

15 Mount Pleasant  
Ewell Village  
Surrey KT17 1XG

28 January 2020

Dear Sirs

**M25 Junction 10/A3 Wisley Interchange Improvement Plan – Issue Specific Hearing 2 and comments on WRs.**

Further to previous correspondence, I write to provide the Guide Association Trust Corporation and Girlguiding Greater London West (“GGLW”) written submission of oral case at Issue Specific Hearing 2 and some additional comments on the Written Representations of other parties.

**Written Submission of oral case**

**Alternative route for safeguarding reasons**

1. The alternative route we propose changes after the gas station and pylon at the north-east end of the site. At this point instead of entering our land, the Private Means Access to our neighbours would turn right down the current access track for the gas station and Park Farm to the A3. It will then need to curve left alongside the widened A3. This will then be a straight access road, parallel to the A3, down to the current entrance for Court Close Farm. (see appendix 1 adapted Access map)
2. Our alternative route keeps our camp site whole rather than severing approx. 20% which includes our warden’s bungalow, garage, tool shed and the ancient woodland area. (see appendix 2 labelled freeholder map).
3. Girlguiding has a Safeguarding policy (see appendix 3). There are 4 levels of safe space training that volunteers are required to undertake according to their volunteer role. Level 1 is completed by everyone including parent helpers; levels 1 & 2 by all adult leaders and young leaders (aged 14-18); levels 1, 2 & 3 by those leading residential trips or are the main leader for a unit; in addition level 4 is completed by all area commissioners. All volunteers undergo an Enhanced Disclosure and Barring Service (DBS) check which is renewed every 5 years. In addition, all activities must prepare a risk assessment undertaken by the leaders.



4. The HE proposed new road is adjacent to the main camping field which has 8 camping areas (Sites 1 to 8) where girls can camp in independent groups. (see appendix 4 pictorial map attached) This field is very popular as it is the flat part of the site. The pictorial map shows the use of the various parts of the site.
5. The HE proposed route would result in the loss of our car parking area which would increase the risk to children and young people as they are dropped off and collected from the site.
6. The number of vehicles using the track to access the site during 2019 was just under 10,000, the majority of which were private cars. There were some minibuses/ transit vans used and for large events there were several coaches. In 2019 there were 12 coaches for one specific event, which were admitted to a pre-planned schedule.
7. Further research has revealed that no other Girlguiding campsite in the UK is in this position of having a public access through it.

#### **Loss of ancient woodland**

8. The current HE proposal identifies a loss of ancient woodland as well as other woodland and vegetation. Girlguiding values the environment; supporting and encouraging our members to protect our planet for their future.

At Heyswood we have always encouraged our young people to freely experience and enjoy this area of woodland. Albeit, we are all volunteers, we have been working to look after the woodland and ensure the young people who use the site do so as well.

We are currently working on:

- (1) Removing invasive species like Himalayan Balsam, having significantly reduced the spread of this over the last two years.
- (2) Removing and managing the false acacia trees that are at risk of falling in the middle section of woodland on the site which we had to temporarily fence off
- (3) Replacing non-native trees with native trees and increasing the number of trees on the site

#### **Comments on the applicant's response to REP1-026**

9. We note that Surrey County Council advised at the hearing that a Private Means Access (PMA) needs to be only 3m rather than 4.8m wide. This means that the GLW alternative route would require less impact on the ancient woodland and less land take than previously calculated.



10. We disagree with Highways England's view that the warden's bungalow would not need to be relocated if the proposed current route is used. The role of a resident warden is important to our members; It is not just access that would be restricted but also the general surveillance across the site. As indicated on the site visit, the fencing in front of the bungalow is specifically low to enable the warden to 'keep an eye' on activities unobtrusively.

