

**From:** Kathy Welham [REDACTED]  
**Sent:** 17 December 2025 12:25  
**To:** Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>  
**Subject:** S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

Dear Planning Inspectorate,

Re: Planning Application no: S62A/2025/1033 Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

I strongly object to Cotham School's planning application. I have given just a few of my reasons for objecting below. There are many more that are well explained by others, and I am familiar with them and support them all. I respectfully ask you to reject this application on every ground. It has nothing to recommend it.

The application is deeply flawed. It contains numerous inaccuracies, omissions and deliberate misrepresentations of both the facts and of the school's real intentions for Stoke Lodge, should they gain the outright control of the site they have sought for over a decade. The applicant is an academy school, independent of the local authority, funded directly by government and with substantial freedom over its finances, but with unfortunately minimal oversight from Ofsted and the DfE.

### **History**

Having shared the site with the community, amicably without issue, for a decade, Cotham School negotiated and willingly signed a lease on Stoke Lodge in 2011. The lease contains a clause protecting all existing use of the land for recreation and leisure activities, 'including use by the community', and the absolute and unconditional prohibition on the erection of any structure on the land. This accords with the authoritative opinion of BCC's heritage and conservation team of experts, that the 22 acres of parkland surrounding Stoke Lodge house is its original curtilage, clearly its designed setting, part and parcel of the property and included in a visible original boundary.

One unusual feature of the lease is a clause that protects all existing rights to use the land for recreation and leisure, 'including use by the community'. Another is the agreement of BCC to remain responsible for the maintenance of all the trees - of which there is an impressive collection of mature and exceptionally fine specimens, most having TPOs - and of the boundaries, which include the original stone wall that runs around most of the parkland and is also the subject of a protection order.

Cotham School's decade-long bid to enclose this open amenity land and Public Open Space - for the second time - depends on the school's succeeding in fencing it in, to completely exclude the local community. This is in contravention of the prohibition of building any structure on the land, and of the lease condition protecting public access to and use by the local community. This application is part of its calculated attempt to control the land by turning it into a hostile, surveilled, threatening environment that has

been stripped of its assets: its beauty, history, peace and safety. It is an essential place of social interaction, cohesion, support and friendship, lifelong education and recreation for all ages, abilities, disabilities and vulnerabilities. It is deeply and widely known and loved, where generations of people have grown up and lived and played with their children and grandchildren and celebrated birthdays and anniversaries and met and walked with friends on the paths that link homes to shops and schools and buses and surgeries and village halls. Stoke Lodge matters and features in the lives of thousands of people.

### **The Public Rights of Way**

There are four public rights of way - PROWs - which have been studied, investigated and accepted by the Inspector and subsequently by the landowner, BCC, as Public Rights of Way Committee. They await registration. The Applicant has failed to follow the NPPF guidance on 'Open Space, Sports and Recreation Facilities, Public Rights of Way and Local Green Space', which points out Defra's stipulation that 'all public rights of way crossing or adjoining the proposed developments site must be marked on the plan to be submitted with the full planning application.' The Applicant has not marked the four PROWs on the plan and misleadingly describes them as being 'adjacent' to the site when in fact they cross it from top to bottom and from side to side. The Inspector found they had been in use long before any school use of the site for PE.

Since it is a serious offence to obstruct a PROW, the School's scramble to re-erect the fence seems unwise and wasteful. There was and is a very strong case for the PROWs, which would be substantially obstructed by the present fence. Re-routing the fence, again, would mean yet more issues of repeated and cumulative damage to the site's ecology, wildlife and habitats, and to the root zones of the numerous TPO trees that are a feature of the parkland.

I think that the only credible reason for Cotham School's hurry to reinstate an unnecessary, inappropriate fence is their intention that the fence should disrupt and destroy the community's use and access to the PROWs. The PROWs, in turn, threaten their control of Stoke Lodge itself. It is difficult to think of any other genuine reason to install the level of CCTV surveillance the application proposes on open parkland in an extremely low-crime area, than to control and deter the community's existing legal activities on the land by making them feel watched, insecure, anxious, threatened and cut off from the former freedoms and calm recreation they've always enjoyed at Stoke Lodge. The parkland was recommended for designation as Local Green Space in the most recent Local Plan consultations (which have been delayed for administrative reasons) after numerous witness statements testifying to the importance of Stoke Lodge in people's lives. Cotham School is using successive planning applications to undermine the community's pattern of use and erode its deep attachment to and responsibility for preserving Stoke Lodge as a valuable heritage asset. The fact is that Stoke Lodge is the hub of a large community and the relationship between the land and the local community benefits both sides.

