

ECCLES WASTEWATER TREATMENT WORKS CPO INQUIRY

INQUIRY DOCUMENTS LIST

Documents highlighted in yellow have recently been submitted

| United Utilities | |
|---------------------------|--|
| AA/1/A | Proof of evidence of Keith Haslett |
| AA/1/B | Summary proof of evidence of Keith Haslett |
| AA/1/C | Appendices to proof of evidence of Keith Haslett |
| AA/1/R | Rebuttal proof of evidence of Keith Haslett |
| AA/2/A | Proof of evidence of Gary Baron |
| AA/2/R | Rebuttal proof of evidence of Gary Baron |
| AA/3/A | Proof of evidence of Keith Hendry |
| AA/3/B | Summary proof of evidence of Keith Hendry |
| AA/3/C | Appendices to proof of evidence of Keith Hendry |
| AA/3/R | Rebuttal proof of evidence of Keith Hendry |
| AA/3/R1 | Appendix 1 – Review of Biogeochemical Modelling, Technical Note |
| AA/3/R2 | Appendix 2 – Outfall Tunnel Technical Memo |
| AA/4/A | Proof of evidence of Luke Pearson |
| AA/4/B | Summary proof of evidence of Luke Pearson |
| AA/4/C1 | Appendix 1 - Water Quality Consenting Standards – AMP2 Guidelines |
| AA/4/C2 | Appendix 2 |
| AA/4/C3 | Appendix 3 |
| AA/4/C4 | Appendix 4 - Details of UIDS Included In Change Protocol "C" |
| AA/4/C5 | Appendix 5 - Notes of meeting between UU and EA 27/11/2014 |
| AA/4/C6 | Appendix 6 - Statement of Obligations |
| AA/4/C7 | Appendix 7 - Ministerial River Basin Planning-Guidance |
| AA/5/A | Proof of evidence of Anthony Parsons (amended) |
| AA/5/B | Appendices to proof of evidence of Anthony Parsons |
| AA/5/R | Rebuttal proof of evidence of Anthony Parsons |
| AA/6/A | Proof of evidence of Roderick McKimm |
| AA/6/B1 | Appendix 1 - CV of Rory McKimm |
| AA/6/B2.1 | Appendix 2.1 - AA 6 B Route Plans Sections and Ground Profile |
| AA/6/B2.2 | Appendix 2.2 - AA 6 B Route Plans Sections and Ground Profile |
| AA/6/B3.1 | Appendix 3.1 - Settlement predictions after tunnel alignment revision |
| AA/6/B3.2 | Appendix 3.2 - Manchester Trunk UID Project Preliminary Impact Assessment Report |
| AA/6/B3.3 | Appendix 3.3 - Parsons Brinckerhoff Settlement Report - October 2014 |
| AA/6/B4.1 | Appendix 4.1 - Allied Exploration & Geotechnics Limited - Borehole Record |
| AA/6/B4.2 | Appendix 4.2 - Exploratory Hole Log |
| AA/6/B4.3 | Appendix 4.3 - Borehole 1 and 2 Diagrams |
| AA/6/R | Rebuttal proof of evidence of Roderick McKimm |
| AA/7/A | Proof of evidence of Peter Nicholson |
| AA/7/B | Appendices to proof of evidence of Peter Nicholson |
| AA/7/R | Rebuttal proof of evidence of Peter Nicholson |
| AA/7/R1 | Appendix 1 - Ship Stability for Masters and Mates (extract) |
| AA/7/R2 | Appendix 2 - The Manchester Ship Canal Company. Bunkering Guidelines and Regulations |
| AA/8/A | Proof of evidence of David Sephton |
| AA/8/B | Summary proof of evidence of David Sephton |
| AA/8/C1 | Part 1 of Appendices to proof of evidence of David Sephton |
| AA/8/C2 | Part 2 of Appendices to proof of evidence of David Sephton |

| United Utilities continued | |
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| AA/8/R | Rebuttal proof of evidence of David Sephton |
| AA/8/R1 | Appendix to rebuttal proof of evidence of David Sephton |
| AA/9/A | Proof of evidence of Tim Spencer |
| AA/9/B | Summary proof of evidence of Tim Spencer |
| AA/9/C | Appendices to proof of evidence of Tim Spencer |
| AA/10/A | Proof of evidence of Colin Smith |
| AA/10/B | Summary proof of evidence of Colin Smith |
| AA/10/C | Appendix to proof of evidence of Colin Smith |
| AA/10/R | Rebuttal proof of evidence of Colin Smith |
| AA/11/A | Proof of evidence of Simon Pemberton |
| AA/11/B | Summary proof of evidence of Simon Pemberton |
| AA/11/C | Appendices to proof of evidence of Simon Pemberton |
| AA/12/R | Rebuttal proof of evidence of Joanne Rands |
| AA/12/R1 | Appendix to rebuttal proof of evidence of Joanne Rands |