**Comments on any additional information/submissions received by Deadline 2**

11. We note that Agnes Engelen our neighbour at Court Close Farm has concerns similar to ours feeling that access to her property is severely compromised:
  - (1) Although security gates/barriers are indicated, the actual operation of these to make them effective is unknown as there would be a large number of various visitors who would often only need access for a single visit or delivery
  - (2) Safeguarding concerns for the numerous people who require access to Court Close Farm as listed in REP1-056-2
  - (3) Road safety concerns with vehicles having 24-hour access through Heyswood Campsite.

Yours sincerely

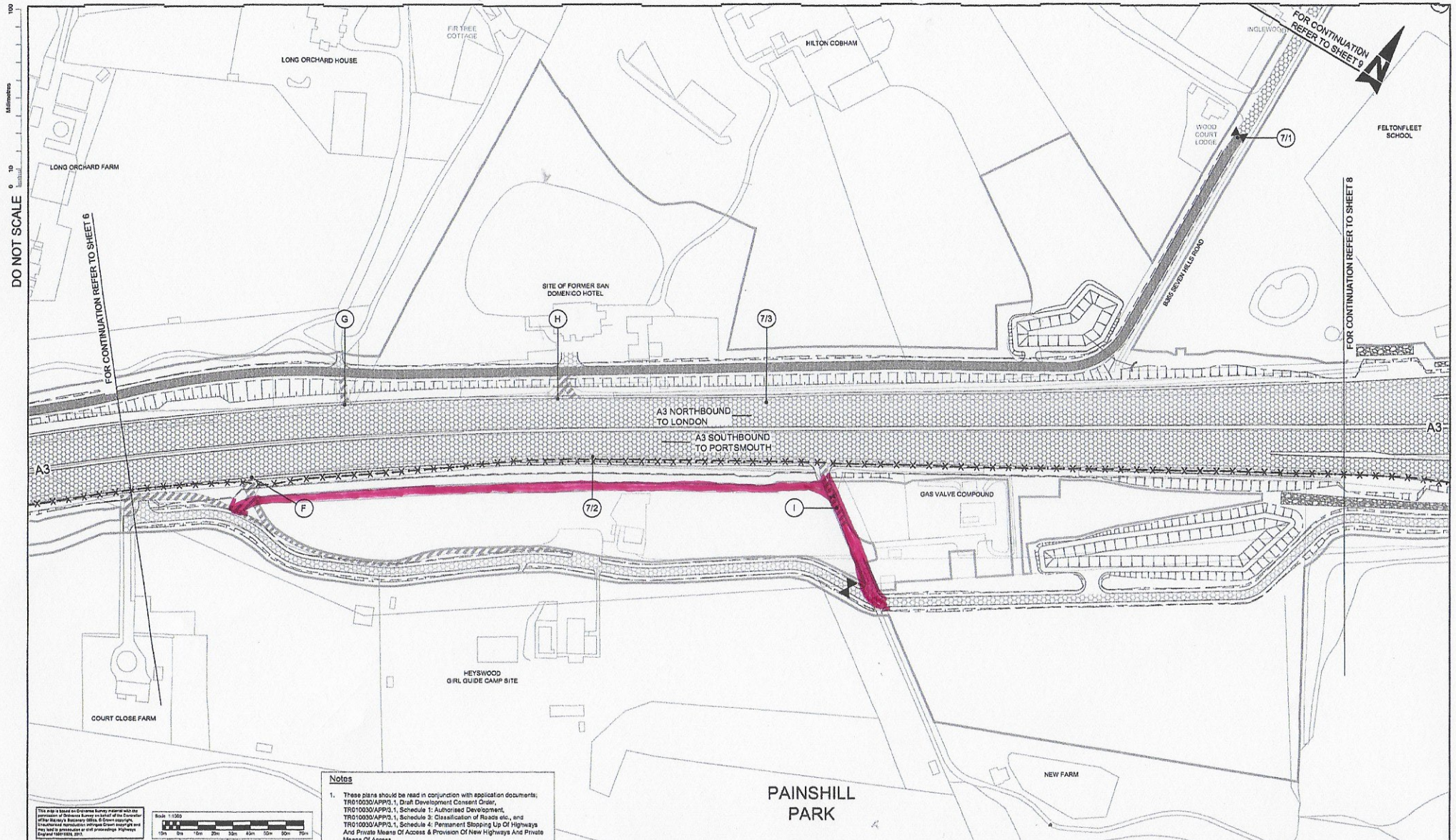


Christine Donovan

County Commissioner Greater London West



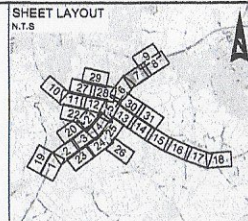
# APPENDIX 1



**Notes**

- These plans should be read in conjunction with application documents: TR010030/APP/2.1, Draft Development Consent Order, TR010030/APP/2.1, Schedule 1: Authorised Development, TR010030/APP/2.1, Schedule 3: Classification of Roads etc, and TR010030/APP/2.1, Schedule 4: Permanent Stopping Up Of Highways And Private Means Of Access & Provision Of New Highways And Private Means Of Access.

Legend:	
	Local authority boundary
	Development consent order (DCO) boundary
	Schema layout (shown for illustrative purposes)
	New, altered or improved highway - motorway
	New, altered or improved highway - trunk road
	New or improved highway - side roads
	Existing highways to be stopped up
	Private means of access to be stopped up
	New/altered private means of access
	Existing Public Right of Way (PRoW)
	PRoW or footway/cycleway to be stopped up/erased/washed
	Existing permissive signposted route
	New or diverted bridleway
	New or diverted footpath or footway
	New or diverted cycle track
	New non-segregated footway/cycle track
	Byway open to all traffic to be improved
	Existing permissive signposted route to be upgraded to bridleway
	Existing permissive signposted route or track to be upgraded to footpath
	Existing footpath to be upgraded to bridleway
	Start/End point of highway / right of way to be improved, diverted, created, stopped up or extinguished
	New signal controlled non-motorised user crossing
	Existing private means of access to be stopped up
	Other private means of access to be altered
	Secure gates or barriers



Revision						
Status	Revised	Drawn	Checked	Reviewed	Authorised	Issue Date
DCO APPLICATION						
Status	Revised	Drawn	Checked	Reviewed	Authorised	Issue Date

Drawing Submitter: **DCO APPLICATION** Sheet: **A4**

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Working on behalf of **highways england**

