



Botley West Solar Farm

STATEMENT OF COMMON GROUND –
London Oxford Airport

EN010147/APP/11.7/5

10 November 2025

NPI-12426
Statement of
Common Ground -
London Oxford
Airport
Rev 2
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Approval for issue

Jon Alsop

10 November 2025

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Contents

SIGNATURES	IV
1 INTRODUCTION	5
1.1 DCO Reference	5
1.2 Date of Examination	5
1.3 Proposed Development.....	5
1.4 Statement Overview	5
2 RELEVANT SUBMISSIONS DOCUMENTS AND PLANS	6
3 RECORD OF RELEVANT CORRESPONDENCE	7
4 AREAS OF DISCUSSION BETWEEN THE PARTIES	8

Tables

Table 2.1: Draft DCO submission documents and plans record pursuant to London Oxford Airport discussions – Aviation Safety	7
Table 2.2: Draft DCO submission documents and plans record pursuant to London Oxford Airport discussions – Aviation Safety and Ecology	7
Table 4.1: Areas of Discussion between the Parties – Aviation Safety	8
Table 4.2: Areas of Discussion between the Parties – Ecology.....	10

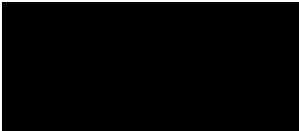
Appendices

Appendix A Record of Relevant Correspondence

SIGNATURES

This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and the London Oxford Airport.

London Oxford Airport (operated by Oxford Aviation Services Limited)



[Redacted]

Operations Director

Oxford Aviation Services Ltd

10th November 2025

PDVP on behalf of SolarFive



Director of Project Development

For and on behalf of Solar Five Ltd.

Photovolt Development Partners GmbH

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11th November 2025

1 Introduction

1.1 DCO Reference

1.1.1 EN010147/APP/11.7/5

1.2 Date of Examination

1.2.1 May 2025 – November 2025

1.3 Proposed Development

1.3.1 The Applicant is seeking development consent for Botley West Solar Farm (the 'Project'), which in summary will comprise the construction, operation, maintenance and decommissioning of a photovoltaic ('PV') solar farm and associated infrastructure with a total capacity exceeding 50 megawatts ('MW'), in parts of west Oxfordshire, Cherwell and Vale of White Horse districts. The Project will export electricity for connection to the National Grid at Botley West.

1.3.2 The Project is classed as a 'nationally significant infrastructure project' ('NSIP') for the purposes of the Planning Act 2008 (PA 2008) and requires an application for a Development Consent Order (DCO). The application for development consent is being submitted to the planning inspectorate ('PINS'), with the decision on whether to grant a DCO to be made by the Secretary of State for Energy Security and Net Zero (the 'Secretary of State'), as required under the PA 2008.

1.3.3 This Statement of Common Ground (SoCG) has been prepared to accompany the DCO application made to the Secretary of State under section 37 of the PA 2008 for the proposed Project. The Application has been submitted by SolarFive Ltd (the Applicant).

1.3.4 A Location Plan can be found in the Examination Library at **[AS-024]** and a full description of the Project can be found at ES Chapter 6 - Project Description **[APP-043]**.

1.4 Statement Overview

1.4.1 This Statement of Common Ground ('SoCG') comprises a record of consultation held with the relevant SoCG organisation to date as appropriate, and is designed to evolve, representing the ongoing nature of these discussions throughout the Examination period.

1.4.2 This SoCG has been prepared between (1) the Applicant and (2) London Oxford Airport (jointly referred to as the Parties).

1.4.3 An overarching Statement of Commonality **[EN01047/APP/11.6]** has been submitted alongside this document and should be referred to in conjunction with this SoCG.

1.4.4 The Examining Authority has requested that the SoCGs include the following matters as set out in the Rule 6 Letter **[PD-006]**:

- Methodology for environmental assessments;

- Data collection methods;
- Baseline data;
- Data/statistical analysis, approach to modelling and presentation of results;
- Expert judgements, assumptions and worst case scenario;
- Assessment of alternatives;
- Design development;
- Identification and sensitivity of relevant features and receptors;
- Construction and operational effects;
- Embedded and additional mitigation;
- Cumulative effects and mitigation; and
- Relevant wording in the draft Development Consent Order (dDCO)

1.4.5 It can be taken that any matters not specifically referred to in sections 3 and 4 of this SoCG are not of material interest or relevance to London Oxford Airports representations and therefore have not been considered in this document.

