

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** Re: Manston Airport (TR020002)  
**Date:** 13 January 2019 14:51:08

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Dear Sirs, I understand that at the recent meeting [REDACTED] in replying to a question said

"that RSP have no track record with operating airports but that they are an investment company and "investing in infrastructure projects is our speciality." He said they plan to hire a management team to run the airport and that the creation of such a team would be subject to scrutiny by the CAA."

Are the inspectors able to ascertain what infrastructure projects RSP, which must exclude residential property development, have invested in during the time since they were incorporated and in particular how many of them have been aviation related.

Adem Mehmet

Dear Sirs, one further point.

Noise assessment and night flights

RSPs noise assessment for planes that fly very low over Ramsgate are at complete odds with evidence available from monitoring of previous airport operations at Manston by Thanet District Council and also assessment done by the CAA at Heathrow airport. I sent both reports from TDC and the CAA with my representation. The inspector needs to question RSP assumptions on this point.

RSP claim they do not require night flights but have applied for a great number of them. The inspector should question RSP on this issue to hopefully provide absolute clarity on this point for local residents whose lives will be completely devastated by even just one night flight over their houses at such low levels. Given the statements by the sponsor on many occasions and those by both local MPs that night flights are not required it is essential that pins are able to ban night flights in their entirety (other than for emergency humanitarian situations) for this airport should the DCO be successful. In addition given the proximity of the airport to the local populations of both Ramsgate and Herne Bay operational hours should also be restricted to perhaps the generally working day between 8am and 6pm.

Adem Mehmet.

Dear Sirs, I can't make the meetings currently being held but would like the following points to be considered by inspectors in determining how the examination should proceed and the items upon which inspectors should focus. I am happy for the below to be read out by inspectors if necessary.

## 1. The use of the DCO legislation

The DCO provisions under the planning act were designed and intended to deliver government sponsored capital projects of significant national interest. In General if we look at previous DCO's that's exactly what they've been used for. The DCO powers were not designed or intended to be used for the speculative acquisition of another companies assets. I don't believe a DCO has ever been proposed by a sponsor which does not own any of the land upon which they seek to build their plans. RSP, when it manifested itself as ROIC previously, attempted to become a CPO indemnity partner for Thanet District Council but failed on each and every occasion in particularly when their funding (there was non) was assessed. Having failed in these attempts they were encouraged by [REDACTED] to try for an application under the DCO legislation notwithstanding they were unsuitable as a basic CPO indemnity partner. This is a purely speculative attempt by a shell company to acquire U.K. assets which they think will be valued at close to zero. It should really have been refused already.

## 2. The need for further freight services.

Independent reports from Falcon, Avia and York Aviation have confirmed that a freight service at Manston is not likely to be successful. Evidence submitted by RSP formulated by Dr Sally Dixon, has been shown to be seriously floored by York Aviation in its various reports on this matter. Dr Sally Dixons evidence cannot be considered as independent as she is a close confidant of [REDACTED] with whom she worked at Planestation, a previous airline operation, which, as all others before, failed.

Inspectors need to rely on the independent evidence from experienced aviation consultants who are relied upon by government when making decisions in this arena and not submissions my Dr Dixon and the views of RSP which have been completely undermined by these same experts.

## 3. The experience and background of the sponsors

The sponsors have a chequered background which should be assessed by inspectors especially in the light of government decisions with respect to Seaborne freight services recently. The background of [REDACTED] should be of particular concern and the fact that in a recent submission to Companies House concerning another RSP company he describes himself as Airport Director. To my knowledge he is not a Director of any Airport, perhaps the inspectors could enquire.

## 4. Funding

RSP is effectively a shell company with no assets or capital. It has no experience of raising funding for operations of this scale or of successfully running an airport operation. RSP have not secured any significant funding to enable their plans to be fulfilled. They claim to have £15m but a substantial amount of this will have been used in the purchase they claim (but which I have been unable to substantiate) of the Jentex site, perhaps inspectors could enquire on this point. No funds have been secured for the £300m required to deliver their plans.

RSP propose to fund their plans using an offshore entity based in Belize, a tax haven and money laundering capital. Investors remain unknown. Belize structures are generally used to avoid the payment of taxes in the U.K. It cannot be right for a company using a funding structure based in Belize, to avoid U.K. tax, to use government sponsored compulsory purchase powers to take assets from a U.K. company.

I will be making a more detailed submission before the 8 February deadline.

Adem Mehmet

On 11 Dec 2018, at 11:29, Manston Airport <[ManstonAirport@pins.gsi.gov.uk](mailto:ManstonAirport@pins.gsi.gov.uk)> wrote:

Dear Sir/ Madam

**Planning Act 2008 – Section 88 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 6**

**Application by RiverOak Strategic Partners Ltd for an Order Granting Development Consent for the upgrade and reopening of Manston Airport**

**Notice of Preliminary Meeting, availability of Relevant Representations and notification of hearings**

Your reference: 20013730

Please find below a website link to the Rule 6 letter giving notice of, and the agenda for, the Preliminary Meeting. This letter includes a number of important annexes, including **Annex D** which provides notice of hearings to be held on 10 and 11 January 2019.

