

**Our ref:** Q900064/JR  
**Your ref:**  
**Email:** john.rhodes@quod.com  
**Date:** 4 February, 2019



Manston Airport Case Team  
National Infrastructure Planning  
The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol, BS1 6PN

For the attention of Kelvin MacDonald

By email

Dear Mr MacDonald

### **Manston Airport: PINS Ref TR020002: Deadline 2 Submission**

I act on behalf of Stone Hill Park Limited (SHP) the owners of the former Manston Airport site. I refer to your Rule 8 letter issued on 18 January 2019, which set out the final examination timetable, including the information to be submitted to the Examining Authority by Deadline 2 (6 February 2019). I am pleased to provide that information on behalf of SHP, as follows:

- a) I confirm that SHP wish to speak at a Compulsory Acquisition Hearing – see further below;
- b) SHP may attend but are unlikely to speak at subsequent Open Floor Hearings;
- c) as site owners, SHP need to attend the Accompanied Site Inspection on 19 March. I would be very grateful if the Case Management team could contact Jamie Macnamara from SHP in order to make arrangements for access to the airport for the site visit and, if necessary, to agree an itinerary for the visit. It may be necessary to discuss some formalities for the visit. Mr Macnamara can be contacted at [jamie@stonehillpark.co.uk](mailto:jamie@stonehillpark.co.uk) (telephone: 0131 220 6719).
- d) SHP has reviewed the submissions from RSP and others made by Deadline 1. These are not considered to change SHP's case in any material respect and our case will be presented in SHP's Written Representations submitted at Deadline 3.

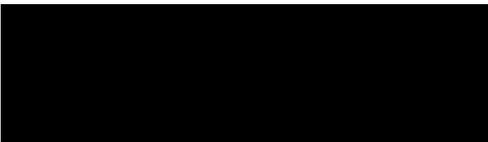
There is one further issue that I wish to raise on behalf of SHP – namely SHP's request to be permitted the right to cross examine RSP's witnesses. We have reflected on this request in the light of the detailed Written Questions issued by the Examining Authority (ExQ1). As a result, we wish to narrow our request to the right to cross examine RSP on its aviation forecasts, which is fundamental to the need case. We anticipate that the examination of other issues relating to viability, funding and delivery will be thorough and that SHP will have the opportunity to fully put its case through its Written Representations and at Issue Specific and Compulsory Acquisition Hearings. The topic of aviation forecasts, however, is specialist and SHP has engaged considerable expertise which has highlighted serious flaws in the aviation forecasts on which the entire RSP





case is founded. The reliance on aviation forecasts is intrinsic to RSP's whole case, and it is this specific aspect of RSP's case which we consider it would be helpful for SHP to have the opportunity to cross examine in a focussed and efficient manner. Leading Counsel is preparing that cross examination. Accordingly, it would be helpful if the Examining Authority could indicate as soon as practical whether this request will be permitted.

Yours sincerely,



John Rhodes OBE

Director