1.4.6 For the avoidance of doubt, this SoCG comprises contributions from the following environmental topic disciplines:

- Aviation and Glint and Glare
- Ecology

1.4.7 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with the London Oxford Airport to date:

- Relevant submission documents and plans
- Record of relevant correspondence to date
- Matters that are agreed
- Matters yet to be agreed
- Matters that are not agreed

1.4.8 As referenced above, c, d, and e (sections 4), summarises issues that are 'agreed', 'yet to be agreed' or are 'not agreed'. 'Not agreed' indicates a final position where the parties have agreed to disagree. 'Agreed' indicates that an issue has been resolved.

2 Relevant Submissions Documents and Plans

2.1.1 A list of DCO documents and plans of relevance to engagement with the London Oxford Airport is identified in the tables below for ease of reference.

Table 2.1: Draft DCO submission documents and plans record pursuant to London Oxford Airport discussions – Aviation Safety

EN010147/APP/6.3	6.3 - ES Chapter 2 - Existing Baseline	APP-039	Nov-24
EN010147/APP/6.5	6.5 ES - Appendix 4.4 Glint and Glare Study inc Technical Aerodrome Safeguarding Report	REP4-012	Rev 1/August 2025
EN010147/APP/17.14	Thermal Impact Report	REP6-066	20 October 2025
EN010147/APP/17.15	Thermal Plume Primary Radar Refraction Report	REP6-067	20 October 2025
EN010147/APP/17.3	Applicant's written summary of oral submissions at ISH2 – Appendix 3 – Bird Strike Technical Note	REP6-047	20 October 2025

Table 2.2: Draft DCO submission documents and plans record pursuant to London Oxford Airport discussions – Aviation Safety and Ecology

EN010147/APP/6.3	6.3 - ES Chapter 9 - Ecology and Nature Conservation (Rev 3)	REP4-010	Rev 3/ August 2025
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3 Record of Relevant Correspondence

- 3.1.1 The Project has been the subject of pre-application engagement with the London Oxford Airport, and both parties continue to engage throughout and beyond the submission of the DCO application for the Project.
- 3.1.2 **Appendix A** identifies the discussions and correspondence that have taken place between the Applicant's project team and the London Oxford Airport to date.

