

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.

1. FULL BREAKDOWN OF THE £1,190.47 BALANCE

- **Please provide a complete itemised statement showing precisely how the alleged balance of £1,190.47 has arisen. This should include the relevant billing periods, water and wastewater charges, meter readings where applicable, standing or fixed charges, adjustments, credits, payments received and any other sums included in arriving at the balance. Please also identify the statutory charging scheme and tariff under which each relevant charge has been levied.**

Please note that this aspect of your request does not fall within the scope of the EIR.

The regulations state that environmental information relates to any information in written, visual, oral, electronic, or any other form on –

- **(a)** The state of the elements such as air and atmosphere, water, soil, land, landscape and natural sites including wetlands, coastal and marine areas, biological diversity and its components, including genetically modified organisms, and the interaction among these elements.
- **(b)** Factors such as substances, energy, noise, radiation or waste, including radioactive waste, emissions, discharges and other releases into the environment, affecting or likely to affect elements of the environment referred to in **(a)**.
- **(c)** Measures (including administrative measures) such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect the elements and factors referred to in **(a)** and **(b)** as well as measures or activities designed to protect those elements.
- **(d)** Reports on the implementation of environmental legislation.
- **(e)** Cost benefit and other economic analyses and assumptions used within the framework of the measures and activities referred to in **(c)**.
- **(f)** The state of human health and safety, including the contamination of the food chain, where relevant, conditions to human life, cultural sites and built structures inasmuch as they are or may be affected by the state of the elements of the environment referred to in **(a)** or, through those elements, by any matters referred to in **(b)** or **(c)**.

Whilst this does not fall under the scope of the EIR, I have asked my colleagues in our Service Recovery

Team to review and respond to this point separately for you.

2. SOURCE OF THE WATER SUPPLIED TO MY PROPERTY

- **I would like to understand precisely where the water for which I am being charged originates.**
- **Please identify, as specifically as reasonably possible, the source or sources of the water supplied to my property and postcode.**
- **In particular, please state whether the raw water originates from a reservoir, river, lake, groundwater/aquifer, borehole, spring, seawater/desalination facility or another source.**
- **Please provide the name and location of each relevant source, together with the treatment works and water-supply zone serving my property.**

Water supplied to your property is abstracted from the River Dee, and your property is situated in Water Supply Zone (WSZ) 138. Whilst you have asked for the name and location of the water treatment works that supply your property, I am not able to share this in line with Regulation 12(5)(a) of the EIR. This regulation states that a public authority may refuse to disclose information to the extent that its disclosure would adversely affect international relations, defence, national security or public safety.

As I am sure you will appreciate, we take our obligations to water quality extremely seriously, which is why in arriving at this decision we have reviewed guidance from DEFRA (Department for Environment, Food and Rural Affairs) and sought views from the Drinking Water Inspectorate (DWI). For awareness, WTW locations form part of Critical National Infrastructure (CNI) and disclosure of this information could pose a security threat to our sites, and thus inadvertently to the public.

When reaching this decision, I have completed a public interest test to determine whether or not Regulation 12(5)(a) is applicable in this instance. A copy of this has been included below.

In considering the potential effects of disclosing the requested information, I have applied the established principle that disclosure under the EIR is effectively to the 'world at large'. This means that any information disclosed in response to a request is not disclosed solely to the applicant but is treated as information made available to the public generally.

Consequently, once disclosed, the information could be shared, and published online, or combined with information from other sources. I have therefore assessed the potential benefits and harms of disclosure on that basis that the information could be accessed by any member of the public, including those who may wish to misuse it.

Public interest factors in favour of disclosing the information:

- Disclosure would promote transparency around United Utilities assets and how drinking water services are delivered.
- Disclosure could promote confidence in the industry by demonstrating openness about

infrastructure and site management.

Public interest factors in favour of withholding the information:

- The requested information forms part of CNI and disclosure could lead to assets being identified and vandalised, thus putting a risk to water quality and in turn, public safety.
- Interference with WTWs could impact water quality or the continuity of supply and potentially impact a large area of the North West, as well as have environmental or economic consequences.
- Location information could lead to trespassing, which also poses a security threat.

Having considered the public interest arguments, I recognise that there is public interest in transparency regarding the locations of our sites, however the risk to public safety and site security significantly outweighs this. Additionally, I note that disclosure under the EIR is to the 'world at large', and therefore anybody can access this information, including those who may wish to misuse it. Whilst I understand this may not be the outcome you had hoped for, I must ensure that our obligations to water quality and drinking water safety remain our top priority.

