

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 a number of specific questions, this response, restates each part of the request (in bold) and then follows this with our response.

This letter constitutes a formal request for information under the Environmental

Information Regulations 2004 (EIR). You are a public authority for the purposes of the EIR because you carry out functions of public administration relating to the environment (water supply and infrastructure). Please provide the following recorded information within 20 working days of receipt of this letter.

- 1. A copy of any wayleave, easement, licence, or other agreement that purports to grant you rights for installation of telecommunications apparatus in and under the subsoil under the footpath adjoining the Property at [REDACTED], including any register entry, plan, or associated correspondence.**

In relation to the installation of a meter on United Utilities' side of the service pipe (communication pipe) within the street, the relevant statutory power is derived from sections 158(1)(b) and (c) of the Water Industry Act 1991 (WIA). This is because the pipe upon which the meter is to be installed would be subject to alteration, and the installation of the meter would be incidental to that alteration.

Furthermore, the authority to enter the street for the purpose of carrying out these works is provided under section 168 of the WIA, in conjunction with the New Roads and Street Works Act 1991 (NRSWA). In practice, notice is ordinarily served by the United Utilities Street Works team to the appropriate street authority. This may be the highway authority, or, in the case of a private street, the owner or owners, including those of properties fronting the street.

Any such notice should make explicit reference to sections 158 and 168 of the Water Industry Act 1991, as well as the relevant provisions of the NRSWA.

- 2. If you claim that no such document exists, please confirm that in writing.**

Please see our response to your first point.

- 3. A copy of any statutory provision (including the specific section of any Act) on which you rely to enter the subsoil of the footpath for the purpose of installing a meter chamber, as distinct from a water pipe.**

Please see our response to your first point.

- 4. A copy of any internal guidance, legal advice, or policy document that you have relied upon to conclude that you may install a smart meter containing a radio transmitter (telecommunications apparatus) within the subsoil, without the landowner's consent.**

As above, this is covered by the WIA as the installation of a meter on United Utilities' side of the service pipe (communication pipe) would be subject to alteration, and the installation of the meter would be incidental to that alteration.

- 5. Copies of any consultation with the local council (Tameside Metropolitan Borough Council) and with local ward councillors regarding the proposed meter installation in the footpath outside the Property, including any notices given, responses received, or consents obtained.**

We engage regularly with local authorities; however, this engagement is conducted primarily through their Streetworks Departments and is focused on the scale and nature of the works being undertaken. Given the size of the programme, we do not routinely engage directly with ward councillors, although we have done so on occasion where specifically requested. As such, we are unable to provide you with the requested information in line with Regulation 12(4)(a) of the EIR as it is not held.

Our direct engagement is primarily with affected customers. This is typically carried out through written correspondence, including a letter accompanied by an informational booklet. These communications provide details of the works and invite customers to contact us to discuss any queries or concerns they may have.

- 6. A copy of any planning permission, certificate of lawful development, or permitted development notification obtained for the installation of a smart meter chamber and associated radio equipment in the footpath subsoil.**

Please see enclosed a copy of the permit which was granted by Tameside Metropolitan Borough Council in Appendix 1.

- 7. A copy of any environmental assessment, screening opinion, or record of consideration of impacts on the subsoil, landowner's property rights, or for vulnerable residents.**

We can confirm that we do not hold any specific Environmental Impact Assessment (EIA), screening opinion, or formal record of consideration relating to impacts on subsoil, landowner property rights, or vulnerable residents in connection with this type of activity. As such, Regulation 12(4)(a) of the EIR is applicable.

As outlined in our response above, the works in question are of a minor and routine nature and are

undertaken in accordance with relevant statutory powers and established procedures. As such, they do not require a formal EIA under the applicable regulations. However, appropriate consideration is given to environmental and community impacts through standard operational controls, compliance with relevant legislation, and engagement with affected customers where applicable.

Additionally, I note that whilst we are installing a meter, our customers are not obliged to move to a metered charge. Once the water meter has been installed, we'll then be able to assess whether customers would make a saving on their existing bill based on the amount of water they use. Every time we send them a water bill, we'll explain what they would pay based on the amount of water they actually use and compare this to their current fixed bill. If they would have paid less with a meter, then we'll charge them the lower amount as part of our Lowest Bill Guarantee. This information was made available in the leaflet that accompanied the letter, which was sent to your customer, however I have also enclosed a copy of this for reference in Appendix 2.

- 8. A copy of any permit granted by the local highway authority (Tameside Metropolitan Borough Council) for the obstruction or blocking of the public footpath or walkway during the proposed works, including any conditions attached to such permit.**

This has been enclosed in Appendix 1.

- 9. The works reference number assigned to these proposed activities under section 2.3.1 of the Code of Practice for the Co-ordination of Street and Road Works (the "Code of Practice"), together with confirmation that you have registered the works in the relevant register and complied with the co-ordination duties set out in that Code.**

Please see enclosed the permit reference number in Appendix 1, and the permit conditions in Appendix 3.

- 10. Any economic, social, and environmental well-being assessment undertaken in connection with the service contract or works order that authorises this meter installation, including any risk assessment and impact assessment that considers the effects on vulnerable residents, the local community, and the private property rights affected.**

We have found that, following our proactive water meter installation programme, approximately 50% of customers experience a reduction in their charges when switched to a metered supply, thereby delivering a direct financial benefit to those customers.