| United Utilities – INQUIRY DOCUMENTS | |
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| AA/INQ/1 | Letter to the PO from Pinsent Masons regarding site notices dated 6 June 2018 |
| AA/INQ/2 | Decision Notice, Land West of A J Bell Stadium and North of the Manchester Ship Canal, 1 November 2017 |
| AA/INQ/3 | Opening submissions by United Utilities |
| AA/INQ/4 | Letter from Pinsent Masons to Walker Morris regarding Plot 5T (with enclosure) dated 19 May 2018 (submitted 14 June 2018) |
| AA/INQ/5 | Plans showing the proposed reduction of Plot 5T, as sent by email to Walker Morris on 6 June 2018 (submitted 14 June 2018) |
| AA/INQ/6 | Letter from Pinsent Masons to BDB regarding MSCCL's statutory undertaking dated 8 June 2018 (submitted 14 June 2018) |
| AA/INQ/7 | Letter from Pinsent Masons to BDB regarding MSCCL's statutory undertaking (with enclosure) dated 13 June 2018 (submitted 14 June 2018) |
| AA/INQ/8 | Preston TPS photo (submitted 14 June 2018) |
| AA/INQ/9 | Full scheme layout plan (submitted 14 June 2018) |
| AA/INQ/10 | Letter from PM to BDB dated 15 June requesting information. (submitted 15 June) |
| AA/INQ/11 | Letter from the Environment Agency to Salford Council dated 6 June (submitted 20 June 2018) |
| AA/INQ/12 | Letter from PM to BDB dated 20 June in response to letter from BDB from 18 June (submitted 20 June 2018) |
| AA/INQ/13 | Hochtief drawing of proposed UU culvert diversion drainage layout (submitted 21 June) |
| AA/INQ/14 | Letter from Pinsent Masons to BDB regarding requests for information dated 25 June 2018 (submitted 26 June 2018) |
| AA/INQ/14.1 | United Utilities Eccles UID Study Network Model Build and Verification Report October 2002(submitted 26 June 2018) |
| AA/INQ/14.2 | Environment Agency, Manchester Trunk UID Study Audit, Audit Report May 2003 Entec UK Limited (submitted 26 June 2018) |
| AA/INQ/14.3 | NM04 - Wastewater Network Modelling, Issue 2, September 2011(submitted 26 June 2018) |
| AA/INQ/15 | Note to Inquiry on turbidity sampling (submitted 26 June 2018) |
| AA/INQ/15.1 | Appendix 1 - Eccles FE turbidity analysis data (submitted 26 June 2018) |
| AA/INQ/15.2 | Appendix 2 – Particle size analysis (submitted 26 June 2018) |
| AA/INQ/15.3 | Appendix 3 - Eccles samples June 2018(submitted 26 June 2018) |
| AA/INQ/15.4 | Appendix 4 – Basic principles of particle size analysis (submitted 26 June 2018) |
| AA/INQ/16 | Eccles WWTW Ammonia Data - 2005 to 2016(submitted 26 June 2018) |
| AA/INQ/17 | - Letter from Pinsent Masons to BDB regarding requests for information dated 26 June 2018 (submitted 27 June 2018) |
| AA/INQ/17.1 | Email from Environment Agency to UU dated 7 November 2006 (submitted 27 June 2018) |
| AA/INQ/17.2 | Spreadsheet enclosed to email dated 7 November 2006 (submitted 27 June 2018) |
| AA/INQ/18 | Letter from PM to BDB dated 26 June (submitted 27 June) |
| AA/INQ/19 | Letter from PM to BDB dated 27 June (submitted 27 June) |
| AA/INQ/20 | Letter from PM to BDB dated 28 June (submitted 28 June) |
| AA/INQ/21 | SAL0018 Manchester Trunk UID's M60 Crossing at Barton High Level Bridge Outline Approval in Principle June 2018 (submitted 28 June) |
| AA/INQ/22 | Letter from PM to BDB dated 5 July (submitted 5 July) |
| AA/INQ/23 | Letter from PM to BDB dated 9 July regarding technical note from Joanne Rands (submitted 10 July) |

| United Utilities – INQUIRY DOCUMENTS continued | |
|---|--|
| AA/INQ/23.1 | Technical note from Joanne Rands (submitted 10 July) |
| AA/INQ/24 | Letter from PM to BDB regarding Schedule of Rights and Compensation and Discharges into Salteye Brook (submitted 11 July) |
| AA/INQ/25 | Taylor & Taylor v North West Water [1995] 70 P&CR 94 (submitted 12 July) |
| AA/INQ/26 | Port of London Authority v Transport for London [2008] RVR 93 (submitted 12 July) |
| AA/INQ/27 | Letter from PM to BDB dated 13 July regarding Mr Perry's proof (submitted 13 July) |
| AA/INQ/28 | Letter from PM to BDB dated 16 July regarding correspondence between the EA and UU (submitted 16 July and all attachments) |
| AA/INQ/28.1 | Email and attachment dated 26 June 2018 |
| AA/INQ/28.2 | Email dated 28 June 2018 |
| AA/INQ/28.3 | Email and attachment dated 5 July 2018 |
| AA/INQ/28.3a | Email and attachment dated 5 July 2018 |
| AA/INQ/28.4 | Email and attachment 5 July 2018 (letter omitted from AA/INQ/028.3) |
| AA/INQ/28.5 | Email and attachment 6 July 2018 |
| AA/INQ/28.6 | Email and attachment dated 9 July 2018 |
| AA/INQ/28.6a | Email and attachment dated 9 July 2018 |
| AA/INQ/28.7 | Email dated 13 July 2018 |
| AA/INQ/28.8 | Email dated 16 July 2018 |
| AA/INQ/29 | Letter from PM to BDB dated 16 July (submitted 17 July) |
| AA/INQ/29.1 | SuDS clarification note |
| AA/INQ/29.2 | (See AA/NQ/028.1 – 28.8) |
| AA/INQ/029.3 | Manchester Ship Canal Aeration AMP5AMP6 meeting |
| AA/INQ/29.4 | BDB RFI 12 Flow plots 9 July 2018 |
| AA/INQ/29.5 | Right to remain |
| AA/INQ/30 | Letter from PM to BDB dated 16 July regarding Wastewater Network Modelling (submitted 17 July 2018) |
| AA/INQ/30.1 | Wastewater Network Modelling (submitted 17 July 2018) |
| AA/INQ/31 | Weather data from Wunderground website (submitted 17 July 2018) |
| AA/INQ/32 | EA Fluvial Design guide – Chapter 11 (submitted 17 July 2018) |
| AA/INQ/33 | Addendums to "FE NORTH STORAM A" UU Initial response (submitted 17 July 2018) |
| AA/INQ/34 | Extracts from Wastewater Treatment Technologies (submitted 17 July 2018) |
| AA/INQ/34.1 | Authors of Environmental Management (submitted 17 July 2018) |
| AA/INQ/35 | Preston TPS (submitted 19 July) |
| AA/INQ/36 | Retention Times (submitted 19 July) |
| AA/INQ/37 | Letter from BDB to PM dated 12 July (all submitted 20 July) |
| AA/INQ/37.1 | Letter from PM to DBD dated 13 July |
| AA/INQ/37.2 | Letter from BDB to PM dated 13 July |
| AA/INQ/37.3 | Email from Laura Thornton to Trevor Perry dated 11 July |
| AA/INQ/37.4 | Email from Trevor Perry to Laura Thornton dated 11 July |
| AA/INQ/38 | Letter from PM to BDB dated 13 September (submitted 13 September) |
| AA/INQ/39 | Letter from PM to BDB dated 26 September (submitted 26 September) |
| AA/INQ/40 | Letter from PM to BDB & WM to carry out Bore Hold surveys dated 28 September (submitted 28 September) |
| AA/INQ/41 | Letter from PM to BDB dated 10 October responding to letter from 4 October from BDB (submitted 10 October) |
| AA/INQ/42 | Letter from PM to BDB dated 11 October responding to letter from 10 October from BDB (submitted 11 October) |

