

**Civil Appeals Office  
Civil Appeals Office Room E307 Royal Courts of Justice  
Strand  
London  
WC2A 2LL**

22 April 2015

your ref: **No. C1/2015/0340**

Dear Sirs

**R (on the application of Blue Green London Plan (as Graham Stevens)) v Secretary of State for Communities and Local Government and Secretary of State for Environment, Food and Rural Affairs (Appeal Court Ref. No. C1/2015/0340)**

**R (Thames Blue Green Economy Limited) v Secretary of State for Communities and Local Government and Secretary of State for Environment, Food and Rural Affairs (Appeal Court Ref. No. C1/2015/0225)**

**R (David Percival) v Secretary of State for Communities and Local Government and Secretary of State for Environment, Food and Rural Affairs (Appeal Court Ref. No. C1/2015/0364)**

**Thames Tideway Tunnel Order judicial reviews**

1. I am writing further to the letters sent to the Court by The Environmental Law Foundation on behalf of Thames Blue Green Economy (TBGE) in response to the letter Berwin Leighton Paisner on behalf of Thames Water Utilities Limited (“TWUL”) on 13 April and 17 April 2015 on behalf of the Secretaries of State, seeking expedition of the three appeals above.
2. I respectfully ask that this letter explaining Blue Green London Plan (BGLP)’s position is placed before the Lord or Lady Justice dealing with the case.
3. BGLP shares common ground with TBGE and adopts the superior arguments of Counsel Nathalie Lieven QC and Andrew Parkinson in addition to those of BGLP. Although a LIP, BGLP has offered to join the other Appellants in common cause when it is administratively convenient to do so and to save court time and cost.
4. In addition to para 7, BGLP also asks that any substantive hearing listed before June 2015 is listed at BGLP’s availability.
5. As BGLP’s application ‘raises one short but important point of statutory construction’ already held by Mr Justice Lewis, permission may also be granted on the papers.
14. A copy of this letter has been sent to TWUL and the Secretaries of State.

Yours faithfully,

Graham Stevens IP, LIP  
Aarhus Convention claimant

