

Briefing Note

Our ref 64194/06/MS/OW
Date 17 October 2025
To Planning Inspectorate
From Oxford Aviation Services Limited

Subject Deadline D6 – Summary of Oral Evidence

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 application by Photovolt Development Partners (“PVDP”) for an Order Granting Development Consent for the Botley West Solar Farm project.
- 1.2 The Airport gave oral evidence to the panel of Inspectors on the afternoon of 9 October 2025, as part of the Issue Specific Hearing (“ISH”). The matter for discussion was Aviation Safety, including radar, thermals, ecology (bird strike) and defence.
- 1.3 In attendance, on behalf of the Airport via video, were:
- Will Curtis - Managing Director of London Oxford Airport; and
 - Owain Nedin - Planning Director, Lichfields (the Airport’s planning advisor).

2.0 Summary of Oral Evidence

Thermal Plume

- 2.1 OASL has not yet received the report promised by the applicant (see REP3 -051 4.1.4 where the applicant confirms that the scope of the report was agreed on 16th July and was to be prepared). There is now less than 6 weeks left in the Examination and it will be extremely difficult to obtain a peer review. The delay is disappointing.
- 2.2 It is important to note that in Aviation, airport safety does not deal with ‘maybes’ and ‘don’t think’. An airport must deal with absolutes. It must be demonstrated that there will be no effect, before OASL will be able to say that it will have no objection.
- 2.3 The applicant’s comparison with thermals over Central Oxford is not relevant, there is limited over-flying of the area. Conversely, there is flight activity to the west of the Airport, where the solar array is proposed. This includes lighter aircraft such as gliders, a low-profile fibre glass construction. These aircraft rely on primary radar returns, which is a weaker reflected return (not one sent back to the Airport via an onboard transponder). The radar reception is sensitive and limited. If it is upset in any way, there is a chance the radar will miss them.

- 2.4 OASL cannot say any more until it receives the applicants report and it is peer reviewed. The report will need to provide empirical evidence that there will be no effect.

Bird Strike

- 2.5 The dangers associated with bird strike have been covered in previous hearing sessions and representations.
- 2.6 The applicant claims that they have covered all necessary CAA guidance for development around airports. However, none of this work has considered or addressed the potential for displacement.
- 2.7 OASL is required to control bird activity on the aerodrome where there are different issues at various times of the year. If you put 1,000 Ha of Oxfordshire's open land under solar panels, the birds that frequent these spaces will go elsewhere, to retained green spaces. This includes the Airport and the areas retained as open space around the aerodrome, such as the undershoot.
- 2.8 The applicant notes that the land to the south of the runway, now removed from the DCO, will be retained as agricultural land. The applicant also notes that agricultural land attracts birds. At the moment the land to the south of the airport has a bird population, but it shares them with other parcels of land. If the solar is built, this land will remain the primary available farmed land in the area, and there is no consideration as to whether birds from elsewhere will be displaced here, and what issue this could cause for the Airport.
- 2.9 To assess risk, OASL must be able to understand the implications of displacement. There has been no report prepared to date which does this. Once it is built, it is too late and this could put unknown limitation on the operations of the business, which is not acceptable.
- 2.10 As above, OASL cannot make do with assurances, it needs certainty. The CAA will expect that OASL have an evidenced hazard identification risk assessment.

Timing and engagement with LOAS

- 2.11 There was a suggestion earlier in the hearing session that the removal of 40Ha of land south of the airport occurred during the examination, rather than before, because no safeguarding map was available in the Local Plan. Therefore, the issues associated with the Airport emerged over time, through discussion, and indeed grew post-submission.
- 2.12 To be clear, a safeguarding map deals with vertical extents. It helps LPA's and developers understand if development will break notional slopes. It does not deal with changes of surfaces that occur below the slopes, and the change of use of land. As such, it would not have been a factor to discussions regards engine failure after take off.
- 2.13 Furthermore, it is not the case that the concerns grew over the course of the application. OASL shared its concern with the applicant prior to submission. In previous representations, OASL evidenced this fact. Furthermore, the applicant, on page 134 of Rep4-013, states that the submission was made in response to discussions with OASL.

- 2.14 OASL welcomes the removal of 40HA of land to the south of the Airport – however it is not the case that these concerns were unknown prior to submission or grew in scale during determination.

Summary

During the hearing, the applicant acknowledged that they could not be entirely sure that the development would not increase bird population at the Airport. But it is for the Airport to manage that risk on their land.

- 2.15 Para 5.5.41 of NPS EN1 states that “*...It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km*”. The applicant is not currently able to demonstrate that the scheme has been designed in such a way so as not to increase bird strike risk. Failing to align with the NPS.
- 2.16 Furthermore, NPS EN1 para 5.5.50 states that “*the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes*”. Based on the evidence available in respect of bird strike and thermals, OASL is not convinced that the SOS could be satisfied on this point.

3.0 Post hearing comment

- 3.1 Whilst not discussed at the hearing, due to time pressures, OASL note that Rev 7 of the draft DCO (CR2-009), is not up to date. In particular, we note that in Schedule 13 Part 2 ‘Figures 2.1a - 2.4c - Illustrative Masterplan’ are still ‘January 2025’ versions. The referenced plans should be updated, as they do not reflect the latest extent of the proposed Order. There are concerns that there may be further updates required and therefore OASL wish to request that the references in the draft consent order are checked thoroughly.