

Dear [REDACTED]

Thank you for your request for environmental information. We appreciate your interest, and we want to let you know that as United Utilities is not subject to the Freedom of Information Act (FOIA), your request has been carefully considered in accordance with the Environmental Information Regulations (EIR). As your request contained a number of specific questions, this response, restates each part of the request (in bold) and then follows this with our response.

**Recently some information has come my way on this matter and I would be grateful if you could answer my points under the freedom of information act.**

Firstly, I would like to clarify how we have answered your request, following our request for further clarification. For points 1 and 2, you asked whether we could provide a response firstly for the North West region, and then secondly for the whole of England and Wales.

Regulation 12(4)(a) of the EIR, states that a public authority may refuse to disclose information to the extent that it does not hold that information when an applicant's request is received. Please note that as United Utilities only covers the North West of England, we are unable to provide you with any information for the rest of England or Wales.

If you wish to understand what approach other water and sewerage undertakers are taking during AMP 8, we suggest contacting them directly.

- 1. What percentage of the system is being updated?**
- 2. Should it not be the entire system why is this the case?**

To answer these two questions, it is first helpful to explain the four key drivers of expenditure on our system of assets:

- **Maintenance** – maintaining, replacing, or refurbishing existing assets, in order to continue meeting existing service levels.
- **New legal obligations** – constructing new assets to meet new legal obligations, for example to improve the quality of wastewater treatment, or to reduce the number of spills from sewer storm overflows.
- **Growth** – upsizing existing assets or constructing new assets to meet extra demand for water and wastewater services, due to population growth, new housing and commercial developments.
- **Service improvements** – constructing new assets or performing additional proactive asset replacement to achieve higher service performance standards, for example to reduce leakage.

The first of these four drives (maintenance) mainly involves replacing or refurbishing existing assets (i.e. our existing system) to ensure that they continue to operate effectively and deliver existing



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performance levels. In any given five-year period, we will perform maintenance on our assets and will prioritise our investment based on need. For example, this might be to proactively replace assets that are performing poorly or are at a high risk of failure, or to reactively replace assets that have already failed. Many of our assets have very long asset lives (many assets have expected lives of over 100 years) and therefore do not need to be replaced every five years, especially if those assets are meeting the required performance standards or have a low risk of failure.

If we were to replace more assets cyclically rather than based on need and risk, this this would be inefficient (f it led to some assets being replaced that could continue working adequately for the foreseeable future, for example) and would also lead to much higher increases in customer bills in order to fund that additional premature expenditure. There would also be environmental costs (in terms of energy and materials) associated with replacing parts of our system prematurely.

The three areas of enhancement expenditure apply to the parts of our system where a specific improvement is required.

- **New legal obligations** – Water Industry National Environment Plan (WINEP) is published by the Environment Agency. This sets out the improvements we need to make at specific locations in order to meet new tighter legal standards (usually in the form of permits) that are being applied to water companies. We operate over 550 wastewater treatment works of various sizes, but the WINEP may only require improvements at a proportion of these treatment works.
- **Growth** – We upgrade/upscale assets in areas of the North West where the expected level of new housing and commercial developments (and general increases in population) cannot be accommodated by our existing assets.
- **Service improvements** – We make targeted interventions on selected parts of our system that provide us with the most cost beneficial improvements in service levels, e.g. by targeting additional replacement of pipes that are most likely to leak to improve leakage performance.

**3. If the above is correct when did work cease?**

**4. The reason for the curtailment?**

Taking these two questions together, there has not been a cessation of work in maintaining our system of assets, or in enhancing our system to meet new legal obligations, to meet new growth, or to improve service performance.

Rather, there has been a significant increase in expenditure for the current five-year period (2025 to 2030), with a subsequent increase in customer bills. This is primarily due to the level of environmental improvements over 2025 to 2030 being significantly greater than the improvements required historically. This large increase in enhancement expenditure to meet new environmental standards will drive considerable improvements across the North West. You can read more about these, here: [Our business plan submissions for 2025/26 – 2029/30 | United Utilities.](#)

**5. What work has been carried out since privatisation?**



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As explained in our earlier correspondence, we are a water and sewerage undertaker and therefore manage all aspects of the water and wastewater cycle -water catchments and abstractions, storage reservoirs, potable water treatment and distribution, and then wastewater collection and treatment. We also manage the treatment and disposal or recycling of biosolids and sludges resulting from our treatment processes. It has been 35 years since privatisation, and therefore, during this time there has been a very significant number of improvements works which have taken place.

Whilst we are unable to provide a detailed breakdown of all action taken since privatisation, we have summarised some of the most noteworthy, improvements that have been made, firstly on a regional basis and then more specifically within the Merseyside area.

