

**From:** Nigel Muntz [REDACTED]  
**Sent:** 17 December 2025 09:51  
**To:** Section 62A Applications Non Major  
<section62anonmajor@planninginspectorate.gov.uk>  
**Subject:** Objection to planning application S62A/2025/0133

Reference number and the address:

S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

Objection submitted by:

Nigel Muntz, [REDACTED]  
(Please keep my address private and not to be published due to privacy concerns)

I don't want to make an oral submission.

I object to the CCTV application on the following grounds:

**1. Totally unnecessary as there is no crime or safeguarding issues**

The crime stats for 2024-2025 quoted by Charlotte Thompson from Avon and Somerset police in her report are hugely misleading – they cover a 400m x 400m area that includes the surroundings of Stoke Lodge, inc shops such as Co-op, & Tesco Express (hotspots for shoplifting), a pub, various other local businesses, a main road as well as over 100 residential houses. For example, there is no vehicle access onto Stoke Lodge (gates and bollards prevent access), so it's impossible to have six vehicle offences occurring there! Stoke Lodge is an open parkland area, and is very safe, there certainly haven't been 72 thefts / three robberies or 20 different incidents of violence against users on the parkland on the past year – that would mean there was at least between 1-2 incidents a week on the parkland, and as a regular user of Stoke Lodge, that simply isn't true in any way, shape or form. In fact Avon & Somerset Police have confirmed that there have been no reports of antisocial or similar behaviour at Stoke Lodge, over the past year, so any claims by school supporters that incidents have occurred and have been reported are false. The application fails to demonstrate the need for this surveillance of a public space and private residential properties in one of the lowest crime areas in Bristol.

With regards to safeguarding, I fully agree the school has a responsibly to ensure their students are safe when at school. However, Cotham School is a secondary school, all students are aged between 11-18 and travel to / from school unaccompanied by adults, either by walking, bus or train, so the students are street wise, trusted and capable of looking after themselves. For the avoidance of doubt, they are not primary school kids who need constant monitoring.

The Stoke Lodge playing fields are three miles away from the main school site in Cotham and only used a maximum of 10hrs per week by the school for PE lessons. So, safeguarding considerations are different for this off-school site. The school's usage is

for 2-3 hours in the mornings, Mon-Fri (they don't attend the fields every day, also in winter, often the fields can't be used as they are waterlogged). The students are transported to Stoke Lodge by a double decker bus, carrying on average a max of 60 students and at least 4-5 members of staff, if not more. The bus parks a short distance away on nearby roads and the students walk independently down the residential streets to access the site on either Parrys Lane or West Dene.

The students are monitored at all times by the accompanying staff during the PE lesson and at no point are they left alone – they always have a 1 teacher to 15 pupils teaching ratio. Once the lessons are finished, they leave the site straight away – there are no mid-morning or lunch breaks taken at the playing fields, where students are left alone. Also, the site is fully fenced and the five pedestrian access gates closed when the school are using the field.

Alongside the staff monitoring the students during the PE lessons, there are currently six CCTV cameras in operation on the top half of the field, covering the area where the school usually undertake their PE lessons Mon-Friday. The existing amount of six cameras is the same number that are installed around the outside of HMP Bristol prison, who have much higher security requirements than a secondary school, so this application for a further 24 cameras in eight locations is wholly unnecessary and extreme.

The school has hugely over exaggerated the safeguarding issue at the playing fields and there is no need for an additional eight CCTV poles holding 24 cameras on this site – three new CCTV poles with 12 cameras will cover the same area as the existing six cameras, and the other five proposed CCTV pole locations with a further 15 cameras will cover an area the school rarely use for the weekly PE lessons. There is clearly no justifiable reason for these additional CCTV cameras to be installed by the school.

## **2. Visual amenity**

The high CCTV poles will look hugely out of place in this Grade II parkland setting. Stoke Lodge is a Grade II listed building and the land is designated as Important Open Space in the Local Plan and has been enjoyed by the community for over 70 years.

The data sheet submitted as part of the application specifically states that the proposed type of pole is typically used in prisons and detention facilities, car parks, railway stations, etc. Even if painted green, it will still look out of place and affect the visual amenity of the parkland.

The application doesn't specify how high the CCTV poles are going to be. The spec supplied says between 4m-12m, but that is a huge difference in height and will look very out of place in the current nature parkland setting. The location is in the curtilage of a Grade II listed building - that precedent has been set in all previous planning applications for this site over the past 20yrs. As such, the installation of a CCTV steel grey pole (Even if painted green, it will still look out of place) will greatly impact on the visual amenity, looking very out of place and spoilt the view of the rear area of the Grade

Il listed building and the surrounding grounds – it is not appropriate for the area and won't prevent crime that doesn't exist in the first place.

