

Briefing Note

Our ref 64194/06/MS/OW
Date 1 July 2025
To Planning Inspectorate
From Oxford Aviation Services Limited

Subject **Deadline D2 – Response to ExQ1**

1.0 Introduction

- 1.1 This response has been prepared on behalf of Oxford Aviation Services Limited (“OASL”), the operators of London Oxford Airport (“the Airport”), in response to the publication of written questions (ExQ1) by the Examining Authority concerning the application by Photovolt Development Partners (“PVDP”) for an Order Granting Development Consent for the Botley West Solar Farm project.

2.0 Response 1 – those questions where the Examining Authority has requested comment from OASL.

The National Policy Statement for Airports

Q1.1.2 - Given the proximity of Oxford Airport and the services offered therefrom, comment on whether the National Policy Statement for Airports has any important and relevant matters for this Examination, and/ or for the Secretary of State (SoS) to be mindful of.

- 2.1 The National Policy Statements for Airports (2018) (NPS) identifies the significant role aviation plays in the UK economy, the support it offers businesses and the importance of connectivity. As summarised in para 2.1 of the Statement:
- “International connectivity, underpinned by strong airports and airlines, is important to the success of the UK economy. It is essential to allow domestic and foreign companies to access existing and new markets, and to help deliver trade and investment, linking us to valuable international markets and ensuring that the UK is open for business. It facilitates trade in goods and services, enables the movement of workers and tourists, and drives business innovation and investment, being particularly important for many of the fastest growing sectors of the economy”*
- 2.2 General Aviation airports, like Oxford, play an important role in regionalising growth, access and innovation. Whilst the focus of the NPS is to support increases in capacity, and specifically at Heathrow, it highlights UK Government support for the growth of the sector in general. This support is mirrored in the NPPF (para 111 (f)) which recognises the importance of maintaining a national network of general aviation airfields.

- 2.3 Development which risks the operational capacity at the Airport, not least of all impacting its role as a leading pilot training airfield, would run counter to the intent of the NPS. In this respect, OASL consider the NPS to be relevant material consideration.

Radar

Q1.17.27 It is not altogether clear whether you concur with the applicant's views on the limited potential of effects of the proposed development on radar or communications, navigation and surveillance (CNS) infrastructure. Set out any concerns for these matters.

- 2.4 The Airport has concerns regarding the potential impact of effects such as thermal plumes on its radar systems. The applicant has not adequately addressed these issues in their submission, and consequently, no evidence has been provided to demonstrate that the proposed development will not have an adverse impact. While the Airport cannot specify the exact nature of the potential effects, the responsibility lies with the applicant to demonstrate that the development will not result in any detrimental outcomes.

Substations

Is there a need for aviation safety lighting of any kind to be applied to any of the proposed substations?

- 2.5 A substation cannot be located where it breaches the Obstacle Limitation Surfaces (OLS). However, outside of this requirement, there is no need for one to have safety lighting. Currently, one of the substations would penetrate the OLS, within the transitional slope – this is not acceptable. The applicant and Airport have met to discuss this matter, and the applicant has undertaken to make the necessary changes to remove the breach, relocating the substation. Assuming this amendment is formalised through a change order, the Airport has no further comment to make on substations.

3.0 Response 2 – Other questions raised by the Examining Authority, to which the Airport wishes to comment

Microclimate

Q1.4.7 - In both OFH1 and ISH1, Interested Parties (IPs) spoke about microclimates and their impacts (reflection or absorption of heat, air thermals, increased light, dryness, wind etc) on aviation safety and ancient woodland.

Has the applicant assessed the potential creation of microclimates and their impact on the surroundings?

If such an assessment has been carried out, provide justification and evidence of any conclusions reached.

- 3.1 The Airport understand that the applicant is undertaking modelling of potential effects of thermal plume on aircraft movement specific to the aircraft, flight patterns and prevailing winds at London Oxford Airport. The Airport reserves the right to comment further on receipt of this modelling.

Glint and glare impacts on road traffic users

Q1.17.9 Paragraph 7.6.1 of the Glint and Glare Assessment [APP-128], states 'A moderate impact has been predicted upon separate 0.3km and 0.1km sections of the B4027'. The paragraph then follows on by referring to the possibility of using fencing or vegetation as screening for mitigation purposes. How are either of these options secured in the dDCO?

Section 9 of the assessment refers to dwellings, railways, road and aviation, as receptors, where vegetation has been specified as a possible means of mitigation for potential impacts. What assurances can the applicant provide that, should this form of mitigation be selected, it will be effective immediately with no reliance on plant growth which could take several years?

- 3.2 The Airport understand that the applicant is re-modelling of potential effects of glint and glare at London Oxford Airport. The original reporting did not account for the revised orientation of panels, which is expected to reduce the glint and glare effects. The Airport reserves the right to comment further on receipt of this updated modelling.

Other examples of solar near airfields

Q1.17.25 The ExA note the Technical Aerodrome Safeguarding Report and the appendices showing the proximity of other solar developments near airfields. At a cursory glance, most of the solar developments are around 1km or greater away from an airfield and, notably, very few panels are positioned at the end of runways on the approach. The ExA do not see how the examples justify the layout of the current proposed development. If the applicant decides not to follow through with the apparent agreement with Oxford Airport, further detail will be required.

- 3.3 The Airport would add that the specifics of each airfield in respect of the microclimate (including prevailing winds) and the aircraft type and movements (such as the dominance of light aircraft and trainee pilots at the Airport) are critical factors to consider when assessing whether the examples cited by the applicant are comparable.