

Applicant	PGQ Property
Project Name	Padel Use, Unit A, Consort Way
Report Title	Response to Neighbour Consultation Comments
Report Ref.	TN01
Project No.	C26044
Date	24/04/2026
Produced By:	RM

TN01: Response to Neighbour Consultation Comments

1. INTRODUCTION

1.1 Background

- 1.1.1 Apex Transport Planning Ltd (“Apex”) has prepared this Technical Note on behalf of PGQ Property in support of planning application DM/26/0781, which seeks the change of use of the existing 1,346 sqm B2/B8 building at Unit A, Consort Way, Burgess Hill to an indoor sports facility (E(d)) comprising four padel courts.
- 1.1.2 The application is supported by a Transport Statement (TS) prepared by Apex (ref: C26044/TS01, Issue 2, 24 March 2026), which sets out the transport and highways implications of the proposals.
- 1.1.3 Mid Sussex District Council (MSDC) has received a consultation response dated 20 April 2026 from Jericho Management Company, landlord of the adjoining Unit B at 9-11 Consort Way, objecting to the application (included at Appendix A). This Note responds to the transport and highway matters raised in that letter.

1.2 Matters Raised

- 1.2.1 The points raised by Jericho Management Company which fall within the scope of transport and highways are:
- Concerns regarding highway safety at the shared vehicle access;
 - A concern that leisure use is incompatible with the surrounding industrial area, citing the nearby Jumpin Fun Inflatable Park as a local precedent for congestion;
 - A suggestion that a secondary access has been considered and would not resolve the fundamental concerns; and
 - A reference to the submitted Design and Access Statement, which is considered to contain inaccuracies.
- 1.2.2 Each of these points is addressed in turn below.

2. HIGHWAY SAFETY AND THE SHARED ACCESS

- 2.1.1 The application site is accessed from the northern boundary via an existing priority junction onto Consort Way, which is shared with the adjoining Unit B occupied by Jericho Management Company. No changes are proposed to these access arrangements.
- 2.1.2 Importantly, Consort Way is an adopted public highway subject to a 30mph speed limit, with continuous footways provided on both sides. It is not a private industrial estate road. Members of the public routinely pass and re-pass through the Victoria Business Park to access a range of existing commercial uses, including gyms, sports shops, and leisure facilities. The characterisation of the surrounding area as a private environment unsuited to general public access is therefore not supported.
- 2.1.3 The existing access junction was assessed and accepted as part of the planning permission for the recently constructed industrial unit (planning ref: DM/24/2970). The permitted B2/B8 use which the access was designed to serve generates regular HGV, delivery and forklift movements as a matter of course. The change of use would not introduce a fundamentally different or more demanding access scenario; indeed, the trip profile set out at Section 5 below demonstrates that vehicle movements at the site would be similar to, or lower than, those associated with the permitted industrial use at the peak hours.
- 2.1.4 The road safety review presented at Section 2.4 of the TS identifies no recorded Personal Injury Accidents within the study area over the most recent seven-year period. There is therefore no empirical evidence of an existing road safety issue at the access or on Consort Way that would be exacerbated by the proposals.
- 2.1.5 The letter raises a concern that operational movements within the shared access — including loading, unloading and reversing of HGVs — may at times obstruct the accessway. It is understood from the applicant that the relevant lease arrangements require both parties to keep the shared access unimpeded at all times, and that blocking of the access is not a permitted condition of occupation. This is an existing arrangement that is in place regardless of the proposed change of use. If obstruction were to occur in practice, it would equally present a concern under the permitted B2/B8 use — arguably a greater one, as it could result in HGVs being unable to enter the site and required to reverse back onto Consort Way. The proposed padel use would not introduce or worsen this scenario.
- 2.1.6 On the basis of the above, the proposals do not give rise to a highway safety concern. The access arrangements are existing, have been accepted by the local highway authority, and have operated safely in the absence of recorded incidents.

3. TRIP GENERATION AND COMPARISON WITH OTHER LEISURE USES

- 3.1.1 The letter suggests that the proposals would introduce significant additional traffic, and compares the proposed padel use to the Jumpin Fun Inflatable Park located elsewhere on the estate. With respect, that comparison is not appropriate.
- 3.1.2 A padel facility has an inherent and fixed capacity ceiling. The proposals comprise four courts, each of which can accommodate a maximum of four players at any one time — a maximum of 16 players on-site at peak occupancy, plus one or two members of staff. Bookings typically run in structured 60 to 90 minute sessions with staggered turnover across the operating day. This trip profile is materially different from a drop-in soft play or inflatable park use, which is characterised by high-turnover group arrivals at peak times.

