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**Sent:** 30 November 2025 18:39  
**To:** Development Management <development.management@bristol.gov.uk>  
**Cc:** Neha Misra [REDACTED]  
**Subject:** Objection – Planning Application S62A/2025/0133 – Stoke Lodge Playing Fields

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Dear Sir/Madam,

I would like to lodge an objection to the proposed installation of eight 6-metre CCTV columns and multi-sensor Avigilon cameras at Stoke Lodge Playing Fields. My reasons for objecting are set out in the detailed points below.

## 1. NO FIELD-OF-VIEW ANALYSIS FOR ANY OF THE 8 CAMERAS

Despite their scale, height and proximity to homes, the application contains:

- no visibility diagrams
- no sightline modelling
- no assessment of views into windows or gardens
- no justification for camera orientation
- no privacy impact evaluation

This was a central reason for refusal of application 20/01826/F.

The same deficiency persists across all eight cameras.

The applicant relies instead on future “digital privacy zones” which:

- can be changed or disabled at any time
- are not enforceable through planning
- cannot be conditioned with certainty
- do not protect residents from technical reconfiguration

Planning law requires avoiding harm \*through design\*, not through operator assurances.

## 2. CAMERAS ARE NOT TRULY “FIXED” AND CAN BE RECONFIGURED

The technical specification (Global MSC Security, Section 7) confirms:

- cameras contain 3 high-powered 5MP lenses each
- lenses are individually aimable and digitally zoomable

- cameras can be reconfigured during maintenance
- privacy zones are software based
- columns tilt down for access

This contradicts repeated assertions in the application that the cameras are “fixed view”. They are \*not fixed in the planning sense\*.

Given eight multi-lens cameras, each with 180°+ coverage, the absence of documented sightlines represents a profound failure to address amenity impact.

### 3. CAMERA COLUMN HEIGHT (6m) IS EXCESSIVE AND UNJUSTIFIED

The Altron AW1545/BAS 6m tilt-down poles:

- are designed for industrial and public realm sites
- are intended for car parks, prisons, stadia, rail platforms
- are not proportionate within a residential edge green space
- introduce industrial-scale structures into sensitive boundaries

The School provides no analysis of:

- why 6m columns are necessary
- why lower-height options were not assessed
- why no alternative camera technologies were explored

The Planning Statement offers no technical justification—contrary to DM26 (local character) and BCS21 (design).

### 4. VISIBLE IMPACT ON MULTIPLE RESIDENTIAL BOUNDARIES

The Heritage Statement confirms visibility to Stoke Lodge is limited due to screening.

However, the same screening does **\*\*not\*\*** protect homes, whose upper floors, gardens, patios and bedrooms remain exposed from 6m height.

The omission of any residential amenity analysis is a critical and unexplained gap.

### 5. HERITAGE BENEFITS CLAIMS ARE OVERSTATED AND UNCONNECTED

The applicant’s prior refusal (20/01826/F) involved heritage concerns. The new Heritage Statement concludes “no harm”.

However, the applicant continues to:

- introduce heritage considerations to justify the scheme
- cite heritage balancing in public benefits

Since the Heritage Statement itself concludes no harm, the heritage balancing test \*cannot be used to outweigh residential privacy harm\*, which must be assessed independently under DM29.

## 6. ECOLOGY & TREE REPORTS REVEAL MAJOR GROUNDWORKS

The Ecological Briefing Note confirms:

- 450mm-wide trenches across the field
- 1.1m x 1.1m x 0.55m concrete bases for each column
- multiple ducting routes
- ground compaction and reinstatement

These works represent significant engineering disruption—not the "light-touch installation" implied.

None of these impacts were assessed for cumulative residential effects (noise, lighting, activity, disruption).

## 7. NO PROPORTIONALITY OR ALTERNATIVES ASSESSMENT

The applicant provides no evidence that:

- fewer cameras were considered
- lower poles were evaluated
- boundary-mounted options were explored
- non-intrusive safeguarding measures were assessed

The safeguarding and crime-prevention narrative is extremely broad and does not specifically justify eight 6m multi-sensor cameras covering the entire field perimeter.

## 8. RELIANCE ON PRIVACY ZONES IS NOT ACCEPTABLE

The DPIA and Technical Design repeatedly rely on privacy masking.

However:

- masks can be adjusted
- masks can fail
- software can be updated
- there is no planning control over camera settings

The planning system is designed to prevent harm through physical design, not operational assurances.

## REQUEST TO THE LPA

Given the scale, proximity, technical capabilities and absence of field-of-view evidence, the LPA cannot reasonably conclude that residential amenity will be protected.

Accordingly, I respectfully request that the Council:

1. REFUSE the application as submitted, due to failure to satisfy DM29, BCS21 and NPPF privacy protections.

OR, if minded to approve:

2. REQUIRE submission of full, enforceable field-of-view diagrams for ALL cameras prior to determination.

3. REQUIRE independent verification that no residential windows or private gardens are visible from any camera.

4. REQUIRE exploration of alternate technologies, lower-height columns, repositioning and reduced coverage.

Until these omissions are addressed, the proposal remains contrary to planning policy and harmful to the established residential community.

Yours faithfully,

Neha and Avinash Misra

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