

From: [Adem Mehmet](#)
To: [Manston Airport](#)
Subject: TR020002 : Manston Airport DCO
Date: 11 August 2023 20:05:32
Attachments: [1691780538382blob.jpg](#)

I refer to your email of 20 July 20203 regarding an application for a change to the Manston Airport DCO made by RiverOak Strategic Partners Limited.

I would like the following to be taken into consideration when a decision is made regarding this requested change.

The applicant is requesting to reduce the security amount at Article 9(1)(a) from £13.1m to £6.2m.

The applicant bases this request on the fact that they have now purchased the site and on valuations carried out by CBRE, which have not been included in the information submitted. It would be helpful to see these in order to comment in a more informed way, could you please request that these be made available?

We must look at the historic evidence of valuations from CBRE in order to come to a view as to whether their current valuations should be relied upon. CBRE provided a valuation for RSP with respect to the airport site during the examination. This valuation was £2.5m but the actual price paid by RSP was £16.5m this is 6.6 times the valuation that CBRE produced. Clearly CBRE valuations cannot be relied upon and if we are to use them they need to be inflated by a factor of around 7 times at least and then indexed further to reflect when these payments might actually become due and be agreed with the relevant counterparties. We cannot have a situation where public tax payer funded bodies like TDC or KCC are at risk.

The relocation of the caravan site is clearly going to cost a lot more than CBRE had predicted.

Other items of the security amount relate to the cost of noise insulation. This amount has already been significantly underestimated due to the use by RSP of noise contours that do not bear any relation to previous noise experience recorded by Thanet District Council when the airport was last operational. RSP claim that noise at central points in Ramsgate will not exceed 63db but real monitoring evidence shows noise levels approaching 90db. This is likely to generate many more claims for compensation than RSP have provided for. Contact has already been made with specialist lawyers in order to launch, on a class action basis, claims under Part 1 of the Land Compensation Act 1973 at the appropriate time. I would estimate claims will be possible by most of the residents in Ramsgate, a town with a population of 40,000 people. The amount of funding set aside by RSP for this purpose is already woefully inadequate therefore and should really be increased, not decreased.

The amounts required under the security amount were calculated many years ago now, possibly in 2018 so the estimates are long out of date in 2023. We have seen prices rise and inflation go to in excess of 11%. The cost of building materials has increased incredibly over the period and this will mean that the cost of insulation and noise mitigation products have risen significantly together with the labour costs for installing them.

We also need to look at the confidence we have that RSP will have funding in place to meet any of these obligations in the future. RSPs accounts continue to be a mystery as does their ownership and it would be interesting to know whether they have met the required obligations for ownership disclosure recently brought into force. Perhaps you could ask? I attached the below the most recent analysis of their company structure showing account balances. You will see that most of the companies have net liabilities and those that don't have insignificant assets.

For these reasons I would object to any reduction in the security amount and in fact would suggest that it needs to be increased significantly.

Please acknowledge receipt of this email and that it will be considered in determining any decision.

Adem Mehmet