

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	
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	
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)
AA/INQ/52	Letter to BDB from PM dated 8 November, in response to their letters of 12, 19 October and 2 November (submitted 8 November)

Manchester Ship Canal Company Limited and Peel Investments (North) Limited	
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	
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	
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

09/11/2018

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	
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 Saltey Brook (submitted 9 July)
MP/INQ/19.1	Salford City Council's Officer's Report (June 2018) (submitted 11 July)

Manchester Ship Canal Company Limited and Peel Investments (North) Limited – INQUIRY DOCUMENTS continued	
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)

09/11/2018

MP/INQ/41	Letter from BDB to PM dated 8 November in response to PM letter of 19 & 24 October (submitted 8 November)
MP/INQ/42	Letter from BDB to PM dated 9 November in response to PM letter of 23 & 24 October (submitted 9 November)

City of Salford Community Stadium Limited & Port Salford Land Limited	
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	
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	
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ID/1	Minutes of the Pre-Inquiry Meeting
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