

From: [REDACTED]
To: [Section 62A Applications Non Major](#)
Subject: S62A/2025/0133 - Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH - OBJECTION
Date: 04 December 2025 19:45:41

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Dear Sir or Madam,

<https://www.gov.uk/guidance/section-62a-planning-application-s62a20250133-stoke-lodge-playing-fields-west-dene-shirehampton-bristol-bs9-2bh>

I object to this proposal on the grounds of it adversely affecting the settings of nationally important listed buildings, and it contravening several national and local planning policies in relation to heritage.

I live locally, and my family and I use Stoke Lodge and its facilities. We do not wish to see these important, lovely buildings or their settings damaged – particularly Stoke Lodge. I will concentrate on heritage objections although I agree with the many of the objections on other grounds which others have made. I am an experienced professional heritage advisor and archaeologist with over 40 years' experience (I am known professionally as Amanda Chadburn).

IMPACT ON HERITAGE

The proposal is for 8 masts for CCTV cameras, 6m high, which would dominate the immediate localities, and present an adverse and urban intrusion into what is the original green setting of Stoke Lodge. There is also a cumulative impact with Cotham School's recently-erected fence (on which I will not comment further) – but this cumulative impact has not been assessed.

Stoke Lodge is one of our best local buildings, is listed, and is nationally important. It is set within its original parkland, arboretum and gardens which mostly survive well, and within which these large, proposed CCTV masts would sit. Walls The list entry can be found here:

<https://historicengland.org.uk/listing/the-list/list-entry/1202564>

Other nationally important listed buildings which will be adversely affected include:

<https://historicengland.org.uk/listing/the-list/list-entry/1206675>

<https://historicengland.org.uk/listing/the-list/list-entry/1202213>

The Heritage Statement is wanting. Although it notes the presence of other nearby listed buildings, it only appears to assess the main building of Stoke Lodge, and then not even its curtilage-listed structures.

One statement is particularly worrying (and seems to colour the overall analysis):

“Desk-based research and on-site analysis have confirmed that the Playing Field

does not meet the criteria for designation as a non-designated heritage asset (NDHA). Its origins as a post-war recreational ground, largely without historic or architectural association with Stoke Lodge, mean that it makes only a limited and largely neutral contribution to the setting of the Listed Building”.

This (see my highlights) is completely and utterly wrong. It’s a bizarre take. Stoke Lodge still *sits within its original park and grounds* – the setting of Stoke Lodge within its own grounds is largely preserved and today anyone can see and understand the original boundaries of the building’s original estate. The land on which the playing fields sit – with no structures (excluding the boundary fence) - fall within that original estate and clearly therefore form part of the setting of the listed building.

The local authority themselves consider that the grounds of Stoke Lodge constitute a heritage asset because of this - although not formally designated (this is referred to within the application). However, this is not really considered in the Heritage Statement but this land is rather dismissed - as above – although it is worth noting the somewhat contradictory parts of the Heritage Assessment later on with which I largely agree:

“4.14. Setting: Stoke Lodge sits within mature landscaped grounds, with large trees, lawns and an approach drive that reinforce its historic character as a 19th century villa set in a designed garden landscape. The sense of a country house villa in a parkland setting remains legible despite later adaptations for institutional and educational use. This relationship between house and grounds enhances the appreciation of its architectural form and its intended picturesque quality.

4.15. This setting is assessed to represent a major contributor to its overall heritage significance”.

Furthermore, although elsewhere the application it is clearly sets out that Stoke Lodge has curtilage-listed structures (outbuildings, walls, a gazebo etc) and it accepts that these are curtilage-listed - which is also the view of the Local Planning Authority - these structures do not seem to have been fully understood or assessed in the Heritage Statement.

Another quote from the Heritage Statement is worrying:

“A site visit has established that none of the proposed CCTV camera locations has a direct visual or spatial relationship with Stoke Lodge, and that views between the Listed Building and the Playing Field are effectively screened by mature planting...”