- **If my property's water can originate from different sources depending upon demand, season, maintenance or other operational circumstances, please identify each potential source and explain the circumstances in which the supply changes.**

Water supplied to your property is abstracted solely from the River Dee. It cannot originate or switch to other sources dependent on demand, season, maintenance or other operational circumstances.

3. TREATMENT OF THE WATER

- **Please explain the treatment processes applied to the raw water before it reaches my property, including, where applicable, filtration, coagulation, flocculation, sedimentation, disinfection, pH adjustment, corrosion control, remineralisation and any other treatment processes.**

Water supplied to your property is abstracted from the River Dee and undergoes a number of treatment processes before entering the distribution network.

The treatment process includes the following stages:

- Coagulation – Ferral coagulant is added which causes particles in the raw water to combine together.
- Clarification – Microsand is added to the coagulated water to aid the removal of the particles from the water.
- Filtration – there are two stages of filtration, the first is through a filter media called Granular Activated Carbon (GAC) to remove the remaining coagulated particles and any organic compounds present in the raw water adsorb to the GAC. The second stage of



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filtration is designed for manganese removal.

- pH correction – we either add sulphuric acid, or an alkali (caustic or lime solution) at various points in the process to ensure that the pH of the water is optimised at each treatment stage.
- Disinfection – Chlorine is added to the water to kill any bacteria that may have been present in the raw water. The amount of disinfectant used is carefully controlled and only the smallest amount possible is added whilst ensuring the water is safe to drink.
- Finally, phosphoric acid is added for plumbosolvency control to help minimise lead dissolution within the downstream distribution system before the water reaches your property.

4. SUBSTANCES AND CHEMICALS ADDED TO THE WATER

Please provide a comprehensive list of substances, chemicals, compounds and treatment agents intentionally introduced into the water during its treatment and distribution.

For each substance, please provide:

- its common name and chemical name;
- its purpose;
- the stage of treatment at which it is introduced;
- its normal or typical dosage/concentration;
- the permitted or regulatory maximum, where applicable; and
- the typical concentration remaining in the finished drinking water supplied to consumers, where this information is held.
- Please specifically identify substances used for disinfection, coagulation/flocculation, pH adjustment, corrosion control, remineralisation and fluoridation, where applicable.

Please see the below table which sets out each chemical used during water treatment as well as its purpose and dosing regimen. Please see our response to your third point, where we have confirmed which stage of the treatment process each chemical is used. Additionally, the data in Appendix 1 shows sample results and therefore any residual concentrations remaining.

Almost all drinking water treatment processes involve the use of chemicals to ensure that water is safe to drink. There is no permitted or regulatory maximum amount allowed, and these chemicals are added through carefully controlled, automated systems that continuously adjust dosing according to the quality of the incoming raw water, using only the minimum amount necessary to achieve effective treatment and comply with the relevant standards. These standards are referred to as Prescribed Concentration or Value (PCV). While chemicals are used during treatment, they are not present in the same concentration or form in the final treated water. As dosing rates are continuously optimised and vary in response to changing raw water conditions, we are unable to provide fixed quantities for each chemical used. However, all chemicals used in the treatment process must meet strict requirements set out in the relevant British Standards.

Chemical additive / treatment substance	Purpose of chemical / treatment substance addition	Dosing regime
Ferral	Coagulant. Ferral, an aluminium based coagulant, is added to the water to help bind together particles in the raw water to aid with their removal	Continuous
Polyelectrolyte	Coagulant aid. Enhances the binding of particles from the raw water to aid with the removal	Continuous
Hydrated lime (calcium hydroxide)	pH correction. The pH of raw (untreated water) is adjusted with hydrated lime (calcium hydroxide) to ensure the pH is right for the next stage of treatment.	Continuous
Sulphuric acid	pH correction. The pH of raw (untreated water) is adjusted with sulphuric acid to ensure the pH is right for the next stage of treatment	Continuous
Microsand	Clarification. Added to coagulated water to aid the removal of particles.	Batched dosing for clarification
Sodium Hypochlorite (chlorine)	Disinfection. Applied to the water to kill any potentially harmful bacteria	Continuous
Sulphur dioxide	Dechlorination. Sulphur dioxide can be applied after a process of super chlorination. It is necessary to reduce the level of chlorine before sending water into the pipes	Continuous
Sodium hydroxide	pH correction. The pH of raw (untreated water) is adjusted with sodium hydroxide to ensure the pH is right for the next stage of treatment	Continuous
Phosphoric acid	Plumbosolvency control. Phosphoric acid is added in small quantities to reduce plumbosolvency, which is the dissolving of lead pipes in customer properties	Continuous

- If fluoride is present in my water, please state whether it is naturally occurring or intentionally added and provide the typical measured concentration for my supply zone.

