



Registration Identification Number - 477
Application - M20 Junction 10a

**National Infrastructure Planning
Written Representation**

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Introduction

North Willesborough Community Forum (NWCF) covers the area shown in the map below - as can be seen, it covers Junction 10 and most of the surrounding roads:



Local Issues

Like most communities, North Willesborough likes things just the way they are and would prefer no change. However, we realise that change is inevitable, and sometimes actually beneficial to the community. In this case, however, we are concerned that the new J10a scheme will actually make things worse.

Our concern here is that HE is responsible only for England's strategic road network, i.e. motorways and major A roads, and that the scheme will be built for the benefit of long-distance travellers, at the expense of local road users.

During our discussions with HE we talked briefly about their cost/benefit modelling and how results can be skewed by the weightings applied to different factors and groups. HE assured us that local users were taken into consideration but we remain sceptical.

In the case of this scheme, ignoring local users will be self-defeating, given that it is the locals who will use (and be inconvenienced by) the scheme most. For example:

- The Junction 10a roundabout will be used by residents of all the villages east of J10a simply to get to Tesco.
- The A2070 will become a local road (rather than a trunk road) following the development of Stour Park, Waterbrook and Finberry.

We are concerned that the scheme will not service the needs of local people.

Consultation

NWCF engaged quite strongly with HE during the Consultation phase:

- Salvatore Zappala of HE presented the scheme at our Open Meeting on the 10th February 2016. The presentation prompted some lively debate and some interesting counter proposals.
- We held a follow-up drop-in workshop on the 9th March 2016 for residents to discuss the scheme in detail with Salvatore Zappala. Alternative ideas were also presented for discussion.
- We provided extensive written responses to both the initial consultation, ending March 2016, and the additional consultation, ending May 2016. (We cannot find a copy of our consultation responses in the documents.)

Not all of our consultation responses are included in the Table D 1-3 Section 47 non-statutory stakeholder responses in document 5.5 Consultation Report Appendix D. Our other responses concerned:

- A20 Junction 10a bypass.
- Traffic capacity on the A20 between Junctions 10 and 10a.
- Retention of the Junction 10 eastbound sliproad to connect with Junction 10a.

For the above we received responses from HE in meetings following the consultation. For the following we received no response so these are described again within this document:

- Enhancements to the A2070 Roundabout
- Traffic Modelling.
- Public Transport.

We are concerned that the applicant documents do not fully cover the consultation phase so far as NWCF is concerned.

The A2070 Roundabout

We mentioned this in our consultation responses but received no feedback on it from HE, so are repeating our case here. It concerns the bypass lanes (see diagram below).



- A. The southwestern bypass lane makes sense.
- B. We are concerned about the northbound bypass lane - whilst useful for traffic heading to Willesborough and Kennington (via J10) it will also encourage London bound M20 drivers to use J10/Hythe Road, rather than J10a, no matter what the signage says. Also, traffic using this bypass lane will be unlikely to slow down, making it more difficult for traffic to exit Barrey Road and cross lanes to either go to J10a or southbound (unless the Barrey Road junction is signalised).
- C. Since the purpose of the link road is to link Junctions 10 and 10a we believe that the roundabout should have an eastbound bypass lane (shown in dark grey in the diagram), thereby facilitating and encouraging traffic flow from J10 to J10a via the link road (rather than the A20).

We believe that this aspect of the design should be revisited.

Traffic Modelling

During the consultation period there were some interesting conversations where HE’s answer was “but our traffic modelling shows that it will work”. In the March-May 2016 consultation we were finally given some figures (figs 7.1 and 7.2 in the Transport Assessment Report) which, upon scrutiny, threw up some anomalies. We commented on these in our May 2016 response but received no clear response from HE. We have now examined some of the data submitted to EXA and find one of the anomalies highlighted to HE last May is still present.

In our consultation response in May 2016 we observed that the figures showed that traffic to and from the Folkestone direction was nowhere near equal, even if it switched between the A20 and the M20:

	Eastbound	Westbound	Difference
A20	7,241	6,662	
M20	26,921	24,822	
Total:	34,162	31,544	2,614

We therefore checked the figures on Table 1.6 in Volume 6.3, Appendix 5.3, Summary of Traffic Changes (TR010006-000310-M20_J10a_6.3_App_5.3.pdf) using the Figure ID’s on drawing Figure 5.10B: Summary of Traffic Data (TR010006-000230-M20_J10a_6.2_Fig_5.10B.pdf).

For the M20 Only:

Figure ID	Link ID	Direction	Flow (veh/day)
20 and 58	1044-1046	Eastbound	26,921
21 and 19	1045-1043	Westbound	24,822

This shows 2099 vehicles per day going in the Folkestone direction and not coming back.

As we did in April 2016, we then checked the A20 figures, as it could be that the 2099 returned via the A20. This was a bit trickier because there are 2 Figure ID’s (55 and 60)for the A20 in the corresponding stretch, and it was also not immediately clear which numbers related to which direction. In the end, however, we deduced the following:

Figure ID	Link ID	Direction	Flow (veh/day)
55	50194-50021	Eastbound	7,241
55	50021-50194	Westbound	6.662
60	8020-50194	Eastbound	7,241

60	50194-8020	Westbound	6.662
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i.e., these are the same figures we were given in April 2016, showing 2,614 eastbound vehicles (8%) never come back.

We were not able to check the other anomaly we found in May 2016 as we can find no Figure ID for that stretch of road (A2070 north of Junction 10).

Document 7.2 (Transport Assessment Report) provides a good narrative of the traffic data collection and modelling processes - it's a shame this was not available to us during the consultation phase as it would have formed the basis of discussions which may have resolved some of the issues and questions still in the air. We feel that HE missed an opportunity here but hope that the EXA will be able to obtain satisfactory answers to our concerns.

