

[REDACTED]

From: Andrew Mitchell [REDACTED] >
Sent: 16 July 2026 21:02
To: Botley West Solar Farm
Subject: Section 10: Response to answers 44 - 49: Aviation (FTEJerez)

Importance: High

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Dear Secretary of State,

Re: Botley West Solar - Glint/Glare report

The developer's assessment, which plays down the perceived threats to aviation from glint/glare of the proposed solar panels, relies heavily on the assumption that glare is only hazardous if it occurs within 50 degrees of a pilot's primary heading on final approach to land (along the extended runway center-line). While this may be appropriate for aircraft on a stabilized, straight-in Instrument Landing System (ILS) approach, it is entirely invalid for visual operations.

During Visual Flight Rules (VFR) operations, pilot attention is deliberately and continuously directed away from the centerline:

The Downwind Leg: A pilot flying downwind is parallel to the runway, looking directly out of the left-hand or right-hand side window (90 to 135 degrees relative to the nose) - they will continually use ground features to cross-check positioning in the visual circuit and judging when it is appropriate to turn to base leg.

The Base Leg: On the base leg, the pilot's primary visual target is the runway threshold, which is positioned diagonally (45 to 90 degrees) off the nose as they turn.

Air Traffic Scanning: Pilots in the visual circuit are legally required to maintain a continuous, active visual scan for other traffic, which spans almost a full 360 degree arc around the aircraft.

By applying only straight-in instrument approach criteria to a busy visual training aerodrome, the developer's study completely misses a multitude of locations where pilots will have the solar panels in their visual field of view - for a student pilot trying to fly a precise circuit, a sudden burst of "temporary after-image" glare can cause immediate spatial disorientation, cockpit distraction, and a breakdown in situational awareness during a critical, low-altitude phase of flight.

The UK Civil Aviation Authority's Combined Aerodrome Safeguarding Team (CAST) Advice establishes that solar developments must not cause unacceptable distraction to pilots. The CAA's safeguarding process requires developers to ensure safety across all standard flight paths, which inherently includes local visual patterns - not just straight-in instrument final approaches.

[REDACTED]

For these reasons, and those detailed in FTEJerez's original submission objecting to the application to develop Botley West Solar Farm, we urge the Secretary of State to refuse DCO consent.

We remain at your disposal for any further information or clarifications.

Best,



[Redacted]
Head of Training

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