United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

Our ref: EIR-768
Date: 18/05/2026
Email: EIRRequests@uuplc.co.uk

Dear [redacted],

Thank you for your request for environmental information. We appreciate your interest, and we want to let you know that your request has been carefully considered in accordance with the Environmental Information Regulations (EIR).

As your request contained thirteen individual points, together with a number of sub points and covered a broad range of topics, we have grouped these requests into four broad categories. The four broad categories are:

1. Wastewater treatment permits and compliance
2. Understanding and managing growth
3. Sludge management and handling
4. Asset maintenance and operation

To ensure that we provide a comprehensive response to your request, for each category we initially set out the requests that are being addressed, then give some background and contextual information and then provide a direct response to each of your specific points and sub points.

We note that this response is relatively long and complex, so iif you would like to discuss any of the information contained within this response then please contact [redacted] at EIRRequests@uuplc.co.uk, and she will arrange for someone to contact you to discuss further.

For clarity, we have also attached a copy of your full original request, in Appendix A.

1. Wastewater treatment permits and compliance

Covering information requests 1, 2, 3, 8c, 9 and 10
1.1 Background

Types of wastewater assets - Water companies manage and operate three different types of assets that can have a discharge to a watercourse:

- Wastewater treatment works (WwTW) which can have three types of discharge:
  - A continuous final effluent discharge for the treated effluent from the works
  - An intermittent discharge from an overflow at the inlet to the works which controls the flows rate to the works to protect the operation of the works, and
  - An intermittent discharge from storm tanks which are designed to temporarily hold excess flows arriving at the works.

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Great Sankey
Warrington WA5 3LP

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- Storm Overflows (SO's) which are designed to protect the downstream sewer network from flooding in periods of high flow, by discharging excess storm water.
- Wastewater pumping stations (WwPS), which can have one or both of two types of discharge:
    - A SO which controls the flows that needs to be pumped on from the station by discharging excess storm water, and
    - An Emergency Overflow (EO), which are typically installed at pumping stations and are required to pass forward all flows that arrive at the station, with the overflow being intended to work only in the relevant emergency situations identified within the permit, such as loss of power to the site or pump failure.

More details of the purpose and operation of wastewater assets can be found on our website via this link: Wastewater services | United Utilities

Environmental permits - assets with either continuous or intermittent discharges to a watercourse operate under permits that are set by the Environment Agency (EA). These permits are set by the EA to protect river water quality and set out specific requirements to ensure that the watercourse, and the discharges to it, comply with relevant environmental regulations, which have been progressively improving over time.

For WwTWs, permit conditions reflect the size and nature of the receiving watercourse as well as the incoming flows and "load" to the works. The load to a works is usually measured in terms of "Population equivalent", which measures the household or domestic population in the catchment plus the equivalent load from any traders in the catchment. Typically, a WwTW permit will include conditions for the flow rates that the works needs to treat and the maximum concentrations of various substances within the treated final effluent that is discharged from the works.

For SO's and WwPS, permit conditions reflect the nature of the receiving watercourse and the flow arriving at the overflow. More recently, new standards have been set in the Governments Storm Overflow Discharges Reduction Plan. Typically, these permits will specify a minimum flow rate that needs to be passed forward to the downstream network before any overflows can occur and, in some case, other factors such as required storage volumes and screening requirements.

Managing compliance with existing permit conditions - United Utilities is responsible for the choice and size of specific treatment processes installed at individual WwTWs, although sometimes regulation requires specific types of treatment such as nutrient removal. The nature and capabilities of the processes at any WwTW need to be sufficient to ensure they consistently comply with permit conditions, in both the short- and longer-term design horizon.

Most of our WwTWs are currently made up from a mix of older (often pre-privatisation) process stages, together with newer process stages that have been added or extended to either ensure compliance with existing consents, or as a result of new environmental legislation, designations or growth within the catchment.

We monitor the performance of our WwTW and SO's to understand the potential risks against their

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

permit conditions and report to the EA for compliance assessment. We use this information to identify potential risks to future compliance because of potential growth within the catchment.

The results of this analysis are then used to develop and implement improvement schemes at these sites, in advance of the growth occurring or the works becoming potentially unable to comply with its consent conditions.

