

[REDACTED]

Manston Airport <ManstonAirport@planninginspectorate.gov.uk>

Dear Madam/Sir

After having studied the proposed 'non-material' changes and being aware of the recent MoD response to a FOI regarding the HRDF, I feel that I will not be able to formulate my response any better than the response below that already has been submitted to you by another person.

I fully endorse every detail and argument made in the response below and wish you to consider same to be *my* response to the proposed 'non-material' change also. As follows:

I write to log my formal objection to the material amendment requests submitted by RiverOak Strategic Partners (RSP) regarding the Manston Airport DCO. I urge the Planning Inspectorate to reject these requests, as they actively compromise national safety, intentionally evade safety regulations, and obscure a critical lack of commercial and financial viability.

2. First and foremost, the applicant's attempt to alter Schedule 2, Part 1, Paragraph 24 of the DCO to circumvent its mandatory obligation to construct a replacement High Resolution Direction Finder (HRDF) facility must be rejected. RSP claims that because the current HRDF asset has experienced technical issues, the requirement to execute a Ministry of Defence (MoD) approved replacement scheme is unnecessary. However, this justification is entirely commercial and safety-deficient. A formal statement obtained by *The Isle of Thanet News* explicitly refutes RSP's stance.

3. An MoD spokesperson confirmed that the Ministry continues to require Ultra High Frequency High Resolution Direction Finding capability in the Southeast to support flight safety. The MoD noted that while there is some limited overlap from existing systems, they do not provide equivalent coverage or functionality, meaning that maintaining this capability ^{either} through retention or appropriate replacement ^{remains} necessary to ensure there is no degradation to safety or operational effectiveness. The HRDF is a critical Royal Air Force emergency tracking and radio navigation system. Under the existing DCO, a decommissioning, relocation, and twin-system testing phase must occur before any structural airfield development can commence. RSP's attempts to remove this safety buffer demonstrate a flagrant disregard for regional air safety, rendering this amendment entirely unnecessary.

4. Furthermore, the applicant is engaging in the deliberate suppression of traffic figures to evade the implementation of Public Safety Zones (PSZs). In the initial DCO

application, provisions and assessments were originally made for well over 14,000 aircraft movements per year. However, RSP has deliberately capped and reduced the forecasted movement figures down to exactly 14,000 in its current operational framework. This artificial reduction is a cynical calculation designed strictly to circumvent Department for Transport criteria that mandate a formal PSZ. By suppressing these numbers, RSP avoids legally binding development restrictions and safety zones at the runway ends. This leaves thousands of residents, homes, and critical local infrastructure directly within a high-risk crash-hazard corridor under the arrival and departure paths without any statutory protection.

5. Finally, RSP lacks acceptable corporate transparency for a project of national infrastructural significance. The company remains heavily reliant on complex, offshore corporate structures and ultimate beneficial ownership vehicles that prevent residents and regulators from scrutinizing who is genuinely financing and controlling the development. Coupled with this opaque ownership, RSP has consistently failed to demonstrate that it has secured the robust, long-term funding required to safely construct and operate an airport of this scale. Advancing an intrusive project without guaranteed capital risks blighting local property values, causing prolonged economic stagnation, and leaving the community with an abandoned site. The Planning Inspectorate should not grant variations for a speculative commercial venture that cannot legally or financially guarantee its own delivery.

6. Consequently, I demand that the Planning Inspectorate decline the HRDF amendment request, force the developer to fully install and test the replacement radar systems as originally agreed in the DCO, and mandate that the developer model safety zones based on realistic, unsuppressed traffic figures rather than the artificially capped 14,000 threshold.

Yours sincerely

Mieke Vrijhof

