



Head of Energy Infrastructure Planning and Innovation
Department of Energy Security and Net Zero
3-8 Whitehall Place
London
SW1A 2AW

16 July 2026

Dear Mr. Wheadon,

BWSF: ref. EN010147 DESNZ RFI, BYG submission re Airport Safety

We have received a copy (attached) of the submission to the SoS of 15 July from the flight school Leading Edge Aviation (*Section 10: Response to answers 44 - 49: Aviation*) which addresses key issues regarding the safety of their student pilots using London Oxford Airport`s training facilities.

Despite being the leading flight school at LOA, Leading Edge state that they `were not contacted for consultation by the Applicant at any stage in the last three years`.

In our submission REP4-043, numbered para 4, we had already drawn the ExA`s attention to the need for contact with the flight schools. This was not followed up and the need was later articulated by Mr. W. Curtis, General Manager of London Oxford Airport, as follows:

“...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.]”

Despite this recommendation, Leading Edge was never consulted by the Applicant and remains unregistered as an Interested Party.

Given the importance of their submission to pilot and public safety, and the risk that its acceptance will be prejudiced by their not being an IP, we are herewith submitting it on their behalf.

Yours faithfully,

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Chair Begbroke & Yarnton Green Belt Campaign (BYG).

IP ██████████

Leading Edge Aviation submission

Section 10: Response to answers 44 - 49: Aviation

Please note: Leading Edge Aviation, based at London Oxford Airport, is not registered as an Interested Party, as we were not contacted for consultation by the Applicant at any stage in the last three years. Given our close relationship with FTEJerez, whose submission is cited in the SoS's RFI documents, we request that the following submission is included at this stage.

Leading Edge Aviation – Response to Proposed Botley West Solar Farm

Leading Edge Aviation strongly objects to the proposed Botley West Solar Farm in its current format. As one of the principal European flight training organisations operating from London Oxford Airport, our foremost concern is the safety of our students, instructors, visiting crews, and the wider public. We do not believe that the aviation safety implications of the development have been adequately addressed, and we remain concerned that the proposal would materially degrade the safety environment surrounding the airport.

Emergency Landing Areas and Engine Failure Scenarios

We disagree with the assertion that concerns relating to Engine Failure After Take-Off (EFATO) have been satisfactorily resolved. While limited amendments have reportedly been made to the panel layout beyond the runway ends, these changes do not address the broader reality that engine failures and partial power loss events can occur at any point during departure, arrival, circuit operations, or training exercises.

As a flight training organisation, we routinely conduct engine failure training in the vicinity of Oxford Airport. The availability of extensive open countryside around the aerodrome has historically been an important safety feature, providing pilots with multiple emergency landing options in the event of a genuine emergency.

The proposed solar arrays would significantly reduce the availability of suitable emergency landing areas across a large geographical area surrounding the airport. In the event of a full or partial loss of power, particularly during training operations conducted at relatively low altitudes, pilots would face substantially fewer safe options for forced landings. This reduction in available emergency landing sites inevitably increases operational risk both to aircraft occupants and to people on the ground.

Glint and Glare Risks

We note the acknowledgement by Oxford Airport's aviation advisers that a residual risk from glint and glare will always remain where large ground-mounted solar arrays are positioned close to an airport.

From an operational perspective, the issue is not whether glint and glare can be modelled, but whether it can be entirely eliminated. We do not believe this can be guaranteed. Even isolated or intermittent glare events have the potential to distract pilots during critical phases of flight when workload is highest.

This concern is particularly significant for student pilots, who have less experience in managing unexpected visual distractions during take-off, circuit operations, and landing. Any increase in cockpit distraction during these phases of flight represents an unacceptable additional risk in a training environment.

Bird Strike Risk

We remain concerned that the development could increase bird strike risk in the vicinity of Oxford Airport. Bird strikes already represent a recognised aviation hazard, and any land-use change that has the potential to alter bird behaviour, habitat utilisation, or concentrations requires detailed scrutiny.

We note that discussions regarding wildlife hazard management arrangements have not, by the Applicant's own admission, been fully finalised. The existence of ongoing negotiations demonstrates that the risk has not been definitively resolved.

For aviation operators, mitigation measures implemented after a risk has been identified are not equivalent to avoiding the risk in the first place. Until there is clear evidence demonstrating that bird strike risk will not increase, the precautionary approach should apply.

Thermal Plumes and Radar Performance

We are also concerned by the potential impact of thermal plumes generated by extensive solar panel installations. We understand that questions have been raised regarding the possible effects on radar performance and surveillance systems, and that suitable independent expertise has not been available to fully review this issue.

Where uncertainty remains regarding a potential aviation safety hazard, especially one affecting navigation, surveillance, or situational awareness, caution should prevail. In our view, unresolved questions around thermal plume effects should not be discounted simply because they are difficult to quantify.

Impact on Flight Training Operations

The proposed development would fundamentally alter the operating environment surrounding London Oxford Airport. Flight training organisations choose training locations based upon a combination of airspace, infrastructure, operational flexibility, and critically, safety.

The extensive open land surrounding Oxford Airport has long been regarded as an important safety asset, particularly for ab initio and advanced pilot training. The proposed scale and proximity of solar panel development would erode that safety margin and make the airport less attractive as a long-term training base.

This has potential implications not only for individual operators but also for the broader aviation cluster based at Oxford Airport, which contributes significantly to local employment, skills development, and economic activity.

Conclusion

Leading Edge Aviation therefore strongly objects to the Botley West Solar Farm in its proposed format. We remain concerned that the development would:

- Significantly reduce available emergency landing areas.
- Increase risk during engine failure and partial power loss scenarios.
- Create the potential for pilot distraction from residual glint and glare effects, particularly for student pilots.
- Increase the risk of aircraft bird strikes.
- Introduce unresolved concerns regarding thermal plumes and potential radar disruption.
- Adversely affect the safety and attractiveness of London Oxford Airport as a major flight training centre.

For these reasons, we believe the proposal, in its current form, presents unacceptable aviation safety risks and should not be approved without substantial revision and a materially enlarged exclusion zone around London Oxford Airport.