

From: Ed Carpenter [REDACTED]

Sent: 16 December 2025 16:18

To: Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>

Subject: Email for support relating to Section 62A Planning Application: S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

Dear Sir or Madam,

Please find my attached supporting statement in relation to the Section 62A Planning Application: S62A/2025/0133 Stoke Lodge Playing Fields, West Dene, Shirehampton, Bristol BS9 2BH

Supporting Statement for CCTV Installation at Cotham School's Offsite Playing Field (Stoke Lodge Playing Fields)

This statement is submitted in support of the proposed installation of eight CCTV poles at Cotham School's Offsite Playing Field (Stoke Lodge Playing Fields). I am making this submission in my role as Deputy Director of Finance and Resources - IT and Facilities Lead, who is responsible for the management of the school facilities, which includes providing a safe and secure environment for the school community. My support is grounded in legal fact, documented evidence of repeated criminal damage, safeguarding obligations owed to students and staff, and applicable statutory and government guidance.

Unambiguous Legal Context: The Land Is Not Public Parkland

Central to any consideration of this application is the High Court judgment, Cotham School v Bristol City Council & Katherine Welham [2025] EWHC 1382 (Ch), handed down on 10 June 2025, which decisively ruled that:

- Stoke Lodge Playing Field is not a town or village green, and prior registration as such has been removed from the register.
- The land is held by Bristol City Council for educational purposes and leased to Cotham School for use as school playing fields.
- Registration as a green was legally incompatible with the statutory educational purpose of the land.
- There is no public entitlement or right to casual access, use or enjoyment of the fields as "parkland".
- Notices on the land warning against trespass and unauthorised use were legally significant in determining that any historical public use was not "as of right".

In short, the judgment confirms that Stoke Lodge is not public open space or parkland and that the public has no inherent legal right of access outside of any formal permitted arrangement. The judge's order explicitly required the deletion of town green status precisely because the statutory educational use of the land could not coexist with such status.

This legal clarity must be applied consistently throughout planning deliberations.

Suggestions that the site is “parkland” or that the public has a right to free use must be disregarded, as the court has affirmed the opposite.

Misleading and Disproportionate Conservation Response

Significance of Stoke Lodge and Role of Playing Fields

Stoke Lodge’s significance lies in its architecture and curtilage structures. The playing fields were historically agricultural, not designed as parkland. There are no historic boundaries, ornamental planting, or design intent linking the fields to the house, undermining claims of parkland character. No such designation exists, and such claims are misleading.

Legal Status and Use of Land

A High Court judgment confirmed the land was appropriated for education in the mid-20th century and lawfully used as school playing fields. This limits its heritage weight and reinforces that it does not function as a historic park.

Assessment of Impact on Setting

The cameras will be modest, boundary-located, and screened by trees. They will not affect the Listed Building’s fabric or immediate historic setting. Any impact is minor, reversible, and occurs within a landscape already altered in the 20th century.

Potential Heritage Harm

Several objectors assert harm to the listed grade II Stoke Lodge. Their assertion is considerably overstated. However, should the Inspector conclude that the proposed CCTV arrangement does cause harm to the designated heritage asset, Stoke Lodge (grade II listed), this harm would be ‘less than substantial’ and significantly outweighed by public benefit. The public benefit comprises the physical education of 1700 students, many of whom are from a diverse global majority (BME) background.

Distinction from Previous Appeal

The earlier single-camera appeal was dismissed on different evidence. The current proposal offers clearer justification, strategic coverage, and benefits supported by legal context. Appeal decisions are not binding; this case must be judged on its own merits.

Public Benefit and Proportionality

The cameras address safeguarding, vandalism, and unauthorised access, ensuring safe educational and community use. No realistic alternative achieves the same level of security. The proposal is proportionate, reversible, and strongly in the public interest.

Summary

The playing fields make only a limited contribution to Stoke Lodge's significance. The proposal complies with statutory duties and national policy, and public benefits clearly outweigh any perceived harm. It represents a justified and proportionate development.

