

Objection to Planning Application Ref: S62A/2025/0133 - Stoke Lodge Playing Fields,  
West Dene, Shirehampton, Bristol BS9 2BH

[REDACTED] >

Section 62A Applications Non Major

Dear Sir/Madam,

I am writing to lodge our objection to the planning application submitted by Cotham School to erect 8no. CCTV poles and attached cameras. We have lived at our property, which [REDACTED], and consider the proposals to be fundamentally unacceptable for the reasons below.

#### Heritage Impact

The submitted Heritage Assessment asserts that the open space is “largely without historic or architectural association with Stoke Lodge.” This conclusion is misleading and fails to properly understand or apply the concept of setting as defined in the NPPF and Historic England guidance. For over a century, this open land has formed an essential part of the setting of Stoke Lodge and its associated curtilage-listed structures, contributing to their significance through openness, long views, and historic spatial separation from later suburban development.

Paragraphs 195–208 of the National Planning Policy Framework (NPPF) require that great weight be given to the conservation of designated heritage assets, with particular importance attached to their setting. Any harm—whether substantial or less than substantial—must be clearly and convincingly justified. The applicant has failed to demonstrate such justification.

The assessment is notably silent on the walled kitchen garden and, most significantly, the curtilage-listed summer house located on the north-west edge of the site in a prominent position adjoining the open space. This omission is indefensible. The summer house is a key heritage feature whose importance was explicitly recognised by Bristol’s Conservation Advisory Panel, and it was restored by the Bristol Buildings Preservation Trust in the early 2000s. Its significance, visibility, and relationship with the open landscape have therefore been formally acknowledged and reinforced. The failure to assess the impact of pole-mounted CCTV infrastructure on this asset renders the Heritage Assessment incomplete and unreliable.

Historic England guidance is clear that setting is not limited to immediate proximity but includes how assets are experienced in wider views and within their historic landscape context. The long-established openness of the playing field has preserved the visual

and historic relationship between Stoke Lodge and its surroundings. The introduction of tall, modern CCTV poles would introduce alien vertical elements into this historic setting, resulting in clear visual harm that has not been properly assessed.

#### Flawed Methodology and Inadequate Visual Assessment

The Heritage Assessment is further undermined by its methodology. The site appraisal was undertaken during the height of summer, when trees were in full leaf, leading to a materially misleading understanding of visibility. The site and its heritage context are experienced throughout the year, not solely during peak summer conditions. For several months annually, when trees are not in leaf, Stoke Lodge, the summer house, and other heritage features are readily visible in wider views across the open space.

This failure directly conflicts with established best practice, which requires assessments to consider seasonal variation and worst-case visibility scenarios. As such, the conclusions drawn regarding limited visual intervisibility cannot be relied upon.

The open playing field has historically functioned as a crucial buffer, maintaining visual separation between the listed site and surrounding suburban housing. This openness is a defining characteristic of the site's historic evolution and significance. The proposed development would erode this separation and permanently alter the character of the setting.

#### Harmful Visual Impact and Failure to Undertake Proper Landscape and Visual Impact Assessment (LVIA)

In visual terms, the proposed pole-mounted CCTV cameras would be conspicuous, intrusive, and wholly out of keeping with the open, undeveloped character of the land. The poles would introduce unnecessary vertical clutter into a sensitive historic landscape, causing harm to visual amenity and the setting of nearby listed buildings.

In line with NPPF paragraph 130, development should be visually attractive, sympathetic to local character, and establish a strong sense of place. The proposals fail these tests.

Given the scale, prominence, and sensitivity of the site, the applicant should have submitted a Landscape and Visual Impact Assessment (LVIA) prepared by a suitably qualified Chartered Landscape Architect (Member of the Landscape Institute), undertaken in accordance with the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment (GLVIA3). The absence of such an assessment represents a

serious evidential gap and prevents the local planning authority from making a properly informed decision.

### Unacceptable Impact on Privacy

The proposed CCTV cameras would also result in a significant and unacceptable loss of privacy for nearby residents. The cameras are to be mounted on elevated poles, enabling wide and intrusive surveillance across the open space and into adjoining residential properties and private gardens. This would create an oppressive environment and a justified perception of constant monitoring.

Paragraph 130(f) of the NPPF is explicit that development should create places with a high standard of amenity for existing and future users. This includes protection from overlooking, loss of privacy, and intrusive development. The proposals clearly fail to meet this requirement.

Furthermore, the use of CCTV in public or semi-public spaces is governed by the principle of necessity and proportionality. The Information Commissioner's Office (ICO) CCTV Code of Practice makes clear that surveillance systems must be the least intrusive means of achieving a legitimate aim, must avoid capturing private areas wherever possible, and must properly consider the rights of those affected. No such assessment has been submitted.

The proposals represent a fundamental change in the character of the space—from open public recreational land to a surveilled, controlled environment intended for exclusive institutional use. This is a material planning consideration. Numerous planning appeal decisions have recognised that the perception of surveillance can be as harmful as actual overlooking, particularly where it affects residential amenity and the enjoyment of nearby homes.

The cumulative impact of elevated cameras, loss of public access, and the erosion of openness would significantly diminish the amenity of neighbouring residents and is wholly inappropriate in this sensitive location.

### Conclusion

The application fails to comply with the NPPF, Historic England guidance, and fundamental planning principles relating to heritage conservation, visual amenity, and residential privacy. The submitted Heritage Assessment is materially flawed, incomplete, and methodologically unsound, and the absence of a proper LVIA and privacy impact assessment prevents any balanced or informed judgment from being made.

In the absence of robust and policy-compliant evidence demonstrating that harm has been avoided or convincingly justified, the proposals should be refused.

Yours faithfully,

Mr & Mrs Pemble