Felbridge Parish Council have already provided evidence for the unannounced closure of Copthorne Road immediately prior to the traffic survey on the 16th May 2023, that survey forms the basis of the Transport Assessment for development of the SA19 site. Surrey Highways confirm that Copthorne Road was closed and that this was unannounced as were closures during the previous 5 days, we believe that this caused motorists to avoid the area as they would not know if the road was open or closed.

Motion's consultation response dated 20/12/2023¹ refuted the evidence of roadworks influencing the survey, stating;

"Regarding the traffic data, the surveys were repeated due to roadworks being in place on the network at the time of the initial surveys. During these repeated surveys, undertaken on the 16th May, no roadworks were in place within the study network and therefore there is no indication why traffic flows would not be representative. Indeed, 7-day traffic counters were placed along Crawley Down Road as part of the survey data collection and indicate that traffic flows in each direction were broadly similar for all weekdays."

Motion have referred to their 7-day traffic counters on Crawley Down Road. Appendix 1 is the 15-minute interval vehicle counts for Site 3 (near Oak Farm Place) for Monday 15th to Friday 19th May 2023 extracted from Appendix C of the Transport Assessment dated 16th January 2024.

Evidence for the road closure immediately prior to the traffic survey on the 16th May is clearly visible in the vehicle counts in both directions along Crawley Down Road after 20:00 on 15th May, when Copthorne Road was closed. The total vehicle counts for the overnight periods are shown in Table 1.

Eastbound	Mon	Tue	Wed	Thur	Fri
00:00-02:30	5	97	9	2	8
02:30-05:00	4	14	8	6	7
20:00-22:00	343	73	93	105	102
22:00-00:00	151	15	24	33	43

Westbound	Mon	Tue	Wed	Thur	Fri
00:00-02:30	8	40	4	6	6
02:30-05:00	1	9	4	5	3
20:00-22:00	310	111	132	167	126
22:00-00:00	124	40	50	49	67

Table 1. Overnight total vehicle counts for Site 3 Eastbound & Westbound (road closure highlighted)

Table 1 clearly shows a significant increase in vehicles using Crawley Down Road during the period when Copthorne Road was closed as they were trying to find an alternative route along Crawley Down Road. During all the highlighted overnight periods above, the traffic counts were more than double the average for the same times on the Wednesday and Thursday, the eastbound 00:00-02:00 was 17 times the average, whilst westbound it was 8 times the average.

The unannounced nature of the previous closures also influences the traffic counts 20:00-22:00 on Tuesday 16th, with both eastbound and westbound counts being 25% below the average for Wednesday and Thursday as drivers avoid the area in case the road is closed again. This is clear evidence that motorist routing patterns were still being influenced by the nature of the road closures even after the PM survey period on 16th May 2023.

The road closure 15th-16th May has also affected the peak period traffic flows on the 16th May when the baseline traffic survey was conducted. Felbridge Parish Council have already provided the evidence that road closed signage was still in place throughout 16th May. Table 2 shows the peak periods, as Tuesday, Wednesday and Thursday are the neutral days for traffic surveys it is appropriate to average the Wednesday and Thursday for comparison with Tuesday which should have similar traffic counts.

				Avg Wed		
Eastbound	Tue	Wed	Thur	& Thurs		
07:00-09:00	322	303	304	304		
16:00-18:00	208	319	215	267		

				Avg Wed	
Westbound	Tue	Wed	Thur	& Thurs	
07:00-09:00	247	279	281	280	
16:00-18:00	399	398	388	393	

Table 2. Peak period total vehicle counts for Site 3 Eastbound & Westbound

¹ Bafelb3 2104022/MF

Whilst the Tuesday eastbound AM & westbound PM periods show no significant deviation from the average, the Tuesday westbound AM & eastbound PM periods are 12% and 22%, respectively, below the averages. Whilst it is not possible to determine how these significant drops in traffic counts measured on Crawley Down Road were reflected in vehicle counts on Copthorne Road, this demonstrates that daytime traffic counts within the survey study area were significantly influenced on 16th May and thus the baseline survey taken on 16th May is not-representative of a neutral period.

Even small changes in vehicle counts are relevant when the Felbridge Junction is operating at capacity, the impact of an additional few % of vehicles will make a big difference in the peak hour average queue times. Using the TDC traffic 2018 survey data², the AM peak hour flow from the A264 south to East Grinstead was 710 vehicles. The junction was recorded as being at 100% saturation, so an additional 5% is 35 cars extra in the queue (no more cars will go through the junction as it is at 100%DoS) the extra queue time is therefore 177sec (3 mins). The reverse is true for small reductions in vehicle counts approaching the junction.

Without a valid baseline traffic survey, the analysis and modelling for the future states with the additional vehicle movements resulting from the proposed development are fatally flawed.

