



11 August 2026

Horsham District Council
Albery House
Springfield Road
Horsham
RH12 2GB

Dear Sir

Application EIA/26/0005

I write on behalf of the owner and operator of Hadfold Farm Airfield in connection with the above application.

The GAAC represents the interests of over 30 Associations, including the Flying Farmers Association (FFA) of which Hadfold Farm Airfield is a member.

The Applicant has made reference to Hadfold Airfield in its EIA Scoping but there are a number of errors and omissions. The scale and nature of Hadfold Airfield has been misrepresented and should not be scoped out of the proposed Environmental Impact Assessment.

Hadfold Airfield

Hadfold Airfield was established in the 1990s and has been in use ever since then. It has five hangars, erected over 20 years ago. It benefits from planning permission with no limitations on, for example, the number of movements, type of aircraft or noise limits. The Applicant's noise assessment was undertaken in December when there was unlikely to be any flying and of course the roads would also be less busy than in summer months.

The Airfield runway is 650 metres long. Contrary to the EIA Scoping report, the end of the runway is only 210 metres from the edge of the proposed development site, not 1.75k, as stated in paragraph 2.7 of the EIA Scoping report. The northern end of the runway is therefore only 900m from the proposed development. Most aircraft take-offs are towards the south west and most landings are towards the north east.

The ‘...small private airstrip.. understood to support limited general aviation / microlight activity...’ (page 124) is significantly busier than the Applicant asserts and has a much wider range of uses than suggested. It is also Regulated for international flights.

The average annual days flown between 2014 and 2023 was 110 per year and in busier years up to 150 days per annum with 10-20 movements a day. Training circuits are also flown. And the airfield is also used for ‘fly-ins’ and events such as BBQs and gatherings. The assertion of ‘infrequent’ use in paragraph 8.9 is incorrect.

The range of activities includes Flexwing Microlights, 3 Axis Microlights, General Aviation Aircraft, Gyros, Helicopters (up to 12 tons), Virgin Balloon launch and land and visiting balloons and Paramotors.

There are currently 10 based aircraft at Hadfold Airfield.

There have been occasional incidents at Hadfold, including an EFATO (engine failure on take-off) and that aircraft landed on the proposed application site.

The proposed Adversane Development could materially alter the operation of the Airfield and it would increase the risk to aviation safety through the loss of currently open land.

The Applicant refers to the site not being licensed. However, the Civil Aviation Authority urges all aerodromes, whether licensed or not, to follow the best practice as set out in CAA safety guidance documents. The requirement for licensing was amended in the Air Navigation (Amendment) Order 2010 so fewer aerodromes must be licensed. The CAA’s Combined Aerodrome Safety Team has also published guidance for unlicensed aerodromes. The CAA also makes clear that the site owner / operator is responsible for the safety of their site.

Planning Policy

The National Planning Policy Framework (NPPF) paragraph 111 states ‘*Planning policies should:*

...f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the General Aviation Strategy.’

The proposed development could constitute a threat to the safe operations of Hadfold Airfield and therefore conflicts with this key NPPF principle.

NPPF paragraph 88 is also critically relevant and states, *‘Planning policies and decisions should enable:*

*...d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, **sports venues**, open space, cultural buildings, public houses and places of worship.’*

Hadfold Airfield is a ‘sports venue’ as Sport England recognises all General Aviation activities as ‘sports’.

NPPF paragraph 200 states:

*‘Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and **community facilities** (such as places of worship, pubs, music venues and **sports clubs**). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development **permitted after they were established**. (Our emphasis)*

A highly salient change to the National Planning Policy Guidance (NPPG) acknowledges the right of existing aviation operations to be protected from new development that could adversely impact those operations, termed an **‘agent of change’**. The existence of Certificates of Lawfulness underlines the weight to be placed on the agent of change principle.

NPPG Paragraph: 012 Reference ID: 30-012-20190722 was revised on 22 July 2019 to specifically include general aviation activities stating: *‘The agent of change principle may apply in areas near to airports, or which experience low altitude overflight...’*

Ministerial Statements on General Aviation elaborate on the importance of these activities. As one example, the Aviation Minister’s statement in issuing the *‘General Aviation Roadmap’* on 27 April 2021 is a succinct summary of overall Government policy and aspiration which states:

‘General Aviation (GA) is often referred to as the ‘grassroots’ of aviation and is the bedrock to our successful and world-leading aviation sector.’

The *Roadmap* also states:

‘We want the UK to be seen as the best place in the world for aviation and this starts at the grassroots. It provides the entry point for careers in aviation, as pilots, engineers, scientists and other highly skilled professions; includes a number of vital businesses and services that are vital to the aviation sector; and is an enabler of innovation. We want GA to be a flourishing, wealth generating and job producing sector of the economy.’



The proposed Environmental Impact Assessment should consider that aviation is 'significant' and must include consideration of:

- a. The risks to aviation safety due to the proximity of proposed residential and mixed use development to an established General Aviation Airfield;
- b. Measures to ensure that the well-established aviation activity will not give rise to future complaints about aircraft noise – including the masterplan layout, particularly in respect of the proximity of residential properties; and
- c. Further noise assessment should be undertaken to accurately reflect all existing sources.

The presence of Hadfold Airfield could also be an asset to the proposed development if the masterplan takes full account of the established aerodrome.

Yours sincerely



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