We are concerned that the traffic modelling figures and processes, upon which much of the justification for the scheme hangs, are flawed.

Public Transport

The Scheme makes no provision for public transport - section 5.5 of volume 7.2 (Transport Assessment Report) simply describes the status quo. There are two places where such provision is essential and which should be included in the Scheme:

Barrey Road - The Barrey Road estate is partly retail so both workers and shoppers need access by public transport; there are two alternatives:

- With a signalised junction providing a right hand turn onto the A2070 a bus stop could be provided on the Barrey Road estate as buses would have full access.
- If a signalised junction providing a right hand turn onto the A2070 is not provided there will need to be bus stops on the A2070 with a pedestrian crossing/footbridge (the Church Road footbridge is too far away).

Stour Park - The projection is that Stour Park will employ over 1,000 people, many of whom will hopefully want to travel by public transport. Although the site's developer's plans do mention bus stops on the site we believe that the Scheme should also include bus stops on the link road, close to the site entrance.

The Scheme should include and describe provision for public transport.

Speed Limit Enforcement

It is noted that the speed limit on the A2070 is to be 40 MPH.

What provision for Speed Limit Enforcement is included in the scheme?

Barrey Road/A2070 Junction

This junction has been the source of much discussion and frustration since it was built:

- It is not possible to turn right out of Barrey Road, which means that traffic wanting to travel southbound on the A2070 has to go north to J10 then either go all the way around it or turn left onto Hythe Road and use local roads.
- Exiting Barrey Road means merging, from a standing start, with traffic travelling at up to 70mph.
- Southbound traffic turning right into Barrey Road has to cross two lanes of northbound traffic travelling at up to 70mph.

This has been an inconvenience to both the residents of Sevington (approx 100 households) and those working in and shopping at the units on the industrial estate, and culminated, just before Christmas 2016, in gridlock to the estate and queuing on the A2070. Over the years there have been numerous petitions and lobbying by both KCC and ABC councillors.

Initially, HE proposed to include some improvements and ran a modelling analysis which showed a cost benefit in introducing traffic lights at this junction - this was shown on a presentation (160309_M20J10a_Presentation (2).pdf) sent to us on the 11th March 2016 - the relevant page is shown below:

**highways
england**

Revised design – Barrey Road

- *Barrey Rd Merge Taper:
 - increases benefits from around £39M to £49M.
 - evaluation of possible safety issues related to visibility of traffic merging (looking over the shoulder rather than at 90deg angle at the junction), as well as issues related to speed limit reduction.
- *Signals at Barrey Rd:
 - Tested
 - full (includes right turn out of Barrey Rd)
 - partial (excludes right turn out of Barrey Rd).

As above the benefits for the current BRJ design are £39.4M. The benefits generated by signalising the BRJ in the DM and DS are as follows:

Design	DM Signalised, DS Priority	DM and DS Signalised
Partial Signalisation	£46.4M	£51.0M
Full Signalisation	£54.7M	£47.9M

It appears that if we are signalising the DM only, then the full signalisation is the most beneficial, whereas partial signalisation is the only option that produces increased benefits when the DS is signalised as well as the DM. This suggests that partial signalisation is, overall, better than the current design, whereas the full signalisation works primarily by creating increased dis-benefits in the DM. Partial signalisation could also be provided with the improved merge taper if A2070 NB traffic was held at the stop line (therefore making it a safer manoeuvre).

Subsequently, however, at a meeting of the Junction 10A Community Working Group in April 2016, the HE J10a team announced that they were referring matters concerning the Barrey Road junction to the local HE team (Area 4) and removing it from their scheme - their reasons were:

- If J10a did not go ahead Area 4 could still deliver a solution.
- Area 4 might be able to deliver a solution before the J10a scheme could.

In view of this, talks are ongoing between HE Area 4, KCC, ABC, residents and business owners to try to broker a solution. We are therefore surprised that, rather than leave the Barrey Road/A2070 junction issue to this group, HE intend to modify the junction under the J10a scheme:

“The existing A2070 /Barrey Road junction would modified with a new a new left turn lane introduced from the A2070 into Barrey Road.”

(Ref Section 2.3.6 of document Volume 6.1 Chapter 2-The Proposed Scheme (TR010006-000175-M20_J10a_6.1_ES_Chapter_2.pdf) and as shown on drawings in document 2.6 General Arrangement Plans (TR010006-000155-M20_J10a_2.6_General_Arrangement_Plan.pdf))

The J10a scheme should either incorporate a proper solution to the junction, in line with their cost/benefit analysis, or omit the left turn lane and leave it wholly to the new multi-party group, especially as their proposed modifications could conflict with the solution currently being worked out.

Conclusions

We understand that, for certain developments to the east of Ashford to go ahead, a Junction 10a is necessary, and we would prefer a full junction to the SELEP scheme. However, we need it to work, not just for national traffic, but for local traffic too.

In summary:

Local Issues	We are concerned that the scheme will not service the needs of local people.
Consultation	We are concerned that the applicant documents do not fully cover the consultation phase so far as NWCF is concerned.
Traffic Modelling	We are concerned that the traffic modelling figures and processes, upon which much of the justification for the scheme hangs, are flawed.
The A2070 Roundabout	We believe that this aspect of the design should be revisited.
Public Transport	The Scheme should include and describe provision for public transport.
A2070 Speed Limit Enforcement	What provision for Speed Limit Enforcement is included in the scheme?
Barrey Road/A2070 Junction	The J10a scheme should either incorporate a proper solution to the junction, in line with their cost/benefit analysis, or omit the left turn lane and leave it wholly to the new multi-party group, especially as their proposed modifications could conflict with the solution currently being worked out.