

Date: 19th November 2020
Our ref: WJS/520324
Your ref:

Chartered Surveyors

Olympus House, Olympus Park
Quedgeley, Gloucester GL2 4NF
T 01452 880000
E bill.simms@brutonknowles.co.uk
W brutonknowles.co.uk
Offices across the UK

Natasha Kopala
Head of Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

Sent by email – transportinfrastructure@dft.gov.uk

Dear Madam

**Girlguiding Greater London West (GGLW): M25 Junction 10/A3 Wisley Interchange
DfT Request for Comments from Girlguiding Greater London West**

We write further to your letter dated 4th November 2020 addressed to our client Girlguiding Greater London West seeking further clarification on the following matters:-

The Applicant and Girlguiding Greater London West are asked to provide an update on any discussions they have had regarding an alternative route for the diversion of the gas main through the Heyswood Campsite

There have been no further meetings between the Applicant and GGLW since the site meeting on Thursday 2nd July and a virtual meeting held on Thursday 12 November. At the recent meeting there were representatives from the Applicant, Balfour Beatty Atkins and GGLW in attendance.

Since the DCO has been submitted and the Applicant has realised the errors in its plans it has been suggested by the Applicant that it may be possible to consider alternative routes for the gas pipe.

GGLW was aware that consideration has recently been given to moving the gas pipe to the north side of the A3, a suggestion it made some 2 years ago but at the time was immediately rejected by the Applicant as not being possible. If the gas pipe were to move to the north side of the A3 then not only would GGLW be able to retain more trees on its property, but its neighbour at Court Close Farm would also be able to keep more trees. GGLW requested a plan of this option at the 12th November meeting but have not received one to date.

At the meeting on 12 November, [REDACTED] for the Applicant ventured a number of high-level reasons why an alternative route along the north side of the A3 might not be viable. He mentioned that it was complex as the gas main would need to go under the A3 at Painshill and although parts were straight forward, he suggested that such a route would involve the removal of trees, the expense of tunnelling under the A3 and the need for additional 3rd Party agreements. With no plan of the route available, GGLW are unclear on the details.

[REDACTED] for the Applicant stated at the meeting that it had no agreement from SGN to any alternative route for the gas diversion (albeit they may not be averse to a change in route). Furthermore, [REDACTED] stated that the Applicant's "current position is to push forward with the alignment as it stands through the site, since introducing a change at this point might scupper the DCO".



Authorised and regulated by the Financial Conduct Authority

██████████ indicated if any potential changes were pursued now, then the DCO may be delayed or completely jeopardised for failing to include these investigations within their original application. However, he suggested that once the DCO has been awarded changes can be made.

After the DCO has been granted ██████████ suggested that it may be possible to amend the diversion to re-route the pipeline across the camping field at Heyswood, a route which the Applicant first suggested just before the closure of the Examination period. An alternative route through the field would reduce the overall number of mature trees that will needlessly be removed if the current alignment is to be adopted. But since no plans have been presented showing the possible alternatives, GGLW have no idea whether this would in fact work for them and there is very little time to reach an agreement considering the ongoing discussions have taken over two years so far.

The Tree Survey Information was on the agenda for the meeting of the 12th November, but the survey wasn't ready to be presented at the meeting, so there was no opportunity given to discuss that (The Tree Survey Information was subsequently released on the evening of 17th November - two days ago - see comments below).

Although ██████████ indicated that the Applicant was prepared to continue to investigate whether there was a suitable alternative route that could be implemented once the DCO was granted, he later advised that the commencement date for carrying out the diversion of the gas main in the programme is April 2021.

The other new information briefly mentioned at the meeting was that the schedule of works is now:-
April 2021 – December 2021 – re-routing of gas main
December 2021-December 2022 – construction of new access road

This means 2 years of disruption to the campsite, thus penalising the girls from maximising use of the property. Following Covid-19, the mental health of young people has been highlighted and access to the outdoors in 2021 and beyond is vital. Previously GGLW had been told that the new access road would be the first stage of the project alongside the gas main re-routing. This news is yet another example of inadequate communication and dialogue from the Applicant to GGLW. GGLW's representatives left the meeting feeling that consultation regarding the route of the gas diversion to date has been wholly inadequate and that the Applicant appears to be pushing forward with the current alignment with indecent haste without considering the enormous impact on its campsite.

Furthermore, the Applicant is concurrently requesting 'early access' to the Heyswood site in order to start preparatory work, which in spite of what GGLW are being told, suggests a lack of intention to explore further the possible options. GGLW are surprised by this when it seems logical that alternatives should need further investigation first, consultations held, then a final resolution that is acceptable to GGLW could be confirmed.

Regarding the Tree Survey Information, neither the ExA nor GGLW has ever seen the alleged tree survey from June 2020 nor by the time GGLW started to draft this response. However, a tree survey has now just been received early evening on Tuesday 17th November which GGLW note was only drawn/printed on Thursday 12th November (the date of its virtual meeting with the Applicant). GGLW feel that receiving a tree survey, requested in July, only days before final response to the DfT and noting that it has only been drawn so very recently is indicative of the frequent late sharing of information from the Applicant that has been the case throughout.

GGLW trust this survey is from a truly independent source but it's very late receipt and current restrictions on travel and face to face meetings do not give time for it to verify the accuracy. GGLW have also been advised by the Applicant in an email dated 17th November that the survey is still not finalised but is 'fundamentally' complete.

Although GGLW have now received this survey it has not yet had the time to discuss this with the Applicant and ensure it understands fully which trees will be removed. GGLW have therefore not been able to fully consider the implications of the tree survey and its impact on differing routes for both the alternative route for the PMA route (where GGLW still believe the best solution is that submitted at Change 7) and for alternative gas main diversions.

Not having had the opportunity to discuss the tree survey, the key makes it difficult to be sure which trees are being removed, but GGLW's understanding is that it is most of them. GGLW understands that **all** of the trees along the route of the current proposed pipeline and 6m either side of it will need to be removed and replacement trees will not be permitted to be planted for a distance of 6m either side of the pipe.

GGLW cares passionately about the environment and would normally expect any trees that were being taken down to be replaced. The loss of all of GGLW's trees can be avoided by the Applicant making an effort to use an alternative route on the northside of the A3 which we now understand is possible.

The Secretary of State invites Interested Parties to comment on the submissions received at Deadline 12

With reference to 9.145 Applicant's comments on GGLW's Deadline 11 submission

2.1.1 The new access road would mean that the car park would be separated from the residential buildings and camping fields. As mentioned in our Deadline 12 response, this increases the risk of accidents as young people arrive and leave the site as they will need to cross the access road.

2.3.2 It was only in the late discussions that GGLW were informed about the magnitude of the excavations (12m wide – see 2.3.4) that would be needed for the gas main which meant that it would never have been able to go under its existing track that is only 3m wide. For the last three years discussions with the Applicant has **always** been on the mutual understanding that the gas main would go under the existing track which is clearly not possible.

2.5.1 Despite promises of the tree survey report, GGLW have only just received this. Therefore, it cannot make any comment on the impact and number of loss of trees in the various alternatives (as mentioned above).

Yours faithfully,



Bill Simms BA (Hons) MRICS
Partner