

**M2 Junction 5 Public Inquiry
Submission of Stockbury Parish Council**

Summary

This submission from Stockbury Parish Council expands on the following themes:

- A brief introduction to the document
- A short history and description of the Parish, its community and its economy, highlighting the importance of the A249 to the village
- A description of the current road layout, including its benefits and challenges
- A discussion on the proposed design of Junction 5 explaining the difficulties that this will cause for Parishioners, customers and visitors to Stockbury, and setting out the need for some form of mitigation to be built into the project design / plan.
- A brief history of the relevant discussions with the HE project team
- Conclusion in which it is argued that the re-modelling of Junction 5 necessitates the inclusion of some form of mitigation at the Church Hill junction as an integral part of the project.

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1. Introduction

Stockbury Parish Council (SPC) acknowledges that there is a problem with traffic congestion causing frequent delays on both the northbound and southbound carriageways of the A249, where they join the Stockbury roundabout. SPC further acknowledges that an improvement to the traffic flow at the junction would allow for further housing and industrial development on land north of the M2. It is understood that funding is currently available for a project to alleviate the problem.

SPC's objection to the scheme, as currently proposed, is based upon the obligation and need to protect and preserve the lives, livelihoods and community of local residents and also visitors to this thriving village, whether those visitors come in a business, essential services or social capacity. SPC seeks to maintain the economic and social viability of the village through continued safe access, so that people are not dissuaded from coming to the village via a route which SPC, villagers and others consider to be a more dangerous access than we currently have. This view will be supported at the Inquiry by statements and evidence from other sections of the Stockbury community, including the Village Hall, the Community Bus, the Harrow Community Pub, village clubs and societies and local businesses as well as people who live, work in or visit Stockbury.

2. Stockbury history

There has been a settlement at Stockbury since the Bronze Age, with an identified village since Saxon times. It is listed in the Domesday Book of 1086 as straddling the valley through which the A249 now runs. At the top of Church Hill is our parish church, the 12th century, grade 1 listed, St Mary Magdalene church which is still open for weekly services, weddings and funerals. Over the centuries, the village and surrounding hamlets have coalesced into an area now described as the Parish of Stockbury, with the hamlet of South Green on the Eastern side of the valley and those of Stockbury village and Yelsted to the west. The Parish Council has a stewardship role to ensure that the village, which has survived and thrived since Anglo Saxon times, continues to exist as a viable and close knit community for generations yet to come.

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2.1 *Stockbury economy*

In contrast with many rural communities, Stockbury has maintained a strong collective identity and, against the odds, has managed to retain a thriving mixed rural economy. These include: farms; a farm shop, post office and butchery; a public house which was recently purchased by villagers as a community asset; a garage and MOT station; a supplier of agricultural equipment; and many small businesses. The businesses in Stockbury supply goods and services to a wide catchment area and rely on more than the 600 residents to maintain their financial viability. A key to their success in the 21st century has been safe access to and from the A249 and the motorway network to which it connects.

The maintenance of a safe method of access to and egress from the village of Stockbury is of paramount importance if the economy is to be maintained and developed. The development of rural economies is viewed by the Government as an important part of the work of the Department for Food and Rural Affairs who are responsible for the Rural Development Programme for England (RDPE). Unlike many, Stockbury has managed to maintain a thriving economy without recourse to the grants available from Government under the RDPE Growth Programme.

2.2 *Stockbury society*

The village of Stockbury, on the western side of the A249, is the focal point of the Parish and is the centre of social activities and amenities for all Parish residents and includes:

- Stockbury Parish Church and Village beacon, focal point for village celebrations, commemorations, memorials and remembrance ceremonies
- The Village Hall which provides a venue for a large range of clubs and events which draw people from across the Parish and beyond.
- A community owned Public House/cafe/restaurant with over 150 shareholders
- The village shop / post office which doubles as a centre for exchange of local news
- The base for the Community Bus which enables those without independent transport to retain their independence as there is no public bus service (other than the school bus) to the village, adjacent bus stops on the A249 having been closed as too dangerous for buses to stop and re enter the A249.

