associated fencing in the parkland setting of a listed building.

It is therefore considered that the proposals would result in substantial harm to the significance of the heritage asset. Accordingly, the proposal fails to satisfy duties under BCS22, DM31, and Chapter 16 of the NPPF.

Visual Impact and Harm to Local Character (BCS9, DM17, DM26, DM27)

The playing fields form an important green open space framed by trees, with a semi-rural feel highly valued locally.

The installation of eight industrial-looking poles will:

- Introduce harsh vertical structures;
- Break the openness of the landscape;
- Dominate views from surrounding homes; and
- Urbanise a sensitive edge-of-city site.

The installation of eight large, multi-sensor commercial surveillance units is wholly disproportionate to the character of the site, which forms part of the historic grounds of a Grade II Listed Building and within the context of a residential



area. These are industrial-grade security systems normally found in car parks, industrial estates, or secure premises, not historic parkland, school playing fields or residential suburbs. Their size, appearance, and technological character introduce an incongruous and urbanised visual element into a sensitive heritage setting.

This causes clear conflict with policies seeking to preserve local distinctiveness, landscape character, and green infrastructure.

Environmental Impact & Trees (BCS9, DM17)

Several proposed pole positions lie close to mature trees, including TPO-protected specimens. Installation poses risks including:

- Root disturbance;
- Canopy conflict;
- Long-term harm to ecological value; and
- Erosion of the tree-lined character of the site.

This is contrary to DM17 and BCS9, which require protection of green infrastructure and avoidance of unnecessary harm.

Policy DM17 also requires that development on part, or all, of an Important Open Space as designated on the Policies Map 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.

The erection of an array of eight CCTV cameras (in addition to those already installed) for the sole purposes of round-the-clock surveillance is not ‘ancillary to the open space use’ of this site.

Impact on Residential Amenity (DM14, DM26)

The proposal would cause unacceptable harm to residential amenity:

Privacy and Overlooking Concerns

The proposed cameras, through height and potential rotation, risk capturing:

- Private rear gardens;
- Residents’ windows;
- Public footpaths; and
- Informal recreational spaces.

Even the perceived possibility of surveillance constitutes harm to amenity and is a recognised planning consideration.

The scheme fails to demonstrate compliance with:



- Surveillance Camera Code Principle 2 (Effect on Privacy); and
- DM14 (Health and Amenity).

Homes backing onto the fields would be subjected to real or perceived surveillance, materially reducing everyday enjoyment of private gardens.

While the application suggests that privacy screening will be applied to mitigate the overlooking of private spaces, it fails to address the issue that the playing fields are subject to a lease which provides for shared use by the community. As a much-loved community amenity space, the proposed high level of surveillance (described by the school as monitoring 100% of a 22 acre field, 100% of the time) is inappropriate, unsettling and intrusive. It is also inappropriate for the area (which has one of the lowest crime rates in Bristol) and for the heritage parkland environment.

The proposal conflicts with policy BCS21 of the core strategy which requires new development to safeguard the amenity of existing development and create a high quality environment. The alleged benefits to the school of being able to monitor students who are already supervised and safeguarded by the presence of school staff, and deterring vandalism to a fence, cannot outweigh the privacy impact on adjoining occupiers (including many families with young children) and their rights under Article 8 ECHR in respect of their private and family life and home.

While there is no specific expectation of absolute privacy in a public space such as the parkland, many people still object to having every movement recorded and potentially stored by the school, with the attendant potential for later review or misuse. Four potential public rights of way traverse the site and would be covered by the proposed surveillance. In addition to any obstruction of the routes, the presence of overt surveillance infrastructure in a heritage parkland setting would detract from the amenity and enjoyment of users. The effect would be to erode the sense of openness and calm associated with the parkland and discourage public use. This is contrary to policies safeguarding the quality and accessibility of public open space and the enjoyment of rights of way. The proposal has not assessed the amenity impacts on users or explored alternative siting that avoids surveillance of public rights of way. Nor has the applicant demonstrated that the extent and intensity of coverage is necessary or proportionate, particularly as there are already six CCTV cameras providing widespread coverage of the field that are not referred to in the application documents. .

Light Disturbance

Infrared or indicator lights associated with cameras could cause:

- Night-time glare;
- Reflections; and
- Disturbance to sleep.

Overbearing Visual Impact

Eight tall poles constitute an intrusive and dominant presence when viewed from neighbouring dwellings.

Psychological Impact



A sense of constant monitoring—whether active or not—is a material amenity impact recognised in appeal decisions nationally.

This is contrary to DM14 (Amenity) and DM26 (Local Character).

Proportionality, Necessity & Legal/Technical Concerns (Surveillance Camera Code)

The application fails to evidence compliance with the Government's statutory surveillance principles:

No Privacy Impact Assessment (PIA)

A PIA is essential where residential properties may be captured. None has been provided.

Insufficient justification for eight poles

The proposal gives no sufficient:

- Up to date crime data;
- Security analysis;
- Alternative options assessment; and
- Explanation for why fewer cameras are insufficient.

Unclear retention, storage & access controls

Without these details, the Council cannot judge adequacy or proportionality.

Conflict with National Principles

The proposal contravenes at least:

- Principle 1 (Specified Purpose);
- Principle 2 (Effect on Privacy);
- Principle 6 (Images strictly necessary); and
- Principle 10 (Review and Audit).

These failings are material considerations weighing strongly against approval.

Summary

For all the reasons set out above, the proposal:

- Fails to comply with multiple policies of the Bristol Local Plan;
- Conflicts with the NPPF and national surveillance guidance;
- Causes harm to residential amenity, local character, landscape value, and heritage significance; and





- Is unjustified, disproportionate, and environmentally harmful.

We therefore respectfully request that planning permission be refused by the appointed Inspector.

We would be grateful for updates as the application progresses.

Yours sincerely,

We Love Stoke Lodge Community Group

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visit



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