Enhancement and changes to permit conditions – as a regulated water company, the nature and scale of the work that we undertake and the bills that we can charge customers is determined by Ofwat (the Water Industry regulator) through the five yearly "price review process".

As part of this process, the EA confirms the permit changes that are required to meet any new environmental requirements at our WwTWs or to reduce discharges from our SOs. Specific requirements in the current five-year period (2025-2030) are set out within the Water Industry National Environment Programme (WINEP).

The WINEP, and its predecessor the national environment programme (NEP), have been important mechanisms for delivering benefits to the natural environment. The level of investment through the WINEP has been substantial, £30 billion nationally between 1989 and 2025. The Environment Act 2021 and the resultant government "Storm overflows discharge reduction plan" (SODRP) have set further legal obligations which have resulted in a significant increase in the size of the required programmes of work, with a £22.1 billion national WINEP programme for 2025–2030.

United Utilities' WINEP programme for the 2025–2030 period includes £2.4 billion specifically to reducing SO spills by over 60% (compared to 2020 levels), alongside major improvements in water quality, biodiversity, and ecosystem restoration. This programme forms a substantial part of our overall £13.7 billion investment plan for the North West. A summary of our programmes of work for the current five years (2025 to 2030) is available via this link: United Utilities - Business Plan 2025 - 2030.

The web page: United Utilities - Better Rivers also provides an overview of the various initiatives and programmes of work that we are undertaking to make the step change that people want to see to the way storm overflows operate. From here, there are links to other pages on the website where more detailed information can be found.

UU Assets within the area that you requested Information for

- Cockermouth WwTW has a final effluent discharge and an intermittent discharge from storm tanks. The sewer network also contains six SO's, three of which are overflows from pumping stations. The name and UU reference number of SO's and storm tanks are:
- Cockermouth WwTW Storm Tank Overflow (UUP00519)
- The Burroughs CSO (UUP01911)
- Fitz Bridge (Low Road) CSO (UUP00741)
- Vicarage Lane CSO (UUP01991)

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Haweswater House
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Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
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- Belle Vue (Cockermouth) PS (UUP00219)
- Brigham Pumping Station (UUP00325)
- Papcastle Pumping Station (UUP01505)
- Great Broughton WwTW has a final effluent discharge, an intermittent discharge from storm tanks and a storm overflow at the inlet to the works, but no other SO's or WwPS within the catchment. The name and reference of the intermittent discharges are:
- Great Broughton WwTW Storm Tank Overflow (UUP00837)
- Great Broughton WwTW Storm Overflow (UUP00838)
- Embleton WwTW has storm tanks but no overflow at the inlet and no other overflows within the catchment, a final effluent discharge, an intermittent discharge from storm tanks, but no SO at the inlet to the works or any other SO's or WwPS within the catchment. The name and reference of the intermittent discharge is:
- Embleton Waste Water Treatment Works Storm Tank Overflow (UUP00704)

Planned Enhancement at the assets within the area that you requested Information for

The 2025-30 WINEP programme includes enhancement projects within all three catchments:

- Cockermouth WwTW
- Phosphate removal scheme for the WwTW final effluent
- Schemes to reduce discharges from three of the SO's within catchment (The Burroughs CSO (UUP01911), Brigham Pumping Station (UUP00325) and Papcastle Pumping Station (UUP01505))
- Investigations to determine potential options to reduce discharges at the other overflows in the catchment that can be delivered in the current five-year period, and to confirm the nature and timing of the work required to allow these overflows to meet the SODRP requirements.
- Great Broughton WwTW
- Phosphate removal scheme for the WwTW final effluent
- Schemes to reduce discharges from the inlet overflow and storm tanks.
- Embleton WwTW
- Phosphate removal scheme for the WwTW final effluent
- Scheme to reduce discharges from the storm tanks (as set out above there is no inlet overflow at the WwTW).

1.2 Specific responses to individual information requests

Request 1) sewage discharge events from the above works from 1 January 2022 to the present

As requested, we have attached Appendix B which contains the following information about the 10 overflows at or within the catchment of these three WwTW:

- 1a) Number of discharge events
- 1b) Dates and start/end times

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

- 1c) Duration of each discharge
- 1d) Type of discharge (storm overflow, emergency overflow, consented effluent discharge)
- 1e) Event Duration Monitoring (EDM) outfall identification references.