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These are vital to the social cohesion of the community and are critically dependent on safe access to, and egress from, the village via the A249.

3. The Stockbury Roundabout and the A249

3.1 *History*

The fundamental layout of the Stockbury roundabout was designed and completed in the late 1960s and anticipated a change in the “side” of the road used by vehicles. At the time, it was thought inevitable that the UK would switch to the European standard of driving “on the right”.

This coincided with the development of the A249 south of the roundabout as a dual carriageway in order to cope with the volume of traffic and to provide a link between the M20 to the south and M2 to the north. The opening of the dual carriageway directly resulted in the death of a Stockbury resident on the first day; something which is still keenly felt in the village.

The residents of Stockbury Parish, the people who commute into the Parish for work and the customers of the businesses are regular users of the A249 and suffer the same difficulties as other road users, particularly at peak times. There is support for re-modelling, but this is currently outweighed by concern about the safety of the current proposal.

3.2 *Current access to and egress from the village via the A249*

To the west of the village, there is a network of rural lanes which feed into the village centre. These are all single track roads with occasional passing spaces and only suited to light vehicles. The main route of access and egress for visitors to the village and businesses is via Church Hill, with a smaller, non HGV, route via Honeycrock Hill. The farms, shop and other businesses depend on heavy goods vehicles and slow moving farm vehicles being able to enter and leave the village via Church Hill.

The lines of sight at the Church Hill junction are poor, particularly when entering the northbound carriageway of the A249. Whilst heavy vehicles have no practical choice, the route of choice for light vehicles wishing to enter or leave the village is Honeycrock Hill as the line of sight when accessing the northbound carriageway of the A249 is vastly superior to that at Church Hill.

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It is important to note that the vehicles which provide the “lifeblood” to the Stockbury economy are generally slow accelerating and slow moving. For those having to enter the village from the southbound carriageway of the A249, crossing the current dual carriageway can be a severe test of patience, particularly at peak times. Frequently, the ability to cross the A249 during the rush hour relies on congestion at the Stockbury roundabout holding traffic and other road users in a slow moving queue, and those vehicles in the queue respecting the recently added “keep clear” zones on the Northbound carriageway.

4. **The proposed re-design of M2 Junction 5**

The proposed design of the flyover has two major effects that are particularly relevant to Stockbury:

- By closing off Honeycrook Hill and directing all traffic via Church Hill, the egress onto the northbound carriageway of the A249 from the village has a restricted line of sight (south). For slow accelerating vehicles, this presents a real danger.
- Creating a smooth flow of traffic both northbound and southbound on the A249 will virtually eliminate gaps between the vehicles making up the “through traffic”. Inevitably, vehicles will travel “nose to tail” particularly at peak times and, with no potential break due to the flyover taking a substantial amount of traffic which would previously have stopped at the roundabout; this will be a continuous flow.

These points are expanded upon below

4.1 *Closure of Honeycrook Hill*

The loss of the safer and more convenient method of entering and leaving the village via the A249 for light vehicles is regretted, but accepted as necessary in order to accommodate the major changes to the road layout. Its closure will, however, leave the village’s economy and community reliant solely on the Church Hill Junction.

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4.2 *Church Hill*

Given that this will be the sole route by which all vehicles can enter or leave the village on completion of the project, the safety and practicality of its use is of paramount importance to the sustainability of Stockbury as a community and an economy.

The Parish Council has serious concerns that, without modification, the junction between Church Hill and the A249 will become both dangerous and impractical.

