

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 numbered points) and then follows this with our response.

Your request, dated 19 July 2026

Please treat this as a request for environmental information under the Environmental Information Regulations 2004. The request concerns the proposed 163-dwelling development at Land at Brunstock Lane, Houghton, Carlisle (Planning Ref: 23/0347). It relates in particular to United Utilities' review of the applicant's Flood Risk Assessment and Drainage Strategy Report (Ref. 23044, Rev P03, dated 4 October 2023) and associated drainage drawings 23044-GAD-ZZ-00-DR-C-1001 (Rev P03) and 23044-GAD-ZZ-00-DR-C-1002 (Rev P03), together with United Utilities' consultation responses dated 12 July 2023 and 24 May 2024.

United Utilities' May 2024 response identified continuing adoptability concerns and confirmed that finished floor levels had not been provided, meaning that its review could not be completed. The applicant subsequently issued a revised Drainage Strategy, Rev P04, in June 2024, which states that infiltration drainage had been discounted because of shallow groundwater. The proposals therefore rely on attenuation and controlled discharge. The Environment Agency later identified a materially different flood-risk position, including Flood Zone 3 extending further into the site, a previously unmodelled watercourse and an exceedance flow route affecting the proposed development. It also advised that the Flood Risk Assessment should be updated before any subsequent approval.

Accordingly, please provide, from 24 May 2024 to the date of your search:

1. **Any external or internal correspondence concerning the revised drainage strategy, shallow groundwater, the discounting of infiltration drainage, attenuation basins, finished floor levels, hydraulic modelling, sewer-surge risk, water-quality treatment or adoption.**

For the updated drainage plans and Flood Risk Assessment we received from Cumberland Council on 11 June 2024, please see Appendices 1, 2 and 3.

- Appendix 1 - Drainage Strategy: SUDS Hierarchy, Drainage Layout 1 of 2
- Appendix 2 - Drainage Strategy: SUDS Hierarchy, Drainage Layout 2 of 2
- Appendix 3 - FRA AND DRAINAGE. STRATEGY REPORT, First Issue, 19/04/2023



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

We confirmed to Cumberland Council by email that our position had not changed following receipt and review of the information provided in the Appendices 1-3. A copy of this email can be seen in Appendix 4. Please note that our records from this time do not clarify whether we were sent these drainage plans directly from the Local Planning Authority or whether we obtained them from the proactive reviews we undertake of planning applications on the Local Authority's public access systems. Therefore, in line with Regulation 12(4)(a) of the EIR, we are unable to supply you with the requested information.

We have also subsequently identified that additional drainage details have been submitted as part of the ongoing planning appeal which we are in the process of reviewing. For your information, these documents can be found on the Cumberland Council website, and can be identified as the below:

- Drainage Layout 1 of 2
 - Drainage Layout 2 of 2
 - FRA and Drainage Strategy Report – PO5
 - Impermeable Areas
 - Drainage Details
 - Exceedance Route 1 of 2
 - Exceedance Route 2 of 2
 - Planning Layout
2. **Any copy of the applicant's revised Drainage Strategy Rev P04, or any later revision, received by United Utilities, together with any detailed drainage submission, pre-development enquiry, technical appraisal, Section 104 application, drawing, calculation, request for further information, decision or other recorded outcome relating to the development.**

Please see question 1 for copies of the drainage and flood risk assessment plans which we reviewed and commented on as part of the planning application. We have also subsequently identified that additional drainage details have been submitted as part of the ongoing planning appeal, and outside of the planning application process. We are in the process of reviewing these documents.

3. **Any drawings, calculations or correspondence showing whether finished floor levels were subsequently submitted to United Utilities, together with any assessment undertaken following receipt of that information.**

We are in the process of assessing the updated drainage details which have been submitted as part of the planning appeal and part of this assessment will include whether levels details, including finished floor levels have been provided. As this is still being reviewed, we are unable to provide you with the required information in line with Regulation 12(4)(d) of the EIR, regarding material still in the course of completion.

4. **Any recorded consideration of: the applicant's decision to discount infiltration drainage because of shallow groundwater; the implications for the proposed attenuation and controlled-discharge arrangements;**

- **the expanded Flood Zone 3 extent;**
- **the previously unmodelled watercourse;**
- **the exceedance flow route; or the Environment Agency's advice that the Flood Risk Assessment should be updated.**

We have not received any information on the applicant's decision to discount infiltration drainage because of shallow groundwater and the implications as part of the planning application submission. We are however in the process of reviewing the additional drainage information which has been submitted as part of the appeal.

- 5. Any record showing the current status of the proposed foul-water system, surface-water system, sustainable drainage system, package treatment plant or associated assets within United Utilities' technical review or adoption process, including whether any element has progressed beyond preliminary consideration.**

We do not have a record of the current status of the proposed foul-water system, surface-water system, sustainable drainage system, package treatment plant or associated assets and therefore in line with Regulation 12(4)(a) of the EIR, we are unable to supply you with the requested information.

- 6. Any updated consultation response, internal review, technical note or correspondence prepared following United Utilities' response of 24 May 2024.**

We're currently considering information recently identified by us which has been submitted as part of the planning appeal, and therefore we are unable to share the updated response in line with Regulation 12(4)(d) of the EIR, regarding material still in the course of completion.

- 7. If United Utilities received no further drainage or adoption information after 24 May 2024, please confirm that position.**

As above, we're currently considering drainage information which we have identified as submitted as part of the planning appeal, and therefore we are unable to share the updated response in line with Regulation 12(4)(d) of the EIR, regarding material still in the course of completion.