| United Utilities – INQUIRY DOCUMENTS continued | |
|---|---|
| AA/INQ/43 | Letter from PM to DBD dated 19 October in response to DBD letter of 4 October (all submitted 19 October) |
| AA/INQ/43.1 | Document 2a – Parsons Brinkerhoff ground investigation report – Sept 2014 |
| AA/INQ/43.2 | Document 3a – Mott Macdonald – Ground conditions report – 14 August 2018 |
| AA/INQ/43.3 | Salteye Brook flow rates |
| AA/INQ/44 | Letter to BDB from PM dated 23 October in response to letter from BDB of 5 th October (MP/INQ/35); (submitted 23 October) |
| AA/INQ/44.1 | Costs summary referred to in the penultimate paragraph AA/INQ/044 |
| AA/INQ/45 | Note to Inquiry on surface water separation opportunities (submitted 24 October) |
| AA/INQ/46 | Note to Inquiry in relation to the revised National Planning Policy Framework ("NPPF") (submitted 24 October) |
| AA/INQ/47 | Note to Inquiry in relation to the requirement for storage in connection with UU CPO Option 3 (submitted 24 October) |
| AA/INQ/47.1 | Appendix A – TWLs Inlet CSO Baseline |
| AA/INQ/47.2 | Appendix B – TWLs Inlet CSO Full Scheme Complete |
| AA/INQ/48 | Note to Inquiry containing examples of large pumping stations within United Utilities (submitted 24 October) |
| AA/INQ/49 | Letter to the Programme Officer from PM dated 24 October, regarding submission of additional documents AA/INQ/45-AA/INQ/48 (submitted 24 October) |
| AA/INQ/50 | Cover email from Luke Pearson to Matt Harris (submitted 24 October) |
| AA/INQ/50.1 | Sediment Report prepared by UU |
| AA/INQ/50.2 | Opinion prepared by Professor David Balmforth |
| AA/INQ/51 | Letter to BDB from PM dated 25 October, regarding the supplementary proofs (submitted 25 October) |

| Manchester Ship Canal Company Limited and Peel Investments (North) Limited | |
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| MP/1/A | Proof of evidence of Trevor Perry |
| MP/1/B | Summary proof of evidence of Trevor Perry |
| MP/1/C.1 | Appendix 1 - Trevor Perry Curriculum Vitae |
| MP/1/C.2 | Appendix 2 - Archimedean Screw Pump Details |
| MP/1/C.3 | Appendix 3 - Do Sampling in Saltey Brook |
| MP/1/C.4 | Appendix 4 - Extract From 16. Capital Investment Committee |
| MP/1/C.5 | Appendix 5 - Nereda Process at United Utilities |
| MP/1/C.6 | Appendix 6 - 9 - 26 March Photographs of Eccles Wwtw Humus |
| MP/1/C.7 | Appendix 7 - Potential Development Plan, Area Adjacent to AJ Bell Stadium |
| MP/1/C.8 | Appendix 8 - The Ideal Sedimentation Basin |
| MP/1/C.9 | Appendix 9 - Observation on UU Method of Entry to the CPO Tunnel |
| MP/1/C.10 | Appendix 10 - Metoffice Rainfall Data for 1 to 7 March 2018 |
| MP/1/C.11 | Appendix 11 - Proportional Discharge |
| MP/1/C.12 | Appendix 12 - Davyhulme Modernisation Project |
| MP/1/C.13 | Appendix 13 - UUWL's Drawing New Site Layout |
| MP/1/C.14 | Appendix 14 - CPO Tunnel Hydraulic Calculations |
| MP/1/C.15 | Appendix 15 - Alternative Solution Matrix |
| MP/1/C.16 | Appendix 16 - High Level Cost and Power Estimates |
| MP/1/C.17 | Appendix 17 - Tables of Costs and Power for Alternatives Discharging Final Effluent and Stormwater |
| MP/1/C.18 | Appendix 18 - Smart Utilisation of Wastewater Storage Capacity |
| MP/1/C.19 | Appendix 19 - Greener Projects |
| MP/1/C.20 | Appendix 20 - Extracts from BS EN 16933-2:2017 |
| MP/1/C.21 | Appendix 21 - List of Documents Reviewed |
| MP/1/C.22 | Appendix 22 - Larger Scale Drawings |
| MP/1/C.23 | Appendix 23 - Plates from Trevor Perry's Proof of Evidence |
| MP/1/C.24 | Appendix 24 - Eccles MSC Proposed Outfall Jet Velocities and Force |
| MP/1/R | Rebuttal proof of evidence of Trevor Perry |
| MP/1/R1 | Appendices to rebuttal Proof of evidence of Trevor Perry |
| MP/2/A | Proof of evidence of Leon Fields |
| MP/2/B | Summary proof of evidence of Leon Fields |
| MP/2/C.1 | Appendix 1- CV of Mr Leon Fields |
| MP/2/C.2 | Appendix 2 - Documents Relied on in Proof of Evidence |
| MP/2/C.3 | Appendix 3 - Funding Treatment of CAPEX in The Water Sector (PR09) |
| MP/2/C.4 | Appendix 4 - Queries Raised with UU |
| MP/2/C.5 | Appendix 5 - Oxera Model Assumptions |
| MP/2/C.6 | Appendix 6 - Figures t |
| MP/2/D | Supplementary proof of evidence of Leon Fields |
| MP/2/R | Rebuttal proof of evidence of Leon Fields |
| MP/3/A | Proof of evidence of Phil Studds |
| MP/3/B | Summary proof of evidence of Phil Studds |
| MP/3/C.1 | Appendices to proof of evidence of Phil Studds |
| MP/3/D | Supplementary proof of evidence of Phil Studds |
| MP/3/F.1 | Appendix 1 - Effect of ammonia concentration on the dissolved oxygen concentration in the MSC |
| MP/3/F.2 | Appendix 2 - Assessment of the flow rates recorded from the Eccles WwTW when low flow is observed in the MSC |
| MP/3/F.3 | Appendix 3 - Mass Balance Calculations |
| MP/3/R | Rebuttal proof of evidence of Phil Studds |
| MP/3/R1 | Appendix A – Hendry Paper |