#### **Regional:**

- **Water Supply** – We manage over 150 reservoirs, the largest portfolio of any water company in England, and since privatisation, in 1989, we have focused on maintaining, upgrading, and securing our existing reservoir infrastructure rather than constructing new, large-scale reservoirs. We have however undertaken major projects to clean and safeguard the aqueduct which supplies the Merseyside area with water from Lake Vyrnwy in North Wales. We are also currently undertaking a major project to replace the aqueduct which transfers water from Haweswater in the Lake District to Manchester.
- **Water Treatment** – We have invested billions of pounds in the North West’s drinking water infrastructure, significantly upgrading treatment facilities to meet new regulatory standards. These efforts have resulted in compliance with water quality standards exceeding 99.96% in recent years.
- **Water Distribution** – We have reduced leakage levels in the North West by over 33% since the 1990s, with a long-term target of cutting levels by 50% by 2050.

We have also made very significant investments on our wastewater assets.

- **Wastewater Networks** – We have made significant reductions in the number properties that suffer from sewer flooding, and in the number of discharges from storm overflows and we are currently implementing a £3.1 billion programme of storm overflow improvements for the period 2025 to 2030. We have also significantly expanded sewer monitoring in recent years, particularly during the 2020 to 2025 investment period and are installing circa 20,000 sensors at key points across our 78,000km wastewater network to transform the management of the sewer network.
- **Wastewater Treatment** – We have installed wastewater treatment for the first time at a large number of coastal or bathing water locations such as Blackpool and Southport. We have also made and continue to make large investments in our wastewater treatment works to meet the progressively tightening standards that have been set by new legislation since privatisation.
- **Biosolids management** – We have transformed our approach to sludge management since privatisation, moving from the pre-privatisation position of sea disposal of partially treated

sludge to a sustainable, in-house recycling and energy generation process. We currently treat approximately 200,000 dry tonnes of sewage sludge annually, turning it into biosolids that are utilised as high quality fertiliser on farmland.

#### **Merseyside specific:**

- Following privatisation, we became actively involved with the revitalisation of the Mersey and its tributaries, with this work being co-ordinated with other bodies through the [Mersey Basin campaign](#), which, as can be seen from the attached link, was considered to be "one of Britain's environmental triumphs". As part of this work, we improved and, in some locations, introduced wastewater treatment for the first time.
- The opening of the MEPAS (Mersey Estuary Pollution Alleviation Scheme) interceptor sewer and the opening of Liverpool wastewater treatment works at Sandon Dock in 1991 occurred shortly after privatisation. Prior to this, untreated sewage was discharged directly to the River Mersey without treatment. More recent investment at Liverpool WwTW has seen the completion of a new extension to the works adding a £165m Sequencing Batch Reactor (SBR) in 2016 to treat the wastewater to even higher standards.
- Specific nutrient reduction programmes have been delivered across the Mersey Basin focussing on phosphorus removal – with significant phosphorus reduction programme between 2020 to 2025 driven by Water Framework Directive requirements.
- These improvements have been a leading factor in the Mersey's environmental success story – from a biologically dead river in the 1970s and early 1980s to one which now supports numerous complex ecosystems. Benefits of these improvements include:
  - Significant reductions in biological oxygen demand and ammonia levels across the Mersey Basin, improving oxygenation and fish habitats.
  - Return of aquatic life that are considered sensitive to pollution including e.g.:
    - 45 species of fish identified in the latest Mersey Estuary Species Hunt (2023).
    - Atlantic salmon in the Mersey estuary and in upstream tributaries including the River Goyt at Stockport where salmon are known to spawn and run.
    - Trout and eel populations across the Mersey Basin, including in upstream waterbodies such as the River Tame.
  - Wider 'place based' benefits of water company investment and improved water quality include supporting economic and developmental regeneration and recreational benefits of being able to connect communities to rivers and bankside environments.
- Water quality across the Mersey Basin remains a complex issue and is not isolated to one sector, industry or project. Therefore, we continue to work with regulators and organisations including the Mersey Rivers Trust to ensure that we are delivering and supporting other partners and organisations, to enable them to meet the non-water company challenges.
- We have also recently signed an agreement with Liverpool City Region, to support the development of a sustainable approach to identifying further integrated water management opportunities.

We have also included the below link, which provides more detail on a number of the projects that



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have been delivered since privatisation and which you may find useful:

[United Utilities - The history of wastewater treatment in the North West](#)

We hope that this response answers your request. However, if you're not satisfied with how we've handled it, 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 [EIIRRequests@uuplc.co.uk](mailto:EIIRRequests@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



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.