The EDM outfall identification references can be used to locate the overflows on the live storm overflow map that we publish on our website: Storm overflow map | United Utilities - Better Rivers. The information presented is indicative of activity happening at each location. All efforts are made to ensure the data is as accurate as possible and that sensors and signals are reporting correctly. Nevertheless, data reported on this map is an indicative picture of a storm overflow discharging and will only be confirmed once all subsequent checks, assurance and verification has been completed.

Validated annual detail of discharges from all overflows is available on the EA web site: Event Duration Monitoring - Storm Overflows - Annual Returns. This data, together with unvalidated monthly discharge data, is also available to download from the dropdown box at the bottom of the following page on our website: Storm overflow performance | United Utilities.

Request 2a) Current environmental permits and discharge consent conditions for each works and associated outfalls.

I have attached copies of the environmental permits for the three WwTW, which set out the specific discharge consent conditions for each works and associated outfalls, in appendices C.1 – C.3.

I have also attached the environmental permits for the six overflows within the Cockermouth WwTW sewer catchment in appendices C.4 – C.9.

Request 2b) Any compliance assessments, investigations or regulatory correspondence concerning discharge impacts on the River Derwent.

We undertake and provide the EA with an annual permit checklist for each of our WwTW. Copies of the most recent annual permit checklists for each of the three WwTW are attached in appendices D.1 – D.3.

The EA has primary responsibility for monitoring and managing river water quality although, as set out above, we have WINEP enhancement schemes within all three WwTW catchments. These schemes are all required to meet river water quality drivers with specific WINEP drivers for the different types of schemes set out below:

- Phosphorus reduction:
- Environment Act_IMP1: Reduce final effluent total phosphorus down from 1mg/l to 0.25mg/l on an annual average basis
- Habitats Directive_IMP: Maintain or restore favourable conservation status at European sites
- Spill reduction from overflows:
- Environment Act _IMP4: Improvements to reduce storm overflow spill to spill on average no

United Utilities
Water for the North West

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

more than 10 times per year, over a 10-year period.

- Environment Act _IMP5: Improvements to reduce storm overflow aesthetic impacts by installation of screens to provide 6mm solids separation up to and including the 1 in 5 years year design storm critical flow rate
- Environment Act _IMP2: Improvements to reduce storm overflows spills to protect the environment (river stretch - Derwent - conf Cocker to tidal) so that they have no local adverse ecological impact).

Request 3) Storm tank capacity and discharges.

Storm tanks are located downstream of the preliminary treatment stage at a WwTW. They are designed to accommodate excess flows in storm conditions by holding then returning this flow to the works when the storms subside. Once the tanks are full, the screened and settled flow in excess of their capacity is discharged to the watercourse.

Details of when the storm tanks reached capacity and discharged have been provided within Appendix B.

The operational triggers that result in discharges from the storm tanks are set out within the attached permits. Each permit specifies a minimum flow that needs to be passed to full treatment at the WwTW. When the flow exceeds this rate, the excess flow is diverted to the storm tanks. Great Broughton WwTW also has an inlet overflow that controls the flow arriving at the storm tanks and, therefore, the maximum flow rate into the storm tanks. The relevant flow rates and storm tank capacities are set out in the table below.

Works name	Storm tank capacity (m3)	Pass forward to full treatment (l/s)	Pass forward inlet overflow (l/s)
Cockermouth	853	93.7	n/a
Embleton	8	0.79	n/a
Great Broughton	235	11.4	32.5

Request 8c) Infrastructure upgrades or improvement plans for the above treatment works or their sewer networks.

As set out in the background to this section of the response, the 2025-30 WINEP programme includes enhancement projects with all three catchments.

Request 9) Monitoring reports, ecological assessments, or environmental impact investigations relating to the effect of discharges from these works on the River Derwent.

As set out in the background to this section of the response, the EA has the primary responsibility for monitoring river water quality, with the 2025-30 WINEP programme including enhancement projects with all three catchments. The specific environmental drivers that these schemes are designed to

United Utilities
Water for the North West

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
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address are set out in response to point 2b above.

Request 10) the flow levels, rainfall thresholds, or hydraulic conditions that trigger storm overflow discharges associated with the above works and their sewer networks.
This flow conditions that trigger discharges from the storm tanks at each works are set out as part of the response to point 3.