I would be grateful if the search could include records held by the relevant Planning Liaison, Planning, Landscape and Ecology, Developer Services, Sewer Adoptions, and hydraulic or network-modelling teams.

Please also retain a copy of this request, together with any response and disclosed material, on any planning, developer-services or site file maintained by United Utilities for this development.

Your request, updated 22 July 2026:

Further to your acknowledgement below, I have now obtained the developers latest Flood Risk Assessment and Drainage Strategy Report, Job No. 23044, Revision P05, dated 10 July 2026, which

I attach for identification and ease of reference.

This is the later revision anticipated within my existing request. I am not seeking to broaden the scope of EIR-908 or alter the requested search period or response date. I am providing it to assist United Utilities in identifying the current drainage proposal and any records concerning its receipt, review or technical assessment.

Revision P05 continues to record widespread shallow groundwater and states at section 5.3, page 15:

"Due to the presence of shallow groundwater on site, BRE365 Soakaway testing has not been undertaken and infiltration drainage has been discounted."

The revised strategy therefore remains reliant upon the formal drainage network, attenuation storage, flow controls and discharge to Brunstock Beck. It also refers to permeable paving, bioretention planters, oversized pipes and geocellular storage.

I would be grateful if the searches undertaken under EIR-908 could include any records showing:
10a. whether Revision P05 has been received or reviewed by United Utilities;

We can confirm that we have identified this document which has been submitted as part on the ongoing appeal and we are currently reviewing this information.

10b. whether the revised design has affected the earlier adoptability concerns;

As this is currently under review, we are unable to provide this information in line with Regulation 12(4)(d) of the EIR, regarding material still in the course of completion.

10c. whether finished floor levels and the information previously outstanding have now been supplied;

As this is currently under review, we are unable to provide this information in line with Regulation 12(4)(d) of the EIR, regarding material still in the course of completion.

10d. whether shallow groundwater, drainage-system surcharge, attenuation storage or receiving-water constraints have been considered; and

10e. the current status of any planning liaison, developer-services or sewer-adoption review.

The aspects outlined in 10d and 10e will be reviewed in line with the hierarchy of surface water management. Infiltration will be ruled out due to high groundwater levels. There is an adjacent watercourse which will be the likely outfall; however, this is determined by the Local Planning Authority or in respect of the ongoing appeal; the Planning Inspectorate. Regarding attenuation under planning frameworks, the site will need to store the 1 in 100-year storm event plus climate change, which is approximately 40–50% dependent on the particular area.



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

I would also be grateful if this email and the attached report could be retained or cross-referenced on any relevant United Utilities planning, developer-services, drainage or site record for the development. My purpose is simply to ensure that the information provided and the concerns raised are retained as an identifiable and retrievable part of the wider record for the site, should permission subsequently be granted and future flood events affect my property or other properties on Brunstock Lane.

We can confirm that this request, along with the attached documents have been shared with our Developer Services and Planning Teams, however they have advised that we cannot consider these documents as part of any response we provide to the appeal or any subsequent planning applications, unless it forms part of the submitted application/appeal documentation.

Your request, updated 26 July 2026

Further to my email below, I attach the following illustrative GIS plan for awareness and for retention with the relevant United Utilities records: *Brunstock_Lane_Proposed_Layout_Flood_Risk_Overlay_v1.pdf*

The plan overlays the revised Planning Layout Rev E with published Environment Agency flood-risk datasets and DEFRA LiDAR terrain contours. It also includes a dated example photograph showing typical waterlogging in the field, looking towards the location of the proposed surface-water attenuation basin.

I appreciate that the Environment Agency and Lead Local Flood Authority are principally responsible for assessing flood risk and surface-water drainage. However, the mapped and observed conditions may also be relevant to United Utilities' consideration of:

- the proposed reliance on the existing foul pumping station and downstream combined public sewer;
- available pumping-station and sewer-network capacity, including surcharge risk;
- the alternative package-treatment-plant arrangement shown on the Revision P08 drainage drawings;
- finished-floor levels and the interaction between the proposed foul and surface-water systems;
- shallow groundwater and the discounting of infiltration drainage;
- the design, operation and adoptability of the attenuation, flow-control and drainage infrastructure; and
- whether the drainage calculations and network models represent the full revised 155-home proposal and the complete contributing area.

As noted in my correspondence below, the appeal documents appear to contain unresolved inconsistencies concerning the proposed foul-water arrangement, the 140-dwelling foul-network model and the stated impermeable and contributing areas. The attached overlay provides additional geographical and topographical context for any existing or future review of those

elements.

The attached plan is an independently prepared illustrative overlay using published datasets.

I would be grateful if the attachment could be:

- retained or cross-referenced on the relevant planning, Developer Services, sewer-adoption, network-modelling and site records;
- passed to the appropriate Planning Liaison, Developer Services and Wastewater Network teams; and
- considered alongside the revised drainage documents if United Utilities is providing an appeal-stage consultation response or undertaking any subsequent technical or adoption review.

My property directly adjoins the proposed development. The attachment is supplied to maintain a clear contemporaneous record of the drainage and flood-risk context while the apparent discrepancies in the appeal documents remain unresolved.

Thank you for the additional information and for sharing the document. This document has been shared with our Developer Services and Planning Team, and will be considered in regarding to flooding where it is within in the remits of United Utilities to do so. However, this document hasn't been submitted as part of the planning application or appeal and therefore, we are limited on what we can comment on. We acknowledge that you have requested this is kept on file for future reference, however it is important for us to state that we cannot consider this document as part of any response we provide to the appeal or any subsequent planning applications, unless it forms part of the submitted application/appeal documentation. However, the Lead Local Flood Authority and Environment Agency in its responses have regard to other forms of flood risk.

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.