| Manchester Ship Canal Company Limited and Peel Investments (North) Limited continued | |
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| MP/3/R2 | Appendix B - Biogeochemical modelling, May 2018 |
| MP/4/A | Proof of evidence of Stephen West |
| MP/4/B | Summary proof of evidence of Stephen West |
| MP/4/C.1 | Appendix 1 - Glossary of Terms |
| MP/4/C.2 | Appendix 2 - Figures |
| MP/4/C.3 | Appendix 3 - British Geological Survey Borehole Logs |
| MP/4/C.4 | Appendix 4 - Geological Information Supplied by MSCCL |
| MP/4/C.5 | Appendix 5 - Ground Movement Report |
| MP/4/C.6 | Appendix 6 - Canal Bank Stability Technical Note |
| MP/4/C.7 | Appendix 7 - Wing Wall Numerical Analysis Technical Note |
| MP/4/C.8 | Appendix 8 - Construction Compound Drawing |
| MP/4/D | Supplementary proof of evidence of Stephen West |
| MP/4/R | Rebuttal proof of evidence of Stephen West |
| MP/5/A | Proof of evidence of Nicholas Clarke |
| MP/5/B | Summary proof of evidence of Nicholas Clarke |
| MP/5/C.1a | Appendix 1, Figure 1 Location of The Proposed Outfall |
| MP/5/C.1b | Appendix 1, Figure 2 |
| MP/5/C.1c | Appendix 1, Figure 3 Location of Rights to be Taken for the Outfall Construction |
| MP/5/C.1d | Appendix 1, Figure 4 Location of Rights for Oversailing Relating to the Outfall Construction |
| MP/5/C.1e | Appendix 1, Figure 5 Location of Rights to Discharge Dewatering Relating to the Outfall Construction |
| MP/5/C.1f | Appendix 1, Figure 6 Proposed Layout of Cofferdam Sheet Piles |
| MP/5/C.1g | Appendix 1, Figure 7 – Not used |
| MP/5/C.1h | Appendix 1, Figure 8 Example of Crane Pitching the First Area of Sheet Piles @ Normal Water Level |
| MP/5/C.1i | Appendix 1, Figure 9 Sequence of Figures Showing Barge and Crane Location in the Canal @ Normal Water Level |
| MP/5/C.1j | Appendix 1, Figure 10 Barge and Crane Location in the Canal @ Design Low Water |
| MP/5/C.1k | Appendix 1, Figure 11- Example of sheet piling 'interlock clutch' – plan view |
| MP/5/C.1l | Appendix 1, Figure 12 – Example of Crane Pitching the Sheet Piles @ Design Low Water |
| MP/5/C.1m | Appendix 1, Figure 13 – Crane Positioned on the Canal Bank |
| MP/5/C.2 | Appendix 2, Technical Report |
| MP/5/C.3a | Appendix 1 to Technical Report |
| MP/5/C.3b | Appendix 2 to Technical Report |
| MP/5/R | Rebuttal proof of evidence of Nicholas Clarke |
| MP/5/R1 | Appendix - Visualisation (Looking West from the Lock) of the Works with a Passing Vessel |
| MP/6/A | Proof of evidence of Steve Gavin |
| MP/6/B | Summary proof of evidence of Steve Gavin |
| MP/6/C1a | Part 1 - Appendix A - Drawings Supplied to United Utilities |
| MP/6/C1b | Part 2 - Appendix A - Drawings Supplied to United Utilities |
| MP/6/C.2 | Appendix B – Historic Plan |
| MP/6/C.2 | Appendix B – Modern Plan |
| MP/6/C.3 | Appendix C - MSC Relative Level Diagram |
| MP/6/C.4 | Appendix D - Manchester Ship Canal Company Water Level Control - Operational Protocol |
| MP/6/C.5 | Appendix E - MSC Engineering 26th January 1894 |
| MP/6.C/6 | Appendix F - MSCC Standing Orders to Upper Lock Staffs 1993 |

