Begbroke and Yarnton Green Belt Campaign (BYG)

Deadline 4: BYG Further Submission on Site Selection Relating to London Oxford Airport.

In our previous submissions, **RR-0092** and **REP1-094** we set out evidence demonstrating that the Applicant failed to undertake a serious review of possible alternative sites.

It can only have been the engagement of a willing landlord that would have persuaded a developer to propose a site that largely covers Green Belt land; that has a high percentage of Best and Most Versatile agricultural land; which is located next to a World Heritage Site; and that contains a multitude of other heritage assets.

Our contention is vindicated by the Applicant subsequently choosing other, far less problematic, sites elsewhere in the country.

1 The presence of the airport presents another significant reason why this site should not have been chosen. Through protracted negotiations, London Oxford Airport has established a "safeguarded area" as advised by *The Combined Aerodrome Safeguarding Team (CAST*). These negotiations during the Examination have demonstrated that the Applicant initially failed to grasp the significant effect of a utility scale solar farm on a busy airport.

2 They have also revealed that existing guidelines for dealing with engine failure after take-off (EFATO) are not sufficiently comprehensive. The latter point is demonstrated by the PagerPower report commissioned by the RPS Group on behalf of the Applicant. The section in this report that relates to airport safety is set out below.

> ***Engine Failure After Take-Off (EFATO)***
>
> ***Overview***
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> *In the event of catastrophic engine failure shortly after take-off, it is recommended that pilots attempt to land in the most appropriate area within 45° each side of the nose. It is important to note that many airports do not have a suitable EFATO zone due to other constraints, and*

the most suitable landing zone is likely to change based on ground conditions and development in the area surrounding the aerodrome.

Analysis

The Combined Aerodrome Safeguarding Team (CAST) published an advice note in February 2024, which includes reference to EFATO considerations for solar farms. In this document it is stated that "the safeguarding of [EFATO zones] must be considered reasonably and pragmatically by both an aerodrome operator and a solar developer". It is further stated that if a designated EFATO safeguarded area is to be implemented, it should be located along the extended runway centreline.

With regard to the proposed development, the developer has already agreed to not site any panels in the field directly south of the runway 01 threshold. This means that the first solar panels would be sited 450m away from the runway threshold, along the extended runway centreline. This may be considered to be a suitably safeguarded zone without any extension of the zone, as this zone will already serve to provide a clear landing zone for aircraft that experience EFATO close to the ground, and therefore have less response time than those who may already have achieved significant altitude.

If it is considered that an extended safeguarded zone is required, this would most likely be achieved through an extension of this panel-free zone running along the extended runway centreline. Figure 5 below shows an example of this, with the safeguarded zone extending to the treeline, offering an unobstructed emergency landing strip extending to a distance 590m from the runway threshold. This could also assist with allowing emergency response vehicles to access a stricken aircraft quickly in the event of an incident.

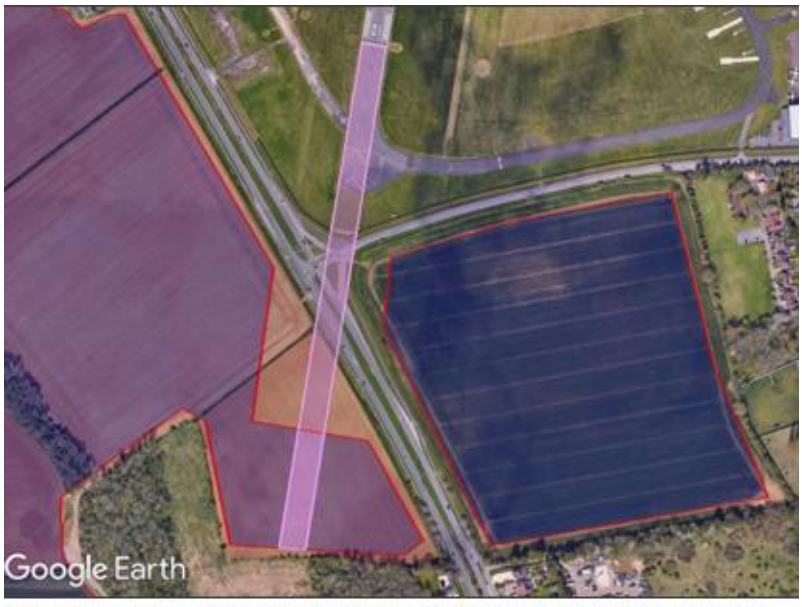


Figure 5 *The suggested designated EFATO safeguarded zone, running along the extended runway centreline*

3 Importantly, the guidelines only deal with the situation of an EFATO event at a time when a pilot can land in a narrow strip of land. Furthermore, there is no requirement or provision for the previous accident record to be considered; nor for consideration of the implications arising from the scale of the BWSF solar farm.