- 3.1.3 Using a first-principles analysis informed by occupancy data from a comparable operational padel facility (see Section 5.3 of the TS), the proposals are forecast to generate:
- Approximately eight two-way vehicle movements in the weekday AM network peak hour (08:00–09:00), representing a reduction of two two-way movements when compared to the permitted B8 use;
 - Approximately 12 two-way vehicle movements in the weekday PM network peak hour (17:00–18:00), representing an increase of three two-way movements — equivalent to approximately one additional vehicle every 20 minutes; and
 - Approximately 11 to 14 two-way vehicle movements in the weekend peak hours, equivalent to approximately one vehicle every four to five minutes.
- 3.1.4 These levels of movement are considered low in highways terms and can be readily accommodated by the surrounding network. They would not result in a severe impact on the operation of the network or on road safety. The application is therefore consistent with paragraph 115 of the National Planning Policy Framework.
- 3.1.5 It is also relevant to note that the use of existing industrial units for padel facilities is an established and common arrangement across the UK. A number of comparable schemes have been delivered in similar employment area settings, typically with a trip profile materially lower than the B2/B8 uses they replace.

4. COMPATIBILITY WITH THE SURROUNDING AREA

- 4.1.1 The letter raises a broader concern that leisure use is incompatible with the surrounding industrial character of the estate. From a transport and highways perspective, this position is not supported.
- 4.1.2 As set out above, Consort Way is an adopted public highway with continuous footways on both sides. The surrounding area is already accessed by members of the public visiting a range of commercial premises within the Victoria Business Park, and is designed to accommodate this movement safely. The road is not an enclosed private industrial access.
- 4.1.3 Additionally, Mid Sussex District Council and West Sussex County Council have identified Victoria Business Park as a key area for active travel improvements within the Burgess Hill Regeneration scheme (see Section 3.3 of the TS). These proposals include new pedestrian and cycle routes linking the Business Park to surrounding residential areas, the town centre and the railway station. This is consistent with the continued and growing role of the Business Park as a destination accessed by members of the public, not solely by commercial operators.

5. SECONDARY ACCESS

- 5.1.1 The letter refers to a "potential mitigation" in the form of a secondary entrance or exit. For clarity, no secondary access has been proposed or considered as part of the application. The access arrangements are unchanged from those serving the existing, consented industrial unit.
- 5.1.2 The existing access has been demonstrated to be safe and suitable for both the permitted B2/B8 use and the proposed change of use. On the evidence presented, there is no justification for requiring a secondary access to be provided.

6. DESIGN AND ACCESS STATEMENT

- 6.1.1 The letter notes that the submitted Design and Access Statement refers to historic neighbouring occupiers that do not reflect the current situation. This is a matter for the authors of that document and is not a transport or highways issue.
- 6.1.2 For the avoidance of doubt, the Transport Statement has been prepared on the basis of the site as it currently exists, including the presence of the actively occupied Unit B. The assessments of access, parking, trip generation and road safety presented in the TS remain valid and are not affected by the point raised.

7. SUMMARY AND CONCLUSIONS

- 7.1.1 The points raised in the Jericho Management Company consultation response that fall within the scope of transport and highways have been considered and addressed above. In summary:
- The shared access onto Consort Way is an existing arrangement, serving an adopted public highway. It has been assessed and accepted for a B2/B8 use generating regular HGV movements, and has operated safely with no recorded Personal Injury Accidents over the past seven years.
 - Obligations to keep the shared access unimpeded apply to both parties regardless of the use served, and would apply equally under the permitted industrial use. The proposals do not introduce or worsen any obstruction risk.
 - The proposed padel use is capacity-limited and generates low levels of traffic — fewer two-way movements in the AM network peak than the permitted B8 use, and an increase of approximately one additional vehicle every 20 minutes in the PM network peak.
 - The comparison with the Jumpin Fun Inflatable Park is not an appropriate comparison given the structurally different trip profiles, and the maximum capacity of the padel courts being self-enforcing.
 - Padel facilities in existing industrial units are an established and common arrangement across the UK.
 - No secondary access is proposed or required. The existing access is appropriate for the proposals.
 - The reference to inaccuracies in the Design and Access Statement is a non-transport matter and does not affect the conclusions of the Transport Statement.
- 7.1.2 The proposals would not result in an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would not be severe. The application is therefore consistent with paragraph 116 of the NPPF and, from a transport and highways perspective, there are no reasons to withhold planning permission.

