

# **Objection to Planning Application S62A/2025/0133 – Stoke Lodge Playing Fields**

**Date:** 17 December 2025

**Reference:** S62A/2025/0133 – Works to install 8 CCTV poles and 24 cameras

**Site:** Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

**Dear Planning Inspectorate,**

I write to object to the above application for eight CCTV poles and 24 cameras at Stoke Lodge Playing Fields.

Having reviewed the application and the extensive number of objections already submitted—many of which contain detailed technical, legal, and regulatory grounds—I do not intend to repeat those points in detail here. I endorse those objections in full and respectfully request that the Inspector gives them significant weight in determining this application. A summary of these key grounds is provided below.

## **Concerns Regarding Impartiality and Process**

I am grateful that the Planning Inspectorate is managing this application. While I note that one of the school's governors, [REDACTED]—who has led the campaign to fence and restrict access to Stoke Lodge for over 15 years—previously held senior roles at both the Inspectorate and Bristol City Council in planning matters, I trust that this application will be determined solely on the evidence.

My concern is that, over many years, Bristol City Council appears to have yielded to sustained pressure from the school, resulting in repeated breaches of the lease and a pattern where policies, procedures, and even statutory requirements have been treated as discretionary. This concern extends to the current application, where detailed evidence from the Conservation Team has been altered—apparently to mitigate the fact that permitted development was allowed on the basis of misinformation from the school and a legal opinion on curtilage that has never been disclosed and, in my view, may not exist.

The original Conservation Team submission (should be considered ( 28<sup>th</sup> Nov). It contains significant evidence that this land forms one parcel within the curtilage of the listed building and should have been consulted prior to permitting development behind closed doors in 2018/19, rather than retrofitting and altering reports years later to justify previous poor decision-making.

## **CCTV Will Not Achieve the Stated Objective**

The applicant claims that CCTV is necessary to meet statutory safeguarding requirements. This is incorrect. There is no requirement for detached playing fields to be fenced or monitored by CCTV, and schools across Bristol comply fully with safeguarding standards without such measures—even in areas with significantly higher crime rates.

Moreover, CCTV on playing fields is not common best practice. Comparable sites used by Cotham School and other schools demonstrate this clearly:

- Golden Hill and Coombe Dingle, both used by Cotham School for years, have open access and no CCTV covering sports grounds. Cotham School have chosen to use a site without CCTV today in an area with higher crime stats.
- Redland Green Sports Ground (Cotham's sister school) has a very large off-site playing field close by – this has no CCTV covering the playing field in an area of higher crime stats.
- Fairfield School Sports Ground, and Ashton Park School (which also has a public right of way) operate without CCTV both in areas of higher crime stats.
- Local primary schools also do not have CCTV on playing fields.

Crime statistics reinforce this point: Stoke Lodge has among the lowest crime figures of all these sites, yet the applicant proposes the most intrusive surveillance scheme. If CCTV were truly essential for safeguarding, these other schools would have adopted it. They have not.

I also note that a small number of headteachers from other Bristol schools have supported this application using a templated response provided by the applicant. These responses describe CCTV as “best practice,” yet none of these schools have CCTV installed on their own playing fields. This inconsistency should be considered by the Inspector when assessing the weight to be given to such support.

The reality is that the purpose of this CCTV appears to be protecting the fence, not safeguarding pupils. There are already six cameras covering the pavilion and grounds hut and the small area the school uses (less than 10% of the site for less than 10% of daylight hours annually).

Despite this, over 1,200 meters of fencing was removed – much of it in full view of existing cameras, and temporary CCTV towers have failed to prevent further damage in plain sight – a panel has been removed within just a few meters of very expensive, intrusive state of the art CCTV. CCTV has not supported any prosecutions and has proven ineffective as a deterrent. Installing eight more poles and 24 cameras, also at huge expense to the school, will not change this. The school has been offered alternative proposals for fencing the site repeatedly for over 7 years. Sadly, the school has chosen to rebuild the fence with no consideration of the community or consultation.

#### **Additional concerns:**

- Large temporary CCTV compounds were installed without permission in September 2025; Bristol City Council has confirmed these are unlawful and require planning consent.
- The school has previously installed covert cameras, which the ICO required to be removed and data deleted.
- Evidence in the applicant's own file shows live monitoring of the site when not in use by the school, including reporting young children to the police for informal play. This raises serious doubts about privacy assurances.

### **Why This Application Should Be Refused**

Installing eight 6-metre poles with 24 cameras will cause significant harm to heritage, landscape, and amenity—issues already comprehensively addressed in other objections—while failing to deliver any proven safeguarding benefit. It is disproportionate, unnecessary, and inconsistent with accepted practice.

## Summary of Grounds for Refusal

- **Statutory and Policy Conflicts:** The proposal conflicts with national and local planning policy and fails to meet statutory duties to protect listed buildings and their setting.
- **Heritage Impact:** The scheme introduces intrusive structures into a historic parkland setting, causing irreversible harm to its character and significance.
- **Procedural Concerns:** The application is premature, incomplete, and based on altered consultee evidence.
- **Privacy and Amenity:** Continuous surveillance of a shared community space and adjacent homes is intrusive and disproportionate.
- **Environmental Impact:** Risks to mature including veteran trees, biodiversity, and green infrastructure have not been properly addressed.
- **Necessity and Proportionality:** The school's use of the site is minimal; crime evidence is weak; CCTV is not required for safeguarding and is not best practice.
- **Deliverability Issues:** The school's lease prohibits the erection of structures. Eight CCTV poles on concrete bases are clearly structures. Whilst the previous Mayor in 2019 decided a fence isn't a structure ! It is very clear that the lease prohibits these cameras which are – irrespective of planning permission. In addition, gas main easements restrict works on parts of the site.
- **Public Rights of Way:** Four PROWs cross the site. The Inspectorate will determine if these are to be added to the definitive map – the Inspector appointed to the application and Bristol City Council voted unanimously for these routes – confirming overwhelming evidence supporting their existence. The applicant has blocked these routes today, they say that they will continue to block these routes and that they 'do not exist in their mind'. It is for the Inspectorate to determine and the application ignoring these routes means the application is procedurally flawed.

**In conclusion**, this proposal fails even on its own terms: it is not best practice, not necessary, and will not achieve the stated objective. It introduces harm without delivering benefit and should therefore be refused.

**Request to Speak:** I would like to confirm my request to speak at any hearing or inquiry that may be held in relation to this application.

Thank you for considering this representation.

Yours faithfully,

Emma Burgess