## **Other problems with the Application**

The Application is full of inaccuracies, misrepresentation and inconsistencies. Its assertions and arguments cannot stand up against any informed interrogation and I question whether any effort has been put into making the suggested project conform to legislation or common sense.

Numerous basic details in the plans provided in the application are incorrect. On the site location plan, the school boundary should coincide with the site boundaries, i.e. the lease line in pink. The red line boundary should include all the land affected by the Application, including access points, i.e. the whole site, every part of which would be negatively affected in terms of amenity and visual impacts. The site location plan is therefore invalid.

The Application gives almost no details of the CCTV towers or the capabilities of the cameras that it is applying for permission to install, so there is not enough information on which to base a decision in any case. This too invalidates the application. However, what the Application does say is highly misleading, and probably intended to be, given the school's desperation urgently to get permission for this fundamentally misconceived project.

While the application simply cites eight towers and cameras, we now know that the towers would be 20ft/6m high, making them an overbearing, conspicuous vertical disruption of peaceful, panoramic views. Each tower would support three (24 in total) super-high resolution, 5 megapixel cameras with 360 degree views both inside and outside the site boundaries. They would be capable of facial recognition and infra-red capability/night vision is likely to be included. It has been found that the school's own provided calculations of expected fields of vision include diagrams showing properties as being outside the range of a camera when, in fact, they would be within that camera's field of vision.

This lack of correct information is no surprise. We have previous experience of Cotham School's willingness to step outside honourable boundaries by filming unsuspecting community members with a camera hidden in a metal box. After its discovery, the ICO required the school to remove the illicit camera. I don't know if they ever did.

No credible or practical proposal has been proposed to mitigate this massive intrusion into people's private lives, e.g. by showing how affected residents may enquire or be credibly reassured that the huge amount of data produced could be examined by them on request, promptly and automatically deleted, handled only by named and vetted individuals etc. It seems very unlikely that any such resolution or assurance would in fact be feasible with this constant volume of data, and any privacy setting would probably not survive the inevitable regular updates.

The invasion of privacy this uncalled-for surveillance would inflict violates several points of the surveillance camera code of practice. The code calls for CCTV surveillance to be limited to fulfilling 'a specified purpose which is in pursuit

of a legitimate aim and necessary to meet an identified pressing need'. This is not the case here. The code also stipulates transparency, consultation and full information about the handling of data to be provided and maintained with affected members of the public. None of this is mentioned in the application.

These proposals do not support the open space character of the land: the cameras and towers are not ancillary to its use as a designated Important Open Space, and they are in no way justified by any evidence of need. Stoke Lodge is a quiet space ringed by and in close proximity to the family homes of the community which daily frequents this acknowledged public amenity green space. As a result, there is a vanishingly low level of problem behaviour associated with the site. Local youngsters play football and meet up while parents and neighbours are always nearby and aware. It is a traditional, self-regulating recreation ground, with the added characteristics of historic parkland owing to its solid, uninterrupted existence as the defined grounds of the old house, round which the dense local community clusters.

The substantial concrete foundations of the CCTV towers, which will affect the ground itself, are not mentioned by the school. And the prediction of 1000 m (1km) of trenching in which to bury the necessary cabling is a substantial underestimate since it does not include anything like the amount of cabling that would be needed to complete this project of surveillance for a site that statistics confirm suffers no crime whatever.

### **Cabling routes: impact on trees and wildlife**

The cabling routes suggested in the Application are inconsistent and their impact on the root zones of TPOd trees - which means most of the trees on this parkland - therefore cannot be properly calculated. The cavalier attitude of the School, and the willingness of their chosen contractors to bend the rules in regard to the placement of the fence, both in 2019 and now again in 2025, has caused intense anger and grief in this community. We witnessed acts of vandalism inside the proscribed root zones of 'protected' trees every day for many weeks during the installation of the first fence in 2019. It will be some years before the 2019 damage - likely to have been caused by power tools cutting thick roots, and freshly mixed concrete being poured into the root zones of grand, mature trees. This includes a magnificent veteran oak, under which Cotham School has recently allowed fence posts to be inserted into its RPA, 23 feet closer than is allowed under a protected tree of this age. The Stoke Lodge trees constitute a wonderful collection, created and left for future generations by the founders and successive owners of Stoke Lodge. Bristol City Council had the far-sightedness, imagination and respect for the long term human needs of Bristolians, to buy Stoke Lodge intact with its curtilage and preserve it for future generations to experience its peace, space, beauty and sense of history and continuity.