The other overflows within the catchments of these WwTWs have a minimum pass forward flow set out within their permits (see appendices C.4 – C.9). When the incoming flow exceeds this level the excess storm flow are discharges to the local watercourse, via a screened overflow.

2. Understanding and managing growth

Covering information requests 4, 5, 8, 11, 12 and 13

2.1 Background

Influencing development - United Utilities is a statutory consultee for Local Plans that councils or other planning bodies, use to direct development and identify the preferred locations for new housing and other types of developments. As a statutory consultee, we work with local authorities to ensure that issues with water and wastewater infrastructure are reflected in the planning decisions and that our longer-term plans for our infrastructure, reflect the agreed development plans.

Whilst the location of specific new development proposals is a matter for the local planning authority, and we are not a statutory consultee on these applications, we do work closely with local authorities to provide comments on applications for planning permission, where we think it is necessary to protect from impact on our assets and our customers.

Our comments must, however, reflect our statutory obligations as a regulated water company, one of which is that we must allow new connections to our network. Whilst we cannot stop development from occurring, we do review applications for planning permission and provide comments where necessary. These comments include recommending planning conditions to control the approach to drainage and seeking to secure foul only connections to the public sewer wherever possible. Foul only connections are important as they help to keep the impact on our wastewater network assets to a minimum, as surface water flows can be much larger than foul flows.

Assessing capacity and risk - As set out in section 1 of this response, most WwTW contain distinct treatment processes that have been added or expanded over time. With the appropriate measure of "capacity" for these different stages also varying, for example volume, flow rate, or "load".

Therefore, the effective overall capacity of each WwTW will, in practice, be based upon a series of different measures for the different process stages. The key requirement for any WwTW is, however, is that the combined capability of each process stage must be sufficient to treat the flow and load that it receives, in line with its environmental permit.

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

As a result of this, we do not routinely update the overall "capacity" data for our WwTW's, with our focus being on monitoring and managing final effluent quality and permit compliance.

Drainage and Wastewater Management Plans (DWMP) - DWMPs are the standard approach utilised within the UK water industry to analyse the ability of WwTWs to comply with their current permits and to be able to accommodate future population growth.

DWMP's are long term holistic plans that contain a wide range of information about wastewater catchments, including strategic context and drivers, catchment characterisation, stakeholder engagement, risk assessments, future needs and investment gaps, options for development and appraisal, preferred strategies and long-term programmes and plans.

The latest version of the DWMP for the overall region was published in May 2023 (Drainage and wastewater management plan) and the outputs can be viewed on the DWMP customer portal (DWMP Customer Portal Environment).

This portal has an input box that allows you to "find an address or place" within the region. It then provides four "buttons" at the top of the page. If you click one of the first three buttons (sewer flooding, Environment or Sewer Condition) the box, at the left of the page, provides a choice of information types (for example, if you click the Environment button, you can choose, Pollution, Use of Storm overflows or Capacity to Treat Wastewater).

If you click the Capacity to Treat Wastewater button, the box at the right hand side of the page, presents the results of the assessment that we have made on WwTW capacities (including volumetric requirements) as a result of forecast population or other growth within the area.

For each drainage area, the data presents risk/opportunities at the following design horizons:

- Current view for the drainage area (2020)
- Developing view for the drainage area (2030)
- Future view for the drainage area (2050)

For each design horizon, the drainage area is presented as being.

- No concern (forecast)
- Potential area of focus (forecast)
- Area of focus (forecast)

If you click the fourth of the buttons at the top of the page; "Your Area Plan", then the box at the right hand side of the page shows you which drainage area the chosen location sits within and provides a link to the more detailed plan that unpins the information presented on the portal.

The Strategic Plans provide more details of the risk assessment process that has been used, the specific risks that have been identified and the proposed adaptive plans that are being followed to manage

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

these risks.
These three WwTW lie within the Derwent (NW) Strategic Planning Area, which can be accessed via this link: Derwent (NW) Drainage and Wastewater Strategic Plan.

Note: the data used within this portal and supporting documents is from 2020 and was used to support the publication of the last DWMP in May 2023. It is not a present day (2025) forecast. We are currently developing the next DWMP which is due to be published in November 2027. These assessments inform our future business plan submissions for growth related expenditure which must then be approved by Ofwat.