4 Areas of Discussion between the Parties

Table 4.1: Areas of Discussion between the Parties – Aviation Safety

4.1.1	n/a	Approach Landing Lights ('ALL')	London Oxford Airport asked the Applicant to consider providing an area of land to allow for the installation of Approach Landing Lights (ALL). The Area of concern was a triangle to the south of the A43 in line South West of Runway 01	The Applicant agreed to removing 2.7 acres of land to accommodate ALL. The area was removed from the project, the Red Line Boundary was adjusted.	Agreed
4.1.2	6.5 ES - Appendix 4.4 Glint and Glare Study inc Technical Aerodrome Safeguarding Report [REP4-012]	The risk of Engine Failure After Take-Off (EFATO) could require a designated EFATO-safeguarded zone to be established.	<p>London Oxford Airport sent a letter dated 17th July 2024 including alerting the Applicant of an EFATO incident and requesting an alteration to the proposed layout sufficient to safeguard an area of land under the approach and departure route south of the airport in order to allow for safe emergency landing. Pager Power on behalf of the Applicant prepared a Technical Aerodrome Safeguarding Report dated Oct 2024 including a proposed a EFATO safeguarding zone, running along the extended runway centreline.</p> <p>On the 6th March the Local Runway Safety Team on behalf of the London Oxford Airport sent a presentation including a number of proposals for the EFATO safeguarding zone." In the Open Hearing, Written Statement, dated 16th April 2025 London Oxford Airport requested an extended safeguarded zone which should be free from solar panels. A face to face meeting was held on the 21st May at London Oxford Airport with the Applicant and the Chief Executive Officer and the Operations Director of London Oxford Airport to discuss this matter.</p>	<p>After discussions a proposed solution was drafted which included the removal of 39ha of solar panels to create a safeguarding zone.</p> <p>The London Oxford Airport CEO agreed to this proposal in the document, Deadline D1 – Further Written Statement dated 4th June 2025</p> <p>On the 19th June the Applicant advised London Oxford Airport that removal of panels, as proposed above, required the re-siting of the existing secondary substation and the existing construction compound. It has been agreed that the substation is moved - 50m to the north, which itself will be reduced in height to approximately 5m, with associated lattice structure lightning rods being no higher than 10.5m. The Applicant has proposed that the construction compound is rotated through 90 degrees from its current position, this has been presented in CR2 at Deadline 5, in September 2025. As a result of the above, the removal of panels and re-orientation of the sub-station has now satisfactorily addressed the need to accommodate a safeguarded zone as far as is reasonably practicable.</p>	Agreed.
4.1.3	6.5 ES - Appendix 4.4 Glint and Glare Study inc Technical Aerodrome Safeguarding Report [REP4-012]	London Oxford Airport state there is the potential for glint and glare to have an impact on the Air Traffic Control Tower (ACT), runway approach 01 and runways approach 19.	<p>In the Open Hearing, Written Statement, dated the 16th April 2025 the London Oxford Airport considers that this matter warrants further consideration before determination.</p> <p>A face to face meeting was held on the 21st May at London Oxford Airport with James Plumb, Senior Technical Analyst of Pager Power on behalf of the Applicant and London Oxford Airport Chief Executive Officer CEO and Operations Director to discuss the issue of 36 minutes of possible Glint and Glare impact on the Control Tower. It was agreed that the Applicant would seek to reorientate panels such that they do not cause reflections towards the ATCT.</p>	<p>The Applicant agrees to reorientate an area of panels to eliminate any risk of reflections toward the ATCT.</p> <p>Following the reorientation of an area of panels the Applicant has agreed to undertake a new Glint and Glare analysis and share results with London Oxford Airport. This analysis was completed and shared with London Oxford Airport on 21st July 2025.</p> <p>The updated Glint and Glare report was submitted to PINS at DL4, in August 2025.</p> <p>As a result of the above work, glint and glare is no longer a matter of concern between the parties. The risk has been managed to a level that is acceptable as far as reasonably practicable.</p>	Agreed.
4.1.4	6.5 ES - Appendix 4.4 Glint and Glare Study inc Technical Aerodrome	London Oxford Airport states the Applicant has not provided detailed consideration to Heat Induced Turbulence.	In the Open Hearing, Written Statement, dated the 16th April 2025 the London Oxford Airport considers that The Applicant's conclusions are not robustly evidenced and a potential risk has not been adequately considered.	The Applicant agreed to draft a scope for an independent review of the impact Heat Induced Turbulence, for London Oxford Airport to agree.	The Thermal Turbulence report prepared by NOVA Fluid

A face to face meeting was held on the 21st May at London Oxford Airport with James Plumb, Senior Technical Analysist of Pager Power on behalf of the Applicant and London Oxford Airport Chief Executive Officer CEO and Operations Director to discuss if Heat Induced Turbulence caused significant turbulence that might impact Single Engine Light Aircraft.

London Oxford Airport also raised potential concerns over primary radar refraction caused by thermal plume from solar panels as part of their representations in the examination period.

London Oxford Airport agreed with the Applicant the scope of the report on the 16th July. The Applicant has since initiated its preparation.

A Thermal Modelling Report was shared with London Oxford Airport on 17th October and was submitted to the ExA for DL6 [REP6-066].

On the basis of the numerical modelling, the following conclusions have been drawn:

The maximum increase in air temperature associated with the thermal effect of the solar farm is 1.1 °C, with an average increase across all assessed cases of 0.6 °C.

It is estimated that the resulting increase in exceedance of the vertical turbulence threshold commonly applied to building induced turbulence is of the order of 1.1% over the course of the year, across the assessed wind directions. Consequently, it is expected that the impact of the proposed solar farm will be minor, and thus may not be considered significant.

Based on the findings of the report, the issue of Heat Induced Turbulence is not believed to adversely impact upon the airports operation in any material way.

A Radar Refraction Report was shared with London Oxford Airport on 17th October and was submitted to the ExA for DL6 **REP6-067**.

The Radar Refraction Report concluded that impact significance is negligible, with the maximum change in perceived height position of aircraft observed by radar at Oxford Airport expected to be no more than three metres at 100km

The Radar Refraction calculations used formulas, data and analysis from The International Telecommunications Union (ITU).