<https://infrastructure.planninginspectorate.gov.uk/document/TR020002-002816>

If this link does not open automatically, please cut and paste it into your browser.

Yours faithfully

Manston Airport Case Team

National Infrastructure Planning

The Planning Inspectorate

Temple Quay House

Temple Quay

Bristol

BS1 6PN

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National

Infrastructure Planning)

Web: [www.gov.uk/government/organisations/planning-inspectorate](http://www.gov.uk/government/organisations/planning-inspectorate)  
(The Planning Inspectorate)

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From: [REDACTED]  
To: [Manston Airport](#)  
Subject: Manston Airport DCO  
Date: 14 January 2019 14:41:22  
Attachments: [IMG\\_0746.PNG](#)

Dear Sirs, at the recent meetings [REDACTED] claimed that RSP had no aviation experience. This seems inconsistent with his previous history involved with many failed aviation projects and with his claimed occupation to Companies House recently as an Airport Director, please see below.

Adem Mehmet

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## [FREUDMANN, Anthony](#)

Correspondence address

**Calder & Co, 16 Charles li Street, London, United Kingdom, SW1Y 4NW**

Role **ACTIVE**

**Director**

Date of birth

**August 1946**

Appointed on

**10 December  
2018**

Nationality

**British**

Country of  
residence

**United Kingdom**

Occupation

**Airport Director**

**From:** [REDACTED]  
**To:** [Manston Airport](#)  
**Subject:** RSP Examination Question Responses  
**Date:** 25 January 2019 17:37:35

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I have just read with interest the answers, or lack thereof, that RSP have given to the concerns and questions you have been raising on their funding situation for many months. In particular I note once more that they compare themselves to other DCO applicants which they claim are of similar standing.

In the RSP Funding Statement, Annex 1 and again in their responses to your questions they have cited examples of provisions regarding funding from other DCOs. However when we look at the nature of these companies we can see they have long term experience of successful operation in their chosen fields. Companies like Covanta and Able have years of significant experience of raising funding and delivering projects of national importance and therefore the degree of scrutiny and requirement in their funding statement is naturally much less than we must expect for RSP which has no experience of successfully funding or operating an airport, no balance sheet or other assets and does not generate any income.

*The Rookery South (Resource Recovery Facility) Order 2011 (SI203/680)*

The Undertaker for this project is Covanta Rookery South Limited. Covanta has a credit rating of Ba3 from Moody's and BB- from Standard and Poors; the two most prestigious rating agencies globally. Covanta is a quoted company on the New York Stock exchange with a share price of \$17.55 and market capitalisation of \$2.5bn. Covanta is an established waste management company which has been in existence since the 1980's. It has demonstrated its track record in this industry and successfully invested in a number of projects around the UK. In Cheshire it invested £300m, in Bedfordshire £425m, Leicestershire £300m and Dublin Euro 550m. It has raised debt on its balance sheet in the order of \$2.5bn. It has successfully raised long term senior debt, has a revolving credit facility, a term loan and corporate bonds. Its full year earnings before interest and tax in 2017 were \$408m. In addition, Covanta is partnering with Veolia on this project which is another very experienced and well financed company also rated by Moody's Baa1, Standard and Poors BBB and Fitch BBB.

*The Able Marine Energy Park Development Consent Order 2104 (SI2014/2935)*

The sponsor for this DCO was Able Humber Ports Limited. Able is a privately owned and very successful business started in 1966. Able is rated IG by Bloomberg. Able is a major player across a number of sectors including demolition, decommissioning, site reclamation, property and ports development. It operates 4 ports, and 3 land sites. Total assets on the group balance sheet in accounts for 2016 show £500m and a consolidated profit of £45m.

*The Swansea Bay Tidal Generating Station Order 2015 (SI2015/1386)*

The Swansea Bay Tidal Lagoon is being developed by Tidal Lagoon (Swansea Bay) PLC which has as part of its funding a loan from the Welsh Government of £1.25 in addition to £35m of committed funding from major institutional investors Mark Shorrocks, Infracapital (the infrastructure fund arm of Prudential Plc), Infrared Capital Partners, David & Heath Stevens, Good Energy Plc a number of other corporates and more than 360 private investors. In addition to the various projects that are being planned in the UK the company has international ambitions in France, Canada, Mexico and India, some of which appear in advanced stages of discussion. The company develops, owns and operates tidal lagoons for the generation of renewable energy. Clearly this is a new technology, currently in a more embryonic stage of its development than commercial freight development and therefore expectations for track record would be considered in this context.

Adem Mehmet

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