

**From:** Councillor John Goulandris [REDACTED]  
**Sent:** 19 November 2025 08:34  
**To:** Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>  
**Subject:** S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton Road, Bristol BS9 2BH

Dear Sir/Madam,

I write to object to this application in my capacity as ward councillor - the application site is in my ward - and as chair of Bristol City Council's Public Rights of Way & Greens Committee, as the application fails to take into account the impact on the four public rights of way across the application site, which have recently been approved by Bristol City Council.

The site history is pertinent and in particular the refusal by Bristol City Council of planning application 20/01826/F, which sought permission for **one** CCTV pole and camera. This application is for **eight** CCTV poles/ bases/cameras. The reasons for refusal of 20/01826/F are still broadly applicable, namely the proposed structures will seriously harm the setting of the adjacent Grade 2 listed Stoke Lodge, the environmental damage to wildlife and to the specimen trees with Tree Protection Orders and the adverse impact on residential amenity especially of nearby neighbouring residential dwellings and those using the site, including the public rights of way.

Stoke Lodge Playing Fields are **not** traditional school playing fields. The applicant, Cotham School, is based some 3 miles away. Stoke Lodge and its grounds were purchased by Bristol City Council shortly after World War 2. The listed house has been used by Bristol City Council for a number of purposes and is currently an adult education centre. The grounds have until recently been open space used by a number of different schools and clubs for a variety of sports as well as by local residents for recreation. The latest school user, Cotham School, on its academisation was granted a lease by Bristol City Council and, whilst not a planning matter, the lease prohibits any new structures on the land. The playing fields are more akin to parkland and are host to majestic trees with TPOs together with an abundance of a wildlife including badgers, foxes, bats, owls and other native birds. The application, if approved, would have a very detrimental impact on this non designated heritage asset. The cumulative visual impact of eight tall poles/concrete bases and associated furniture would inevitably destroy the tranquillity of the open space environment of the parkland. There would be a disruption to views/sightlines, which would fail to preserve the spatial relationship between the listed main house and its grounds.

The proposed works and in particular the extensive excavation, which the many metres of cabling require, represent a major disruption to the land. This will have consequences for wildlife and trees. There has been mention of badgers by the applicant, but I have not seen a bat survey. Apologies, if I have missed that. A survey will be required, as the tall CCTV poles/radio signals could have a material impact on the local bat population. The cabling works will pass very close to trees with TPOs and

some harm to trees is inevitable. The cabling route appears to go through the root zone of a TPO tree (T24) and I suspect other TPO trees will also be adversely impacted.

Scant attention has been paid by the applicant to the four public rights of way, which traverse the application site and how the proposed development will impinge on the public rights of way. Proposed camera poles 4 and 5 appear to obstruct a public right of way. By way of background, four public rights of way were **unanimously** approved by Bristol City Council's Public Rights of Way & Greens Committee on 27th November 2024. There has been an objection lodged by Cotham School and the Planning Inspectorate will need to consider the public rights of way (ROW /3363939). A public enquiry is anticipated in H1 2026. If the public rights of way are ratified and Definitive Map Modification Orders made, this would have consequences for the current fence line, which would need to be adjusted and also the location of the camera poles. Given the issues here, it may be appropriate for any planning decision to be deferred, until such time as there is clarity regarding the public rights of way.

The applicant argues that there is a safeguarding need for the additional cameras. This ignores a number of important points. There are already 6 cameras on the sports pavilion and associated buildings. This provides good visibility of most of the site and certainly the part of the site most used. In any event, it is important to remember that school pupils are brought to the site by coach in relatively small numbers, closely supervised at all times by school staff. Once the PE session has finished, the pupils immediately return by coach to Cotham School's main site (some 3 miles away). Pupils are not left unattended at any time. There is also a fence, which encloses the site and offers additional 'protection'. The applicant has cited a small number of police reports. None has anything to do with pupil safeguarding. The reports are historic and refer primarily to use of the application site during COVID by members of the public. Accordingly, the proposed 8 camera poles are not needed for pupil safeguarding.

Whilst some information has been provided by the applicant on the camera equipment and the substantial 6 metre height of the poles (much taller than the 2 metre fence), there is no information or visual aids to help understand the extent to which the eight poles would project above sensitive areas adjacent to Stoke Lodge, a grade 2 listed building and a major local landmark. From the limited information provided, it does appear that the poles are utilitarian in design, have no aesthetic merit and no attempt has been made to take into account the context of this important open space. If approved, the 8 CCTV poles/bases will be veritable blots on the landscape!

In summary, the previous application for one pole/camera was rightly refused by Bristol City Council and I trust that this application for eight poles will also be refused. The application has failed to address a number of key issues - the full impact on wildlife, especially bats and badgers with no bat survey undertaken, the harm to landmark trees with TPOs, the adverse impact on residential amenity, the impact on the four public rights of way, which traverse the application site and which have been largely ignored by the applicant, and importantly the unsympathetic visual impact eight tall structures will have on the parkland itself and the historic Grade 2 listed Stoke Lodge. There are already 6 cameras attached to the sports pavilion. The applicant has failed to establish

any justification for the serious harm to the heritage assets being offset on the grounds of wider public benefit. Other less harmful options do not appear to have been considered. Accordingly, the application does not adequately preserve or enhance the setting of the adjacent Grade 2 listed house, does not protect trees on site, does not protect wildlife, does not preserve the amenity of surrounding residents/site users, fails to take into account the four recently approved public rights of way and hence should be refused.

Yours faithfully

**Councillor John Goulandris**  
**Bristol City Councillor for Stoke Bishop Ward**  
**Chair, Bristol City Council Public Rights of Way & Greens Committee**  
c/o City Hall, PO Box 3399, Bristol BS1 5TR

