

S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

Works to install 8no. CCTV poles and 24 cameras

I respectfully submit that this application should be rejected because (a) it is invalid and misleading in the form and content that has been presented and (b):

- it would harm the setting and significance of the listed building and undermine the historic and landscape character of the parkland, reduce the amenity and enjoyment of four public rights of way and result in unacceptable intrusion into the privacy of local residents; and
- the applicant has failed to demonstrate any pressing need or overriding public benefit or to consider less damaging alternatives.

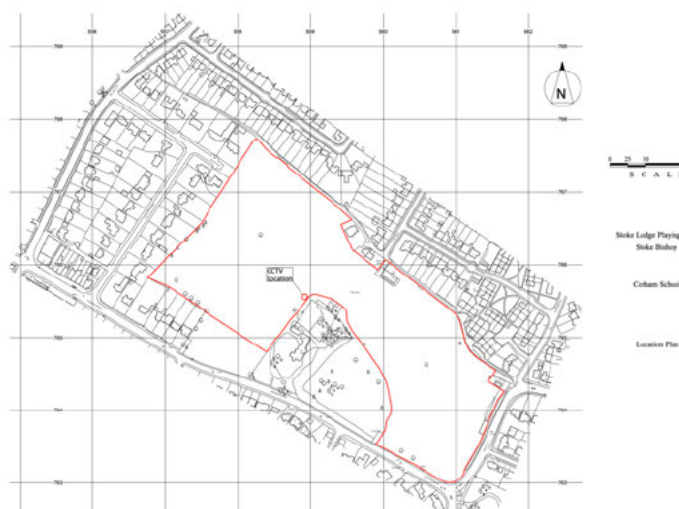
As such, the application conflicts with statutory duties to preserve listed buildings, as well as relevant national and local policies on heritage, design, landscape, and public open space.

1. Validity of submission

(a) Errors and inconsistencies in application documents

The submitted plans and documents are inaccurate and contradict each other in various key respects including the site location plan, the precise location of some of the cameras/poles and the route of the proposed cabling.

- On the site location plan, the blue continuous line (labelled as the school boundary) is artificial; the school boundary is the lease line which is marked as a dashed pink line. Many significant and protected trees are within the boundary of the land and within the school's leased area. The submitted plan also shows a red line which is said to be the 'extent of the planning application area'. This red line broadly follows the route of the proposed cabling, although it has an outcrop in the centre of the plan which is a further artificial measure to include proposed trees within the 'planning application area', while having in fact excluded all the actual trees on the site. The red line on the site location plan should properly include all necessary land, including access points etc. The redline boundary marked on the plan provided by the applicant is neither accurate nor sufficient. The school's previous application for one CCTV tower (BCC LPA reference 20/01826) correctly provided a redline boundary matching the lease line (see fig.1). The same site boundary used for the previous single CCTV tower application must also apply to this application for 8 towers since the whole site is affected in terms of visual and amenity impact – there is no proper reason to do otherwise. The applicant's site location plan is invalid.



**Fig.1: Plan submitted
by Cotnam School
for application
20/01826/F**

- The proposed site plan provides an inaccurate key, making it impossible for the Inspectorate to determine what is existing ducting, what is proposed new ducting and what is fence line.
- The cabling route shown in the arboricultural report broadly follows the perimeter of the site, but the site location plan proposes a zigzag formation across the field, so the arboricultural report does not address the actual proposal. The cabling route shown in the arboricultural report goes through the root zone of a protected walnut tree (T24), despite the report stating that open trench installation is likely to sever roots and harm trees.
- The arboricultural and CCTV reports do not accurately show the school's perimeter fence (for example, in the north west part of the site) and therefore do not show the location of each of the proposed CCTV poles accurately.

(b) *Public rights of way*

The applicant admits at Q6 of the application form that there are several claimed rights of way 'adjacent to the site' but has intentionally failed to address the impact of the proposal on these rights of way. In fact, the four rights of way cross the site itself (see fig.2). The Council as landowner supports the addition of these routes to the Definitive Map and consideration at a public hearing is due to take place next year (ROW/3363939). At least one proposed CCTV tower (camera 5, and possibly camera 4) would directly obstruct a right of way.

