



15 Mount Pleasant
Ewell Village
Surrey KT17 1XG

17 December 2019

Dear Sirs

M25 Junction 10/A3 Wisley Interchange Improvement Plan – Responses to ExQ1 and comments on WRs.

Further to my letter of 26 November 2019, I write to provide the Guide Association Trust Corporation and Girlguiding Greater London West (“GGLW”) responses to ExQ1 and some additional comments on the Written Representations of other parties.

Question 1.12.7

a) Would the proposed access for the Heyswood Girl Guide Camp, including the location of the secure gate and fencing, provide an appropriately secure access for the camp site?

1. No. In order to operate the Heyswood Campsite in a way that ensures the safety of our girls we need to be able to control access to the Campsite in a secure and practical way.
2. The Scheme Layout plans show an electric gate to be provided at the eastern end of the access road as it passes through GGLW’s land but that will not provide an effective form of security because that gate will also have to service residents or occupants of Court Close Farm. GGLW have no way of controlling who stays at Court Close Farm or of confirming whether or not people staying there are ‘child-safe’. As a result, GGLW will need some form of additional security between the access road and those areas where the children will be allowed to camp and/or spend time without direct supervision.
3. Even with that additional security, which is discussed further below, the effect of the access road will still be to sever the northern and southern parcels of the Campsite and will prevent GGLW guides from being able to use the northern parcel without direct supervision.

4. As explained in our Written Representations, we consider that the selection of the access route is unjustifiable when compared to the alternative of providing an access along the northern edge of the Heyswood Campsite.

b) If not, how could the access arrangements be amended to improve the security of the access to and from the camp site?

5. The Scheme Layout plans do not show any form of gate within the highway fencing to be provided along the access road, or the form of fencing. GGLW will need:

- (1) An electric gate to be provided to access the southern parcel of land. This will need to be provided next to the main campsite buildings but will need to connect to an additional stretch of track within the southern parcel which will allow access to the campsite area itself.
- (2) Confirmation that the highway fencing to be provided along the edge of the southern parcel will be sufficiently high and solid to secure the Campsite and to block out views into the camping area. The camping area is quite close to the access road on the eastern side of the site and it is a requirement of our safeguarding measures that we can ensure that this area is not overlooked.

6. In order to ensure that all areas which are used by the guides are properly secured we would also need:

- (1) The supervisor's bungalow to be relocated to the southern parcel (potentially increasing the impact of the Campsite on the Painshill Grade I Registered Park and Garden by moving built structures closer to the historic core;
- (2) The shop relocated further south as it appears to fall partly within the land to be taken and will, at a minimum, have its access obstructed by the construction of the fencing; and
- (3) The carpark on the northern area to be extended to replace lost capacity (potentially increasing the overall loss of ancient woodland).

Other comments

7. We also note that the Book of Reference contains a number of incorrect references to the Campsite: at pgs 224, 232, 233, 473, 477, 478, 559, 563 and 564 it is incorrectly referred to as "Heywood" rather than "Heyswood". This has made it much harder for GGLW to understand the full scope of the proposals by restricting our ability to effectively search the text of a 666pg document.

8. GGLW has the following comments on the written representations submitted by other parties:
- (1) We note that National Grid will require access at any time for maintenance of the towers – ZM022, ZM023, ZM024. While there are no towers within the Heyswood Campsite itself this will require National Grid to have a code for access through the electric gate at the eastern end of the access track. This reduces the security benefit from the gate currently proposed.
 - (2) In a similar vein, we note that Painshill has asked for access to be provided to the Gothic Tower for both emergency access vehicles and maintenance vehicles. They comment that they may in the future have lodgers in the Gothic Tower and we feel that in time they too would seek access along the same route. This would increase the level of traffic along the access road even further; multiplying the number of people who may pose a safeguarding risk to the Guides.
 - (3) We also note that a number of other parties retain Safeguarding concerns about the proposed route for the access track, including the owners of Court Close Farm and Royal Borough of Kingston-Upon-Thames.
9. We note that the WR on behalf of [REDACTED] mentions that Gantry access has also been requested which would involve further traffic along the proposed track.
10. These concerns reflect Highway England’s failure to properly address the concerns of affected parties and to select an access option which appropriately balances disruption and impact upon an existing much valued resource with the environmental impacts of losing a small additional portion of (potentially) ancient woodland.
11. In these circumstances, we remain of the view that the DCO is not consistent with national policy in the NPS for National Networks and should be refused unless amended to include the GGLW alternative.

Yours sincerely

[REDACTED]

Christine Donovan

County Commissioner Greater London West