I can confirm that the water supply to [REDACTED] is not artificially fluoridated and no remineralisation occurs as part of the treatment process. Any fluoride present in the water is naturally occurring. As per our [Drinking Water Register](#), the average concentration of fluoride in the last 12 months is less than 0.27 mg/l.

5. QUALITY AND COMPOSITION OF THE FINISHED WATER



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- Please provide the most recent comprehensive water-quality analysis applicable to the supply zone serving my property.
- I am interested not only in substances intentionally added during treatment but in what is actually detected in the finished water supplied to consumers.
- Please therefore provide available results for chemical, mineral, microbiological and other regulated parameters, together with their measured concentrations and applicable regulatory limits. This should include substances occurring naturally in the source water, treatment by-products and other contaminants or substances for which United Utilities routinely tests.

Please see enclosed a copy of the sample data we hold for your WSZ in Appendix 1. This covers the period July 2025 – July 2026, and includes final water sample data (including water treatment works, service reservoir, and WSZ sample data).

When reviewing the attached dataset, it is important to note that all laboratory methods have a Limit of Quantification (LOQ). This means that the method cannot read lower than a certain value. Any results marked as less than the LOQ means that the result is lower than the lowest quantifiable value that the method can detect. In this dataset, results less than the LOQ are marked 'LT'.

The latest water quality data for the water supplied to your area is published on our website at <https://www.unitedutilities.com/help-and-support/your-water-supply/>. If you input your postcode on the website, the results of samples that have been taken in the last 12 months from your local area can be viewed. The report covers a rolling 12-month period and is updated weekly. In the past 12 months, there have been no exceedances of the water quality standards.

6. LEGAL OWNERSHIP, TITLE AND RIGHTS IN RESPECT OF THE WATER

I also require clarification regarding the precise legal status of the water for which United Utilities charges me. Please answer the following questions individually:

- a. From whom, or from what legal source, does United Utilities obtain the raw water ultimately supplied to my property?
- b. What statutory powers, abstraction licences, deeds, conveyances, agreements, easements, rights or other legal instruments authorise United Utilities to abstract, collect or otherwise obtain that water?
- c. Does United Utilities claim legal or beneficial ownership of the raw water that it abstracts or collects? If so, please identify the precise legal basis upon which that ownership arises and the point at which United Utilities considers ownership of the water to pass to it.
- d. Does United Utilities claim absolute ownership of the treated water subsequently supplied through its distribution network? If so, please identify the statutory provision, deed or other legal instrument upon which that claim of ownership is based.
- e. If United Utilities does not claim absolute ownership of the water, please state the precise nature of its legal interest or rights in respect of that water and explain the legal basis upon which customers are charged for its supply.



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- f. Please provide a copy of any deed of trust, trust instrument, conveyance, assignment, deed or equivalent written instrument held by United Utilities upon which it relies as evidence of legal or beneficial ownership of the relevant water or water rights. If United Utilities considers that it is not applicable, please confirm this and identify the legislation and legal framework which does govern United Utilities' ownership, possession or other rights in respect of the water.
- g. Please identify the relevant abstraction licence or licences applicable to the source or sources from which my water is obtained, including the issuing authority and relevant licence/reference numbers where this information can lawfully be disclosed.
- h. In your response, please distinguish between:
- ownership of land surrounding or beneath a water source;
 - ownership of reservoirs and water infrastructure;
 - statutory or licensed rights to abstract water;
 - the legal status/ownership of water following abstraction;
 - the legal status/ownership or control of treated water within United Utilities' distribution network; and
 - United Utilities' statutory entitlement to charge a domestic occupier for water and wastewater services.

I specifically request this distinction because ownership of land, reservoirs or infrastructure does not by itself answer my question concerning the legal status of the water itself.

Please note that this aspect of your request does not fall within the scope of the EIR. Your request asks for legal documents showing ownership of the raw water sources. As such, I have forwarded this aspect of your request onto our Legal Team, who will review and respond in due course.

7. STATUTORY BASIS FOR CHARGING ME

Separately from the question of ownership of the water, please identify the precise statutory and/or contractual basis upon which United Utilities considers me liable for the charges associated with this property. Please identify the relevant provisions of the Water Industry Act 1991, United Utilities' applicable charging scheme and any other legislation, regulations or terms upon which you rely.

As per our response to Q1, this aspect of your request also does not fall within the scope of the EIR. Whilst this is the case, I have asked my colleagues in our Service Recovery Team to review and respond to this point separately for you.

We hope that this response answers your request. However, if you're not satisfied with how we've handled Q2 – Q5, 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.



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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.