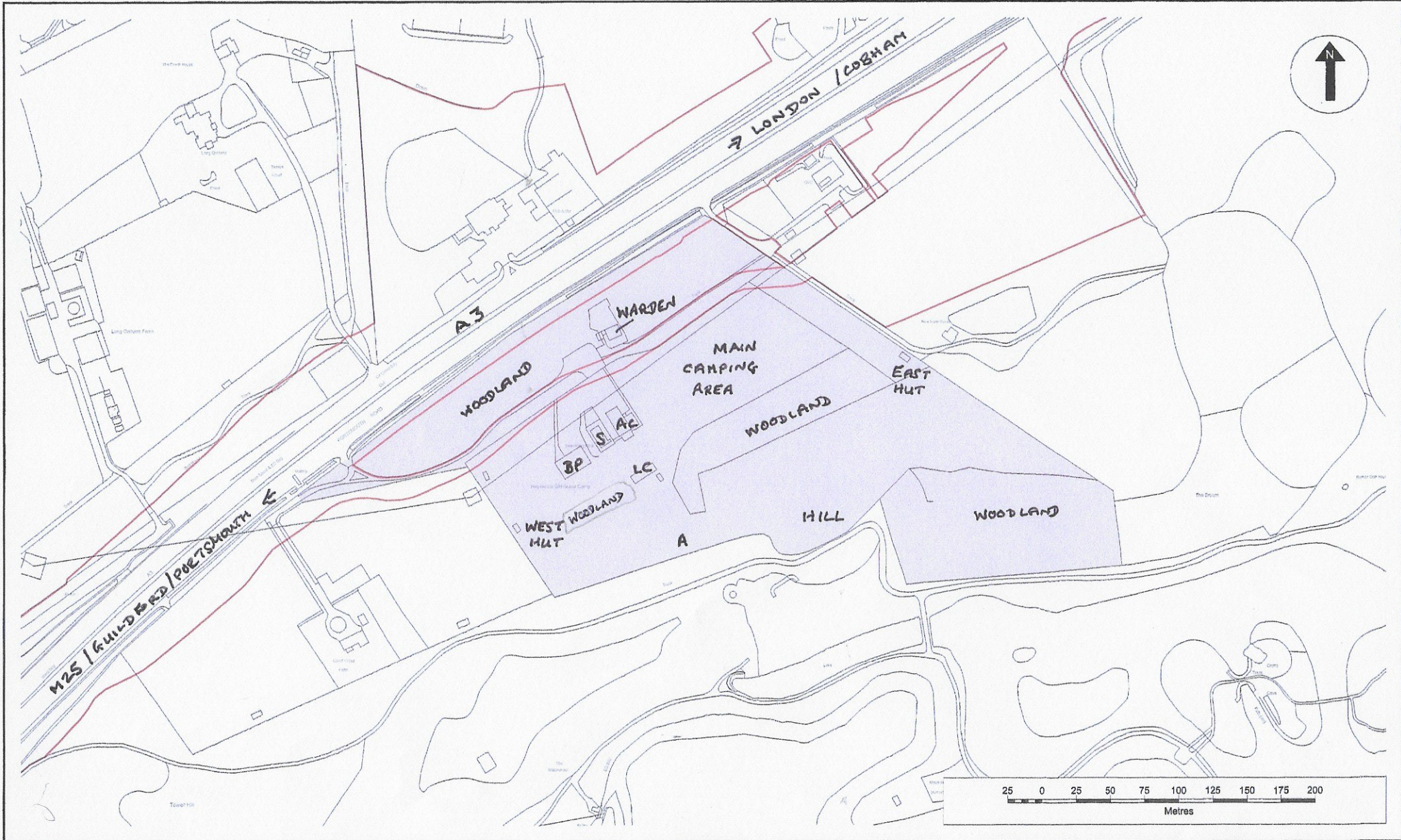
Project Title: <b>M25 junction 10/A3 Wisley interchange</b>	Drawing Title: <b>STREETS, RIGHTS OF WAY AND ACCESS PLANS REGULATION 5(2)(K) SHEET 7 OF 31</b>
Drawing Number: <b>TR010030/APP/2.4 ADAPTED</b>	Rev: <b>0</b>
E-Plan: HE551522	Scale: 1:1000
Original Set: <b>A1</b>	

Girlguiding GLW alternative route

This Drawing is saved on ProjectWise. Plotted: 13/06/2016 08:31:43 By: ARRO0098



APPENDIX 2



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- KEY:**
- AC ACTIVITY CENTRE
  - BP BP LODGE
  - LC LOG CABIN
  - S SWIMMING POOL
  - A AEROBALL

Produced by:  
TerraQuest Solutions Limited  
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- Area of your Interest
- Proposed Scheme Boundary

**M25 Junction 10/A3 Wisley Interchange**

<b>Party Name</b>	The Guide Association Trust Corporation (Freeholder)		
<b>Reference</b>	M25_J10_LP_2578_20		
<b>OS Map Ref</b>	TQ 09 60		
<b>Scale</b>	1:2500@A3	<b>Date</b>	23/10/2018





## Safeguarding policy

### Statement of purpose

Safeguarding is at the heart of everything we do in Girlguiding, and it's the responsibility of all of us.

As a Girlguiding volunteer you share this responsibility to protect and promote the safety and wellbeing of girls, young women and adults as you help them reach their full potential through great guiding experiences.

So it's really important that you're clear about your safeguarding responsibility, and about Girlguiding's commitment to safeguarding.