| Manchester Ship Canal Company Limited and Peel Investments (North) Limited continued | |
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| MP/6/C.7 | Appendix G - Blank Works Licence and Charging Schedule |
| MP/6/C.8 | Appendix H - Redacted Licence |
| MP/6/C.9.1 | Appendix I - Engineering Note for Lock Crane Access |
| MP/6/C.10.1 | Appendix J - MSC Lock and Sluice Site General Checks - 4 Week |
| MP/6.C/10.2 | Appendix J - MSC Lock and Sluice Site General Checks - Annual |
| MP/6/C.10.3 | Appendix J - Lock Capstan Mechanical Annual Inspection |
| MP/6/C.10.4 | Appendix J - Lock Gate 6 Monthly Mechanical Inspection |
| MP/6/C.10.5 | Appendix J - Lock Lighting General (LFL, IRL,BL, MW) |
| MP/6/C.10.6 | Appendix J - Lock Gate Machinery Valves 6 Monthly Checks |
| MP/6/C/10.7 | Appendix J - Mechanical Lock Power Pack Inspection (Weekly) |
| MP/6.C/10.8 | Appendix J - Lock Sluice Machinery Mechanical Service (6 Monthly) |
| MP/6/C.11 | Appendix K - Mode Wheel Repair Design |
| MP/6/C.12 | Appendix L - Irlam Container Berth Crane Positioning Plan |
| MP/6/C.13 | Appendix M - Irlam Wharf Quay Cross Section |
| MP/6/C.14 | Appendix N - Code of Practice on Security in Ports |
| MP/6/C.15 | Appendix O - The Order 2016 |
| MP/6.C/16 | Appendix P - Figures |
| MP/6/D | Supplementary proof of evidence of Steve Gavin |
| MP/6/F | Appendix 1 – Borehole report |
| MP/6/R | Rebuttal proof of evidence of Steve Gavin |
| MP/6/R1 | Appendix 1 – Construction of Outfall, Media City |
| MP/6/R2 | Appendix 2 – Water Level Regime of Canal Ponds |
| MP/6/R3 | Appendix 3 – Works Licence, Media City |
| MP/7/A | Proof of evidence of Joe Blythe |
| MP/7/B | Summary proof of evidence of Joe Blythe |
| MP/7/C | Appendices to proof of evidence of Joe Blythe |
| MP/7/D | Supplementary proof of evidence of Joe Blythe |
| MP/7/R | Rebuttal proof of evidence of Joe Blythe |
| MP/8/A | Proof of evidence of John Rhodes |
| MP/8/B | Summary proof of evidence of John Rhodes |
| MP/8/C.1 | Appendix 1 - Background Note: The Charging Regime for Discharges to the Manchester Ship Canal |
| MP/8/C1.1 | Appendix 1.1 - MSCCL Schedule of Port Charges 2018 |
| MP/8/C1.2 | Appendix 1.2 - Peel Water Services Limited Charging Scheme 2018 – 2019 |
| MP/8/C.1.3 | Appendix 1.3 - United Utilities Charges Scheme 2012/2013 |
| MP/8/C1.4 | Appendix 1.4 - 2017 / 2018 Wholesale Sewerage Charges Scheme |
| MP/8/C.1.5 | Appendix 1.5 - UUWL 2017/2018 Water Plus Charges |
| MP/8/C1.6 | Appendix 1.6 - 2018/2019 Water Plus Non Household Charges Scheme |
| MP/8/C.2 | Appendix 2 - Note on Regulatory Context of Wastewater Treatment and Discharges |
| MP/8/C.3 | Appendix 3 - Optioneering Timeline |
| MP/8/C.3.1 | Appendix 3.1 - Optioneering Timeline Plans |
| MP/8/C.4 | Appendix 4 – Environment Agency’s Letter to Salford City Council, dated 9 May 2018 |
| MP/8/C.5 | Appendix 5 - MSCCL And PINL Land and Rights Schedule and Plans |
| MP/8/C.6 | Appendix 6 - Options Appraisal |
| MP/8/C.6.1 | Appendix 6.1 - Long-List Filter |
| MP/8/C.6.2 | Appendix 6.2 - Rag Matrix |
| MP/8/C.7 | Appendix 6 - Schematic of Manchester Ship Canal |
| MP/8/D | Supplementary proof of evidence of John Rhodes |
| MP/8/F | Appendix 1 – RAG matrix |

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| Manchester Ship Canal Company Limited and Peel Investments (North) Limited continued | |
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| MP/8/R | Rebuttal proof of evidence of John Rhodes |
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| Manchester Ship Canal Company Limited and Peel Investments (North) Limited – INQUIRY DOCUMENTS | |
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| MP/INQ/1 | Letter to Bircham Dyson Bell from Pinsent Masons, 22 May 2018 |
| MP/INQ/1.1 | Draft Heads of Terms MSCCL and SCPL (was ID/2a) |
| MP/INQ/1.2 | Appendix 1 - Rights to be Granted by Manchester Ship Canal Company Limited (was ID/2b) |
| MP/INQ/1.3 | Appendix 2 – Provisions for the Protection of MSCCL (was ID/2c) |
| MP/INQ/2 | Letter to Pinsent Masons from Bircham Dyson Bell, 23 May 2018 (was ID/3) |
| MP/INQ/3 | Letter to Pinsent Masons from Bircham Dyson Bell, 4 June 2018, regarding draft heads of agreement for an asset protection agreement (was ID/4) |
| MP/INQ/3.1 | Draft Heads of Agreement for Protection of MSCCL Assets and Undertaking (enclosure to Bircham Dyson Bell letter dated 4 June 2018) (was ID4/a) |
| MP/INQ/4 | Opening submissions by Manchester Ship Canal Company Limited and Peel Investments (North) Limited |
| MP/INQ/5 | Addendum note to Trevor Perry's proof (submitted 18 June) |
| MP/INQ/6 | Addendum note to Leon Fields' proof (submitted 18 June) |
| MP/INQ/7 | Addendum note to John Rhodes's proof (submitted 18 June) |
| MP/INQ/8 | Letter from BDB to Pinsent Masons dated 18 June 2018 (with enclosures) (submitted 18 June) |
| MP/INQ/9 | Second letter from BDB to Pinsent Masons dated 18 June 2018 (with enclosures) (submitted 18 June) |
| MP/INQ/10 | Letter from BDB to PM dated 21 June 2018 (submitted 21 June) |
| MP/INQ/11 | Letter Bircham Dyson Bell to Pinsent Masons dated 26.06.2018 (all parts of this document submitted 26 June 2018) |
| MP/INQ/11.1 | Barton 65ft lock downstream north quay wall survey 18th May 2018 |
| MP/INQ/11.2 | Barton Lock Crane Load Calculations |
| MP/INQ/11.3 | Barton Lock MBES & Laser |
| MP/INQ/11.4 | Irlam Wharf Reach Stacker Loads |
| MP/INQ/11.5 | IS 4515 2002 |
| MP/INQ/11.6a | Photographic Condition Report for MSCCL 2016 Barton Lock Excerpt – Part 1 |
| MP/INQ/11.6b | Photographic Condition Report for MSCCL 2016 Barton Lock Excerpt – Part 2 |
| MP/INQ/11.6c | Photographic Condition Report for MSCCL 2016 Barton Lock Excerpt – Part 3 |
| MP/INQ/11.6d | Photographic Condition Report for MSCCL 2016 Barton Lock Excerpt – Part 4 |
| MP/INQ/11.6e | Photographic Condition Report for MSCCL 2016 Barton Lock Excerpt – Part 5 |
| MP/INQ/11.6f | Photographic Condition Report for MSCCL 2016 Barton Lock Excerpt – Part 6 |
| MP/INQ/11.6g | Photographic Condition Report for MSCCL 2016 Barton Lock Excerpt – Part 7 |
| MP/INQ/11.6h | Photographic Condition Report for MSCCL 2016 Barton Lock Excerpt – Part 8 |
| MP/INQ/11.6i | Photographic Condition Report for MSCCL 2016 Barton Lock Excerpt – Part 9 |
| MP/INQ/11.7a | Photographic Condition Report for MSCCL 2018 Barton Lock Excerpt – Part 1 |
| MP/INQ/11.7b | Photographic Condition Report for MSCCL 2018 Barton Lock Excerpt – Part 2 |

