

Dear Ofwat,

CASE No.20152028A Blue Green London Plan V. Secretary of State for Environment, Food and Rural Affairs and Others

I write under Court Procedure Rules Part 31, Disclosure and Inspection of Documents, requesting your cooperation in giving disclosure of the following documents which may be used as evidence in court proceedings currently under consideration in the Court of Appeal, or in future proceedings.

The request follows Martin Blaiklock's response to your 'Consultation : Thames Tideway Tunnel ["TTT"]: Infrastructure Provider ("IP") Licence.' for responses by August 14th 2015. As suggested by his observations, for the public to make informed responses to your public consultation, the following documents are required:-

- a) The technical specification of IP's project and its TW interfaces;
- b) IP's estimated costs of the project, with its major contract values;
- c) TW's costs spent to date in developing TTT and the preparatory works;
- d) IP's proposed construction contractual structure and basis for completion risk assessment;
- e) IP's "Alliancing Agreement" with TW;
- f) IP's "Revenue Agreement" (between TW and IP)
- g) IP's "Direct Agreement" with Government;
- h) IP's "Project Management Contract" with CH2MHill; and
- i) IP's "Tax Change" exemption agreement with HMRC.

The information is necessary to show that it is not in the public interest to build the Thames Tideway Tunnel as there is no need.

My concerns are that, in issuing a licence before court proceedings are concluded, Ofwat would be in contempt of court and, for the avoidance of any doubt, requiring taxpayers to pay for an unnecessary Tunnel is fiscal fraud, whether intended by any stakeholder or not. (Fraud Act 2006)

Setting a date of 14 August 2015 for response is in bad faith, knowing the circumstances outlined in Martin Blaiklock's response and the SsOS's intention; as any response is unlikely to stop construction of the Tunnel, it appears Ofwat intends, under the guise of lawful issue of a license, the improper purpose of risking fiscal liability for its non issue or cancellation. Parliament in good faith has no intention of risking such liability, as recent questions in Parliament make clear, now put in evidence.

These considerations make Ofwat's consultation of material relevance to my case.

In order to save court time and costs, may I suggest you email the most convenient way the documents may be accessed.

Thank you for cooperating with the court in this matter,

Yours Faithfully,

Graham Stevens IP, LIP

(as **Blue Green London Plan**)

Aarhus Convention appellant

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