Our safeguarding policy will make that clear for you. It's for everyone involved with Girlguiding - whether you're a volunteer, staff or member - and it shows you our safeguarding principles and how we seek to protect children, young people and adults who are involved with the organisation.

You must read and always follow the safeguarding policy, and the safeguarding procedures that go with it. This isn't part of the contract of employment for staff or the code of conduct for volunteers, but it is a condition of your employment or voluntary service.

### Girlguiding's commitment to safeguarding

It's our policy to safeguard all adults and children while they take part in Girlguiding activities. This is regardless of their age, disability (physical or mental), gender reassignment, marriage and civil partnership, pregnancy and maternity status, race, religion or belief or sexual orientation. We recognise that some people are vulnerable because of the impact of previous experiences, their level of dependency, their communication needs, or other issues.

Everyone has a right to live free from abuse, exploitation, harm and fear and to be safe and well. We recognise and respond to all types of abuse and harm including physical, emotional, sexual and domestic abuse, neglect, online abuse, child sexual exploitation, female genital mutilation, bullying, harassment and cyberbullying, radicalisation, trafficking, grooming and harmful sexual behaviour. (You can find more information on the categories of abuse at: <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>)

We work in partnership with children, young people, parents, carers and external agencies to promote the safeguarding and welfare of our young members and our adult members and volunteers.

Our safeguarding policy, procedures and guidance are designed to create a safe space for great guiding, protecting the safety and wellbeing of all our girls, young women and adults, regardless of role. They are also designed to enable everyone associated with Girlguiding to share allegations, concerns or disclosures - whether related to Girlguiding activities or not.

### How do we effectively safeguard adults and children?

- We value, listen to and respect them.
- We have a safeguarding structure in place. (Please see: <https://www.girlguiding.org.uk/making-guiding-happen/policies/girlguiding-policies/safety-and-safeguarding-policy/safeguarding-structure/>).
- We have child protection and safeguarding procedures which reflect best practice.
- We share concerns and information with other agencies when there are significant concerns about an adult's suitability to work with children, or where we believe that someone is at risk of abuse or harm.
- We process information lawfully and securely, in line with the Data Protection Act 2018.
- We share information about child protection and safeguarding best practice with members, staff and volunteers. We do this via 'A Safe Space' pocket guides, e-learning and face-to-face training.
- We recruit volunteers safely, in line with the recruitment and vetting policy.
- We use our procedures to manage allegations against staff and volunteers.
- We make sure volunteers follow the code of conduct.
- We use complaints and whistleblowing policies and procedures.
- We always have health and safety measures in place - in line with the law and regulatory guidance - to provide a safe physical environment.



### **What does Girlguiding expect of you as volunteers, staff or adult members?**

- To follow the good safeguarding behaviours on our website: (<https://www.girlguiding.org.uk/making-guiding-happen/policies/girlguiding-policies/safety-and-safeguarding-policy/good-safeguarding-behaviours/>).
- To report all concerns, allegations and disclosures to your commissioner, the national Safeguarding team or, if you are based with British Guiding Overseas, the BGO Chief Commissioner
- To work with your commissioner or the national Safeguarding team to act when there's a report of an allegation, concern or disclosure.
- To be vigilant - so that you are alert when something is wrong.
- To act as soon as there's a problem. Report it within 24 hours, or sooner if it is an emergency or there's an immediate risk of harm.
- To be inclusive when thinking about safeguarding issues.
- To be accountable - don't assume that someone else has responded to a concern.
- To support the development of safeguarding knowledge.
- To help on behalf of others, and support them to develop their voice.
- To take safeguarding training relevant to your role, in line with our A Safe Space programme.

### **What do I do if I have a concern?**

As a volunteer or member of staff you must understand the procedures for recognising, responding to and referring any concerns, allegations or disclosures of harm or abuse. You can find information about this in our safeguarding procedures.