4 During Issue Specific Hearing 1, Mr. Curtis, General Manager of London Oxford Airport, told the ExA that the airport is pre-eminent in the UK for professional pilot training. At any one time, there are roughly 1000 cadets training there for professional licences. Many of them will operate single-engine aircraft. Mr. Curtis considered there was, on average, one engine related "event" every two years. Importantly he also said that "*ultimately it is the aircraft operators who take the risk. But our duty of care is to ensure that we have done our best to mitigate risks associated with the use of the airport*". (**EV5-007**). [There appears to be no provision for representation of the views of trainee pilots or their school in the Examination.]

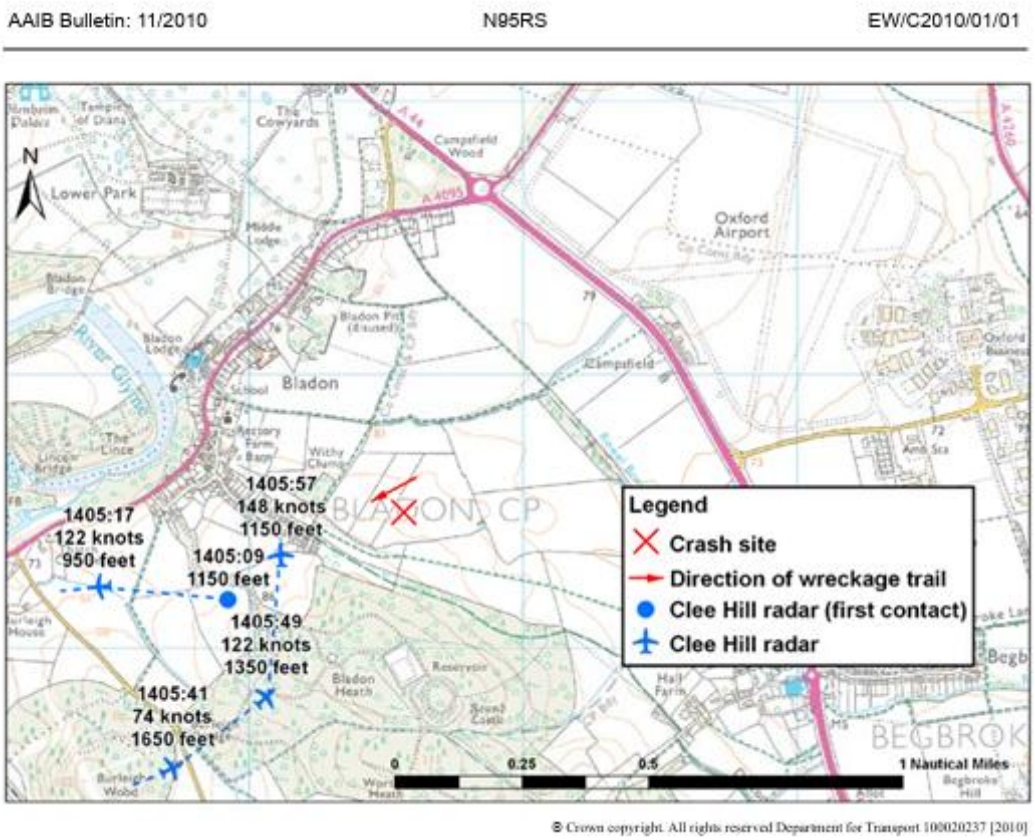
5 Over the 40-year period proposed for the site, the evidence indicates that forced landings will take place *over the wider area* involving aircraft landing on fields of panels. This would significantly increase the danger of life-threatening injuries as well as creating serious problems for emergency vehicles.

5.1 The submission by Professor Stephen Westaby **REP3-119** highlights his involvement in two crashes on Bladon Heath. Bladon Heath is well outside the safeguarded area that is being agreed for panel removal.

5.2 A review of crashes at Oxford Airport in the last 25 years, logged by the **Bureau of Aircraft Accident Archives**, reveals two outside the airport. There was a further one in 2024 that is yet to be logged.

5.2.1 The first took place on 6 December 2003. There were three fatalities. As seen on the map below, the crash site is just to the left of where the proposed safeguarded area would be.