In addition, we offer all customers a "Lowest Bill Guarantee" for a period of up to four years. Under this arrangement, customers receive a comparison between measured and unmeasured charges and are billed on the lower of the two amounts during this period. At the end of the guarantee period, customers are able to make an informed decision as to whether to remain on unmeasured charges or to transition fully to a metered billing basis.

At United Utilities, our Water Resources Management Plan details the overall social benefit of



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metering, particularly in the assessment of long term supply demand of metering compared to other options for maintain water resources. For further details, we recommend visiting the webpage here: [Our current Water Resources Management Plan](#)

We have a number of methods by which we aim to protect vulnerable customers who have a meter installed. An example of this is our 'lowest bill guarantee', which allows customers who have opted for a meter to revert back to their previous billing technique in the two years following meter installation. We also have tariffs such as WaterSure, for customers who need to use lots of water and might struggle to afford bills while on a meter. This tariff puts a cap on how much these customers are charged. Customers can also apply for financial support with their bills online. Increasing our meter penetration also allows customers to influence their own bill, potentially reducing their bill where other billing practices might have resulted in a larger amount.

Moreover, United Utilities maintains a comprehensive Vulnerability Strategy, which takes into consideration the metering of those with additional needs. This includes help with reading the water meter, and moving the meter to a place that is easier for the customer to read if necessary, as well as providing free water-efficiency devices to help cut bills. You can find further information on the Vulnerability Strategy here: [Priority Services Strategy - Our Approach | United Utilities](#).

11. Please confirm in writing whether you classify the proposed meter chamber and access cover as street furniture, and if so, what authority the local council has to approve such installation over a landowner's objection.

No, meter chambers and the associated access cover are not deemed to be "street furniture". They are instead regarded as underground utility apparatus.

As such, their installation is undertaken pursuant to statutory powers available to water undertakers under the WIA, together with the relevant provisions of the NRSWA governing works within the highway.

Given this classification, the role of the local authority is not to approve the installation in the same manner as it would for items of street furniture. Instead, where works are carried out within the public highway, the authority acts in its capacity as highway authority, with oversight exercised through the street works permitting and coordination regime established under the NRSWA.

ADDITIONAL REQUESTED INFORMATION AND REASONABLE ADJUSTMENTS FOR VULNERABLE GROUPS

1. Please confirm what specific reasonable adjustments you will implement under the Equality Act 2010 and your Priority Services scheme, addressing the following identified risks.

There have been no risks identified. As such, no adjustments will be implemented. Whilst we have not identified any risks which would require reasonable adjustments, if you feel there are any, please contact our Priority Services Team on 0345 072 6093 to discuss these further.

- 2. Safe access and exit from the Property: excavation, equipment, and open chambers in the footpath may obstruct or create hazards at the only pedestrian route to and from the premises. Please state how you will maintain a safe, unobstructed access route at all times and provide advance risk assessments.**

The site will be established in accordance with the Highway Authority approved permit conditions and the scope of works, ensuring compliance with the NRSWA.

- 3. Health and safety of the vulnerable: the presence of workers, machinery, open excavations, and noise may cause distress, confusion, or physical risk. Please state what specific measures you will take to prevent harm, including prior notification, a point of contact, and on-site safeguarding protocols.**

Noise will be kept to minimum, and a United Utilities Assistant Project Coordinator will be present onsite to liaise with the customer throughout operational activities.

- 4. Noise pollution: excavation, drilling, and machinery operation will generate noise. Please state what limits you will adhere to, what hours of work will be observed, and how you will mitigate noise disturbance, given vulnerable groups.**

Works will not begin before 08:00 and as above, noise will be kept to minimum. A United Utilities Assistant Project Coordinator will be available to communicate with the customer before and during the works.

- 5. Interruption to water supply: you have stated that water supply may need to be switched off. Please state what alternative arrangements you will make for the vulnerable, who require continuous access to water for hydration, medication, and hygiene.**

Site teams follow the United Utilities “Kick Process”: knock, inform, complete, knock again. Any planned interruption to the water supply will be limited to no more than 15 minutes. Additionally, our onsite teams carry bottled water in their vehicles to give to our customers, should the water supply need to be isolated for a prolonged period of time.

- 6. Emergency water supply and drinking water: during any interruption, please state what emergency supply you will provide, how it will be delivered and what arrangements are in place for drinking water. Please also state who will be responsible for carrying water into the home if the vulnerable adult cannot do so.**

In the event of an unplanned disruption, the standard emergency response will be followed whereby our Network Team will issue the customer with bottled water, and where necessary, carry this directly into the property for the affected customer.

- 7. Implementation of reasonable adjustments: please provide a written plan setting out exactly how each of the above adjustments will be implemented, by whom, and on what date. Please confirm that no works will commence until that plan has been agreed in writing with the Association on behalf of our members.**

As explained in our response to your first point, as there have been no risks identified, we will not be making any adjustments to our work. If however, you feel as though there are any reasonable adjustments that we should consider, please contact our Priority Services Team to discuss this further.

- 8. Please confirm that no works will take place without at least 14 days prior written notice to the Association and to our member, and without our member's explicit written consent, unless you first produce legally enforceable documentation.**

I can confirm that the letter your customer received was the written 14 days' notice to notify them of the intended meter installation. As set out above, under the Water Industry Act 1991 (WIA), s. 158(1)(b), we are legally allowed to install a water meter on a U UW asset, therefore written consent is not required.

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 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.