Appendix A Jericho Management Company consultation letter

Jericho Management Company

The Courtyard Shoreham Road, Upper Beeding, Steyning, West Sussex, BN44 3TN

Joanne Fisher,
Planning Department,
Mid Sussex District Council,
Oaklands,
Oaklands Road,
Haywards Heath,
RH16 1SS

20th April 2026

Response to Planning Permission Application

DM/26/0781

Unit A1, A2 and A3, Consort Way, Burgess Hill, West Sussex

Dear Joanne,

We would like to respond to the Notification of Planning Application relating to Unit A1, A2 and A3, Consort Way (Application No. DM/26/0781).

We write in our capacity as landlord of Unit B, 9-11 Consort Way, a directly adjoining and actively occupied industrial unit, to formally object to the proposed change of use of the neighbouring building to a Padel Tennis Centre.

Highway Safety and Conflict with Existing Industrial Use

The application site is accessed via a shared vehicle access route which serves our property, an active industrial unit. This access is routinely used by heavy goods vehicles (HGVs), delivery trucks, and forklifts throughout normal working hours.

The nature of our operations requires regular manoeuvring of large vehicles, including reversing, turning, and loading/unloading activities. At times, these essential operations necessitate temporary obstruction of the accessway. This is a normal and unavoidable part of operating a functioning industrial premises.

The introduction of a leisure use open to the general public would create a significant and unacceptable conflict between:

- Members of the public (including pedestrians and private vehicles unfamiliar with industrial environments), and
- Heavy industrial traffic engaged in complex manoeuvres.

Jericho Management Company – Company Registration 07404666 VAT# 994 8395 43
Address : c/o Taylorcocks, The Courtyard, Shoreham Road, Upper Beeding, Steyning, West Sussex BN44 3TN
Telephone: 07816673527
Bank account: NatWest, 27 South St, Worthing BN11 3AR, Sort code – 602431, Account Number 16994817

This raises serious safety concerns. The proposal would introduce “free-flowing” public access into an area not designed or managed for such use, increasing the risk of accidents involving vehicles and pedestrians.

Furthermore, any obstruction caused by necessary industrial manoeuvres is likely to impede access to the proposed facility, potentially resulting in queuing onto the surrounding estate road network. This road is already busy, and additional congestion would exacerbate both safety and operational issues.

We would also draw attention to the nearby leisure facility, Jumpin Fun Inflatable Park, which provides a relevant local precedent. That development has resulted in significant traffic congestion and parking pressures within the surrounding industrial estate. This has led to vehicles queuing on estate roads and increased conflict between commercial traffic and visitors unfamiliar with the operational nature of an industrial environment. This example demonstrates the practical difficulties that arise when high-footfall leisure uses are introduced into an industrial setting and further reinforces our concern that the proposed development would be incompatible with the established character and functioning of the estate.

Incompatibility of Uses

The proposed leisure use is fundamentally incompatible with the established industrial character and function of the surrounding area. The estate is designed for commercial and industrial activity, not for public-facing recreational use with high footfall and turnover.

Introducing a Padel Tennis Centre in this context would place members of the public in close proximity to operational risks that they may not anticipate or understand.

Potential Mitigation: Secondary Access

We note that a potential mitigation could be the provision of a secondary entrance/exit to the site located away from the shared industrial access. While this may offer some limited improvement in terms of access arrangement, it would not overcome the fundamental issue that the site is located within an active industrial estate. The surrounding environment would continue to be characterised by frequent HGV movements, servicing activity, and operational hazards. As such, members of the public would still be required to navigate an environment that is not designed for, nor suitable for, general public access associated with a leisure use. Accordingly, the provision of an alternative access point would not adequately address the inherent safety and compatibility concerns arising from the proposed development.

Inaccuracies in the Design and Access Statement

We also note that the submitted Design and Access Statement contains incorrect information regarding neighbouring occupiers. It refers to nearby occupiers who are historic neighbours, which does not reflect the current situation.

Our building remains actively occupied and operational, and any assessment of the site’s context must accurately reflect the presence of ongoing industrial uses and associated access requirements.

This inaccuracy calls into question the robustness of the applicant's assessment of the site and its surroundings.

Conclusion

For the reasons set out above, we consider the proposal to give rise to significant highway safety risks, operational conflicts, and an incompatible mix of uses. Additionally, the supporting documentation does not accurately represent the current context of the site.

We therefore respectfully request that the application be refused.

I would be grateful if you could acknowledge receipt of this letter by way of reply via email.

Kind regards,