2.2 Specific responses to individual information requests

Request 4 flows and loads arriving at each WwTW

As requested, we have attached Appendix E, which contains the following information about the three WwTW.

- The population equivalent draining to the WwTW
- The consented Dry Weather Flow (DWF)
- The actual DWF annually since 2020.

As set out in the background section of this response, our focus is on monitoring and managing final effluent quality and permit compliance and as a result of this we do not routinely update the overall "capacity" data for our WwTW's. Additionally, maximum flow to treatment information is available in each of the site permits.

What the data in Appendix E does however show is that the actual dry weather flow at Cockermouth WwTW and Great Broughton WwTW, is substantially below the consented dry weather flow, which indicates that there should be adequate capacity at these works.
The appendix does show that historically the dry weather flow arriving at Embleton WwTW had exceeded the consented dry weather flow. As a result of this we have already installed new treatment units to operate alongside the existing assets at Embleton and Great Broughton WwTWs: £10.6m scheme to stop sewage spills in Cumbria makes 'good progress' – cumbriacrack.com.

In addition, we have also been implementing an infiltration reduction plan, to identify and address potential sources of excessive inflow of surface water to the sewer network, which will reduce the dry weather flow to the works and will also reduce discharge levels from the SO at the inlet to the works.

An overview of our approach to infiltration reduction plans and a summary of the plans that we are carrying out in the Cumbria area, including the one at Embleton can be seen at this link: Infiltration Reduction Plans | United Utilities - Better Rivers.

We are also currently designing two WINEP schemes for Embleton WwTW. The first will provide additional nutrient (phosphorous) removal at the works, with the second scheme reducing discharge

United Utilities Water for the North West

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

levels from the storm tanks to meet the requirements of the SODRP and spill on average no more than 10 times per year, over a 10-year period.

The WINEP schemes are being co-ordinated with the infiltration reduction plan and the combined solutions will involve work to reduce surface water input to the sewer network, together with a combination of storage work and/or increased flow through the works.
The two WINEP schemes need to be implemented before the end of March 2030, although we will seek to deliver them as quickly as is possible and will address infiltration issues as and when identified, with over 100m of sewer having already been relined within the catchment.

Request 5 Sewer Network Modelling and Planning

As set out in the background section of this response, the outputs from our sewer network modelling and planning can be viewed on our DWMP customer portal (DWMP Customer Portal Environment).

For all three catchments the level of risk to wastewater treatment capacity is classed as being "No concern" for each design horizon (2020, 2030 and 2050).

We have also summarized the ongoing work that we are undertaking in earlier responses.

Request 8) Network Capacity, constraints and improvement plans

We have set out details of the work that we are undertaking to reduce discharges from the overflows within these three catchments in response to earlier points. With all of these schemes being designed to accommodate potential future growth within the network.
The level of risk for the sewer flooding and sewer condition (blockages and collapses) has not been directly set out in the DWMP customer portal for the Embleton and Great Broughton Catchments, because of the relatively small size of these catchments. For Cockermouth, the risk levels are flagged as being of 'potential concern' or as being 'of concern'.

Request 11) hydraulic or operational constraints affecting the above works or their sewer networks.

The summary of our assessment of hydraulic issues or other operational constraints within these catchments, is set out within the DWMP and was summarised in response to point 8 above.
Request 12) tankering, temporary storage, or operational balancing between sites.

I can confirm that we have not undertaken and do not undertake any tankering, temporary storage, or operational balancing between these sites to manage excess sewage flows within the catchment.

Request 13) can the existing sewer network and treatment works capacity accommodate current and future flows

The summary of our assessment of growth within these catchments, is set out within the DWMP and was summarised as part of the response to point 5 above.

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

3. Sludge management and handling

Covering information request 6

3.1 Background

We operate sludge treatment processes at a relatively small number of our larger regional wastewater treatment works. The sludge treatment process involves a variety of different technologies, such as further screening, lime stabilisation which neutralises any pathogens within the sludge by raising the pH, or anaerobic digestion.

In anaerobic digestion, sludge is subjected to heat, agitation and in advanced processes such as thermal hydrolysis, high pressure to encourage anaerobic bacterial growth, this significantly breaks down the organic matter and generates biogas as a renewable energy source, the resulting dewatered product is known as biosolids and is used as a nutrient rich agricultural soil conditioner and fertiliser.