### **3. Privacy issues**

The eight cameras will be recording 24hrs a day, and be equipped with night vision too. They will overlook numerous neighbouring properties and based on past actions from the school, there is no trust that the school will stick to any privacy screening or monitoring arrangements and this is impossible to enforce through a planning condition too (as acknowledged by planning inspectors in previous applications from Cotham School for CCTV cameras on their main school site). The school have previously broken CCTV monitoring rules, and faced enforcement action from the Information Commissioner

Both plans submitted by the applicant show different positions for the location of the CCTV poles, so it is hard to work out exactly where they will be positioned. The submitted plans are wrong, they don't show the Bristol Tree of the Year nearby, newer houses on West Dene and they don't show the nearby children's playpark, all which would end up being covered by the range of the CCTV too. This would result in the loss of privacy to park users and house owners bordering the playing fields. This might be a coincidence to deceive the planning officer, as this throws up a whole number of privacy issues.

The school's application suggests that Stoke Lodge is 'school premises' but this is not the case. When requesting this confirmation, representatives of the school misinformed the Department for Education that the school had an 'exclusive lease' of Stoke Lodge; however, the DfE has previously confirmed, based on accurate data about the terms of the lease and the school's use of the land, that Stoke Lodge is a 'shared facility that the school makes use of alongside others', not school premises. The authoritative test was stated by the Minister for School Standards in Parliament in response to a Written Parliamentary Question from Darren Jones MP. On the basis of the school's minority use of the field (in area and in hours per week) and the terms of the lease, the field is not the 'premises' of the school. This is in any event not a relevant planning consideration for this application.

Neither the DfE nor Ofsted has issued any guidance relating to security requirements for detached playing fields. School supporters have pointed to selective quotes from guidance for main school sites referring to 'secure perimeters', but Ofsted has specifically confirmed on multiple occasions that it does not require a fence at Stoke Lodge or on other detached playing fields. This conclusively demonstrates that the guidance being quoted does not apply to Stoke Lodge. This planning application rests solely on the documents provided by the school.

The school has specifically confirmed that it does not follow the Surveillance Camera Code of Practice even though this is standard practice in most other schools. There is also evidence of the school breaching its own policy in its use of, and sharing of, CCTV images. The community does not have confidence in the school's proper handling of data and is particularly concerned about excessive intrusion into private residential

property of Stoke Lodge Cottages, houses at the end of West Dene, properties on Stoke Paddock Lane and the surveillance of a children's play park, as well as the impact on the amenity of the setting and the public's use of this important open space. It is important to bear in mind that the school's rights under the lease are subject to community use; it has no automatic right to monitor the public lawfully using that space. There is no possibility that the camera's range can or would be limited to the boundaries of the school's leased area. The applicant says that it is not live monitored unless there is an incident in progress. But of course it's entirely up to them what constitutes an 'incident'. Past history shows the school are incredible petty and in their eyes an incident could simply be a member of the public talking to a staff member or a community note being cable tied to the fence! As the school doesn't follow the Surveillance Camera Code of Practice and have confirmed that the CCTV footage would be live monitored offsite / home (if out of hours) from personal mobile devices, there is no control over who views the footage, what they do with the footage and what happens to it. There is nothing to stop the CCTV operator viewing / sharing footage with other friends or spying and a similar incident like the one mentioned in this news article below occurring at Stoke Lodge Playing Fields:

<https://www.thesun.co.uk/news/4081742/blackburn-rovers-security-man-arrested-cctv-camera-12-girl/>

The school's application provides none of the necessary detail about the proposed pole or camera and no consideration whatsoever of the heritage and privacy implications. In particular, Bristol City Council's Surveillance Camera Strategy states that all CCTV proposals must involve consultation with people most regularly affected by the scheme to address concerns around privacy. No such consultation has taken place. The installation of the pole is for the explicit and sole purpose of installing CCTV so these two elements of the application cannot be considered separately. In particular, as the school already has six CCTV cameras monitoring the site, which have apparently had no deterrent impact, there is no indication that installation of further intrusive surveillance would achieve positive results. Crime levels in this area are among the lowest in Bristol and the two specific reports in 2020 (during the lockdown) relate to minor and reversible incidents.

By having eight additional poles holding 24 CCTV cameras, the public right to enjoy the parkland space would be significantly negatively impacted, as they would feel they are being watched all the time they are using the area. Also, with four Public Rights of Way (PROW) passing over the parkland, the right to enjoy these paths would be negatively impacted through being watched all the time when passing through.

Thanks

Nige