The International Telecommunication Union (ITU) is the United Nations agency for digital technologies, including radar and communications networks, and develops technical standards to ensure that these technologies work effectively. The ITU-R is the Radiocommunication Sector of the ITU. The ITU-R manages the radio-frequency spectrum and produces recommendations covering many uses, including tracking aircraft using radar. These recommendations provide the basis for operators and other parties to determine radar impacts.

Documents produced by the ITU describe and explain the potential effects upon radio-frequency waves caused by changes in atmospheric conditions, including increases in air temperature as are predicted to occur over the Botley West Solar Farm. These ITU documents establish that the possible effects from increased air temperature would be limited to low levels of refraction which would change the perceived height of aircraft.

Mechanics Limited and the Radar Refraction Report produced by Pager Power Limited the applicant concludes that the issue of Heat Induced Turbulence and the impact on is not believed to adversely impact upon the airports operation in any material way.

However, in view of the timeframes of the examination, the time required to procure and receive a peer review and the consequential absence of opportunity for peer review, Oxford Aviation Services Limited is unable to verify the findings of the technical studies, in so far as they might impact on aviation safety. Therefore, Oxford

				<p>REP6-067 uses the calculations and formulae set out in ITU-R P.452 and ITU-R P.453 to quantitatively assess the potential effects upon primary radar returns at Oxford Airport, which would result in a small change in the perceived height of aircraft (approximately 2.3m for an aircraft 100km away from the radar). This is not considered to be significant relative to the size and speed of a typical aircraft.</p> <p>These results are based on a worst-case analysis of 100% humidity, 15°C ambient air temperature (rising to 16°C over the solar farm) and assumes that thermal effects apply to the whole path of propagation; the results are therefore likely to overstate the possible effects</p> <p>Calculations undertaken suggest that impact significance is negligible, with the maximum change in perceived position of aircraft observed by radar at Oxford Airport expected to be no more than 2.27 metres for an aircraft 100km away from the radar and this is not deemed to be significant relative to the size and speed of a typical aircraft</p> <p>The reports submitted by the applicant are the only studies undertaken in respect of the impact on turbulence and radar. Given the stage in the Examination in which they were made available for review, the Airport has not been in a position to commission a peer review to assess the soundness of either study. Oxford Aviation Services Limited acknowledges that the Examining Authority can only make their recommendation on the basis of the evidence available to it. However, the Airport is unable to validate the conclusions drawn on these matters of aviation safety in the absence of the reports being subject to a peer review.</p>	Aviation Services Limited cannot be confident of the conclusions reached by these reports produced by experts in these fields
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Table 4.2: Areas of Discussion between the Parties – Ecology

4.2.1	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 3) [REP4-010]	Bird strike	<p>London Oxford Airport feel the proposed replacement of agricultural land with solar panels risks the displacement of birds onto open land on the Airport. The introduction of species rich grassland in immediate proximity to the Airport has the potential to attract more birds. In some cases, designed specifically to attract them. addressed in the application. The solar panels, by reflecting polarised light, can attract polaristic insects, which in turn will attract more birds that feed off the insects. Research has also shown that solar PV arrays can be mistaken by</p>	<p>A face to face meeting was held on the 21st 2025 May at London Oxford Airport with Nick Betson Lead Ecologist for RPS on behalf of the Applicant, and London Oxford Airport Chief Executive Officer CEO and Operations Director to discuss the issue Avion displacement and the safety of the Airport. After discussions the Applicant agreed to draft a proposed solution to reduce features that might attract birds of risk to aviation in the immediate proximity of the Airport.</p>	<p>Agreed. Conditional on the provision of an additional bird-scaring unit by the applicant. The Appliant and</p>
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water bodies by birds. This can attract larger bird species such as waterfowl, known to be in population locally as well as geese, swans and gulls. Larger birds create a greater risk of serious bird strike.

In the Open Hearing, Written Statement, dated 16th April 2025 the London Oxford Airport are asking for additional research of potential Avion displacement.

The Applicant agreed to draft a technical note to address the concerns of London Oxford Airport, to set out the principles of habitat creation/management to be adopted in proximity to the airport and to be based on the CAA's guidelines with respect to managing wildlife hazard at airports.

