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Marlowe Innovation Centre
Marlowe Way, Ramsgate CT12 6FA



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

Date: 23 March 2022
Our Ref: Manston ECA 2022

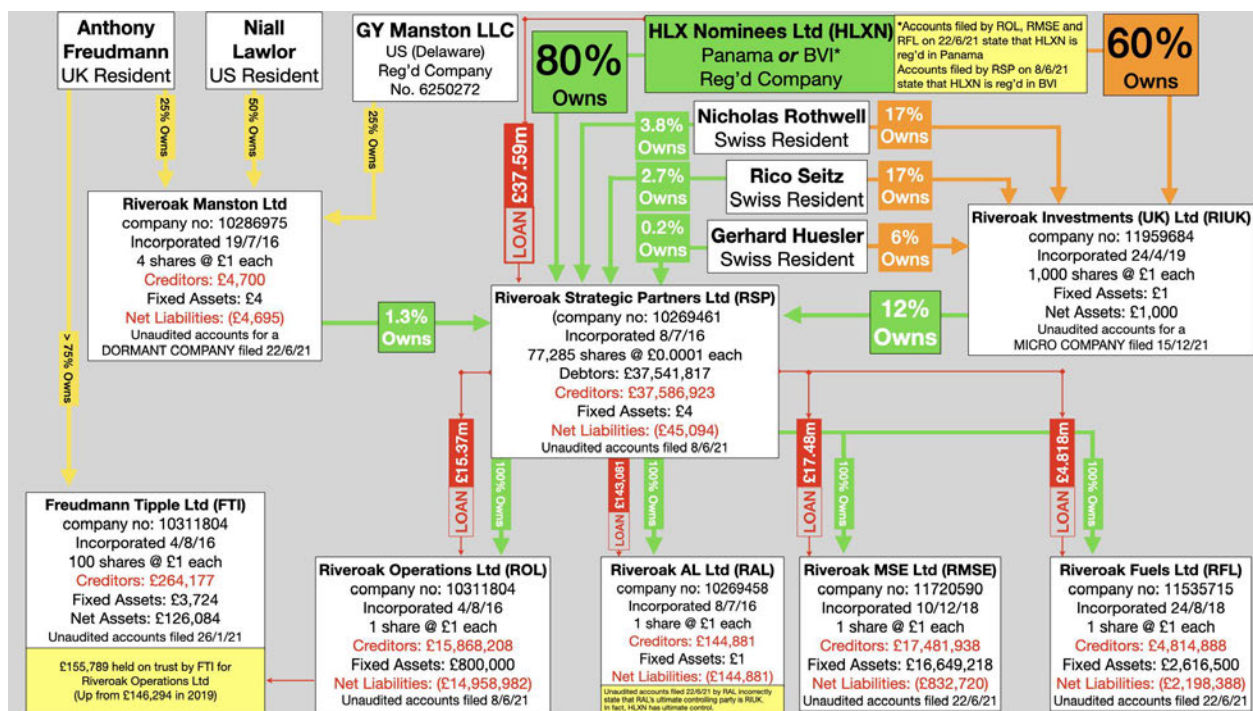
Email: manstonairport@planninginspectorate.gov.uk;

Background

- A. On 11 March 2022, the Secretary of State issued a letter and at paragraph 11 stated that Interested Parties who have submitted re-determination correspondence with any comments that they wish the Secretary of State to treat as formal consultation response should re-submit these comments by 28 March 2022.
- B. Since our re-determination correspondence to the Secretary of State of 1 March 2022 the Economic Crime (Transparency and Enforcement) Act 2022 ("**Economic Crime Act 2022**") has been expedited through Parliament and has now received Royal Assent.
- C. Accordingly, we submit this formal request to the Secretary of State as a **formal consultation response** to the Secretary of State.

Formal Request

- D. Under the Economic Crime Act 2022 overseas entities which have been registered proprietors of Qualifying Estates pursuant to application after 1 January 1999 will be required to register with the new Register within 6 months of commencement of the Economic Crime Act 2022.
- E. Riveroak Strategic Partners Limited and its subsidiary companies (including Riveroak MSE Limited and Riveroak Fuels Limited) are owned as follows:



- F. A letter from BDB Pitmans LLP dated 2 July 2019 confirmed that a subsidiary company of the Applicant, RiverOak MSE Ltd, exchanged contracts with Stonehill Park Limited on 2 July 2019 for the purchase of all of the land it owns at the former Manston Airport site¹.
- G. RiverOak MSE Limited's Total Exemption Full Accounts filed with Companies House on 22 June 2021, at paragraph 8 state²:

"8. Controlling Party

*The company's parent undertaking is RiverOak Strategic Partners Limited, a company incorporated in England & Wales, which owns 100% of the issued share capital. **The ultimate controlling party is HLX Nominees Limited, a company incorporated in Panama**" (bold added for emphasis).*

¹

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004558-AS%20-%20RSP.pdf>

²

H. The Applicant acquired the Jentex fuel site in September 2018 which is part of its Development Consent Application³. The Jentex fuel site is owned by Riveroak Fuels Limited⁴.

I. Riveroak Fuels Limited's Total Exemption Full Accounts filed with Companies House on 8 June 2021, at paragraph 7 state⁵:

"7. Controlling Party

*The company's parent undertaking is Riveroak Strategic Partners Limited, a company incorporated in England & Wales, which owns 100% of the issued share capital. **The ultimate controlling party is HLX Nominees Limited, a company incorporated in Panama**" (bold added for emphasis).*

J. Riveroak Strategic Partners Limited's Total Exemption Full Accounts filed with Companies House on 8 June 2021, at paragraph 8 state⁶:

"8. Controlling Party

***The ultimate controlling party is HLX Nominees Limited, a company incorporated in the British Virgin Islands, which owns 80% of the issued share capital**" (bold added for emphasis).*

K. Therefore, as Riveroak MSE Limited, Riveroak Fuels Limited and Riveroak Strategic Partner Limited are owned by overseas entities which have been registered proprietors of Qualifying Estates pursuant to application after 1 January 1999 they will be required to register with the new Register within 6 months of commencement of the Economic Crime Act 2022 (ie on or around September 2022 and perhaps some time after the Secretary of State's decision to grant or refuse the Development Consent Order).

³

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004668-Applicant's%20Overall%20Summary%20of%20Case.pdf>

⁴

<https://rsp.co.uk/https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004668-Applicant's%20Overall%20Summary%20of%20Case.pdfnews/riveroak-strategic-partners-completes-jentex-acquisition/>

⁶ [Riveroak Strategic Partners Limited Unaudited Financial Statement, filed with Companies House](#)

- L. In the spirit of and in line with the statutory law requirements of the Economic Crime Act 2022, to save national embarrassment and/or much worse a national security risk and/or listing on the UK Sanctions List we formally request the Secretary of State demand pursuant to (and not limited to) paragraphs 16,17 and 34 of the Economic Crime Act 2022 that the Applicant disclose the identity and /or identities of the individuals which make up 87.2% ownership and the ultimate controlling party of Riveroak Strategic Partner Limited and Riveroak MSE Limited and Riveroak Fuels Limited.