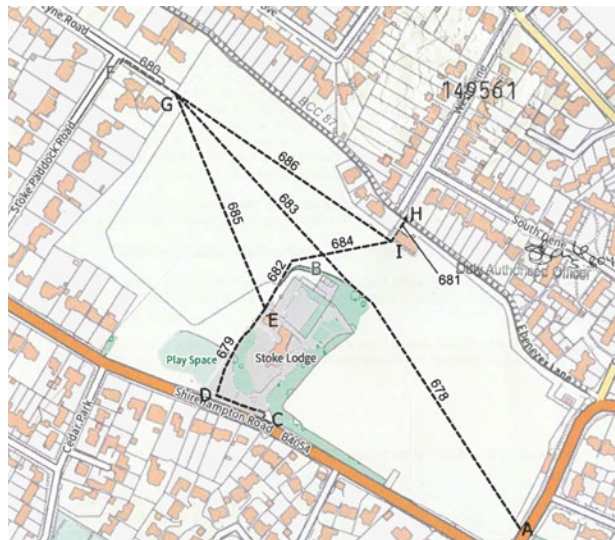


Fig.2: Proposed additions to the Definitive Map (ROW/3363939)

The National Planning Policy Framework and guidance on 'Open space, sports and recreation facilities, public rights of way and local green space' refers to [Defra Rights of Way circular 1/09](#) for guidance on the consideration of rights of way in association with development. Defra circular 1/09 states at paragraph 7.4 that all public rights of way crossing or adjoining a proposed development site must be marked on application plans with explicit details on how the development might affect them. The applicant has not met these basic requirements. In addition, the Defra guidance requires decision-makers to identify and take into account any rights of way potentially affected by the development, including applications for the addition of a path, the possible existence of any other rights of way and paths not yet recorded on the definitive map. Without this information, the Planning Inspectorate cannot properly assess the proposal or consider the impact of the development on those claimed rights of way and the amenity of users – a material flaw and grounds for rejection.

If the paths are added to the Definitive Map, the applicant is likely to relocate the fence. This application is therefore premature: it seeks to place CCTV towers based on a fence that may be moved or removed, undermining both the visual amenity assessment and the applicant's claimed need for security measures.

(c) Use of land

In Q14 of the application form the applicant states ‘School playing fields leased for sports/education use’. The school’s lease of the site is expressly ‘subject to all existing rights and use of the Property, including use by the community’. Community use of this designated important open space is ongoing. Sports club use continued until the school stopped hiring pitches out from September 2025. The only obstacle to ongoing use is the school’s own decisions/actions.

Cotham School is located some 3 miles away and makes very limited use of the site: small groups of pupils (typically 30-60 plus 2-4 staff) attend for periods of 45-60 minutes, up to eight times a week during term time (depending on the weather and ground conditions) and typically only use the top third of the site. Six CCTV cameras mounted on the pavilion and the white maintenance hut already cover this area, making the proposed four additional CCTV towers in this area unnecessary. The school scarcely uses the lower (wetter) field.

2. Applicant’s arguments in favour of the proposal

(a) Applicant’s claims about necessity

The applicant suggests that it needs CCTV to monitor pupils 100% of the time. However, pupils are never unsupervised at the site as they are being taught and supervised by accompanying staff. There is no evidence for the alleged risks of assault/abduction, particularly since Stoke Bishop and neighbouring wards are among the safest in Bristol.

The alleged need for CCTV to deter fence damage is undermined by the ineffectiveness of the existing 6 cameras in the upper field. Neither the Department for Education nor Ofsted require detached playing fields to be fenced or students to be under constant CCTV surveillance. In relation to the document ‘Keeping children safe in education’ mentioned by the applicant, Ofsted’s School Inspection Handbook states that ‘We expect schools to meet the other requirements of Keeping children safe in education, but have no additional or separate expectations of schools with respect to taking any specific steps with regard to site security; in particular, inspectors do not have a view about the need for perimeter fences or lockdown alarms’. Ofsted’s position is that schools can fully comply with safeguarding standards without perimeter fencing or blanket CCTV surveillance. The applicant’s claims that CCTV is ‘necessary to meet statutory safeguarding requirements for pupils and staff’ and that ‘it is a statutory requirement that the same controls are in place when students are using the school playing fields’ are simply untrue and unsupported by any regulation. The mere mention of safeguarding does not provide an evidence base justifying a ‘need’ for eight CCTV cameras and poles in addition to the existing six cameras, in parkland that is used by the school for less than 5% of the week.

In paragraphs 6.2-6.13 the applicant makes generic references to various legislation but these do not establish a need for CCTV monitoring. The references to specific sections of the Children Act 2004 appear to be incorrect or irrelevant. No weight should be attached to this material; the duty is to act reasonably, not to impose excessive measures. Schools have been held by the courts to act ‘in loco parentis’ and of course parents and schools do allow their children/pupils to go to parks and to play football etc in unfenced open spaces without constant CCTV surveillance, particularly for older, secondary school-aged children. Local families have safely used Stoke Lodge for generations without fencing or CCTV, just as millions of other prudent and reasonable parents (and schools) around the UK do in their local green spaces.