The Applicant has updated the Ecology Strategy of the Outline Landscape and Ecology Management Plan to include a technical note to the management of land outside of the panel arrays with the following:

Recognising the proximity of Oxford Airport to the Central Site Area, landscape design within 1.5km of the airport, within the Order Limits, will be designed in general accordance with the principles set out in CAA CAP 772 Wildlife Hazard Management at Aerodromes. This will include ensuring that there are no water features present, no additional scrub/tree planting along hedgerows and grassland areas outside of the panel arrays managed according to a long grass policy, maintaining a sward height of circa 220-300mm. In addition, once operational, the Applicant will ensure on-going dialogue with the airport with respect to the management of wildlife risk, in line with CAST Renewable energy developments: solar photovoltaic developments CAST Aerodrome Safeguarding Guidance Note. The Applicant has included in the oLEMP the monitoring of Bird carcasses that are as a result of Birds colliding with the Panels.

The Applicant has agreed to the removal of approximately 39 ha of Solar Panels from the project site closest to the Airport boundary. This freed-up land will continue to be used for agricultural purposes, managed by the landowner. The Applicant's position is that there will not be an increased population of birds in the area.

For Deadline 6 (20 October 2025), the Applicant submitted "The Applicant's Written Summary of its Oral Submissions at Issue Specific Hearing 2". This submission includes the *"Bird Strike Technical Note"* as Appendix 3 [REP6-047].

Oxford Aviation Services Limited have agreed a Letter of Understanding on the provision of an additional bird-scaring unit

Below is a summary of this Bird Strike Technical Note:

The Applicant's position with respect to the change in bird strike risk as a result of the Project is that the development of a solar site in this location would either not change or slightly decrease the overall risk in the area.

The baseline within the Project site comprises agricultural land which is a specific land use type listed within the CAA CAP772 Guidance as being high risk with respect to bird strike. As such, removal of the arable land use and its replacement with a less intensive land management within the Project site in and

around the panel areas will mean that similar flocks of birds (especially gulls) aren't attracted to the Project site in the same manner.

A feature of the Project site is the River Evenlode and the Flood area. The Corridor is approximately 84ha and will comprise restoration of flood meadow grassland and associated habitats. This restoration will create habitat that is highly suitable for foraging birds such as lapwing and curlew. As such, it is likely that this feature within the Project site will attract birds to forage.

Notwithstanding, as a precaution, the Applicant has agreed in principle—subject to reasonable costs—to fund the provision of an additional bird-scaring unit. At present, London Oxford Airport operates one such unit.

Appendix A

Record of Relevant Correspondence

The below schedule does not detail all of the representations made by Oxford Aviation Services Limited throughout the examination and which formed the majority of their correspondence during that time.

Form of Correspondence

Topics Discussed

Aviation and Glint and Glare

23/01/2023		Approach Landing Lights	<p>The Applicant agreed to remove 2.7 acres of Solar Installation to allow for the installation of Additional Landing Lights. The Area was a triangle to the south of the A43 in line Southwest of Runway 01</p> <p>The Applicant redesigned this area of the including repositioning of Secondary Substation and installation Area. The 2.7 acres was removed from the Project Red Line Boundary.</p>
12/07/2024	Letter	<p>London Oxford Airport sent a letter dated alerting the Applicant of an EFATO incident. The letter included request to alter the project proposed layout to accommodate a Safeguarding the area under the departure route South of the Airport Runway,</p> <p>A methodology for Fire and Rescue Safety, a Study of Avion Displacement, a study on Heat Induced Turbulence, and a study on potential Electrical Interference</p>	<p>The applicant designed a Fire and Rescue system and protocol and Pager Power on behalf of the Applicant prepared a Technical Aerodrome Safeguarding Report dated Oct 2024 addressed all these points (including a proposal to alter the layout to accommodate a EFATO Safeguarded Area) bar Avion Displacement which RPS responded on behalf of the Applicant</p>
02/10/2024	Meeting	<p>F2F meeting between Nicholas Philips PVDP, Peter Gerstmann PVDP, Kriss Black and Wil Curtis from London Oxford Airport. to discuss Technical Aerodrome Safeguarding Report dated Oct 2024 prepared by Pater Power including a proposed a EFATO</p>	<p>London Oxford Airport asked the Applicant to draft a Emergency designs and protocol for Fire and Safety access</p> <p>The applicant prepared a draft proposal and submitted on the 16th October 2024</p>

The below schedule does not detail all of the representations made by Oxford Aviation Services Limited throughout the examination and which formed the majority of their correspondence during that time.

