

To: Secretary of State for Transport
% Planning Inspectorate,
National Infrastructure Planning

Date: 10 November 2021

Our Ref: SoS/R/007

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For the attention of the Manston Airport Case Team

1. This submission is in response to the SoSFT's letter of 21 October 2021 and specifically paragraph 4.
2. We submit our comment to the First Round of Consultation herewith as a formal consultation response to the Second Round of Consultation.
3. Our comment is in response to the independent aviation assessor's draft report ("**Independent Aviation Report**").
4. We respectfully draw the Secretary of State's attention to the response published in the public domain by the Applicant after the Independent Aviation Report's publication.
5. The Applicant's public statement of 22 October 2021¹ is cut and pasted below:

"RSP brands Manston Assessor's report "amateur and poorly constructed"

Having read the Assessor's report – which didn't take long – it is clear that it is an amateur and poorly constructed report. Setting aside the numerous grammatical errors and typos – not to mention the reference at para 1.3 to a section on the sixth Carbon Budget that the author has then apparently forgotten to even write – the content of this report does not address the broader strategic need case set out in the Secretary of State's original decision letter and is little more than a

¹ Available online at:



(accessed on 10 November 2021)

by-the-numbers review of the Examining Authority's previous report, and series of opaque assertions using pre-2019 data, with little or no detailed analysis or reasoning behind any of the conclusions drawn.

To be honest, we have come to the conclusion that someone has accidentally sent an unfinished draft to the Department of Transport.

For a report designed to inform the Government's decision making on the nation's long term global airfreight capacity needs, the thinking behind it appears firmly stuck in a pre-COVID past. It takes no account of the need for greater resilience in our logistics infrastructure the pandemic has highlighted, the permanent disruption to the traditional 'just-in-time' business model that has occurred – and the requirement for enhanced cross border trading infrastructure required to address this – nor even the constraints at existing airports pre-COVID that will re-appear as the industry recovers and will only get worse in the medium to longer term. The report therefore neither defines or deals with the need for Manston and pays absolutely no attention to the big picture strategic requirements of the UK in a post-pandemic, post-Brexit global market.

As aviation propositions go, Manston is unique – because it will be built to be Carbon Net Zero from scratch, providing a model for future airport planning. It represents a perfect opportunity for the UK Government to demonstrate how it can deliver on its commitment to grow the aviation sector, whilst still meeting its decarbonisation targets, a model approach which UK expertise can then export around the world. It also provides the prospect of becoming a flagship levelling-up project, by providing much needed economic and employment stimulus to one of the UK's most deprived areas – yet none of these considerations even feature in the report. Lower GDP will lower air freight demand? How about trying to increase GDP by increasing trading opportunities?

Effectively, this report concludes that the Secretary of State should look in the rear view mirror to try and plan the future. How embarrassing. We need to be looking forward to a new, decarbonised aviation industry, serving the UK's global trading and levelling up ambitions. We will be responding in depth, in due course.

6. This type of conduct was copied by Sir Roger Gale in his twitter feed of 25 October 2021. As of 10 November 2021 this was his last tweet²:

 (accessed 10 November 2021)

← Thread

 **Sir Roger Gale MP** ✓
@SirRogerGale

Manston Airport

I regard the draft “Manston Airport Assessors Report” as deeply flawed that is not surprising as it contains numerous errors & no original material but is instead based upon one-sided extracts drawn from the original Inspectors` report which itself was flawed 1/4

2:01 PM · Oct 25, 2021 · Twitter for iPhone

6 Retweets 2 Quote Tweets 25 Likes

   

 Tweet your reply Reply

 **Sir Roger Gale MP** ✓ @SirRogerGale · Oct 25
Replying to @SirRogerGale
For example, the report`s authors (led by Arup) appear to have made no effort to make contact with locally elected representatives to seek their views and have not addressed the reasons given for the Secretary of State`s original and correct decision. 2/4

 3  1  11 

 **Sir Roger Gale MP** ✓ @SirRogerGale · Oct 25
I shall submit a detailed critique in due course but in the meantime believe that this piece of work, which has so far cost the taxpayer £150,000. 3/4

 4  3  13 

 **Sir Roger Gale MP** ✓ @SirRogerGale · Oct 25
And has taken six months to prepare forty-one pages that could have been written over a weekend, deserves no credibility whatsoever.