4.2.1 *Crossing from the Southbound carriageway of the A249*

Traffic wishing to enter Stockbury village from the north that has not travelled on the A249 south on the new flyover from the Sittingbourne direction, eg have come from the M2 either W or E, or have joined the roundabout from the new slip road at the roundabout to join the A249 southbound, will have to then cross two lanes of free flowing traffic from the north side of the M2 to access the “crossover” at the Church Hill junction. It’s important to note that from the start of the A249 on Sheppey this will be the first time that the southbound traffic, having travelled possibly approx 8 miles at speeds of up to 70mph, will have encountered any crossovers on the carriageway. The drivers will not be anticipating traffic crossing in front of them. We believe that this will be less safe than the current arrangement, particularly for slow moving vehicles, but also for southbound drivers not anticipating any vehicles crossing their path.

Once at the crossover, any vehicle will need to cross two lanes of free flowing traffic preparing either to access the flyover or cross into the new feeder lane for the new roundabout. One of the prime purposes of the junction re-modelling is to maintain a free flow of traffic travelling at up to 70mph at all times both northbound and southbound on the A249. At peak times in particular, separation between the vehicles anticipating entry to the flyover will be minimal; in effect, they will form a continuous stream with no impediment to break the flow. This is excellent for vehicles wishing to continue travelling into Swale, but will render crossing the A249 into Church hill extremely dangerous in the opinion of the Parish Council. The dangers will be further compounded by traffic seeking to change lanes in order to access the feeder road to the M2 westbound. Again, as a prime link between the M20 and M2, vehicles conducting this manoeuvre will be travelling at speeds of up to 70mph. Whilst natural gaps may appear, the lines of sight are such that slow accelerating vehicles are unlikely to have time to cross safely into Church Hill.

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4.2.2 *Entering the Northbound carriageway of the A249*

Entering the northbound carriageway at Church Hill entails entering 2 lanes of free flowing traffic which will be travelling at, or up to, 70mph and at peak times separation between vehicles will be minimal. Stationary cars waiting to join the northbound carriageway would be required to accelerate to a speed at or about 70mph in a matter of a few seconds. Slow accelerating vehicles would have no hope of achieving this and, given the restricted line of sight (see below), it would become a dangerous manoeuvre for most vehicles

Church Hill has historically been less safe than Honeycrook Hill due to a very short line of sight and lack of an acceleration lane when entering the northbound carriageway from Church Hill. Indeed, it is for this reason that the vast majority of light vehicles currently use Honeycrook Hill. The remodelling does not alter that inadequate line of sight, or add an acceleration lane, but will increase the northbound traffic flow / density. It is our contention that this will render what can be a difficult junction, especially at peak times, much less safe.

5. **Consultations with Highways England**

Stockbury Parish Council has made its best endeavours to engage in constructive discussions with HE over the last 3 years, hosting events and meeting directly with the project team. We have taken great pains to understand, as fully as we are able, the technical merits of various aspects of the project's design, but have consistently expressed concern about the effects that it would have on the safety, economy and community of Stockbury.

HE, during the majority of the discussions with SPC insisted that as Church Hill was outside the area covered by the scheme it was therefore outside the scope of its operations. Since the boundary change, HE maintains that the scheme will provide safe access to Church Hill, will not increase the risk as compared with the existing situation and has been designed with the safety of those using the route in mind.

In January 2020, the boundary of the project was extended to the south side of the Church Hill junction, bringing the entire junction and associated risks within the purview of the overall project. This was followed by a brief assessment of four potential solutions ie traffic lights, a roundabout, a bridge and an underpass. The Parish Council declined to express a preference on the basis that we lack the

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professional expertise properly to assess the merits of each proposal, but any of the choices would be better than no mitigation.

The Parish Council was asked to comment on the merits of each potential solution, but also told that there was no funding to build any of them and that this would be an entirely separate project which may or may not go ahead at a future date which was undefined.

It is our contention that this is unreasonable and that the design and remit of the overall project should include ensuring that the safety of the local community is not compromised. The construction of a mitigating solution should be an integral part of the M2 Junction 5 re-modelling.

5.1 *Entering the northbound carriageway*

At a meeting with HE held on 6.2.20., it was explained by HE that egress from the village onto the northbound carriageway would have no on-slip as the traffic movements were not sufficient to justify one. As put forward in 4.2.2, this will render joining the A249 northbound as dangerous as crossing from the southbound carriageway. It should also be noted that as Honeycrook Hill will be closed the volume of traffic using Church Hill would be increased.

