

Objection to inclusion of Kinver Scout Training Camp in the Local Green Spaces element of Kinver Neighbourhood Plan

Jamie Sandison – Chairman, Hereford and Worcester Scout County Council

05/03/2023

I write on behalf of Hereford and Worcester Scout County Council, otherwise known as Scouts Hereford and Worcester. Our premises, Kinver Scout Training Camp is included as a site under consideration for designation as a Local Green Space (URN K15) within the Kinver Neighbourhood Plan process.

Whilst we support the purpose of the Neighbourhood Plan, we strongly object to our premises being included in the Local Green Space process. We have previously registered our objections within the process and feel they have been largely ignored, so will summarise them here, with additional information and context:

1. Our site does not meet the criteria required for designation as an LGS.

According to the guidance published in the *South Staffordshire Council Preferred Options 2021: Local Green Space Assessment and Methodology Topic Paper*, to be considered for designation as a Local Green Space, evidence should be provided that a site meets several criteria. We feel that the application fails to provide any of the necessary evidence and it is our assertion that our site is not suitable on the following basis:

(a) The land has to be ‘reasonably close to the community it serves’.

We accept that as our site is within the parish boundary, it is close to the local community, but as we have previously asserted, this is not the community that the site serves as less than 1% of use comes from within Kinver.

(b) The land has to be ‘demonstrably special to a local community’.

Evidence must be provided of the land’s value to and use by the local community to show that it holds a particular local significance. The land must fulfil one or more of the following criteria:

i. Beauty

Our site is surrounded by fencing, woodland and neighbouring premises on all sides which do not allow a view of, over or through the site. Our site is intentionally screened and private and therefore does not add to the local aesthetic or provide passers by with favourable views.

ii. Historic significance

Our site does contain assets of historical value to scouting, but these assets are not of local importance or archaeological value.

iii. Recreational value

Our site does not have local recreational significance. Local users represent less than 1% of the use of the proposed designated area. The site is not owned by a ‘local’ organisation. Even our core user group, Scouts from the counties of Herefordshire and Worcestershire, travel from outside the area to use the site.

iv. Tranquility

We are not aware of a local tranquility map or scheme, but given that the

primary purpose of our site is to provide outdoor experiences and adventure training to young people, it is far from tranquil when in use.

v. **Richness of wildlife**

The most prolific wildlife on the site are grey squirrels and muntjac, both invasive non-native species. When in use the site can be occupied by up to 500 young people plus their leaders and associated tents, fires, activities and noise and at these times wildlife is not visible or evident. LGS would not affect this.

(c) The land needs to be 'local in character, not an extensive tract of land'.

At 23 acres we would consider our site extensive and it is far from local in character. The landscaping and arboriculture of our site has been heavily engineered by generations of wardens and scouts over 100 years of custodianship. We have photographic records showing significant change across large areas of the site. The woodland and glades are populated by a mixture of both native and non-native trees planted by our users and volunteers throughout the history of the site.

2. Designation increases the risk of trespass. Increasing risk of safeguarding incidents and risk to the safety of users and trespassers.

Our site is private property and does not allow public access. This is intentional and by design, as we offer a safe outdoor environment to provide adventurous activities and experiences to young people and vulnerable adults to whom we have a safeguarding obligation. We already suffer trespass, which occasionally results in confrontation with our volunteer staff, as trespassers assume a right of access. By designating our site an LGS, it will increase the risk of trespass, thus increasing the risk of our volunteers having to deal with hostility and confrontation when challenging trespassers.

Further to the safeguarding risk, we also carry out some dangerous activities, including a variety of target sports (archery, rifle and crossbow shooting and axe throwing). Trespassers represent a risk to the participants of these activities through distraction and a danger to themselves through not knowing what activities are underway or where.