If you have a concern about someone in Girlguiding you should follow our process for reporting. You can find information about this in our *A Safe Space* pocket guide, and in our safeguarding procedure document.

You can contact the national Safeguarding team on:

- Tel: 020 7834 6242 (usual office hours)
- Out of hours emergency phone: [REDACTED] (5pm-10pm Monday-Friday; 9am-10pm Saturday/Sunday)
- Email: [safeguarding@Girlguiding.org.uk](mailto:safeguarding@Girlguiding.org.uk)

In an emergency you can also contact the police, you must let the Safeguarding team know ASAP if you do this.

For volunteers or members of staff from British Guiding Overseas (BGO) you can also contact the BGO Chief Commissioner on (+33) 6224 53553

### **Timescales**

The Safeguarding team aims to respond to all concerns/emails within 1-2 working days, and will always respond within 5 working days. The out of hours phone is for emergencies only.

### **Legal framework and Girlguiding policies**

This safeguarding policy complies with all relevant legislation, policy and guidance which seeks to protect children and adults across all ten of Girlguiding's countries and regions.

The national Safeguarding team will explain all relevant legislation and guidance to you. You can find a summary of this in the appendix.

You should read this policy alongside our other organisational policies, guidance and procedures. Find these on the website: <https://www.girlguiding.org.uk/> or on the intranet for staff.

### **Appendix**

#### **Related policies, procedures and documents**

You can find these at <https://www.girlguiding.org.uk>. Girlguiding is committed to these policies:

- Managing concerns about adult volunteers policy



- Anti-bullying policy
- Complaints policy
- Managing information policy
- Equality and diversity policy
- Whistleblowing policy
- Social media policy
- Recruitment and vetting policy

#### **Procedures - how Girlguiding puts our policies into practice**

- Managing concerns about adult volunteers procedure
- Complaints procedure
- Whistleblowing procedure
- Safeguarding procedure

#### **Supporting documents and guidance**

- Volunteer code of conduct
- *Dos and don'ts of handling disclosures*
- Risks and issues online guidance
- Sharing photos and videos online guidance
- Privacy notice
- *A Safe Space* pocket guide
- Safeguarding for Girlguiding Staff

#### **Legislation and guidance for safeguarding children and adults (not exhaustive)**

You can find an overview of child safeguarding legislation at: <https://learning.nspcc.org.uk/child-protection-system/>

Human Rights Act 1998

Counter-Terrorism and Security Act 2015

#### **England and Wales**

Children Act 1989

Children Act 2004

Children and Social Work Act 2017

Working together to Safeguard Children 2018

Safeguarding Vulnerable Groups 2006

Care Act 2014

#### **Wales**

Children Act 1989

Children Act 2004

Social Services and Well-being (Wales) Act 2014

All Wales child protection procedures, 2008

Working together to safeguard people guidance

#### **Scotland**

Children (Scotland) Act 1995

Children and Young People (Scotland) Act 2014

Getting it right for every child (GIRFEC) (Scottish Government, 2018)

National guidance for child protection in Scotland (Scottish Government, 2014a)

Protection of Vulnerable Groups (Scotland) Act 2007 (PVG Act)

Safeguarding Policy V2. March 2019



Adult Support and Protection (Scotland) Act 2007  
Mental Health (Care and Treatment) (Scotland) Act 2003