Form of Correspondence		Topics Discussed	
10 Nov 24 to Feb-25		safeguarding zone, running along the extended runway centreline.	
		Number of Follow up requested for Technical Aerodrome Safeguarding report and proposed EFATO Safeguarding proposal	London Oxford Airport asked the Applicant to draft Emergency designs and protocol for Fire and Safety access. The applicant prepared a draft proposal and submitted on the 16 th October 2024
27-Feb-25	Email	E mail from Mr Curtis advising of RR, Peter Gerstmann responded in phone call.	The Applicant agreed with Mr Curtis to review the Relevant Representation
27/02/2025		Lichfields Planning Consultants submitted RR on behalf on OASL	
06/03/2025	Email	London Oxford Airport sent presentation of Local Runway Safety Team review of the applicant proposals in relation to Engine Failure After Take-off scenarios.	
21/05/2025	Meeting	Statement of Common Ground and the Matters concerning London Oxford Airport and next steps.	
29/05/25	Email	Increased Safeguarding Area	Plan and description of panels and areas removed from RLB
04/06/2025	Email	Deadline D1- Further Written Statement, from London Oxford Airport.	List of agreed actions: 1. Increase the safeguarded area for EFATO incident. London Oxford Airport agreed to remove its objection to this matter. 2.The Applicant agreed to undertake Revised modelling for G&G after reorientation of panels. 3.Ecology, London Airport requested The Applicant agreed to present revised proposals to manage increased Bird and animal activity in areas around the Airport. 4.Heat Induced Turbulence, The Applicant to agreed to undertake a

The below schedule does not detail all of the representations made by Oxford Aviation Services Limited throughout the examination and which formed the majority of their correspondence during that time.

Form of Correspondence		Topics Discussed	
			modelling of possible heat induced turbulence
19/06/2025	Email	Further information in advance of meeting on the 24 th June 2025. This included the re-siting of the existing secondary substation and the existing construction compound.	
23/06/2025	Emails	Exchange of emails relating to varying airport height restrictions and distance from end of runway	
24/06/2025	Meeting	The re-siting of the existing secondary substation and the existing construction compound.	Further analysis required for relocation of Substation. London Oxford Airport proposed reordination of Construction Site by 90 degrees.
25/06/2025	Meeting	The re-siting of the existing secondary substation.	Ongoing analysis and discussions
04/07/25	Email	The re-siting of the existing secondary substation.	Proposed location for Substation
16/07/25	Email	The re-siting of the existing secondary substation, Thermal Turbulence Report.	Agree location of Substation and agreed scope for Thermal Turbulence Report
21/07/25	Email	New G&G report	New G&G report sent to London Oxford Airport
30/07/25	Email	The Applicant shared updated SoCG	No response from London Oxford Airport
15/08/25	Email	The Applicant asked London Oxford Airport for comments on SoCG before DL4	No response from London Oxford Airport
03/09/25	Email	The Applicant asked London Oxford Airport for comments on SoCG before DL5	No response from London Oxford Airport
01/10/25	Email	The Applicant asked London Oxford Airport	No response from London Oxford Airport

The below schedule does not detail all of the representations made by Oxford Aviation Services Limited throughout the examination and which formed the majority of their correspondence during that time.

Form of Correspondence

Topics Discussed

for comments on SoCG
before DL6

Ecology

16/04/2025	Open hearing	Avial Displacement warranting further consideration before determination.	Ongoing.
21/05/2025	Meeting	Discussion on Avial Displacement warranting further consideration before determination.	After discussions the Applicant agreed to draft a proposed solution to reduce features that might attract birds of risk to aviation in the immediate proximity of the Airport. Ongoing.
15/08/25	Email	The Applicant asked London Oxford Airport for comments on SoCG before DL4	No response from London Oxford Airport
22/08/2025		Discussion on Avial Displacement warranting further consideration before determination.	For DL4 The Applicant responded to the ExA's Second Written Question S2.16.8 confirming an update to the oLEMP for DL5