

Statement

Our ref 64194/06/MS/OW
Date 16 April 2025
To Planning Inspectorate
From Oxford Aviation Services Limited

Subject Preliminary Meeting – Written Submission on behalf of Oxford Aviation Services Limited (London Oxford Airport)

1.0 Introduction

- 1.1 This Statement has been prepared on behalf of Oxford Aviation Services Limited (“OASL”), the operators of London Oxford Airport (“the Airport”), in response to the Rule 6 letter received concerning the application by Photovolt Development Partners (“PVDP”) for an Order Granting Development Consent for the Botley West Solar Farm project.
- 1.2 This Statement responds to Annex A, of the Rule 6 letter – Agenda for the Preliminary Meeting. In accordance with the requirement of the Preliminary Meeting (Appendix B) this response considers only the proposed content of the examination and does not appraise the merits or disadvantages of the proposed development. Specifically, the below provides comment on Item 3 of the agenda - the Inspectors’ **Initial Assessment of Principal Issues**.

2.0 London Oxford Airport Context

- 2.1 The Airport is one of only 29 aerodromes in the UK that are officially safeguarded through the provisions of the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002. According to Annex 1 of the Direction, these aerodromes are safeguarded due to:
- “Their importance to the national air transport system... in order to ensure that their operation and development are not inhibited by buildings, structures, erections or works which infringe protected surfaces, obscure runway approach lights or have the potential to impair the performance of aerodrome navigation aids, radio aids or telecommunication systems; by lighting which has the potential to distract pilots; or by developments which have the potential to increase the number of birds or the bird hazard risk.”*
- 2.2 The Airport is a general and business aviation aerodrome, and has been at the forefront of commercial pilot training for several decades. In excess of 50,000 airline cadet trainees have started their careers at the Airport. Some 75% of all the flying activity is training-related today, with close to 70,000 movements a year under a permitted limit of 160,000; no other peers have a similar capability.

- 2.3 The Airport stands out among other general aviation airports due to its ongoing focus on providing an environment ideal for professional training requirements, including long opening hours, seven days a week operating, facilitating night flying all through the year and an air traffic control set-up, replicating the same environment as one would find at a commercial airport hosting airline activity. Geographically, the airport resides in busy and complex airspace which – compared to other aerodromes – is a very positive environment for trainees to establish the necessary skills and disciplines required.
- 2.4 In recent decades, the Airport has become ever more valuable as a training base in the UK, as notable peers have reduced capacity and/or diminished operating hours, lost navigational aids and overall capability, or encountered other issues. For example:
- Gloucestershire Airport now has significantly reduced slot capacity and no radar service;
 - Cranfield has reduced hours and therefore capacity; and
 - Cambridge Airport will be closed by 2030.
- 2.5 There are no other ‘IFR’ (all weather/day/night) airports within the southern half of the UK with anything close to the capacity and capabilities of the Airport. Most other ‘commercial’ regional airports in the UK have to give priority to scheduled airline and commercial activities and have significantly less capacity to host professional pilot training.
- 2.6 Since Brexit, training organisations have had to retain a capability to offer both UK CAA licence qualifications alongside EU EASA qualifications, such that airlines need to be able to find solutions for both. The choices of airport from where that is possible have diminished significantly.
- 2.7 In hosting several professional pilot training organisations today, the Airport is still the first choice option for cadets and the airlines ultimately employing them, with the acknowledged highest standards of training found globally. The Airport’s business model relies significantly upon the sector.
- 2.8 Any threat to its ability to maintain its current offer to pilot training would be critical to the Airport, but also detrimental to the UK’s overall position in the professional pilot training system and its offering to the world’s airlines, with many students trained coming from overseas (representing a source of global exports with associated economic value to the UK).

3.0 National Policy Statement

- 3.1 In accordance with paragraph 104 of the Planning Act (2008) (‘the Act’), the determining authority must have regard to any National Policy Statement (‘NPS’) “*that has effect in relation to the development*”. In the case of Botley West, as identified in Annex B of the Rule 6 letter, the following designated NPS are relevant:
- Overarching NPS for Energy – NPS EN1
 - Renewable Energy Infrastructure – NPS EN3

- Electricity Networks Infrastructure – NPS EN5

3.2

NPS EN1 forms the principal Policy Statement in respect of Botley West. Section 5.5 of the document provides the considerations specific to aviation, acknowledging that new energy developments can affect the operation of aerodromes. Of particular note is:

- 1 An acknowledgement that aerodromes can be affected by new energy development (5.5.1), and that scenarios whereby either aviation or energy stakeholders are unduly compromised should be avoided (5.5.2);
- 2 That it is 'essential' that safety, operations and capabilities are not adversely affected by new energy infrastructure (5.5.3);
- 3 That the Civil Aviation Authority ("CAA"), NATS and any aerodrome likely to be affected should be consulted with (5.5.39);
- 4 That matters such as Bird Strike Risk and Thermal Plume Turbulence should be taken into account (5.5.41);
- 5 Mitigations measures should be integral to the proposed development (5.5.43);
- 6 That the Secretary of State ("SoS") should be satisfied that effects on civil aerodromes have been considered and addressed by the applicant, and necessary assessment carried out (5.5.49);
- 7 That the proposals should be designed to minimise adverse impacts on the operation and safety of aerodromes (5.5.50); and
- 8 One of the concluding considerations of the SoS is to consider whether the development would cause harm to an aerodromes training or emergency service's needs (5.5.59).

Request for modification to the examination procedure

3.3

In light of the above, and given the following key considerations, the Airport would expect that matters of operation and safety at the aerodrome would have been considered a Principal Issue:

- The Airport's status as one of only 29 aerodromes in the UK safeguarded due to its importance to the national air transport system.
- The Airport as an established and 'first in class' training centre, a service that is otherwise diminishing throughout the UK, which provides a valuable resource for the UK's role as an area for the training for pilots around the world.
- The importance of this sector to the Airport as a business and employer.
- The Airport specialism in training and flights by light aircraft making air travel to and from the aerodrome more susceptible to changes in the local environment due to pilot experience and aircraft size. Matters such as glint and glare, thermal turbulence, increased bird activity and the need to have adequate safety zones for engine failure after take-off ("AFATO") are all issues of greater importance in this context than they might be at a larger airport.

- The clear and specific consideration given to matters of aviation safety by the NPS, particularly EN1.
- That submission document APP-128 (Glint and Glare Study inc. Technical Aerodrome Safeguarding Report) identifies the need for a designated safeguarding zone to be agreed due to risk of engine failure after take-off; concludes that there are glint and glare issues for the Air Traffic Control Tower (ATC) and for pilots; and does not consider risk of bird strike as a safeguarding concern. These matters clearly warrant further consideration.
- The recognition that the CAA is an interested party with which a Statement of Common Ground is requested. This highlights the importance placed on reaching agreement on matters of aviation safety.

3.4 In combination, the Airport firmly considers that the effects of the proposed development on aviation operation and safety warrant scrutiny through direct questioning, the submission of written statements and a dedicated hearing session. Without such scrutiny, there is an overarching concern that the Inspectors will not have opportunity to adequately consider the possible implications and whether the existing aerodrome would be compromised, particularly on safety grounds. This could lead to determination of the application for a DCO without the determining authority having adequate regard for the relevant NPS, which would fail to be in accordance with the Act.

3.5 The Airport therefore respectfully requests that the list of Principal Issues is updated to include aviation operations and safety.