**Northern Ireland**

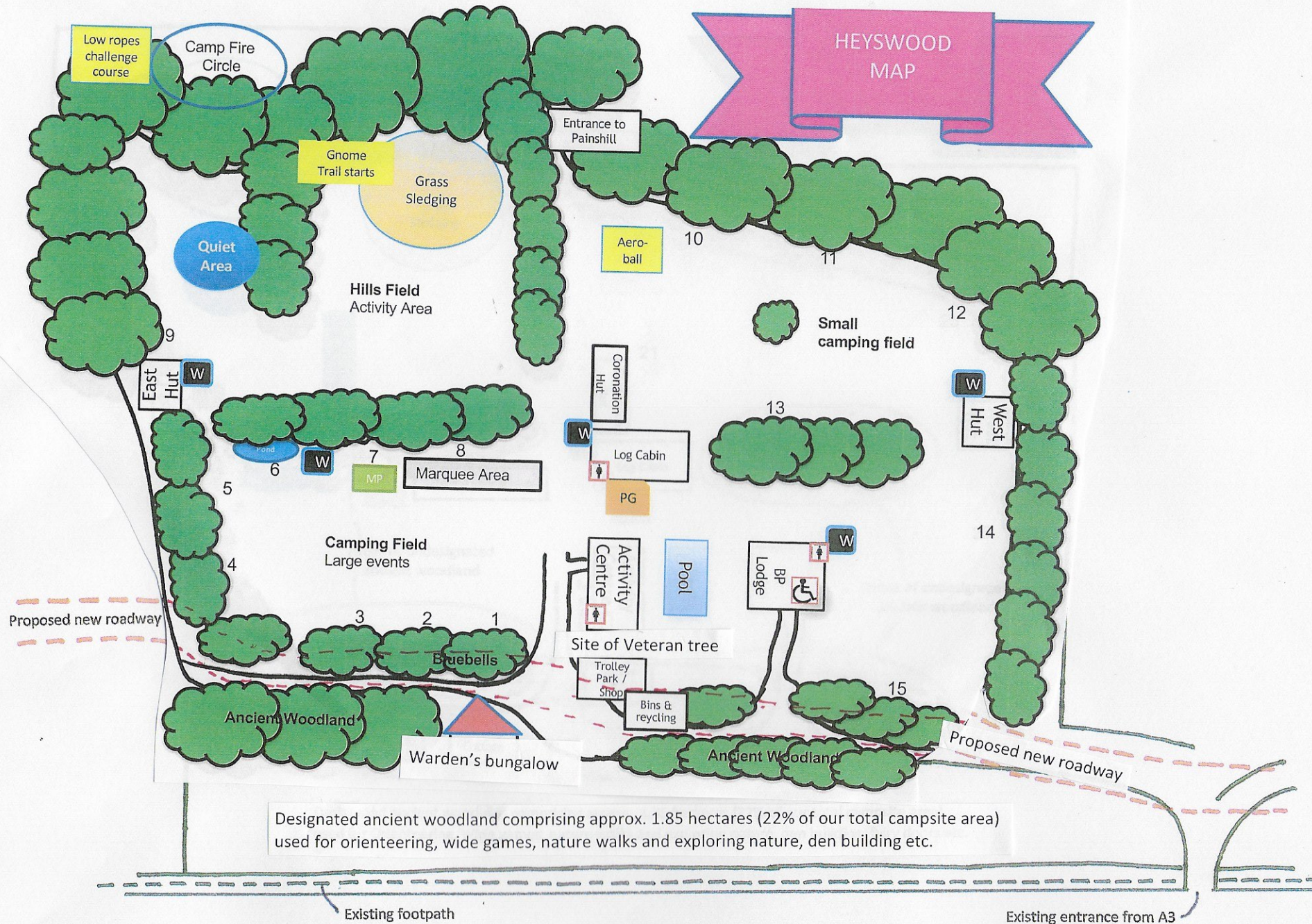
The Children (Northern Ireland) Order 1995  
Co-operating to Safeguard Children and young people in Northern Ireland (Department of Health, 2017)  
Revised regional core child protection policies and procedures for Northern Ireland (Safeguarding Board for Northern Ireland, 2018)  
Adult Safeguarding: Prevention and Protection in Partnership

**British Guiding Overseas (BGO)**

For relevant legislation please contact the BGO Chief Commissioner for details



HEYSWOOD MAP



Designated ancient woodland comprising approx. 1.85 hectares (22% of our total campsite area) used for orienteering, wide games, nature walks and exploring nature, den building etc.

A3 Southbound