

Jericho Management Company

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RH16 15S

14th May 2026

Response to Technical Note TN01

DM/26/0781

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

Dear Joanne,

Re: Planning Application DM/26/0781 – Unit A, Consort Way, Burgess Hill

We have noted the applicant's supplemental supporting statement dated 27/04/2026. As this introduces new arguments specifically addressing our previous objection, we wish to provide a brief rebuttal to ensure the officer has a balanced view of the operational impacts on the neighbouring industrial site.

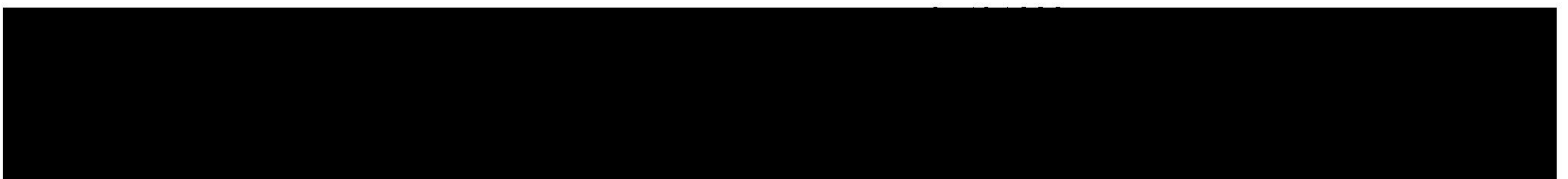
I write further to the applicant's Technical Note TN01 dated 24 April 2026, submitted in response to the concerns previously raised by Jericho Management Company regarding the proposed change of use of Unit A to an indoor padel facility.

While the applicant's consultant seeks to characterise the proposal as a low-impact leisure use, we remain concerned that the submission materially understates the operational conflicts and practical consequences arising from introducing a public leisure destination into an actively functioning industrial environment with a constrained shared access arrangement.

Our concerns are not limited to the narrow issue of recorded highway accidents. Rather, they relate to the day-to-day operational compatibility of the proposed use with neighbouring industrial activity and the suitability of the shared access arrangements for the materially different nature of movements associated with the proposed development.

Shared Access and Operational Conflict

The Technical Note repeatedly states that the shared access already serves industrial traffic and has operated safely historically. However, this fails to address the fundamental concern raised in our



original representation: namely, the interaction between industrial servicing activity and frequent public leisure traffic sharing the same constrained access and circulation space.

The existing industrial use of Unit B involves operational servicing movements, including deliveries, loading/unloading activity, reversing manoeuvres and vehicle movements associated with commercial operations. The proposed development would introduce members of the public, many unfamiliar with the estate layout and industrial environment, into direct interaction with those activities throughout the day and evening.

The applicant relies heavily on the absence of recorded Personal Injury Accidents. However, the absence of recorded injury collisions does not demonstrate the absence of operational conflict, near misses, congestion, obstruction, servicing interference or compromised manoeuvrability. These are legitimate planning considerations, particularly where a leisure use is proposed adjacent to active industrial operations.

Underestimation of Traffic and Parking Demand

We remain concerned that the applicant's trip generation assumptions are overly optimistic and do not reflect realistic operational behaviour.

The Technical Note refers to a theoretical maximum of 16 players onsite at any one time. However, this appears to exclude or minimise overlap between bookings; early arrivals and late departures; coaching activity; spectators or accompanying visitors; staff movements; social congregation before and after sessions; and tournament or organised event activity.

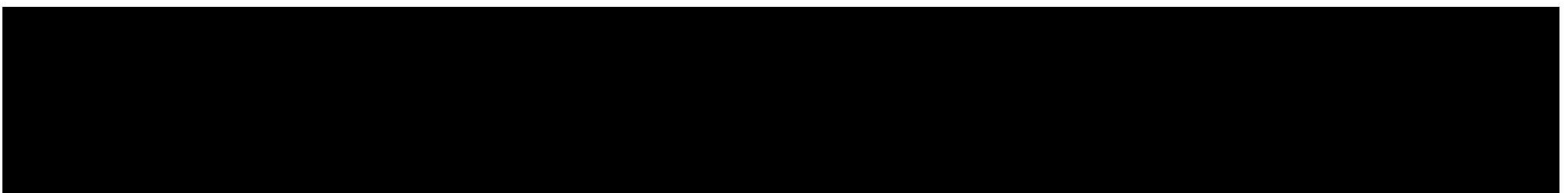
In practice, it is unrealistic to assume all users will arrive in perfectly staggered patterns or consistently share vehicles. Even modest deviations from the assumptions presented could materially increase vehicle accumulation and parking demand within a constrained shared industrial environment.

The comparison to the lawful B2/B8 fallback position is also overly simplistic. The issue is not merely the numerical quantity of vehicle movements, but the fundamentally different nature, timing and pattern of those movements. Industrial vehicle activity is operationally managed and generally predictable. Leisure traffic associated with a commercial sports facility is materially different in character and user behaviour.

Suitability of the Location

The applicant suggests that because members of the public already visit parts of the business park, the proposed leisure use is therefore compatible with the surrounding area. We do not agree that this conclusion necessarily follows.