² TSP 3-day traffic survey conducted for TDC 17th-19th July 2018

Appendix 1 Crawley Down Road vehicle counts 15th-19th May 2023

IIUIX	Site 3 E	astboun		Thu		counts 15		Vestbou	nd	Thur	F.w.:
00:00	Mon 1	Tue 21	Wed 2	Thu 0	Fri 0	00:00	Mon 2	Tue 1	Wed 1	Thur 4	Fri O
00:15	2	11	2	0	3	00:15	4	7	0	1	1
00:30 00:45	0	12 12	2	0	2	00:30 00:45	1	2 6	1 0	1	0 4
01:00	Ő	12	1	2	2	01:00	Ö	3	0	Ö	Ö
01:15	0	5 9	0	0	0	01:15	1 0	4	1 1	0	0
01:30 01:45	0	7	1	0	0	01:30 01:45	0	5 2	0	0	0
02:00	0	3	1	0	0	02:00	0	6	0	0	1
02:15 02:30	2	5 6	0	0	1	02:15 02:30	0	4 4	0	0	0
02:30	0	1	Ö	Ö	0	02:45	0	4	0	0	0
03:00	0	3	0	1	0	03:00	0	0	0	1	1
03:15 03:30	0	1 1	0	0	0 1	03:15 03:30	0	0 0	1 1	2	1
03:45	0	0	1	1	1	03:45	0	0	0	1	0
04:00 04:15	0 1	1 1	1 2	0	0 4	04:00 04:15	0	1 0	1 1	1	0
04:30	1	0	0	0	0	04:30	1	0	0	0	Ö
04:45 05:00	0	0	2	2	1 2	04:45 05:00	0 1	0 0	0	0 1	1 1
05:15	1	0	1	0	1	05:15	1	2	4	0	1
05:30	5	1	4	4	4	05:30 05:45	3	5	2	2	2
05:45 06:00	5 7	8 11	4 11	3 12	6 5	06:00	3	5 5	4	5 5	3
06:15	8	15	8	10	10	06:15	7	8	9	0	10
06:30 06:45	15 24	18 19	14 24	14 18	15 19	06:30 06:45	11 11	10 7	4 10	12 8	6 12
07:00	24	24	26	25	25	07:00	9	10	16	21	12
07:15 07:30	18 38	32 38	25 30	25 41	28 22	07:15 07:30	26 19	19 25	24 13	19 23	16 21
07:45	47	50	58	41	53	07.30 07:45	30	22	28	27	34
08:00	62	59	52	40	40	08:00	28		33	39	38
08:15 08:30	37 53	44 37	36 48	42 44	37 56	08:15 08:30	41 36	41 34	56 52	50 39	27 47
08:45	27	38	28	39	30	08:45	70	65	57	63	46
09:00 09:15	27 28	30 24	23 21	23 27	25 27	09:00 09:15	22 33	26 28	45 31	30 27	42 24
09:30	25	21	27	28	28	09:30	29	25	19	23	44
09:45	24	21	28	20	20	09:45	29	20	27	27	30
10:00 10:15	30 30	22 18	16 27	19 20	30 27	10:00 10:15	21 28	30 31	36 20	24 25	26 29
10:30	19	23	34	16	31	10:30	25	34	34	37	38
10:45 11:00	28 26	29 23	27 23	12 28	24 41	10:45 11:00	13 25	32 32	18 33	28 32	30 44
11:15	19	23	19	12	41	11:15	26	20	32	27	25
11:30 11:45	20 27	19 25	27 34	21 16	36 30	11:30 11:45	29 31	26 19	15 36	26 28	36 39
12:00	24	21	35	24	40	12:00	33	30	23	28	38
12:15	32	16	39	16	26	12:15	27	32	36	36	39
12:30 12:45	21 15	18 24	27 38	22 15	37 44	12:30 12:45	29 33	33 32	31 26	21 38	37 26
13:00	21	35	40	17	51	13:00	25	30	36	27	31
13:15 13:30	14 23	13 19	27 19	14 17	38 18	13:15 13:30	39 32	29 28	30 35	21 21	34 30
13:45	27	22	22	25	29	13:45	27	31	34	35	24
14:00 14:15	18 16	13 27	20 19	21 25	19 20	14:00 14:15	22 26	30 24	24 24	24 35	30 39
14:30	35	27	26	24	58	14:30	36	16	25	29	28
14:45 15:00		34 23	30 33	38 32	71 58	14:45 15:00	28 41	34 49	31 41	28 53	40 27
15:15		15	32	24	42	15:15	82	58	73	61	61
15:30		31	25	27	24	15:30			36	40	61
15:45 16:00		31 27	26 22	18 25	21 16	15:45 16:00	42 47	42 44	35 46	36 40	45 44
16:15	23	24	28	31	35	16:15	48		52	57	38
16:30 16:45	26 29	29 16	35 47	25 26	20 27	16:30 16:45	41 43	49 46	48 41	38 45	36 37
17:00	36	35	43	29	30	17:00	49		43	45	45
17:15 17:30	33 20	29 25	44 39	28 21	28 26	17:15 17:30	56 58		57 55	64 56	47 49
17:45	22	23	61	30	33	17:45	51	43	56	43	41
18:00 18:15		24 24	53 37	48 44	30 30	18:00 18:15	37 29	54 43	42 50	46 47	35 56
18:30		26	24	44	23	18:30	33	45	25	37	43
18:45	24	21	22	36	29	18:45	27	25	31	28	40
19:00 19:15	32 24	26 20	23 22	25 21	19 25	19:00 19:15	23 27	28 32	25 26	38 37	35 26
19:30	20	16	24	20	21	19:30	13	26	18	61	35
19:45 20:00		17 10	23 20	37 28	15 20	19:45 20:00	17 56		21 19	23 30	22 18
20:15	57	11	8	18	12	20:15	34	17	17	30	23
20:30		3	11	11	11	20:30	38		24	12	9
20:45 21:00		18 9	14 20	16 9	14 17	20:45 21:00	41 39		16 15	15 17	21 26
21:15	45	6	7	8	9	21:15	38	11	8	24	13
21:30 21:45	33 32	8	6 7	7 8	11 8	21:30 21:45	34 30		17 16	18 21	8
22:00	17	4	5	5	5	22:00	46	13	16	10	14
22:15 22:30	47 18	3 1	4 6	6 5	8	22:15 22:30	18 4		5 9	10 10	10 8
22:30	18 9	3	2	7	5	22:30 22:45	4 14		3	8	8
23:00			_	4	2	23:00		4	4	5	
22.45		2	3		3		11			2	14
23:15 23:30	20	2 1 1	1 2	3	3 5 4	23:15 23:30	15 13	1	6	3 2	14 5 4