Disproportionate Arboricultural Response

I would like to address several inaccuracies and disproportionate comments raised in the Arboricultural Officer's comments.

As stated in the application submission, no trees will need to be removed to enable the proposed development. The CCTV columns have been carefully positioned to avoid conflict with existing trees. Each column will be 6m tall, and its location is clearly shown on the Proposed Site Plan and Tree Protection Plan. All columns are situated within the confines of the existing perimeter fence.

Only minor pruning is recommended for two trees (T13 and T43) and one group of blackthorn suckers (G17). These works would be minimal and would not affect the character or appearance of the local area. If required, such works can be assessed and delivered through a separate tree works application, which is standard practice.

The Officer's statement that no details of the concrete bases have been provided is incorrect. Both the Planning Statement and the submitted Camera Pole Elevation clearly specify that foundations for each column will comprise a concrete base measuring 1.1m x 1.1m x 0.55m, constructed just below the field surface.

With regard to new tree planting, indicative locations are shown on the Proposed Site Plan and Tree Protection Plan. Species selection could be agreed following consultation with Bristol City Council as landowner and BCC Parks Tree Officers. As noted by the Tree Officer, a detailed planting plan can be secured by condition should planning permission be granted.

Accordingly, it is my view that, provided the tree protection measures detailed in the submitted report will be followed, the matters raised above do not amount to a reason for refusal.

Repeated and Costly Criminal Damage

The need for enhanced security measures, including CCTV, is reinforced by a documented pattern of criminal damage and vandalism at the site. These incidents have repeatedly resulted in substantial financial costs and have diverted valuable resources away from teaching and learning. Some of these costs have been met by the school's insurers, part of the Department for Education (DfE), Risk Protection Arrangement (RPA), meaning that central government funding is being redirected away from its intended purposes.

Fence Damage and Removal

- There have been numerous incidents of vandalism to the perimeter fencing, which have had a direct and detrimental impact on teaching and learning,

preventing the school from using the Site to deliver PE lessons where members of the public may freely roam.

- In one particularly serious incident, remediation costs exceeded £80,000 after the land was unlawfully registered as a Town or Village Green. This followed the removal and destruction of perimeter fencing around more than 90% of the playing field by members of the local community.

This level of damage represents a significant and avoidable expenditure of public funds, which could otherwise be directed towards educational provision. The installation of CCTV will help deter any recurrence of this behaviour and, where necessary, provide evidence to support police investigations and potential criminal proceedings.

Other Acts of Vandalism

The site has also experienced:

- Graffiti, spray-painting and defacement of signage. Acts reportedly celebrated by some social media accounts associated with groups like “sign fairies”
- Repeated unauthorised behaviour on school property, including consumption of alcohol, fly tipping, and dog walking inside areas used for PE lessons.
- The Pavilion Building has been subject to vandalism, break-ins and historical arson, which included its total destruction rendering the building unusable circa 2010.

Collectively, this demonstrates that, without effective deterrence and monitoring, the risk to physical assets and student safety is both real and ongoing.

Safeguarding Duties and the Protection of Students and Staff

Under current statutory guidance and law, schools and academy trusts are obligated to take proportionate steps to safeguard children, including in relation to the security of land used for education:

Academy Trust Handbook

The Academy Trust Handbook requires trusts to:

- Maintain robust governance and risk management, including the protection of assets and the prevention of fraud, vandalism and other irregularities.
- Act promptly and proportionately where there is evidence of damage or misuse of trust resources.

This duty supports the installation of security measures, including CCTV, to protect school property from repeated damage and to ensure financial resources are not repeatedly expended on repairs that could have been prevented through deterrence and monitoring.

Keeping Children Safe in Education (KCSIE)

KCSIE is statutory guidance for safeguarding under Section 175 of the Education Act 2002 and places a legal obligation on schools to:

- Assess and address foreseeable harm to students.
- Plan for risks reasonably expected on sites used by students, including off-site playing fields.

