

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 15S

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,

