

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

[REDACTED] >

Section 62A Applications Non Major

Dear Case Officer,

I am submitting a formal objection to application S62A/2025/0133 concerning Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH.

Name: [REDACTED]

Address: [REDACTED]

I submit this objection on material planning grounds only.

1. Disproportionate Visual Impact & Perimeter Massing

Eight 6 metre masts carrying 24 cameras will introduce repeated vertical structures across the boundary of the field.

The repeated 6 metre poles around the boundary introduce a visually dominant perimeter structure that changes Stoke Lodge from an open green space to one defined by built surveillance equipment.

This fundamentally alters the visual openness and landscape character of a long established green site.

Verified visualisations show the poles significantly above tree and fence lines, demonstrating an urbanising effect inconsistent with the open historic parkland character.

2. Redundant Security Infrastructure

The perimeter fencing has already been constructed to restrict access.

Planning policy requires security measures to be proportionate to demonstrated need.

If fencing fulfils the safeguarding function, a second permanent layer of wide area surveillance becomes unnecessary.

Conversely, if 24 perimeter cameras remain necessary, this would imply that fencing has not fulfilled its stated purpose. Either condition defeats justification for approving both forms of permanent enclosure simultaneously.

3. Permanent Structures for a Time Limited Operational Need

Safeguarding requirements apply only during defined school hours.

The proposed camera masts are permanent built structures with 24 hour operational capacity.

It is not proportionate to impose permanent visual and landscape change for an intermittent operational need.

4. Public Rights of Way have already been determined by the Local Authority

The Local Authority has already resolved, on the basis of submitted evidence, that the routes meet the statutory tests for addition to the Definitive Map; only procedural confirmation now lies with the Planning Inspectorate.

Implementing full perimeter surveillance infrastructure while that Council determination stands risks prejudicing the statutory process and undermining the authority of the Committee's earlier resolution.

A statutory body has already examined the evidence and reached a formal conclusion. Any approval of intrusive surveillance infrastructure before that determination is honoured would create the appearance of administrative pre-emption.

The application fails to map and assess these routes as required by Defra circular 1/09, preventing proper consideration of amenity and obstruction impacts and rendering the submission procedurally incomplete.

5. Heritage Trees and Root Protection Zones

Several pole sites sit within or adjoining root protection areas of established trees.

Expert arboricultural advice confirms:

excavation risks root damage and compaction

repeated vertical intrusion interrupts historic open sightlines between tree corridors

The site's visual and amenity value derives from uninterrupted green openness.

6. Functional Overreach Beyond Educational Scale

Safeguarding CCTV in educational settings is normally:

inward-facing

entrance or zone-specific

The proposed perimeter-wide configuration monitors the landscape, not defined pupil zones. This scale is characteristic of commercial or municipal surveillance rather than proportionate educational safeguarding.

The outward perimeter coverage will also, unavoidably, extend viewing into surrounding residential aspects, raising standard planning considerations of privacy and residential amenity.

7. Regulatory Matters Planning Cannot Pre-Determine

This proposal intersects with unresolved statutory matters (including public rights of way and operational governance obligations). Planning permission cannot be used to pre-empt these determinations, nor to resolve compliance questions that lie outside the scope of the planning authority.

Determinations on access rights and operational governance must precede, not follow, planning consent.

Conclusion

For the reasons above, the application fails key planning tests regarding:

proportionality of security measures

cumulative visual and landscape harm

redundancy of dual security systems

heritage and tree-root constraints

unresolved statutory access determinations

regulatory questions planning cannot lawfully pre-decide

Accordingly, this application should be refused in full.

Policy Conflict

The proposal also conflicts with Bristol Local Plan Policy DM17 (Protection of Open Space), which permits development only where it is ancillary to the open space use. Full-perimeter surveillance masts do not serve or support the open space function and therefore fail this policy test.

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In light of the significant public attention and sensitivity surrounding this application, I request that my personal contact information be used solely for statutory validation purposes and withheld from publication, in accordance with UK GDPR and the Planning Inspectorate's privacy policy.

Yours faithfully,

[REDACTED]