(b) Applicant’s claims about deterrence of crime

Perimeter fencing was originally erected in 2019. The land gained village green status in August 2023, making enclosure of the land a criminal offence. The High Court ruled in June 2025 that the legal test for village green registration was not met and the school has now reinstated a fence under claimed permitted development rights, despite Bristol City Council deciding in November 2024 that four public rights of way exist across the land (all of which are obstructed by the fence). Cotham School’s lease provides that its use is ‘subject to all existing rights and use of the Property, including use by the community’. The High Court confirmed that this includes rights of way, whether or not shown on the Definitive Map.

The applicant's schedule of reported crimes sets out incidents almost exclusively from the lockdown period or shortly after. Notably, some of the incidents listed took place in view of existing CCTV, undermining claims of its deterrent effect. No incidents are listed after June 2020 and it is concerning that the school has listed and retained CCTV of children simply playing football. This level of intrusiveness is unacceptable. Subsequent to making its application, Cotham School published a controversial press statement about further vandalism but its claims have been shown to be exaggerated.

Stoke Bishop has one of the lowest crime rates in Bristol and there are no known instances of theft, abduction or assault on the land. The proposal is disproportionate and unnecessary and detrimental to the amenity use of the land.

(c) Surveillance Camera Code of Practice

The applicant refers to the Surveillance Camera Code of Practice (incorrectly naming it 'Surveillance Camera **Covert** Practice') in paragraphs 4.7-4.9 of the Planning Statement, listing its 12 principles with an unsubstantiated statement about compliance. Cotham School has breached those principles in the past, notably by operating covert CCTV cameras which were declared unlawful by the Information Commissioner after media exposure and complaints from residents, councillors and our MP. The claim at paragraph 6.14 that police advised the installation of CCTV is unsubstantiated; the school previously made the same claim about the covert cameras and this was strongly denied by the police.

The Code requires surveillance cameras to serve a specific, legitimate purpose and to meet an identified pressing need (principle 1), to be proportionate to the need demonstrated (principle 2) and to be effective in supporting public safety (principle 11). The school has failed to demonstrate any 'pressing need' since there is no statutory requirement for constant pupil CCTV surveillance during lessons or for security fencing/CCTV monitoring on detached playing fields; it has carried out no consultation with the community. The public is and feels safe on these fields without CCTV, and would feel less safe and more threatened with it in place.

The applicant already has 6 CCTV cameras mounted on the pavilion and white hut, covering the upper field. Its statement suggests that these have not been effective in deterring crime - and yet the applicant has not provided any evidence of crime since 2020. The applicant has recently added 3 mobile CCTV compounds on site, comprising a further 21 cameras (in breach of planning rules) but now appears to suggest that these have also been ineffective in preventing vandalism. There is no evidence that installing eight CCTV towers would be effective or proportionate.

Other specific issues relating to the necessity and proportionality of the proposal:

- Camera 1 covers an area that is already monitored by three CCTV cameras mounted on the pavilion. Similarly, camera 3 is close to the white hut which also has three CCTV cameras covering that area of the field.
- Camera 2 appears to be located between the canopies of two protected trees, a black pine and the turkey oak - potentially leading to future requests for unnecessary pruning of these trees. It has a very intrusive impact on housing close to the boundary of the parkland. Cameras 6, 7 and 8 are also intrusive of housing in close proximity.
- The CCTV system survey and design report states that each camera will require 'clear line of sight between the proposed camera locations and the pavilion building'. This will not be possible for camera 7 due to the slope of the land and existing housing.

Additional CCTV in these locations is plainly unnecessary and unacceptably intrusive.

3. Detrimental impact

The school's alleged need for CCTV must be weighed against the significantly detrimental impact on local privacy and amenity. The key question is whether the proposal genuinely supports the open space use of the land.

(a) Visual impact

Cotham School states that its poles and cameras will not be visually intrusive, but they are wholly unsympathetic to the heritage parkland surroundings. Previous applications for fencing, signage, and CCTV have consistently been refused (or withdrawn after officers said they would recommend refusal in the case of the 2016 fence application) due to their negative effect on the listed building, its setting and the heritage parkland character of the site.

Cameras 1, 4, 5, 6 and 8 will be particularly intrusive as they are not positioned at the edge of the land but in open space and are three times the height of the existing fence. Other specific issues include:

- Camera 4 is close to Stoke Lodge's iconic 'Tree of Life', a sculpture that preserves a formerly majestic Cedar of Lebanon and is a key designed focal point. It is nonsensical to claim that a 6 metre high metal pole and camera within metres of that feature would be unobtrusive. Another much-loved tree close by, a TPO-listed Copper Beech, collapsed in recent months and is due to be replaced with another tree in its close vicinity to provide replacement visual amenity - a CCTV pole in this location would be entirely detrimental to that objective.
- Camera 5 would obstruct a public right of way. A CCTV camera in this location has previously been refused by BCC and that refusal was not appealed by Cotham School. It is wholly unsuited to the heritage environment. The school's perimeter fence was erected on the basis of permitted development and is also antithetical to the heritage environment but that should not be a gateway to or lever for further unsympathetic and detrimental development.
- The location of camera 8 is unclear based on the application information. It is either free-standing in open space outside the fence or much further into the site than indicated, depending on which of the applicant's plans is looked at. Either way, it will clearly be visible to users of the listed building (the Adult Learning Centre) and damaging to the visual amenity of the parkland.