Finally, the application ignores any impact on the ecology and wildlife of the parkland. It does not mention the rich birdlife, the resident, breeding badgers and their setts, the resident foxes, the three species of protected bats that locals see most nights around

dusk, around the house and also right across the park and along the Ebenezer Lane boundary. Badgers have ancestral social and foraging routes and their disruption forces them onto the roads where they died in significantly higher numbers after the first fence was installed. The school is well aware of all this, but chooses to employ consultants and ignore their findings. This is not the behaviour of an organisation which can ever be trusted with the safekeeping of a heritage asset with so many features that merit conscientious consideration, care and respect.

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## **Conclusions**

This application suggests that facts and evidence have been given a low priority compared with ambition, wishful thinking and a certain amount of wilful blindness. The submission that Stoke Lodge Parkland, the surviving curtilage of Stoke Lodge, is a suitable site for the wholesale development that seems to be suggested by the school, is widely off target. It would require the obliteration of the multiple protected trees and original boundaries of a historic parkland, which has been and still is intimately connected to its contemporary historic, listed Manor House. Together, for nearly 200 years, house and park have continually presided over Stoke Bishop. Together, they form a beautifully composed stage - a halfway house - on the way from expanding, worldly Bristol, and glancing on towards the great estates of Blaise and Kings Weston with their grand houses and dramatic outlooks and rolling acres. The parkland was and is a green oasis, knowingly created as a much more modest setting but large enough for a family and friends and visitors to wander and converse and provide healthful exercise. Sheltered and secluded and kept private by the trees, it is also very much within a community strongly connected to Bristol by trade, professional, family and social links. The history of the house is full of clues regarding its occupants and their hospitality and involvement with the local neighbourhood, on the brink of suburbanism and always aware of the city over the Downs and the world beyond - traders and travellers, docks, river, railways coming up fast - and always rumours of war and news of wars, losses of sons and fathers. Stoke Lodge occupants could have looked through the trees, with lines of Wordsworth in their heads, seeing wide, rolling hillsides, dramatic sunsets over Avonmouth, thinking of the ships sailing up through the Gorge, below the then-wild Downs with its sheep and mines, bleak and treeless. They must have talked of the SS Great Britain getting stuck in the locks - and steaming over the Atlantic to the New World. In any case, their Stoke Lodge parkland trees were carefully chosen and sited for calculated effect in an artistically imagined romantic landscape that was deliberately quite separate from the seething city that had probably paid for them, but which formed part of its inhabitants' time and their world. Stoke Lodge and its parkland marks a particular point in a world that was on many cusps at once.

Other houses on the outskirts of Bristol, on a similar scale to that of Stoke Lodge and with comparable medium sized parks, did exist, but most can only be seen in paintings now. The houses have gone and their land has been developed. Benign relative neglect - after Bristol City Council bought it for the City from Miss Emily Butlin in 1947 - can be credited with Stoke Lodge's survival intact. It is now a rarity, complete with its original family parkland. Without its gloriously unexpected green land, that opens up so unexpectedly and rolls away from you from behind its old stone walls as you stand and

look out over it from Druid Hill Top, Stoke Lodge would be stranded meaninglessly beside Shirehampton Road. Its context and history, social continuity, and connections with our lives today no longer safely, physically stored in a small but limitless-feeling park with sight of beyond, that has room for safe school PE with no need for fences or surveillance - just normal levels of care such as parents would give. This is all that Ofsted guidance recommends and requires. There are so many more stages and aspects of the human being than are captured between the ages of eleven and sixteen.

Please reject this application in its entirety so that Stoke Lodge can be protected, instead of being destroyed and lost to the local and the wider community. Permitted development rights should not apply to this unique Bristol treasure.

Thank you for the opportunity to comment. I hope the community's participation in this process will be helpful.

Yours sincerely,

Kathy Welham