

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Manston Airport DCO Briefing Note pursuant to correspondence from Sir Roger Gale MP
Date: 08 August 2022 18:45:04
Attachments: [Briefing Note re Manston DCO for Rishi Sunak 8 Aug 2022.pdf](#)
Importance: High

Dear Mr Sunak

We understand that Sir Roger Gale MP for North Thanet has recently been in touch requesting your intervention and/or comment with regards to the Development Consent Order (DCO) application for a proposed freight airport at Manston submitted by Riveroak Strategic Partners (RSP). The proposed site is located in Kent in the South East.

As you may be aware, we previously contacted Department for Transport (DfT) on 11/3/22, with copies sent to Liz Truss at the Foreign, Commonwealth & Development Office (FCDO), with regards to national security concerns surrounding RSP and its ultimate beneficial owners. We received a response from FCDO dated 23/3/22, (ref: CTO2022/08327).

The correspondence you have recently received from Sir Roger Gale MP (SRG) relates to a live DCO Application which is currently awaiting decision by the Secretary of State for Transport (SoSFT). As such, it is highly inappropriate for SRG to seek comment and/or try to circumvent the legal process on this DCO application from any other Secretary of State, MP, or Prime Ministerial candidate.

We remind you that this DCO Application has already been the subject of a successful Judicial Review supported by the local council and community.

Notwithstanding the above, please find attached a 2 page briefing note summarising the key issues for your consideration.

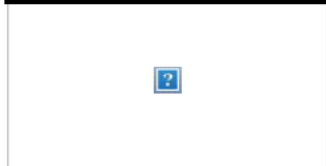
Kind Regards

Jason and Samara Jones-Hall

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Jason Jones-Hall
Director of Development
[Five10Twelve](#)
Research Fellow
[ral and Creative Industries \(iCCi\)](#)

[REDACTED]



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Manston Airport DCO : Briefing Note

Five10Twelve Ltd

Marlowe Innovation Centre

Marlowe Way, Ramsgate CT12 6FA

Email: manston@fivetentwelve.com

To: Rt Hon Rishi Sunak MP

Date: 09 August 2022

Email: [REDACTED]

Our Ref: SoS/R/090822_RS

Cc: Rt Hon Grant Shapps MP [REDACTED]; National Infrastructure Planning (Manston Airport Case Team) manstonairport@planninginspectorate.gov.uk; Rt Hon Elizabeth Truss MP [REDACTED]

Re: Manston Airport Development Consent Order (DCO) - Letter from Sir Roger Gale MP

Dear Mr Sunak

We understand that Sir Roger Gale MP for North Thanet has recently been in touch requesting your intervention and/or comment with regards to the DCO application for a proposed freight airport at Manston submitted by Riveroak Strategic Partners (RSP). The proposed site is located in Kent in the South East.

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Notwithstanding the above, please find below a 2 page briefing note summarising the key issues for your consideration.

¹ Letter to DfT dated 11 March 2022

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006261-Five10Twelve%20Limited%20SoS_R_110322a%20Manston%20SoS%20_Redetermination_SecurityConcerns.pdf (accessed 8/8/22)

Manston Airport DCO : Briefing Note

Economic Crime (Transparency and Enforcement) Act 2022 / Reputational Risk

1. A summary chart detailing Riveroak Strategic Partner's (RSP) secretive chain of shell companies masking its anonymous foreign owners is attached at Appendix 001. This is based on the most up-to-date filings at Companies House.
2. In its most recent filings, RSP states that its Ultimate Controlling Party (UCP) is HLX Nominees Limited - a company incorporated in the British Virgin Islands².
3. HLX Nominees Limited's majority shareholders - the 'warm bodies' - that own and control RSP and therefore the Manston site and the proposed freight airport - are unknown.
4. There is a reputational risk with regards to aligning with RSP's founding Director and spokesperson, Tony Freudmann, given his career history. This includes directorships of 18 dissolved companies³ - including numerous failed aviation, airport and travel businesses - over a period of 23 years since being struck off the solicitors' roll for misappropriation of client funds.