| Manchester Ship Canal Company Limited and Peel Investments (North) Limited – INQUIRY DOCUMENTS continued | |
|---|---|
| MP/INQ/11.7c | Photographic Condition Report for MSCCL 2018 Barton Lock Excerpt – Part 3 |
| MP/INQ/11.8 | The Structural Design of Heavy Duty Pavements |
| MP/INQ/11.9 | T_14_1490-CL(19)02-F1 - Drainage Layout Sheet 2 |
| MP/INQ/11.10 | T_14_1490-CL(19)03-C1 - Outfall Long Section |
| MP/INQ/11.11 | T_14_1490-CL(19)03-F1 - Outfall Long Section |
| MP/INQ/11.12 | T_14_1490-CL(19)04-C2 - Outfall Headwall Detail |
| MP/INQ/11.13 | T_14_1490-CL(19)04-F1 - Outfall Headwall Detail |
| MP/INQ/11.14 | T-14-1490 - MC-BB-82 - Outfall Cofferdam Backfill |
| MP/INQ/11.15 | Hochtief UK Construction MSCL 159 |
| MP/INQ/11.16 | Hochtief UK Construction WGIS MSCL097 |
| MP/INQ/11.17 | Hochtief UK Construction WGIS MSCL121 |
| MP/INQ/11.18 | Hochtief UK Construction WGIS MSCL151 |
| MP/INQ/11.19 | MSCC WORKS LICENCE APPLICATION v1 21.08.17 (signed)(Issued) |
| MP/INQ/11.20 | MSCC WORKS LICENCE -MSCL 157 Tower demolition (Extension) |
| MP/INQ/11.21 | WGIS MS Lift Bridge Rev B |
| MP/INQ/12 | Wessex Water Disposal Design Specification (submitted 28 June 2018) |
| MP/INQ/13 | Letter from BDB to PM dated 3 July 2018 (all parts of this document submitted electronically 3 July) |
| MP/INQ/13.1 | Appendix A and B to letter from BDB to PM dated 3 July 2018 |
| MP/INQ/13.2 | Barton Lock PM |
| MP/INQ/13.3 | Barton Sluice Boom Inspection 20.03.2018 |
| MP/INQ/13.4 | Drawing 01864AF_D_105H |
| MP/INQ/13.5 | North Bank MSC Sections 2004 Phase 1 |
| MP/INQ/13.6 | North Bank MSC Sections 2004 Phase 2 |
| MP/INQ/13.7 | North Bank MSC Sections 2004 Phase 3 |
| MP/INQ/13.8 | North Bank MSC Sections 2004 Phase 4 |
| MP/INQ/13.9 | North Bank MSC Sections 2004 Phase 5 |
| MP/INQ/13.10 | North Bank MSC Sections 2004 Phase 6 |
| MP/INQ/13.11 | North Bank MSC Sections 2004 Phase 7 |
| MP/INQ/13.12 | Media City SW Outfall Plan |
| MP/INQ/14 | Letter from BDB to PM dated 4 July re the CIRCA Report R141 (submitted 4 July). |
| MP/INQ/14.1 | CIRCA Report R141 |
| MP/INQ/15 | Second letter dated 4 July from BDB to PM dated 4 July regarding required information (submitted 4 July) |
| MP/INQ/16 | Letter from BDB to PM dated 5 July requesting information (RFIs) (submitted 5 July) |
| MP/INQ/16.1 | Copy of Table AA/INQ/15.3 with formulas (submitted 5 July) |
| MP/INQ/17 | Letter from BDB to PM dated 9 July (submitted 9 July) |
| MP/INQ/17.1 | Note of volume flow rate for the River Irwell, River Irk and River Medlock |
| MP/INQ/17.2 | Note on weather conditions in MSCCL's biogeotechnical sediment modelling |
| MP/INQ/18 | Letter from BDB to PM dated 9 July (submitted 9 July) with update on Schedule of Rights and Compensation and Discharges into Salteye Brook (submitted 9 July) |