Any sludge that is used in agriculture is managed for pathogen control using a HACCP (Hazard Analysis and Critical Control Point) system, this involves system monitoring and laboratory analysis of the biosolids to ensure it meets the standards for export.

The raw sludge that is produced from smaller works is typically thickened on site and the liquid sludge is then either tankered directly to one of the regional sludge treatment sites for treatment and subsequent disposal/recycling, or the sludge can be tankered to a more local but larger WwTW, where it is mechanically thickened to produce a solid "sludge cake" for onward treatment at sludge treatment site.

The majority of our smaller WwTW have a fixed weekly sludge export schedule, which depends upon the size of the works and the amount of sludge that is produced on a daily basis. Although some of the smaller sites, only tanker sludge away from the site as and when required by the operations team.

If more or less sludge export is required than the fixed weekly schedule, then the local site teams submit an internal request to the regional planning team, for a change to the schedule. Change requests can be driven my numerous things such as weather, seasonality or tourism. The planning team then review and process the request and organise the necessary transport and import space at the receiving treatment works.

3.2 Specific responses to individual information requests

Request 6) tanker activity associated with Great Broughton Wastewater Treatment Works

The sludge produced at Great Broughton WwTW, is taken by tanker to Workington WwTW. At Workington the sludge is thickened and dewatered to produce cake. This cake is then usually transported to the lime treatment facility at Carlisle WwTW, prior to being dewatered and used in

United Utilities
Water for the North West

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

agriculture. Although in some cases the cake can be used in third party permitted land restoration activities, such as recovery of open cast mining sites etc.

As requested, I have attached an excel spreadsheet titled Appendix F, which provides details of:

- Dates and frequency of the tanker visits to Great Broughton WwTW
- The destination of the transported sludge
- Additional information on the nature and volume of the tankered sludge.

4. Asset maintenance and operation

Covering information request 7

4.1 Background

We use both a central and local approach to operate and maintain the assets within our treatment works, which is underpinned by extensive use of real-time data and operational monitoring, to allow us to focus on proactive (rather than simply reactive or time based) operation and maintenance.

All of the assets on our operational sites are logged on our corporate asset management database, with all work that is undertaken on these assets on the assets as well as key performance indicators from the assets, being recorded and used to confirm that performance is meeting expectations or to flag potential risks to both the local operations team and to a central operations team based in Warrington.

The central database and operations team, determine and schedule the routine operation and maintenance tasks that the local teams undertake and identify and schedule any reactive work that may also be required at these sites on a 24 hour per day basis.

4.2 Specific responses to individual information requests

Request 7) regular vehicle movements to and from Great Broughton Wastewater Treatment Works

The vehicle movements to and from Great Broughton WwTW are used to allow UU staff and contractors to access the site and to allow materials used in the treatment process to be taken to the site. It also allows sludge produced by the treatment process to be removed from the site. We note that we do not hold “vehicle logs” as such, however both UU and third-party staff are required to sign into the site when visiting. As such, we have enclosed in Appendix G copies of the sign-in sheets that we hold for Great Broughton WwTW. Please note that there is no regulatory requirement for water and sewerage companies to retain sign-in sheets, and as such the information may be incomplete. Additionally, please note that redactions have been made in line with Regulation 13 of the EIR and UK GDPR to remove any personal details such as staff names and contact information.

We hope that this response answers your request. As above, if you would like to discuss any of the

United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000
unitedutilities.com

information contained within this response then please contact Emma Dennett, Head of Environmental Information at EIRRequests@uuplc.co.uk, and she will arrange for someone to contact you to discuss further.

Alternatively, if you are not satisfied with how we've handled this response, you can request an internal review. To do this, please write to us at Environmental Information Office, Haweswater House, Lingley Mere, Warrington, WA5 3LP or email us at EIRRequests@uuplc.co.uk, addressing your request to [redacted], and explaining why you're unhappy with our response. We'll be very happy to review your request and ensure we've done everything we can to assist you.

Any request for an internal review should be made within 40 working days of receipt of this response, and we will reply within 40 working days from receipt of the request for internal review.

Many thanks
[redacted]

We'd love to hear your feedback on how we handled your request! If you have a moment, please complete our short survey here – your input helps us improve our service.