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BCAP has analysed the amended representations, *Bristol City Council - Conservation comments checked*, submitted in response to PINS application [S62A/2025/0133](#) (the Amended Representation), when compared with 25/14649/PINS CONSERVATION CONSULTEE COMMENTS 4087159 (the Original Document) published on the Bristol City Council portal page for [25/14649/PINS](#). The Original Document has been extensively edited, but we focus on the substantive changes listed below:

1. The author of the Original Document is shown as [REDACTED], a member of the Conservation Section. It was created on 28/11/2025 and published on the council's planning portal for 25/14649/PINS on the 01 December 2025. It has since been removed.
2. The identity of the author and date of the Amended Representation have been deleted from the Documents Properties.
3. The font, font size and formatting of the Amended Representations have been altered in places.
4. The last sentence of the Summary paragraph 1.1 of the Original Document, '*Proposals lack clear and convincing justification for the harm posed, and it's considered any genuine public benefits could be secured with alternatives that wouldn't result in visual harm or at a reduced level of harm through mitigation*', has been deleted.
5. At paragraph 1.2 of the Original Document, the word 'strongly' has been deleted.
6. At paragraph 2.1 of the Original Document, the final sentence, '*We note that there also several factual errors in this document that tend to obfuscate the site's significance*', has been deleted.
7. In paragraph 2.11 of the Original Document, the statement:

Whilst the landscape setting of Stoke Lodge has not been identified as a locally listed landscape of historic importance close inspection of the site and the historic context demonstrate that the parkland setting of the house meet the criteria to be considered as a “non-designated heritage asset” under the terms of the National Planning Policy Framework (NPPF).

has been changed to:

The landscape setting of Stoke Lodge has not been identified as a locally listed landscape of historic importance. In light of the historic context the parkland setting of the house can be argued to meet the criteria for a ‘non-designated heritage asset’ under the terms of the National Planning Policy Framework (NPPF).

8. Under the Communal value section, paragraph 2.30 of the Original Document, has been shortened from:

The post-war history of Stoke lodge is fundamental to its communal value. After the Local Authority purchased it in 1947 the grounds became publicly accessible in a way they had never been in private ownership. Although recreational use had begun long before it was in Council ownership that they became dedicated sports and recreation fields. The open grassland and verdant ornamental grounds have proved popular as a destination for several generations now since

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the war. They have been taken to heart by the public in a way that more utilitarian playing fields elsewhere in the city have not. The use of the house as an Adult Education Centre has further cemented a sense of communal ownership of the historic house and surrounding parkland. The Council's designation of the parkland as Important Open Space in 1994 has given formal recognition of the use of the space in planning terms, but the Heritage Values of the place are not so well established.

to read:

After the Local Authority purchased it in 1947 the grounds became publicly accessible, it was in Council ownership that they became dedicated sports and recreation fields. The Council's designation of the parkland as Important Open Space in 1994 has given formal recognition of the use of the space in planning terms. A detailed consideration of the history of the use of the space, including its use by the community is contained in the judgements in relation to the failed Town and Village Green applications.

9. Paragraph 2.33 of the Original Document:

For the reasons summarised above we are required to consider the grounds around, and associated directly with, Stoke Lodge as a heritage asset in their own right. This is separate from those assets considered as curtilage Listed, but must be understood as an indivisible part of them Conservation Recommendation with the host mansion. ...

Have been altered to read:

For the reasons summarized, there is evidence to consider the grounds around, and associated directly with, Stoke Lodge as a non-designated heritage asset in their own right. This is separate from those assets considered as curtilage Listed, but must be understood as an indivisible part with the host mansion. ...

10. The final words of paragraph 4.2, '... as a non-designated heritage asset' have been removed.

11. Paragraph 4.6 of the Original Document:

We note that planning consent is required where the erection of a fence would take place within the curtilage of a listed building. It is the view of Conservation that this should be applied for retrospectively' has been removed. However, this is material to the current application since it is integral both physically and purposively to the CCTV application.

has been removed.