| Manchester Ship Canal Company Limited and Peel Investments (North) Limited – INQUIRY DOCUMENTS continued | |
|---|---|
| MP/INQ/19.1 | Salford City Council's Officer's Report (June 2018) (submitted 11 July) |
| MP/INQ/19.2 | Salford City Council's Additional Info Officer's Report (June 2018) (submitted 11 July) |
| MP/INQ/20 | Copy of the case London Borough of Bexley v Secretary of State for the Environment, Transport and the Regions and others; Sainsburys Supermarkets Ltd v Secretary of State for the Environment, Transport and the Regions and others [2001] EWHC Admin 323, referred to in Simon Pemberton's Proof of Evidence but not included in the Core Documents (submitted 11 July) |
| MP/INQ/21 | Letter from BDB to PM dated 12 July regarding land transferred from Ship Canal Properties (submitted 12 July) |
| MP/INQ/21.1 | Updated version of Appendix 2 to SoC and Appendix 5 to John Rhodes Proof of evidence |
| MP/INQ/22 | Letter from BDB to Pinsent Masons dated 13 July (submitted 13 July) |
| MP/INQ/22.1 | Bristol Water plc: A reference under section 12(3)(a) of the Water Industry Act 1991 - Appendices 5.1 – 11.1 and glossary(submitted 13 July) |
| MP/INQ/23 | Second Letter from BDB to Pinsent Masons dated 13 July (submitted 13 July) |
| MP/INQ/24 | Note in response to AA/INQ/15 Turbidity results(submitted 13 July) |
| MP/INQ/25 | Second Addendum note to Trevor Perry's proof (submitted 13 July) |
| MP/INQ/26 | Second Addendum note to Leon Fields' proof (submitted 13 July) |
| MP/INQ/27 | Replacement to John Rhodes's Appendix 2 (submitted 13 July) |
| MP/INQ/28 | Letter to PM dated 22 August 2018 (submitted 22 August) |
| MP/INQ/28.1 | The London Borough of Sutton (Orchard Hill Woodmansterne Road Access Land) Compulsory Purchase Order 2010 |
| | Please note that MP/INQ/029.1-029.3 were not submitted earlier but have now been linked to reference MP/INQ/029 for clarity. |
| MP/INQ/029 | Letter from BDB dated 26 July 2018 (submitted to Inspector 14 September) |
| MP/INQ/029.1 | Enclosure: Mark up of UU protective provisions dated 22 May 2018 (submitted to Inspector 14 September) |
| MP/INQ/029.2 | Enclosure Proposed protective schedule dated 26 July 2018 (submitted to Inspector 14 September) |
| MP/INQ/30 | Letter to PM dated 13 September (submitted 13 September) |
| MP/INQ/031 | Letter to PM dated 14 September (submitted 14 September) |
| MP/INQ/032 | Letter to PM dated 2 October (submitted 2 October) |
| MP/INQ/032.1 | Mersey Gateway Bridge Order 2011 Schedule 10 part 1 |
| MP/INQ/032.2 | Trafford Park Extension Order 2016 |
| MP/INQ/033 | Second Letter to PM dated 2 October (submitted 2 October) |
| MP/INQ/033.1 | Blank revised MSC Licence v3 |
| MP/INQ/34 | Letter from BDB to Pinsent Masons dated 4 October (submitted 4 October) |
| MP/INQ/35 | Letter from BDB to the Inspector dated 5 October (submitted 5 October) |
| MP/INQ/36 | Letter from BDB to PM dated 10 October in response to PM letter of 10 October (submitted 10 October) |
| MP/INQ/37 | Letter from BDB to PM dated 12 October in response to PM letter of 26 September (submitted 12 October) |
| MP/INQ/38 | Letter from BDB to PM dated 22 October in response to PM letter of 26 June 2018 (submitted 12 October) |
| MP/INQ/39 | Letter from BDB to PM dated 24 October in response to PM letter of 19 October 2018 (submitted 24 October) |
| MP/INQ/40 | Letter from BDB to PM dated 2 November in response to PM letter of 12 & 19 October (submitted 2 November) |

| City of Salford Community Stadium Limited & Port Salford Land Limited | |
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| PS/1/A | Proof of evidence of Robert Longworth |
| PS/1/B | Summary proof of evidence of Robert Longworth |
| PS/1/C1 | Appendix A - Tunnel route through CoSCoS |
| PS/1/C2 | Appendix B - Ground Conditions along the Tunnel Route |
| PS/1/C3 | Appendix C - Land Ownership |
| PS/1/C4 | Appendix D - WGIS Highways |
| PS/1/C5 | Appendix E - Consented rail infrastructure |
| PS/1/C6 | Appendix F - Meeting record BHLB 220218 |
| PS/1/C7 | Appendix G - Port Salford Proposed Site Plan |
| PS/1/C8 | Appendix H - Topographical Survey Salteye |
| PS/1/C9 | Appendix I - Rail Masterplan Layout |
| PS/1/C10 | Appendix J - Jacobs Rail Report |
| PS/1/C11 | Appendix K - Masterplan and CPO Plots |
| PS/1/C12 | Appendix L - CoSCoS Masterplan |
| PS/1/C13 | Appendix M - CPO Overall Plan |
| PS/1/C14 | Appendix N - CPO Plots East |
| PS/1/C15 | Appendix O - CPO Plots Stadium |
| PS/1/C16 | Appendix P - CPO Plots Stadium North |
| PS/1/C17 | Appendix Q - CPO Plots Port Salford |
| PS/1/C18 | Appendix R - Plan 4a – Freehold Plots |
| PS/1/C19 | Appendix S - Stadium Drainage |
| PS/1/C20 | Appendix T - Anchor Retail Unit Plot |
| PS/1/C21 | Appendix U - Schedule of Meetings |
| PS/1/C22.1 | Appendix V.1 - Draft/ Heads Of Terms |
| PS/1/C22.2 | Appendix V.2 - Offer Schedule 2/5/18 Rev-B |
| PS/1/C22.3 | Appendix V.3 - Port Salford Land Limited and CoSCoS Limited |
| PS/1/C22.4 | Appendix V.4 - Map 10001A - P7 |
| PS/1/C22.5 | Appendix V.5 - Map 10001 - P11 |
| PS/1/C22.6 | Appendix V.6 - Map 10002 - P10 |
| PS/1/C22.7 | Appendix V.7 - Ground Conditions along the Tunnel Route |
| PS/1/C22.8 | Appendix V.8 - Tunnel-Pile Interaction |
| PS/1/C22.9 | Appendix V.9 - Proposals for Ground Monitoring |
| PS/1/C22.10 | Appendix V.10 - Pile Capacity & Settlement Analysis for Bridging Slabs |
| PS/1/C22.11 | Appendix V.11 - Design 10036-P03 |
| PS/1/C22.12 | Appendix V.12 - Design 10037-P04 |
| PS/1/C22.13 | Appendix V.13 - Building Foundation Options |
| PS/1/C22.14 | Appendix V.14 - MMD 00 XX DR C 0001-P6 |
| PS/1/C22.15 | Appendix V.15 - MMD 00 XX DR C 0002-P6 |
| PS/1/C22.16 | Appendix V.16 - MMD 00 XX DR C 0003-P6 |
| PS/1/C22.17 | Appendix V.17 - MMD 00 XX DR C 0004-P6 |
| PS/1/C22.18 | Appendix V.18 - MMD 00 XX DR C 0005-P6 |
| PS/1/C22.19 | Appendix V.19 - MMD 00 XX DR C 0020-P7 |
| PS/1/C22.20 | Appendix V.20 - MMD 00 XX DR C 0021-P6 |
| PS/1/C22.21 | Appendix V.21 - MMD 00 XX DR C 0022-P6 |
| PS/1/C22.22 | Appendix V.22 - MMD 00 XX DR C 0023-P6 |
| PS/1/C22.23 | Appendix V.23 - MMD-00-XX-DR-C-0024 |
| PS/1/C22.24 | Appendix V.24 - MMD 00 XX DR C 0024-P6 |
| PS/1/C22.25 | Appendix V.25 - MMD 00 XX DR C 0025-P6 |
| PS/1/C22.26 | Appendix V.26 - MMD 00 XX DR C 0035-P2 |
| PS/1/C22.27 | Appendix V.27 - MMD XX 00 SK Z 10046-P2 |
| PS/1/C22.28 | Appendix V.28 - MMD XX 00 SK Z 10048-P2 |
| PS/1/C22.29 | Appendix V.29 - Salt-Eye Brook Diversion Retaining Walls |

