

From: [Jason Jones-Hall](#)
To: [Manston Airport](#)
Subject: Response to Reg 6 consultation re proposed change to Manston DCO
Date: 15 August 2023 17:04:44
Attachments: [Manston Change to DCO - Reg 6 - Formal Response - JJH.pdf](#)

Re: Planning Inspectorate Reference: TR020002, (Manston Airport)

Dear Sirs

Please find attached to this email a formal response to the consultation with regards to the application for a change to the Development Consent Order (DCO), proposed by the Applicant, Riveroak Strategic Partners (RSP).

Kind Regards
Jason Jones-Hall

Ref: Manston Airport, Planning Inspectorate Reference: TR020002

Response to consultation re Regulation 6 Application to make a non-material change to the Development Consent Order 2022 (S.I. 2022/922)

I would like to strongly oppose the proposed changes, based on a number of significant concerns with the proposal and its potential impact on local people.

My concerns are:

- 1) The reduction being requested will not leave enough funds available for the remaining land acquisitions (over-and-above the airport site) **and** the noise mitigation and this will have an impact on my own local authorities, (both Thanet District Council (TDC) and Kent County Council (KCC) - both of whom are landowners, as per the Book of Reference), and on local residents.
- 2) This request will therefore risk leaving limited funds available for mitigation measures, including noise mitigation.
- 3) Weighed against these concerns, there is nothing in the Applicant's proposal to suggest any other benefit for approving these changes other than for the sole benefit of RSP and its shareholders and/or to service its significant debts. This echoes widely reported similar issues with regards to Southern Water and other Water Companies which - as widely reported - have paid large dividends to shareholders whilst neglecting to invest in infrastructure in order to fulfil its obligations and/or mitigate environmental and community impacts.

Background Information and Evidence

As a local resident and business owner, I would particularly like to bring to the attention of the Planning Inspectorate and to the Minister the following concerns with regards to RSP's requested change to the security figure in the DCO:

- 1) RSP's request to amend the security figure is based on reducing the amount available for land acquisition to just £1.1m. This significantly reduces the amount available for the remainder of land acquisition required, outwith the main airport site, which is detailed in the [Book of Reference](#), covering over 880 pages, including property currently owned by TDC and/or local residents and now subject to compulsory acquisition under the terms of the DCO. Additional land owners impacted also include Network Rail, Kent County Council, Crown Lands Estate and the Defence Industry Organisation (Ministry of Defence). It is not credible that all of the lands set out in the Book of Reference will be acquired for as little as £1.1m and there is a significant risk that land owned by TDC, KCC and/or local residents will be undervalued and acquired by compulsory acquisition at a less-than-reasonable price which would impact the local authority finances. There is a further risk that if there are insufficient funds to cover land acquisition, this may impact and/or interfere with amounts available for noise mitigation measures and blight for Thanet residents.
- 2) Both Noise Mitigation and Blight security amounts are also currently set at a very low value. Costs will also be impacted by the widely reported impacts on the construction sector of supply chain, recruitment and inflation issues.
- 3) RSP claims in its [supporting documents](#) at para 2.2 that its figure of £1.1m is in line with "an up-to-date valuation carried out by CBRE and this figure is reflected in the correction that is being applied for". Concerns with this valuation and correction are as follows:
 - a) Prior to RSP's purchase of the airport site from Stonehill Park, **CBRE originally valued, on behalf of RSP, the whole of the airport site at £2.5m**, (as detailed in a letter from CBRE to Stonehill Park dated 10/10/18 and submitted to the DCO Examination. This letter and valuation is

available publicly on the Manston Airport examination records on the Planning Inspectorate website, at page 28 of the PDF at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-003693-Stone%20Hill%20Park%20Ltd%20-%20Answers%20to%20ExA's%20Written%20Questions.pdf>).

b) CBRE's valuation of the main airport site at £2.5m clearly fell far short of the actual sum RSP paid Stonehill Park to acquire the site, which was reported at £16.5m - almost 7 times CBRE's original valuation. This being the case, this surely calls into question whether CBRE's valuation for RSP for the remainder of the land acquisition of just £1.1m is at all credible.

c) Any shortfall in sums available for land acquisition will inevitably impact security amounts available more widely - including for noise mitigation. In short, this provides little or no security or reassurance for the local community.

Given the risk to properties owned by TDC, KCC, others and local residents, and the further risk to the noise mitigation security, this surely further calls into question whether or not the proposed amendment should be considered a Material Change on the basis that it risks impact on local people, (as per para 16 of the Planning Act 2008: Guidance on Changes to Development Consent Orders 2015).

In any event, I strongly oppose the proposal to lower the security figure available as this carries with it significant risk as outlined above.

Kind Regards
Jason Jones-Hall
Thanet/Kent Resident