5.2 *Crossing from the southbound carriageway into Church Hill*

In response to concerns expressed by the Parish Council, HE presented three sketches for potential modification of the junction: traffic lights; a roundabout; or a bridge, and asked the Parish Council to indicate their preference. It was made very clear to the Parish Council that, despite presenting the sketches and asking us to express a preference, HE took no responsibility for assessing their viability, securing funding or undertaking any works. The Parish Council declined on the basis that we are not technically competent to judge the merits of the sketches and that our concerns focus on the outcome rather than input.

5.3 *Statement of Common Ground*

Contrary to the assertion now being made, SPC has not failed to engage with HE nor to respond to proposals made to mitigate what we believe will be the fundamental damage caused by the proposed scheme to the viability of this rural community.

On the contrary, we have made our concerns unambiguously clear. It is not for us to analyse and assess possible solutions. Unlike HE we have neither the expertise nor the resources to do so. If it is the considered view of HE that, of the

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proposed mitigating measures, one appears to be more satisfactory than others, whether that be in terms of cost/benefit, ease of construction, visual amenity or whatever, then SPC respect that view and are happy to endorse it. Put another way, it is for the designers of the scheme, whose proposals bring about the need for mitigating measures to preserve the viability of this long standing rural community, and not for us, to incorporate within that design whatever measures are necessary to avoid the wholly disproportionate damage to life in Stockbury that is the inevitable consequence of the ambition of accelerating the passage of traffic along the A249.

Our position can be summarised as follows:

- We acknowledge the Highways England view that Junction 5 of the M2 needs to be re-modelled to alleviate the current difficulties experienced by road users
- We do not agree with Highways England that the scheme as currently proposed is safe for people wishing to enter or leave the village of Stockbury via Church Hill which will be the only access to the village available to all types of vehicles.

6. Conclusion

It is now two generations since the last major modification to the Stockbury Roundabout and attendant feeder roads, and it is likely to be two more before any further changes are considered. It is vital that any re-design is not only fit for purpose in 2020, but will also serve Stockbury Parish well and safely in 2070.

The Parish Council has no objection to the objectives of the scheme, but contend that the survival of Stockbury as a community on both sides of the A249 and as a thriving local economy depends upon mitigation of the effects that the current proposed scheme, as it stands, will have on access to, and egress from, the village. Our paramount concern is that entering / exiting the village, or crossing the A249 should, at a minimum, be no more difficult or dangerous than currently. As discussed above, our view is that the scheme as it is proposed would endanger the lives of Parishioners and visitors to the village, dissuade many others from visiting, and irreparably harm both the Parish's economy and community.

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Our contention is that HE should take responsibility for the potential effect of the scheme on Stockbury and should include some form of mitigation as an integral part of the project. We make no judgement as to the nature of that mitigation which would be for those with expertise in the field to determine.

For all of the reasons we have set out, it is our contention that the scheme as proposed, without the mitigation measures sought, would leave what is presently a thriving and successful rural community in Stockbury at risk of being fundamentally compromised. The consequence is likely to be that local businesses will cease to be viable, quite possibly to the extent of extinction, and social cohesion of this community, bisected as it is by the A249, will be forever broken. This in turn would undermine the vibrancy of this long established community, which should be seen as a model and an example to be followed and not something to be sacrificed in the interests of an accelerated journey for passing traffic with no interests in, or concern for, the local community of Stockbury. Put another way, the damage to the Stockbury rural community that seems an inevitable consequence of the scheme as presently set out, is simply too high a price to pay for faster traffic on the A249.

We would ask the Inspector to recommend to the Secretary of State that the scheme, should it be allowed to go ahead, be subject to modification which mitigates the problems referred to. We would also ask that it should be a condition, if the scheme is approved, that such mitigation be included as an integral part of the scheme as a whole and completed at the same time as the new flyover comes into operation.