On a personal level, I have experienced instances of being followed, harassed, photographed and videoed, while on the playing fields in the course of carrying out my professional duties. This behaviour from the local community is not appropriate and has contributed to a sense of intimidation for both me and my colleagues, who are attending the site to undertake our responsibilities.

Given the documented history of trespass, vandalism, and unauthorised access, the absence of adequate monitoring and deterrence directly undermines safeguarding and therefore must be addressed through measures such as CCTV that are proportionate, justified and evidence-based.

CCTV as a Proportionate, Necessary and Lawful Measure

CCTV installation at school sites is widely considered a legitimate and necessary security measure where there is evidence of repeated criminal activity or where safeguarding risks have been identified. The Department for Education's security guidance recognises that:

- CCTV should be used to deter crime and antisocial behaviour when a site is demonstrably vulnerable.
- It provides a means of investigating incidents and supporting law enforcement when offences occur.

Additionally, the CCTV installation proposed in this application will be accompanied by appropriate data protection safeguards (Data Protection Impact Assessment, restricted access to footage, and limited retention policies) to ensure compliance with the UK GDPR and Data Protection Act.

The proposed eight CCTV poles are strategically aimed at protecting:

- Perimeter boundaries susceptible to intrusion.
- Key access points where unauthorised entry and criminal damage occur.
- Areas of the field where students, staff and contractors use the land.

This is a proportionate response to a persistent problem, backed by documented incidents and compliant with statutory and regulatory expectations for schools.

Addressing Local Concerns with Accurate Legal Context

Some opposition to CCTV installation has been framed in terms of aesthetic concerns or assertions of "public rights" over the land. However:

- The High Court judgment conclusively determined that the land is not public parkland and that no such public rights exist outside the controlled and lawful use of the playing field for education.

- Assertions that CCTV would create a “prison-like” environment overlook the fact that CCTV is widely regarded as a normal and proportionate security measure in educational contexts, particularly where there is repeated malicious activity.

It is essential that the legal status of the land is respected in any planning consideration, and that planning decisions are based on fact and not on outdated or incorrect characterisations of the site.

Conclusion

For the reasons set out above, I strongly support the planning application for the installation of eight CCTV poles at Stoke Lodge Playing Field. The application is consistent with:

- The High Court’s confirmation that the land is school playing fields and not public parkland.
- The school’s statutory duties are to safeguard students and protect its assets.
- National guidance on school security and safeguarding.
- The clear record of criminal damage and vandalism at the site.

Granting this application will ensure that Stoke Lodge Playing Field can be responsibly secured, allowing Cotham School to fulfil its educational obligations without enduring ongoing damage, unnecessary expense, or compromised safety.

I respectfully request that the planning authority approve this application without delay.

Supporting Photographs



Intentional cutting and removal of fence panel (finished 31 October 2025) – Photo taken 13 October 2025



Cutting of replacement fence (finished 31 October 2025) – Photo taken 13 October 2025



Intentional damage to perimeter gate and fence post – September 2022



Magnetic access control lock stolen from gate 09/12/2021 to prevent automatic locking during normal school use.



Removal of various fence panels and posts near the Pavilion building - 16/12/2024



Damage and removal of school signage 04/12/2018



Malicious damage to school signage
05/11/2018



Pavilion Building – June 2016, following historical arson attacks on the building.



06/09/2018 work of the “sign fairies” with members of the community group “We Love Stoke Lodge” endorsing the behaviour.

Someone kindly wrapped the signs and lef



Like

Share



Intentional wasting of school time and funds through “sign fairies” actions. 02/10/2018

Intentional wasting of school time and funds through “sign fairies” actions. 29/10/2018

Kind regards,



Ed Carpenter

Achievement - Diversity - Respect

We believe everyone in our school community adds something special to who we are. We show dignity towards others by being kind and respectful in our communications with each other.