I shall be submitting a full critique to the Department For Transport. 4/4

 6  2  16 

7. Sir Roger Gale is on video record commenting that "*[I] know that [I've] been called the Member of Parliament for RiverOak and [I] actually regard that as a badge of honour³*" and on 3 November 2021 Sir Roger Gale tabled 7 Written Questions in the House of Commons. Each written question was directly related

³ Available online at [REDACTED] (accessed 10 November 2021)

to the Independent Aviation Report perhaps as an attempt to collate evidence for his promised “*detailed critique*”⁴.

8. The 7 written questions in the House of Commons tabled by Sir Roger Gale were:

“1. To ask the Secretary of State for Transport, what assessment his Department has made of the impact of future GDP growth on air freight tonnage for (a) imports into and (b) exports from the UK.

2. To ask the Secretary of State for Transport, what assessment his Department has made of the impact of new trade deals on the import and export volumes that will require air freight transportation.

3. To ask the Secretary of State for Transport, what assessment his Department has made of the impact of internet sales on demand for air freight services.

4. To ask the Secretary of State for Transport, what modelling his Department has made of levels of future air freight volumes to and from the UK up to 2050.

5. To ask the Secretary of State for Transport, what estimate he has made of the annual tonnage of air freight that is (a) trucked from the UK to EU airports for onward carriage by air and (b) flown into EU airports and then trucked onwards into the UK.

6. To ask the Secretary of State for Transport, what estimate his Department has made of the air freight capacity available at (a) Heathrow (b) Stansted and (c) East Midlands airports.

7. To ask the Secretary of State for Transport, what assessment his Department has made of UK airfreight infrastructure required to accommodate (a) dedicated freighter aircraft using UK runway capacity, (b) belly freight on passenger aircraft served by existing UK airports and (c) airfreight trucked to or from EU airports”.

9. The answer given by Roberts Courts on behalf of the Department for Transport to each of the 7 written questions on 9 November 2021 was:

“The Department actively monitors the passage of air freight in and out of the UK and engages regularly with industry including airlines, airports and ground handling companies.

⁴ [REDACTED] (accessed 10 November 2021)

The Government recognises the vital role air freight plays in supply chains by ensuring that essential goods can continue to be brought into and out of the UK without disruption. The sector is highly resilient and exclusively private. In 2017 air freight contributed £7.2 billion to the UK economy".

10. We respectfully remind the Secretary of State that RIVEROAK STRATEGIC PARTNERS LIMITED Company number 10269461 unaudited Financial Statements made up to 31 July 2020 filed on 08 June 2021 state the ultimate controlling party is HLX Nominees Limited, a company incorporated in the British Virgin Islands which owns 80% of the issued share capital⁵. The shareholders of HLX Nominees Limited are anonymous. There is no requirement in BVI for filing annual returns or public disclosure of directors, shareholders, charges, loans, or agreements. The information on beneficial owners and shareholders is kept confidential at the Registered Agent and is not in the public domain⁶. Further, there is some confusion with the filings to Companies House as to whether HLX Nominees Limited is incorporated in Panama⁷ rather than BVI. In any event the ultimate shareholders are unknown.

11. **Conclusion:**

Maintaining public confidence in the Department for Transport, its commissioned consultants and this very process, the propensity to obey rules, and trustworthiness must be at the heart of any national infrastructure project, not least one involving an airport and the wider context of national security.

⁵ Available online at:

[REDACTED]
(accessed on 9 November 2021)

⁶ [REDACTED] (accessed 9 November 2021)

⁷ Please see unaudited financial statements of subsidiaries of Riveroak Strategic Partners Limited filed at Companies House - Riveroak MSE Limited Available online at:

[REDACTED] (accessed on 9 November 2021) and Riveroak Operations Limited Available online at:

[REDACTED]
(accessed on 9 November 2021) and Riveroak AI Limited Available online at:

[REDACTED]
(accessed on 9 November 2021) and Riveroak Fuels Limited Available online at:

[REDACTED] (accessed on 9 November 2021)