Response to Action Point 19

23 October 2026

Context

1 The Inspector raised a number of action points throughout the hearing sessions. This response focuses upon action point 19, which is recorded as follows:

"Short response to issues raised by representations regarding Hadfold Farm Aerodrome."

2 Hadfold Farm Airstrip lies south of Billingshurst (around 600m at its closest point) and north east of the of the hamlet of Adversane (approximately 140m at its closest point). Of particular relevance to the Local Plan, it lies approximately 210m north (at its closest point) of land proposed to be allocated as a new settlement at Adversane, to which MM227 relates. The Airstrip benefits from Lawful Development Certificates for both its hangars (DC/23/1914) and its airfield operation and office (DC/24/0293).

3 The owner of Hadfold Farm made a representation (**comment ID /660**) on MM227 and a hearing statement (**MHB6d.05**). Other representations (for instance, **comment ID /840**) made similar comments. This response focuses on comments provided by the owner of Hadfold Farm.

Response to the Representation

4 The representation (**comment ID /660**) appears to focus on information supplied as part of an EIA Scoping application that has been undertaken by the site promoter (EIA/26/0005) but has relevance to the proposed allocation. In doing so, it makes a number of points, which have been summarised below in **bold**. The Council's response to each point is made in *italics*.

1. **The distance between the site is not 1.75km.** *The Council agrees that the site is approximately 210m (at its nearest point) from the proposed allocation.*

2. **The Airfield is an established lawful use.** *The Council agrees with this, as referenced earlier in this document. It is not considered that the allocation would affect its current use as an airstrip.*

3/4/5. **Aviation safety, particularly engine failure after take off, must be considered and assessed, with a recent accident at the Airstrip making this relevant. This includes in relation to fields proposed to be allocated east of the railway line.** *It is agreed that that aviation safety is important. This would be considered as part of any planning application.*

6. **No substantive consultation has taken place with the Airfield.** *MM227 was made available for public representations, to which the owner has commented. A similar process was undertaken for EIA/26/0005, which was also commented upon by the owner. The Council is not responsible for consultation between the owners of the Airfield and the site promoters. The site promoters are clearly aware of the Airfield (**comment ID /1759, para 4.28**) and will need to account for this in their application, which they appear willing to do.*

7/8. **Noise impacts will need to be assessed and monitoring from December is not representative. The 210m distance would need to be taken into account**. *The Council would expect a noise impact assessment per Strategic Policy 11(5) of the Local Plan. This would be assessed at the application stage, where the appropriateness of information could be judged and further information requested should it be deemed necessary.*

9. **The development must not create future pressure for restrictions on the Airfield**. *As per point 2, the Council recognises that the Airfield has an established lawful use. The allocation would not affect that. Development on the site needs to be conscious of the current operation of the Airfield – not the other way around.*

10. **Safeguarding should be established before planning permission is granted.** *The onus is on the operator of the Airfield to seek non-statutory safeguarding (which has subsequently occurred, as discussed later in this document). Any safeguarding arrangement is separate to a planning application or Local plan process. Non-official safeguarding would not prevent development at the allocation site.*

11. **The application should not be determined on the current evidence.** *There is no live planning application. A response to the EIA Scoping application (EIA/26/0005) was provided by the Council on 14th July 2026.*

5 It is not considered any of the above matters affect the allocation of the site and it is considered that the presence of neighbouring land uses (including the Airstrip) will be assessed during any subsequent application, as would ordinarily be the case.

Response to the Hearing Statement

6 Subsequent to the submission of representations on MM227, the owner of the Airstrip submitted a draft safeguarding agreement for the Council's consideration on 24 September for it to become a 'Non-officially Safeguarded Aerodrome'. The draft document was also submitted as a hearing statement (**MHB6d.05**). The draft safeguarding agreement seeks to establish two zones around the Airstrip (a 2km zone and a 13km zone) to ensure that it is notified of particular types of planning applications in each zone and to ensure that the operation of the Airstrip can be taken into account.

7 The Council, through the Development Management team, is considering the draft safeguarding agreement and will liaise with the Airstrip's owner, taking into account relevant guidance from the Civil Aviation Authority (CAA)[1]. Should a safeguarding agreement be agreed with the Council, the Council would need to consult the Airstrip's owner in line with whatever safeguarding arrangements are agreed. This would not prevent certain types of developments occurring in the identified zones but would ensure that account of its current operation is considered as part of any application as part of the planning balance.

8 Importantly, what is being proposed by the owner should not be taken to be an application to be an 'Officially Safeguarded Aerodrome'. There are 29 Officially Safeguarded Aerodromes in England and include the nation's major airports (of which nearby Gatwick Airport is one). Such designations are made by Government and allow for the CAA to call-in applications to prevent the operations of airports being affected by development.

9 It is therefore not considered that a safeguarding agreement, if made, would impact on the ability of the proposed allocation to deliver development.

Conclusion

10 It is not considered that the matters raised by the owner of Hadfold Farm Airstrip in their representations and hearing statement prevents the allocation of land at Adversane as proposed by MM227. Matters raised (noise, impact on the operation of the Airstrip, etc.) can be considered as part of an application.

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[1] https://www.caa.co.uk/publication/download/12346