National Airports / Leveling Up

5. The South East is already a highly competitive market for aviation, with 10 existing airports operating in the region, (Biggin Hill, Bournemouth, Gatwick, Heathrow, London City, Luton, Lydd, Southend, Stansted, Southampton). This list includes 5 UKNET airports.
6. The aviation sector is currently struggling to fill existing vacancies, to the extent where British Airways, as just one example, has cancelled 13% of its planned capacity⁴.
7. Supporting air freight at airports closer to manufacturing regions in the midlands and the North of England has been recognised as a need in the Steer Group report for Airlines UK, Assessment of the Value of Air Freight Services to the UK Economy⁵.
8. Opportunities for supporting air freight services have been identified in expansion plans for East Midlands Airport, Manchester Airport, Doncaster Sheffield Airport and as part of the investment plan for Teesside Airport as part of Teesside Freeport⁶.

²RIVEROAK STRATEGIC PARTNERS LIMITED Company number 10269461

(accessed 8/8/22)

³Summary of Tony Freudmann's Career History filed with Planning Inspectorate UK See pages 20-30, <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006245-350%20-%20Five10Twelve%20Ltd.pdf> (accessed 8/8/22)

⁴ British Airways Stops Ticket Sales on Some Heathrow Flights

(accessed 8/8/22)

⁵ Assessment of the value of air freight services to the UK Economy, Steer Report

(accessed 8/8/22)

⁶ Global Aviation Firm Begins Planning For Substantial Investment in Teesside Airport

<https://teesvalley-ca.gov.uk/global-aviation-firm-begins-planning-for-substantial-investment-in-teesside-airport/> (accessed 8/8/22)

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Alternative Use

9. The leaders of six Conservative-controlled councils recently wrote to the SoSFT regarding road congestion across Kent and surrounding Dover, with proposed urgent solutions including much-needed lorry parks and increased rail freight⁷.
10. The lorry park function was previously successfully delivered at the Manston site via a Special DCO⁸ and historically has done so since 2015.
11. Such alternative use of the Manston site is consistent with the **Transport for the South East Freight, Logistics and Gateways Strategy**, published in May 2022. The only reference to the Manston site in this entire 193 page report is in the context of the site's use as a lorry park as part of Operation Brock⁹.

Procedural Issues

12. The UK Planning Inspectorate Examining Authority (ExA) Recommendation Report recommended refusal of the DCO on multiple grounds¹⁰.
13. The original decision which went against this recommendation was quashed by High Court Order on 15 February 2021¹¹.
14. The SoSFT commissioned an Independent Assessor's report (**IA Report**) authored by Ove Arup following the High Court Order.
15. The IA Report agreed with the ExA Recommendation Report and concluded that there was not sufficient need for the development at the Manston site, additional to (or different from) the need which is met by the provision of existing airports¹².

⁷ **Open Letter to the Secretary of State for Transport of 29 July 2022**

<https://www.dover.gov.uk/News/Press-Releases/2022/Why-Whitehall-must-step-up-to-the-challenge-of-cross-Channel-disruption.aspx> (accessed 8/8/22)

⁸ **The Town and Country Planning (Manston Airport) Special Development Order 2019**

<https://www.legislation.gov.uk/ukxi/2019/86/made> (accessed 8/8/22)

⁹ **Page 42, Transport for the South East Freight, Logistics and Gateways Strategy, published in May 2022**

(accessed 8/8/22)

¹⁰ **Manston Airport Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Transport** of 18 October 2019

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005347-TR020002%20Final%20Recommendation%20Report%20to%20DfT.pdf> (accessed 8/8/22)

¹¹ **THE QUEEN (on the application of JENNIFER DAWES) Claimant - and - SECRETARY OF STATE FOR TRANSPORT Defendant - and - RIVEROAK STRATEGIC PARTNERS LIMITED Interested Party CONSENT ORDER of 15 February 2021**(accessed 8/8/22)

¹² **Department for Transport Manston Airport Assessor's Report by Ove Arup & Partners Ltd (1) Centre for Economics and Business Research (2) and MDS Transmodal (3) of 21 October 2021**

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-005842-Manston%20DRAFT%20Assessors%20Report%20-%20Publicationv1.pdf> (accessed 8/8/22)

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RSP Group of Companies and Shell Companies as per up-to-date filings