| City of Salford Community Stadium Limited & Port Salford Land Limited continued | |
|--|---|
| PS/1/C22.30 | Appendix V.30 - Building Foundation Options |
| PS/1/C22.31 | Appendix V.31 - Review of Potential Tunnel Loading Scenarios |
| PS/1/C22.32 | Appendix V.32 - MMD 293621 Z DR 00 XX 12090-P03 |
| PS/1/C22.33 | Appendix V.33 - MMD XX 00 SK Z 10040-P02 |
| PS/1/C22.34 | Appendix V.34 - MMD XX 00 SK Z 10045-P2 |
| PS/1/R | Rebuttal proof of evidence of Robert Longworth |
| PS/2/A | Proof of evidence of Garry Rowlands |
| PS/2/B | Summary proof of evidence of Garry Rowlands |
| PS/2/C | Appendices front cover |
| PS/2/C1 | Appendix 1-5A |
| PS/2/C2 | Appendix A-E |
| PS/2/R | Rebuttal proof of evidence of Garry Rowlands |
| PS/2/R1 | Draft Position Statement, 4 June 2018 |
| PS/2/R1a | Schedule 1 to the Draft Position Statement |
| PS/2/R1b | Schedule 2 to the Draft Position Statement |
| PS/2/R1c | Schedule 3 to the Draft Position Statement |
| PS/3/A | Proof of evidence of Michael Francis |
| PS/3/B | Summary proof of evidence of Michael Francis |
| PS/3/C1 | Appendix 1 - CV |
| PS/3/C2 | Appendix 2 - Ground Conditions along the tunnel route |
| PS/3/C3.1 | Appendix 3.1 - Guidance on piling, heavy loads, excavations, tunnelling and dewatering |
| PS/3/C3.2 | Appendix 3.2 - Requirements for Third Party Works in the Vicinity of UK Power Networks Assets |
| PS/3/C3.3 | Appendix 3.3 - Chapman ET AL |
| PS/3/C3.4 | Appendix 4 - UU tunnel alignment plan drawings Sheet 1 to 4 |
| PS/3/R | Rebuttal proof of evidence of Michael Francis |
| PS/4/A | Proof of evidence of Andy Hall |
| PS/4/B | Summary proof of evidence of Andy Hall |
| PS/4/C1 | Appendix front cover |
| PS/4/C1.1 | Appendix 1 - MH1032 SK94 CoSCSL Land |
| PS/4/C2 | Appendix 2 - MH1032 SK95 CoSCSL Land Constituent Parts |
| PS/4/C3 | Appendix 3 - CoSCS Annual Report 2017 |
| PS/4/C4 | Appendix 4 - COSCOS Repayment Schedule |
| PS/4/C5 | Appendix 5 - Plan of Competing Sites |
| PS/4/C6.1 | Appendix 6.1 - 9733 PL03 RevC Proposed Site Plan 1.0 |
| PS/4/C6.2 | Appendix 6.2 - 9733 PL04 A Ground Floor Plan1.0 |
| PS/4/C6.3 | Appendix 6.3 - 9733 PL05_A Mezzanine Floor Plan 1.0 |
| PS/4/C7 | Appendix 7 - MH1032 SK88 Existing Sewer Easement |
| PS/4/C8 | Appendix 8 - Deed 10 November 2004 |
| PS/4/C9 | Appendix 9 - Extract from Pinsent Masons Letter 19 January 2017 |
| PS/4/C10 | Appendix 10 - MH1032-SK101 Option 1 Existing Sewer Retained |
| PS/4/C11 | Appendix 11 - MH1032-SK102-Option 2 Redirected Sewer Outfall Retained |
| PS/4/C12 | Appendix 12 - MH1032-SK106 CoSCSL Land CPO Plots |
| PS/5/A | Proof of evidence of Doug Hann |
| PS/5/B | Summary proof of evidence of Doug Hann |
| PS/5/C1 | Appendices 1-6 |
| PS/5/C2 | Appendices 7A-7E |
| PS/5/C3 | Appendices 7F-7Q |
| PS/5/C4 | Appendices 8-15 |
| PS/5/R | Rebuttal Proof of evidence of Doug Hann |

| City of Salford Community Stadium Limited & Port Salford Land Limited INQUIRY DOCUMENTS | |
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| PS/INQ/1 | Draft Position Statement, 4 June 2018 (was ID/5) |
| PS/INQ/1.2 | Schedule 1 to the Draft Position Statement (was ID/5a) |
| PS/INQ/1.3 | Schedule 2 to the Draft Position Statement (was ID/5b) |
| PS/INQ/1.4 | Schedule 3 to the Draft Position Statement (was ID/5c) |
| PS/INQ/2 | Letter to Pinsent Masons from Walker Morris, 11 June 2018 (was ID/6) |
| PS/INQ/3 | Opening submissions by City of Salford Community Stadium Limited & Port Salford Land Limited |

| Inquiry Documents (ID) – FROM THE INSPECTOR/PROGRAMME OFFICER | |
|--|------------------------------------|
| ID/1 | Minutes of the Pre-Inquiry Meeting |