



Baldwins Wynyard Park House, Wynyard Avenue, Wynyard, TS22 5TB

Manston Airport Case Team
The Planning Inspectorate
Room 3/8 Eagle Wing
Temple Quay House
2 The Square
Bristol, BS1 6PN

Date 5 July 2019

For the attention of Mr Kelvin MacDonald

Dear Mr MacDonald,

Proposed Manston Airport Development Consent Order (Application ref: TR020002)

Please note that this letter (and Enclosure 1) comprise the full Deadline 11 submissions of Stone Hill Park Limited (“SHP”).

1. SHP’s Answers to Fifth Written Question CA.5.1

“Acquisition by Agreement

A letter from BDB Pitmans LLP dated 2 July 2019 [AS-index number to be allocated] informs the ExA that a subsidiary company of the Applicant, RiverOak MSE Ltd, has exchanged contracts with SHP on 2 July 2019 for the purchase of all of the land it owns at Manston Airport.

- i. Confirm or otherwise this statement.***
- ii. If this statement is true, provide a submission by Deadline 11 on 5 July indicating the status of your submissions made to date related to Compulsory Acquisition and funding.***
- iii. Indicate whether SHP wishes to withdraw, modify or qualify its objection to the request by the Applicant to compulsorily acquire land and rights over land.”***

SHP Response

- i. Please see attached letter enclosed as Enclosure 1, which confirms that SHP (“SHP”) has exchanged contracts with RiverOak MSE Limited.**

In its answer to the ExA’s fourth written question CA.4.7, SHP stated that it considered it unlikely that negotiations could be concluded satisfactorily in the

short period of time available. SHP would note that this answer was entirely accurate, based on the information available to SHP at the time.

However, after SHP made its submission on Friday 28 June, the Applicant reverted with an improved offer that was accepted by SHP.

- ii. As further noted in the letter in Enclosure 1, SHP confirms that, subject to the sale of the SHP land completing on the contracted terms, SHP will request the withdrawal of the representations it has made objecting to the Application.
- iii. Please refer to our answer to CA.5.1 (ii) above. The withdrawal of SHP's objection to the request by the Applicant to compulsorily acquire land and rights over land, is conditional upon the sale of the SHP land completing on the contracted terms. The letter further notes that if completion is on or before 9 July 2019, SHP will write to the ExA again, confirming the status of the transaction; and if it is after 9 July, it will write to the Secretary of State for Transport.

2. SHP's Comments on Response to Fourth Written Questions

Due in part to the lack of time to review and comment on the responses to Fourth Written Questions and the fact that the issues of concern to SHP have been addressed in SHP's previous submissions, SHP has not submitted comments on the answers by the Applicant or other parties.

Yours sincerely,



For and on behalf of
Stone Hill Park Ltd

ENCLOSURE 1: SHP LETTER DATED 5 JULY 2019



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Date 5 July 2019

For the attention of Mr Kelvin MacDonald

Dear Mr MacDonald,

PROPOSED SALE OF SHP LAND

Please accept this letter as notification that Stone Hill Park Limited (“SHP”) has exchanged contracts with RiverOak MSE Limited, a subsidiary of RiverOak Strategic Partners Limited, for the sale of the land owned by SHP at the former Manston Airport.

Completion of the transaction remains conditional upon the Secretary of State for Transport granting his consent, which it is expected to be received by 10 July 2019.

Thereafter, RiverOak MSE is required to complete the transaction within one working day. Accordingly, completion is anticipated by 11 July 2019.

SHP confirms that, **subject to the sale of the SHP land completing on the contracted terms**, SHP will;

- withdraw the representations it has made objecting to the Application by RiverOak Strategic Partners Limited, for an order granting development consent for the upgrade and reopening on Manston Airport (PINS Reference Number: TR020002);
- withdraw its application for an award of costs submitted on 22 May 2019;
- arrange for Kent Facilities Limited, whom currently holds a legal charge over the SHP land, to withdraw the representations it has made objecting to the Application.

If completion is on or before 9 July 2019, SHP will write to you again, confirming the status of the transaction; if it is after 9 July, it will write to the Secretary of State for Transport.

Yours sincerely,

For and on behalf of
Stone Hill Park Ltd