Collectively and individually, the CCTV towers will harm the character and appearance of the area. The cumulative impact of eight additional poles and cameras (in addition to the existing cameras) will destroy the tranquility of the open space environment and create a more hostile, overdeveloped space. By disrupting important views, sightlines, and the designed relationship between the building and its grounds, the proposal would be severely detrimental to the setting of the listed building and would cause harm to its significance.

The applicant has attempted to argue that the site is not the heritage parkland of the listed building at all, and that it is 'largely without historic or architectural association with Stoke Lodge'. This is misleading and untrue, as Cotham School is well aware. I have addressed this issue in separate representations.

(b) Impact on amenity

The application ignores the fact that the playing fields are subject to a lease which provides for shared use by the community. Proposing 24/7 surveillance of the entire 22-acre site is excessive, intrusive, and completely inappropriate for a valued local amenity, public rights of way, and heritage parkland. It would have a chilling effect on use of this designated important open space.

The proposal directly conflicts with policy BCS21 which requires new development to protect local amenity and create a high quality environment. Privacy screening cannot be conditioned or reliably enforced, and the community has no faith in Cotham School's assurances or practice, especially after its past use of covert

cameras in breach of policy and law. Any supposed benefit to the school – such as monitoring students who are being supervised by qualified staff, or deterring vandalism to a fence that may soon be moved—does not justify undermining privacy, including that of families with young children, or breaching Article 8 ECHR rights.

Physical and visual intrusion from surveillance infrastructure in this heritage parkland setting would spoil the enjoyment and open character of historic public footpaths, discouraging public use and enjoyment and violating policies protecting the quality and accessibility public open space and the enjoyment of rights of way. The effect would be to degrade the sense of openness and calm associated with the parkland and discourage public use. The application deliberately fails to assess the amenity impacts on users and does not consider less intrusive alternatives, nor does it show that blanket coverage is necessary or proportionate. The community strongly objects to having their movements continually recorded and potentially misused by the school.

4. Planning policy

From a planning perspective, the site is designated as Important Open Space, valued for recreation, leisure, community use, landscape and visual amenity quality. It is proposed for designation under the next Local Plan as Local Green Space (although this is currently pending final adoption). Bristol's policy DM17 states that development on part or all of an Important Open Space will not be permitted unless the development is ancillary to the open space use, which 24/7 CCTV monitoring is not.

No visuals or drawings clarify the impact of camera 5 above historic features, nor how towers 5 and 8 would affect the house's silhouette or how any of the towers would affect parkland views. The basic, utilitarian design of the CCTV poles fails to meet local or national standards for high-quality, context-sensitive design. The sheer number, size, and spread of the cameras amplifies the harm. There is no evidence that the existing six cameras solved any problems before June 2020, nor any recent incidents to justify this expansion. The application does not comply with design, heritage, or open space policies, no clear and compelling need case has been provided and there is no justification for any harm to the heritage assets being offset on the grounds of wider public benefit.

5. Other matters

The school's lease includes a prohibition on erecting new structures on the land. Additionally, the proposed ducting near camera 3 crosses a 6-metre-wide easement strip centred on two underlying gas mains. Activity on or under this strip is forbidden under the lease dated 8 April 2011 between Bristol City Council and Wales and West Utilities Limited. The proposal is not properly thought-through or workable.

Conclusion

In summary, this application is fundamentally flawed and fails to provide the necessary information for the Inspectorate to make an informed planning decision. The information presented is not only insufficient but also misleading in several respects, which is a cause for significant concern. The proposal should be refused in its entirety.

Even if assessed on its own merits, the proposal should be rejected for the reasons outlined above: it would harm the setting and significance of the listed building, undermine the historic and landscape character of the parkland, reduce the amenity and enjoyment of four public rights of way, and result in unacceptable intrusion into the privacy of local residents. The applicant has failed to demonstrate any overriding public benefit or to consider less damaging alternatives. As such, the application stands in clear conflict with statutory duties to preserve listed buildings, as well as relevant national and local policies on heritage, design, landscape, and public open space.

Accordingly, I respectfully urge the Inspectorate to refuse this application. Should the Inspectorate nonetheless be minded to grant permission, this should be strictly limited in duration and subject to robust conditions, including prohibitions on illumination and any additional equipment without separate application and consent.