

From: [REDACTED]
To: [Section 62A Applications Non Major](#)
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Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

Fiona Evans, [REDACTED]

I wish to object to this application on the grounds that it fails to meet the requirements of the Surveillance Camera Code of Practice, that is not necessary or proportionate for the very limited level of school use of the land, and will cause significant harm to public amenity, heritage parkland character and community use of this Important Open Space.

1. Inadequate Demonstration of Compliance with the Surveillance Camera Code of Practice

The application simply lists the twelve Guiding Principles of the Surveillance Camera Code of Practice and asserts—without evidence—that they will be complied with. It provides no detail on how each principle will be met, monitored or enforced.

This is particularly concerning given the applicant's previous unlawful use of covert CCTV at Stoke Lodge in October 2022. Transparency and accountability were entirely absent at that time. Only after local media reporting was the issue investigated, with the Information Commissioner subsequently finding the covert cameras unlawful. Given this history, the absence of an explicit, evidenced compliance plan is unacceptable. The application fails to demonstrate lawful, proportionate or accountable use of surveillance systems.

2. Misrepresentation of the Actual Use of the Land

Misstated Pupil Numbers

The applicant repeatedly claims the site is required for 1,700 pupils, but the school's Published Admission Number is 1,215, and governor minutes confirm a planned reduction in intake. The school informed the Council (FOI, 26 Sept 2025) that its playing field requirement is 6–7 hectares (approx. 16 acres). Adjusting this figure proportionately to the actual roll of 1,215 pupils, the required land area falls to approx. 11.4 acres—less than half the site. It is therefore not necessary or proportionate to install eight CCTV masts covering the entire 28-acre heritage parkland.

Limited and Supervised Use

When previously using Stoke Lodge, the school had access for approximately 8 hours per week of supervised PE lessons, with 30–60 pupils and 2–4 staff.

Pupils are *never* unsupervised on the site; they are always accompanied by staff.

The school primarily uses only the top third of the land, which already has six CCTV cameras on the pavilion and storage hut. There is *no justification* for four additional masts in the top half of the field or any masts in the lower, wetter half, which the school barely uses.

Community Use Ignored

Q14 of the application states the site is used as “school playing fields”, omitting the material facts that the lease expressly states the school’s use is “subject to all existing rights and use of the Property, including use by the community.” Community amenity use has continued for decades. Local sports clubs used the pitches until the school declined to renew hire arrangements in Sept 2025.

The only barrier to wider use is the school’s own choice not to stop hiring out the parkland.

The application misrepresents the dominant use of the land—community use vastly exceeds school use.

School Not Local to the Site

The school is located three miles away, making this an unusual and intermittent detached facility, not equivalent to on-site school playing fields. This is relevant when considering what is “necessary” for safeguarding and supervision.

3. Lack of Necessity or Proportionality

No statutory requirement for CCTV on playing fields

The applicant suggests CCTV is “statutorily required” to keep pupils safe. This is incorrect.

Ofsted’s School Inspection Handbook states:

- There is no requirement for perimeter fencing on school sites.
- There is no requirement for CCTV, including on detached playing fields.
- Inspectors have no expectation of additional site security measures beyond the general duties in *Keeping Children Safe in Education (KCSIE)*.

The Children Act duties require what is reasonable in the circumstances—not constant surveillance.

Parents do not require their teenage children to be under CCTV when visiting parks, sports pitches or the Bristol Downs; hundreds of schools operate perfectly safely without such measures. Local parents have never asked for CCTV at Stoke Lodge for safeguarding reasons.

Misleading references to safeguarding risk

Pupils on the site are always supervised. There is no evidence of abduction or assault risks, particularly in a part of Bristol with one of the lowest crime rates (BS9). The school claims CCTV is needed to protect the fence, yet the existing CCTV at the top of the field has not succeeded. Fence protection is not a planning justification for intrusive surveillance masts on Important Open Space.

Applicant’s own email undermines its case

In the 26 September email to the Council, the Head Governor proposes remaining at the better-equipped Golden Hill site should alternatives to Stoke Lodge exist. This significantly undercuts the claim that extensive security infrastructure at Stoke Lodge is essential.

Harm to Public Amenity, Landscape and Heritage Character

Stoke Lodge is designated Important Open Space and part of a heritage parkland setting linked to the listed Stoke Lodge building. The legal decision to rid the site of Curtlidge status has not been shared to the local ward counsellors, nor was there the required Public C

Visual Intrusion

The proposed poles (up to 6 metres high) would be:

- Industrial in appearance
- Completely at odds with the historic parkland character
- Visually intrusive across open rolling fields

The school cites earlier applications (2016–2020) but omits that all were refused or withdrawn due to heritage

and visual impact concerns.

Impact on Enjoyment, Safety and Atmosphere

Stoke Lodge's open character creates natural surveillance, which supports feelings of safety—especially for:

- women and girls walking at dusk
- dog walkers
- local children and teenagers using the fields informally
- families using the land for recreation

Following discovery of covert cameras in 2022, many users already feel watched.

Installing eight towers with four cameras each would significantly amplify this, creating a sense of scrutiny and hostility on public parkland owned by the Council.

Strong Local Community Use

The site is cared for by a well-connected community, local litter pickers and users provide a quiet, informal safety net. Multiple local social media groups including three Facebook groups swap concerns around wildlife, traffic and general safety. The group specific to Stoke Lodge reunites lost property, share photos of it's attractive vistas and create awareness of damage caused by fallen branches etc.

Neighbours have returned left behind school equipment found on the fields after a PE session (once it was football cones, another time tackle bags).

Community vigilance prevented a child from being left behind on the locked field (January 2023), a neighbour got in her car and drove to the coach to stop it leaving the pupil behind. This strong community presence fosters safety naturally—far more effectively than an array of CCTV masts.

The application fails to demonstrate why eight 6-metre CCTV masts covering an entire public open space are justified for a school that uses only a small part of the land for a few supervised hours per week who may be considering another more appropriate location for suitable PE lessons..