My own site visit today clearly established the opposite. Several camera poles – in particular numbers 4, 5, 8 and 3 - adversely affect listed buildings and their settings. Number 4 directly affects the historic arboretum. Number 5 is exceptionally close to the curtilage-listed buildings and structures and intervisible with the main house. There are clear lines of intervisibility between the listed cottage and pole number 3 and the listed gate piers are also affected adversely, although to a lesser degree. There are clear lines of visibility between Stoke Lodge itself and pole number 8. This is all readily checkable by an onsite visit.

A nearby scheduled monument - Druid Stoke burial chamber – will not be affected in terms of direct impact, but its proximity to the area has not been fully considered.

<https://historicengland.org.uk/listing/the-list/list-entry/1005426>

In view of the exceptional importance of this rare structure (the oldest built structure in

Bristol), the upper part of the Stoke Lodge parkland has archaeological potential which has not been assessed. This part will be affected by extensive service trenches. An appropriate level of non-intrusive archaeological surveys needs to be undertaken and this part of the site archaeologically assessed and taken into account before planning permission is considered.

NATIONAL POLICIES ABOUT THE HISTORIC ENVIRONMENT

NPPF (Dec 2024) states:

“Considering potential impacts

212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

and

“213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”

I consider that these national planning policies are clearly breached by this application, not least because the applicant has provided a limited assessment of the heritage significance of the proposals; no convincing or reasoned justification for this proposed development within its setting (which as the original and well-preserved Park for Stoke Lodge itself is an historic asset in its own right, although not designated); and has given no mitigation measures or consideration to the heritage sensitivities of this area.

LOCAL POLICIES ABOUT THE HISTORIC ENVIRONMENT

Policy BCS22 of the existing Bristol Development Framework Core Strategy - Adopted June 2011 - says:

"Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including:

- Scheduled ancient monuments;
- Historic buildings both nationally and locally listed;
- Historic parks and gardens both nationally and locally listed;
- Conservation areas;
- Archaeological remains."

The emerging plan has exactly the same policies.

Thus I consider this proposal also breaches local policies. This proposal will not safeguard

or enhance the setting of these nationally listed heritage assets - rather it will damage them.

LOCAL POLICIES ABOUT GREEN SPACE

This land - the setting of the Listed Building - is classified in the Adopted Local Plan (July 2014) (Map 12) as "Important Open Space", and as such, Policy DM17 also applies:

"Important Open Spaces

2.17.3 Important open spaces with a role and value for recreation, leisure, community use, townscape, landscape or visual amenity quality are designated and shown on the Policies Map and protected from development."

ADDITIONALLY:

- No clear or justifiable reasons are set out in the application as to why these large and ugly pole-mounted CCTV cameras are needed, and no alternatives are given.
- The school does not need these cameras, despite what it alleges – plenty of schools do not have CCTV on their playing fields. This level of surveillance is more appropriate to a high-security prison than a sleepy Bristolian suburb.
- Cotham School has a poor reputation with regard to CCTV. The Information Commissioner's Office (ICO) has previously criticized Cotham School and found its hidden cameras at Stoke Lodge playing fields to be "unlawful" and in "contravention of the principles of data protection law". The ICO stated the school must turn them off, deeming the cameras covert because they were difficult to detect and individuals would not reasonably expect to be filmed. The public are allowed on these grounds and this level of surveillance is not needed.
- The area has one of the very lowest crime rates in the whole of the relatively safe city of Bristol, and the use of the area by school pupils playing sport would not seem to warrant the need for CCTV, as pupils here must surely be accompanied by an appropriate number of school staff?
- No mitigation measures (e.g. design modifications) are shown to take account of the highly sensitive heritage locality.
- It is unclear when the cameras will be used, when, and how, and what rights of privacy and/or residential amenity could or will be breached.
- No evidence is given showing what areas of Stoke Bishop the cameras can view, nor in what detail, but this must surely include the public play park and public car park, the Adult Education Centre, and may also include private houses and gardens.

I object to this proposal for all these aforementioned reasons.

Yours sincerely,

Amanda MacDonald

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