We understand that the LGS does not present a right of access, but that does not mitigate for those who do not understand their rights under the scheme. The LGS guidance document "Site Selection and Review (August 2022)" in describing the purpose of the LGS scheme, in paragraph 2.3 references *The Accessible Natural Greenspace Standard (ANGST; Natural England 2010)* which uses the word accessible numerous times when referring to designated sites. In that same paragraph that document states "A considerable population along the eastern border of the parish has little access to natural green spaces other than those we are proposing". This unambiguously but erroneously suggests people will have access to the proposed sites, further encouraging trespassers.

As per the published consultation document, our concerns around perceived right of access and increased trespass appears to be echoed across numerous objections by owners and operators of other sites under consideration. We consider it irresponsible of the steering group to flatly dismiss these concerns with no consideration, particularly in the case of sites

such as ours which are exclusively intended for children and vulnerable people and where potentially dangerous activities take place.

The insistence of the Kinver Neighbourhood Plan to include our site in this process represents a direct risk to the safety of our users and those that assume a right of access, which will result in a significant financial cost to our charity in order to properly mitigate.

3. Description wording has been changed since the initial consultation to dishonestly represent the level of local use. The wording is ambiguous and contains numerous inaccuracies.

The information about our site in the proposal document has been changed since the original submission to include the word “Local” in increased frequency in a disingenuous attempt to add relevance, but still contains a number of inaccuracies and exaggerations.

4. The published information, relied upon as evidence of suitability, is materially incorrect.

a) Location: this area is not used by members of the local community. The area of our site used by a local business for before and after school clubs, and by the Kinver Scout Group is not within the boundary of the proposed designated area and is held under a separate property title.

b) Local Significance/Community Value:

- i. **Near the community it serves:** see above points re local use.
- ii. **Recreation/Sports/Paths:** Our site is not bounded by paths to Kinver Edge or St Peters Church, as none of our boundary is made up of public paths and no public rights of way cross our site. The list of facilities is correct, but is moot as our users are drawn from a national movement and not the local community and as previously stated, the proposed designated area is not used by local groups.
- iii. **Wildlife/Ecology:** Our site does not adjoin Kinver Edge, it is separated by palisade fencing and a busy local road. We have no information around the Comber Copse Biodiversity Alert wildlife site and can find no reference to it in open source searches. We were not previously aware of the Kinver Nature Recovery Report. Having read that report we are unable to determine its relevance to this process or its affect on our site as that document is unclear, the meaning of the designation is undefined and we have received no communication on that process. We are not aware of any persons accessing our site to carry out any ecological survey to support this report.
- iv. **Heritage:** The heritage events described are correct. Some of these events are significant in scouting circles and to the history of Scouts Hereford and Worcester, but we would argue are of no significance to the community of Kinver.
- v. **Beauty, setting, tranquility and green lung:** Our site does not provide a green backdrop to the local school or village. It can not be seen from either of those locations and is private and secluded by design. As above, it does not constitute ancient woodland as it is an entirely engineered landscape as the photographs on the application attest.

- vi. **Size, Scale, Local in character, not extensive:** published information incorrect for reasons previously given.

Following the informal consultation, the boundary of the site map being considered for inclusion in the process was amended and redrawn to remove land belonging to one of our neighbours. In redrawing the boundary, it now includes the area marked on Ordnance Survey maps as Comber Copse. It should be noted that Comber Copse is not part of Kinver Scout Training Camp and is not owned or controlled by Scouts Hereford and Worcester or the Scout Association Trust Corporation. We do not know if the owners of that land have received any communication or opportunity to respond.

5. Other areas have been adjusted or removed based on similar objections.

We are aware that at least one area has been removed from the process for reasons which appear similar to our own objections based on private ownership and user groups.

In addition to the objections outlined above, our site is already protected by the restrictions that come with being wholly within a Green Belt and within a Conservation Area. The protection and control that the LGS process provides to Kinver Parish Council is irrelevant and unrequired. As custodians of our site we have no intention to develop or alter the site in any way that the LGS would influence therefore the risk to us as a charity and the local community is grossly disproportionate to any potential benefits offered by the scheme and wholly irresponsible.

If you wish to discuss this document in further detail, please contact me via email at chair@scoutshw.org.uk where I can provide a telephone number or other contact details.