However the caption to the photograph below paragraph 2.28, which refers to 'the erection of the fence within the curtilage', remains.

12. Paragraph 4.7 of the Original Document:

The Grade II Listed house and its curtilage Listed structures must have 'great

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weight' placed in their conservation and that of their setting. By their nature, a designated Listed building is of national importance. Any negative impact, or 'harm' must have a "clear and convincing justification" for that harm regardless of the degree of impact. Whilst this does not act as a stand-alone test under the NPPF the lack of justification for harm is likely to entirely erode any argument of public benefit where better or less harmful alternatives are a clear option and could either reduce or entirely remove that harm. Despite having assessed a degree of harm in their previous application. the applicant has now identified no harm; we strongly disagree with this assessment, one founded on a poor understanding of the assets, curtilage, and NDHA.

The last sentence has been edited to read (new paragraph 3.6):

... Despite having assessed a degree of harm in their previous application, the applicant has now identified no harm; we disagree with this assessment.

13. Evidential indicators about the status of the land as a non-designated heritage asset in the Original Document have been removed. In some places this involves the deletion of factual information. For example:
 - At paragraph 2.3 H - the statement '*The gate piers and connected boundary wall to Shirehampton Road, Parry's Land, and Ebenezer Lane*' has been deleted.
 - At paragraph 2.4 - the statement '*It is unclear whether the former lodge cottages integrated into the wall on Ebenezer Lane were in separate ownership at 1.1.1948, but their shared fabric and history with Stoke Lodge is assumed*' has been deleted. (It has now been confirmed that the Lodge cottages were in common ownership with the rest of the estate until the 1990s.)
14. In the section headed '**What are the purported public benefits? (NPPF para 202) Has clear and convincing justification been given for the harm? (NPPF para 200)**' of the Original Document, paragraphs 4.8 to 4.10 have been removed altogether.
15. The last paragraph of the section '**Do public benefits outweigh harm where that harm has clear and convincing justification? (NPPF para 202)**' of the Original Document, Paragraph 4.1, which states:

We are required to place "great weight" in the conservation of designated heritage assets. The degree of harm posed by development is less than substantial, but unjustified. The lack of any tangible public benefits means that the harm is not outweighed.

Has been altered to remove the last sentence.

The last paragraph of 4.3, of the Original Document, which states:

It has not been demonstrated that there is no alternative or more appropriate method of safeguarding through the use and training of staff, appropriate levels of staffing, or alternative management of the site, or that all other options have considered. There is no proposed mitigation for the visual impact of the columns or the visual incongruity of the structures in this setting. It's not been shown why so many cctv cameras with such high-definition are necessary and

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why fewer would provide proportionate or adequate coverage. It has not been shown why the continued use of other shared sports pitches is not a sustainable and less harmful alternative. We do not consider the test set out under items i, ii, iii, or iv of DM31 have been met.

has been altered to read:

There is no proposed mitigation for the visual impact of the columns or the visual incongruity of the structures in this setting. It's not been shown why so many cctv cameras with such high-definition are necessary and why fewer would provide proportionate or adequate coverage. We do not consider the test set out under items i, ii, iii, or iv of DM31 have been met.

16. Section 5.2 of the **Recommendations** section of the Original Document:

We conclude that the current proposals are unjustified and that harm is not demonstrated to be unavoidable in return for securing the purported public benefits. Therefore, in the planning balance we do not consider that any harm to heritage assets to be outweighed by those benefits and the application should be refused in line with national legislation, and national and local planning policies, designed to protect the historic environment. This includes, but is not limited to, The Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the National Planning policy framework, Bristol Core Strategic Policy BCS22, and Development Management Policy DM31.

has been changed to:

5.2 We conclude that harm is not demonstrated to be unavoidable in return for securing the purported public benefits.

16 December 2025