There is a material distinction between occasional trade visitors accessing commercial premises and the establishment of a dedicated leisure destination operating continuously throughout the week. The proposal would intensify public activity within an environment that remains fundamentally industrial in character and operation.



The proposal risks creating ongoing conflict between industrial servicing requirements and leisure-related vehicle and pedestrian movements, particularly during peak periods.

Insufficient Assessment of Operational Impact

The applicant's submission remains heavily focused on theoretical traffic generation figures and broad highway principles. However, no detailed assessment has been provided in relation to operational interaction between leisure users and industrial servicing; vehicle accumulation within the shared access; parking stress during peak periods; servicing overlap scenarios; management of overspill parking; or practical circulation arrangements during busy periods.

In our view, the current submission does not robustly demonstrate that the proposal can operate without adverse impact on neighbouring occupiers or without creating operational conflict within the shared access environment.

Conclusion

Jericho Management Company maintains its objection to the application.

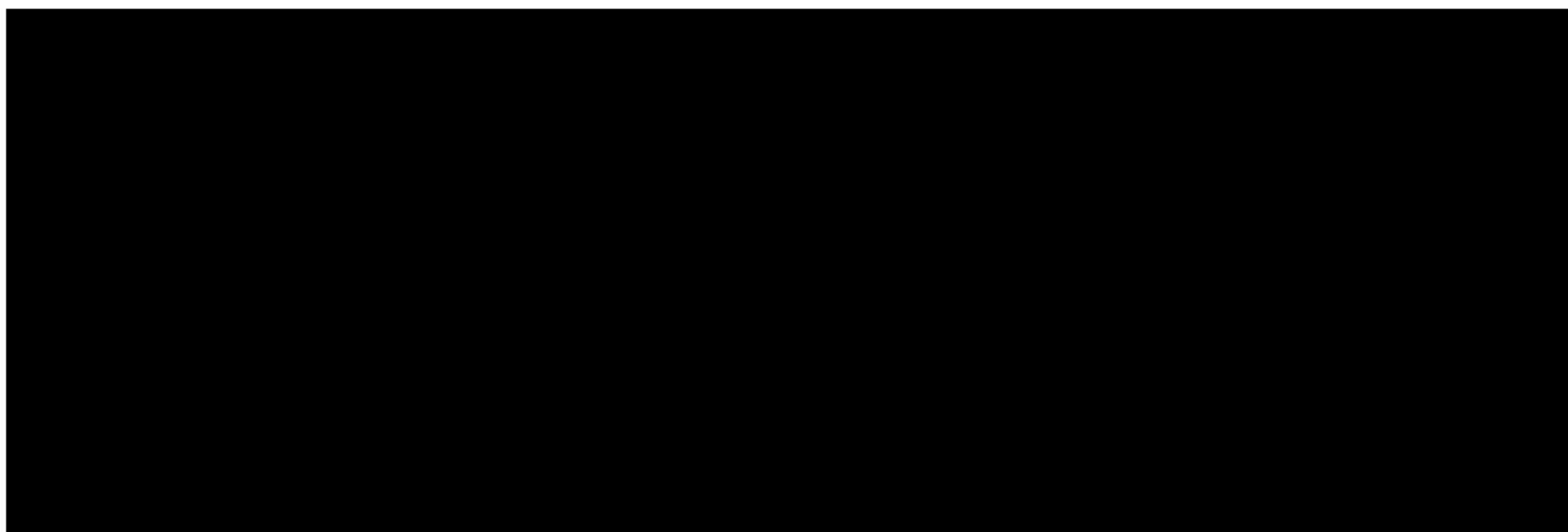
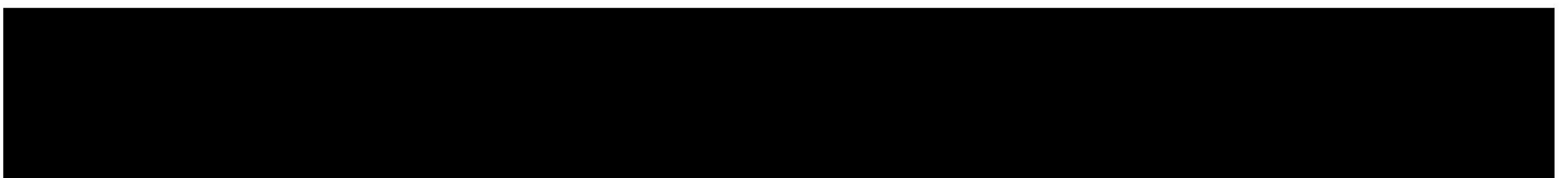
The concerns raised are not speculative or anti-leisure in nature. They relate to the practical compatibility of a public-facing leisure use operating within a constrained shared industrial access arrangement adjacent to active commercial operations.

We respectfully request that the Local Planning Authority gives careful consideration to the operational realities of the shared access arrangement; the differing behavioural characteristics between industrial and leisure traffic; the likely underestimation of parking and movement demand; and the potential for conflict between public leisure activity and established industrial operations.

For these reasons, we respectfully request that the Local Planning Authority refuses planning permission for application DM/26/0781.

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

Kind regards,

A large black rectangular redaction box covering the signature and name of the sender.A wide black rectangular redaction box covering the contact details, likely an email address, at the bottom of the letter.