

Name of applicant: RiverOak Strategic Partners Ltd (the “Applicant”)

Reference Number: TR020002

Dear Madam/Sir,

I note that the Applicant has submitted an application (“the Application”) to the Secretary of State for Transport under Regulation 4 of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (as amended), for a non-material change to be made to the Manston Airport Development Consent Order 2022 (“the DCO”). The Planning Inspectorate reference number is TR020002.

I further note that the Application seeks a non-material change to the DCO as follows:

“(2) To amend Schedule 2, Part 1, Paragraph 24 (High Resolution Direction Finder) as follows: To amend the requirement so that as an alternative to the Applicant having to agree with the Ministry of Defence a detailed mitigation scheme for the provision of an alternate High Resolution Direction Finder, the Ministry of Defence is able to confirm that an alternate High Resolution Direction Finder is not required”.

It is of grave concern that the Applicant would perhaps wish to mislead the Planning Inspectorate on matters of such national and critical importance.

The Ministry of Defence (“MOD”) has been a very engaged and active interested party throughout and a more detailed examination of the High Resolution Direction Finder was undertaken.

At 6.9.98 of the Report to the Secretary of State for Transport it states that the High Resolution Direction Finder (“HRDF”) *“...serves as an integral part of a UK-wide network (the UK Diversion and Distress Facility) which is used to locate aircraft or personnel and direct rescue services. Maintaining the operational effectiveness of this technical installation is therefore critical to maintaining the UK emergency response capabilities for the management of air safety incidents [REP7a-005]”*.

And at 6.9.107 of the Report to the Secretary of State for Transport it states that *“to summarise the MoD maintains its objection to the development on the basis that the proposals would have a significant and detrimental impact on the capability of safeguarded technical equipment located within the boundaries of the development, and no acceptable scheme detailing location, specification of equipment or technical mitigation has been submitted for the provision of what would be a replacement HRDF system [AS-287]”*.

The Ministry of Defence made representations throughout the process concerning the HRDF [AS-287, REP2-017, REP6- 030, REP7a-025, REP7a-026, REP8-025, REP9-019].

As of today’s date (30 June 2026) it is a matter of fact that the **Ministry of Defence continues to require High-Resolution Direction Finding capability in the Southeast to support flight safety for both Civil and Military flying.**

(Please see Ministry of Defence FOI response_:

https://www.whatdotheyknow.com/request/manston_airport_hrdf_2/response/3465153/attach/html/3/FOI2026%2011020.pdf.html)

Therefore the application by the Applicant to change the DCO and to amend Schedule 2, Part 1, Paragraph 24 (High Resolution Direction Finder) must be denied.

Please confirm receipt of my representation.

Yours faithfully

Samara Jones-Hall