

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).

Your request:

I am writing to request clarification and supporting information regarding the operation, regulatory status, and future planning of the following wastewater treatment works:

- Tarvin WwTW
- Duddon WwTW
- Utkinton WwTW

These sites discharge to waterbodies currently failing for phosphate under the Water Framework Directive (WFD), and there appear to be significant gaps in publicly available permitting information.

1. Current Phosphate Performance

Please provide the most recent available data (ideally the last 3–5 years, or latest reporting period available) for each site:

- Effluent phosphate (total phosphorus) concentrations (mean and percentile where available)
- Compliance performance against any existing or informal limits
- Any internal operational targets for phosphorus removal
- Evidence of seasonal variability or operational constraints affecting P removal

2. WINEP (Water Industry National Environment Programme) Plans

In the context of the **WINEP 2025–2030 programme**, please confirm:

- Whether each of the above sites is included in WINEP for phosphorus investigations or upgrades
- The current status of each scheme (e.g. investigation, design, delivery)
- The proposed scope of works (e.g. chemical dosing, tertiary solids removal, optimisation)
- Anticipated delivery timelines
- Any identified constraints (e.g. land, cost, operational feasibility at small rural works)

3. Permit Variation Applications

Given that public records do not appear to show current numeric phosphorus limits for these works, please provide:

- Details of any **permit variation applications** submitted to the Environment Agency (EA)
- Copies or summaries of draft permits or variations under discussion
- Expected phosphorus limits being proposed or negotiated (e.g. annual mean limits)
- Timelines for determination and implementation

If no applications have yet been submitted, please confirm the anticipated programme for doing so.

4. Position on Environment Agency Proposed Limits

Please set out United Utilities' position regarding expected or emerging EA requirements for numeric phosphorus limits at these sites, including:

- Your assessment of technically achievable limits at each works
- Views on feasibility and reliability of tighter limits (e.g. ≤ 1 mg/L or 0.5 mg/L where applicable)
- Any concerns regarding disproportionate cost, particularly for small rural works
- Your understanding of the relative contribution of each works compared to diffuse sources within the relevant catchments
- Any discussions or challenges raised with the EA regarding modelling assumptions or load apportionment

5. Supporting Context (Optional but Requested)

To assist with transparency and public understanding, I would also welcome:

- Any catchment-level assessments used to justify investment decisions
- Evidence supporting prioritisation or deprioritisation of these sites within WINEP
- Any published or internal reports relevant to phosphate management in the River Gowy and River Weaver catchments

Our response:

Water companies and our Regulators work in five-year investment cycles. The current Asset Management Period of 2025 to 2030 is commonly known in the industry as 'AMP8'.

There are no investigations or phosphorus reduction requirements listed for any of the three wastewater treatment works (WwTWs) in the AMP8 WINEP so there are no scheme delivery obligations for United Utilities during this upcoming period.

An environmental discharge permit is a legal authorisation from the Environment Agency (EA). It sets

strict limits on the volume and chemical composition of treated wastewater that water companies are legally allowed to release into rivers, estuaries, or the sea. The EA set permit levels using site-specific modelling that factors in the environmental capacity of the receiving waterbody, legal water quality standards, and downstream human or ecological uses. All three sites were subject to capital scheme investment in AMP7 (2020 to 2025) in order to achieve new enhanced levels for phosphorus, as set out in an updated environmental permit at each site. The requirement at Tarvin WwTW was to meet 0.25 mg/l, at Duddon 0.70 mg/l and at Utkinton 1.00 mg/l. All three schemes were completed and the outputs confirmed as delivered with the EA on 12 December 2024. There are some residual activities to complete at Duddon WwTW to replace some temporary equipment with permanent assets. This work does not affect the claiming of the AMP7 output and is planned to be complete by October 2027.

1. Appendix A displays the sample results for each of these works from the past 16 months. Data is not available prior to January 2025 as there was no permit requirement for phosphorus limits (and therefore no compliance sampling) before that date.

To allow for seasonal variability, phosphorus compliance is assessed by the EA on a rolling 12-month average, rather than on individual sample results. Therefore, you may see isolated results within the dataset that exceed the permitted levels, but the average performance is within the limits and the three sites are currently performing well, without operational constraint.

We do not apply any internal target levels for Phosphorus removal as the limits are set by the regulator in our discharge permit.

2. As described above, there are no investigations or phosphorus reduction requirements listed for any of the three WwTWs within the AMP8 WINEP.
3. For Tarvin WwTW there are no permit variations or draft permits currently under discussion with the EA. Following the completion of the AMP7 scheme, as outlined above, a phosphorus limit of 0.25 mg/l was in place from 31/03/2025 (as per permit extract below).

Status log of the permit		
Description	Date	Comments
Environment Agency initiated variation 016810035/V001	21/02/2018	Varied and consolidated permit issued in modern condition format.
Environment Agency initiated variation 016810035/V002	15/04/2020	Variation of permit initiated under PR14 review programme to incorporate improvements to be delivered under AMP6 - EDM
Environment Agency initiated variation 016810035/V003	01/04/2020	Variation of permit initiated under PR19 review programme to incorporate improvements to be delivered under AMP7 – UMON3_4 & Phosphorus
Variation determined 016810035	31/03/2025	Varied and consolidated permit issued in modern condition format.

For Duddon WwTW there are no permit variations or draft permits currently under discussion with the EA. Following the completion of the AMP7 scheme, as outlined above, a phosphorus limit of 0.70

mg/l was in place from 07/03/2025 (as per permit extract below).

Status log of the permit		
Description	Date	Comments
Environment Agency initiated variation 016810029/V001	01/04/2020	Variation of permit initiated under PR19 review programme to incorporate improvements to be delivered under AMP7 Phosphorus and Iron, reduction of DWF and 3 in 5 year DWF conditions
Variation determined 016810029	07/03/2025	Varied and consolidated permit issued

For Utkinton WwTW there are no permit variations or draft permits currently under discussion with the EA. Following the completion of the AMP7 scheme, as outlined above, a phosphorus limit of 1.00 mg/l was in place from 10/01/2025 (as per permit extract below).

Status log of the permit		
Description	Date	Comments
Environment Agency initiated variation 016810033/V001	01/04/2020	Variation of permit initiated under PR19 review programme to incorporate improvements to be delivered under AMP7 (Phosphorus)
Variation determined 016810033	10/01/2025	Varied and consolidated permit issued.

4. As the new phosphorus limits have just been recently introduced into the environmental permits at all three WwTWs, there is currently no requirement to have any additional discussions with the EA regarding phosphorus limits at these sites.
5. As described above, all three WwTWs were included in the AMP7 WINEP with phosphorus removal drivers, and all three associated schemes were successfully delivered ahead of the regulatory deadline. There are no investigations or new phosphorus reduction requirements listed for any of these three WwTWs within the AMP8 WINEP, although there is some residual work to complete at Duddon WwTW to replace some temporary kit with permanent assets.

Our justification to undertake the investment for these sites in this order is therefore fully aligned to the regulatory requirement to meet the new site-specific permit limits for phosphorus set by the EA through the WINEP.

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.



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Many thanks,



EIR team
United Utilities

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.