5.2.2 The second took place on Bladon Heath on 15 January 2010. It is located far outside the safeguarded area, possibly being one of the crash sites attended by Professor Westaby. There were two fatalities. This area would be covered in panels.



5.2.3 The third incident occurred on 1 July 2024. A Tecnam P2008-JC light aircraft, making an emergency landing directly after take-off, managed to land in a field near Begbroke. The location of this field is shown in the Google Earth image below. The lines in red show the areas where panels would be located (although some of these panels in front of the runway will now be removed).

5.3 These three incidents, in a relatively short space of time, demonstrate that there is a random pattern of widely dispersed crash sites. A safeguarded area will only provide, at best, a limited area of safety. Accidents will continue to happen in the wider area; and the scale of Botley West would make it increasingly difficult to find safe emergency landing areas free of solar panels. It is highly probable that there will be emergency landings in future that involve light aircraft crashing into panels.

6 We have already argued on several grounds that the site proposed for BWSF is inappropriate. The introduction of airport safety hazard adds to these and could have been avoided if a less unsuitable site had been chosen. We do not regard this as a technical issue, or one requiring specialist knowledge. The evidence of hazard alluded to above, and that provided by Professor Westaby, is straightforward and merits further consideration.

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Note.

Following submission on 4 August 2025 an important letter was published in the local magazine, the *Woodstock and Bladon News*. We have therefore resubmitted this submission with the letter attached as an appendix.

Appendix

This letter appeared in the *Woodstock and Bladon News* which was published on 14 August 2025. The author of the letter wished to remain anonymous but, as indicated, the details of the writer were checked by the magazine's Editor before publication.

Dear Editor,

London Kidlington Airport close to Solar Panels

I am a Flying Instructor who has taught trainee pilots from Oxford Airport at Kidlington - an excellent training centre for novice pilots, many of whom go on to careers in commercial aviation.

During my time instructing there, I was in no doubt that it is one of the safest learning environments for many reasons, not least the surrounding countryside that offers a reassuring choice of emergency landing areas in the event of any technical issues.

With safety in mind, I am dismayed to see that the Botley West developer proposes to install thousands of solar panels so close to an exceptionally active airfield with mixed traffic, from learner pilots in single engine aircraft to helicopters and the largest of private jets.

In response to a recent engine-related emergency landing in a field just beyond the end of the southerly runway, the developers have removed a 'wedge' of the proposed solar panels roughly in the direction that an aircraft would be pointing, with the aim of making any engine failure after take-off safer. While this is obviously a positive move, it unfortunately assumes that all such engine failure incidents happen in the textbook fashion, which unfortunately they don't.

The standard departure procedure for single- engined light aircraft is to climb to 1000 feet above sea level before a right turn along the railway line and continuing to climb to no higher than 2000 feet until the aircraft is at least 5 miles from the airport. During this take-off phase the pilot has to be aware of potential engine failure and be prepared to take very decisive action.

Most training aircraft can glide without the engine with a descent rate of approximately 500 feet per minute, giving a maximum time of approximately 3.5 minutes for the pilot to identify a suitable field, manoeuvre the aircraft safely towards the field, carry out essential security drills, potentially deal with passengers, and make Air Traffic Control aware of the situation.

This routine is practiced many times during training until it becomes instinctive, however the one thing the pilot has no control over, no matter how good the training, is the choice of available landing sites. To cover so many fields close to the airport and the pilot training area with solar panels would severely restrict the options available in this situation.

I don't wish to overstate the risks of an engine failure as it is fortunately a rare event. However, options need to be available and should the unthinkable happen, I have always been satisfied as a Flying Instructor that those options exist at Oxford Airport.

Another important consideration - the physical effects of large numbers of solar panels close to the landing/take-off areas cannot be understated. In hot weather they can create serious turbulence and glare which can very easily upset the approach of a light

Appendix/cont

aircraft, particularly for a student or low- hours pilot. I have instructed at other airfields close to solar farms, much smaller than the proposed Botley West plans, and have had to take emergency control from a student pilot as the invisible thermals suddenly disrupt a nice approach.

One final point: I have previously worked as a member of the emergency services and the thought of a rescue operation to retrieve injured people from the midst of a solar farm fills me with dread. I struggle to think of how it could be achieved without severe risk to all concerned, including the emergency responders.

Anonymous

Editor's Note: The identity of this anonymous letter, a local resident who wishes to remain anonymous, has been validated by the Editor.