Our Drainage and Wastewater Management Plan 2030-2055

Delivering for customers, communities and the environment

Performance Indicator Methodology - Good Ecological and/or Chemical Status: Urban and Transport (Shared Responsibility)

March 2026

Thames Water

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This methodology document has been prepared based on the requirements of the published DWMP guidance and informed by agreements made through the Water Industry Task and Finish Groups for each Performance Indicator (PI). As the DWMP stages for each PI progress, this methodology will be refined to reflect the practicalities of deployment and feedback from stakeholders. A final published methodology document will describe the detailed approach followed.

1. Introduction

1.1. This document provides a detailed description of the **Good Ecological and / or Chemical Status (Urban and Transport) Performance Indicator** and its purpose and contribution to forming our Drainage and Wastewater Management Plan (DWMP). This emerging performance indicator looks to investigate the impact that our surface water networks can have on the Water Framework Directive (WFD) status of waterbodies. The sources of contamination into surface water sewer systems and the ownership of the systems themselves varies significantly, meaning that there needs to be a coordinated response to the issue across the different stakeholders. This Performance Indicator therefore seeks to bring together all those who discharge into surface water networks in our region. Its purpose is to identify the sources of pollution, understand the system ownership and responsibilities, and mitigate the impacts of any contamination.

Purpose of this document

1.2. The purpose of this document is to outline the methodology that will be used to establish the base year and future baseline forecasts for the **Good Ecological and / or Chemical Status (Urban and Transport) Performance Indicator**, as part of our DWMP for the 2030-2055 planning period. The base year is 2030 and it is our best estimate of expected performance for this indicator at the end of the current investment period (2025-2030). It reflects the outcome of schemes and maintenance activities planned for this period. We then forecast what is expected to happen to the indicator at points in the future if no change in investment is made. These future points are set in the short term (2035), the medium term (2045) and the long term (2055).

1.3. In addition, it sets out threshold values (where applicable) that will be used to summarise the level of risk and further guide the development of options for the 2030-2055 planning period.

1.4. The requirements for Performance Indicators are set out in Government guidance for DWMPs[1] and subsequent clarifications from the Environment Agency[2]. To understand the general approach to our DWMP, please also refer to our Strategic Context document on our website.

1.5. Assessment of the base year and future risks for each of our Performance Indicators is an important step in the development of our DWMP. It informs our understanding of how the drainage and wastewater system is able to meet legal obligations, and meet the needs of customers and the environment. The DWMP approach requires completion of a risk assessment for the following Performance Indicators for each future planning horizon at the wastewater catchment scale:

[1] Guidelines for Statutory Drainage and Wastewater Management Plans (DWMPs) - GOV.UK

[2] EA letters to water companies with feedback on performance indicators (02/10/2025), (23/03/2026) and reporting thresholds (17/10/2025).

- Internal flooding
- External (curtilage) flooding
- Storm overflow performance (England)[$]
- Treatment works compliance (numeric)[$]
- Treatment works compliance (descriptive at numeric sites)[$]
- Treatment works compliance (Dry Weather Flow (DWF))
- Treatment works compliance (Flow to Full Treatment (FFT))
- Good Ecological and/or Chemical status: Public sewerage
- Pollution incidents: serious[$]
- Pollution incidents: total
- Bathing water quality
- Shellfish water quality
- Surface water flooding (Shared responsibility)[β]
- **Good Ecological and/or Chemical Status: Urban and transport (Shared responsibility)[β]**
- Emergency overflow performance[$β]
- Treatment Works Compliance (descriptive)[β]
- Groundwater pollution[β]
- Groundwater infiltration[β]

1.6. Performance Indicators marked $ will use a nationally consistent suite of thresholds to describe the general level of risk. Performance Indicators marked β are considered more experimental in nature and are recognised as inherently difficult to forecast and will hence be trialled in DWMP28 as emerging Performance Indicators and then possibly refined for subsequent DWMPs.

Background

1.7. Our region has some of the most beautiful and environmentally important watercourses throughout the UK. Much of our drinking water is abstracted from chalk bedrock which also provides baseflow to watercourses, especially chalk streams. Improving and maintaining the ecological and chemical status of these surface and groundwater bodies is important to us, our customers and our stakeholders. Our long-term aim is for our drainage systems to support the watercourses in our region achieving 'Good' status in line with HM Government targets.

1.8. This ambition is complicated when we start looking at the impact of surface water runoff from highways and urban areas and the impact of misconnections of private sewerage infrastructure into surface water networks. In many instances, it is often unclear who owns the surface water networks and many of the issues require the involvement of multiple parties to address. These are issues of 'shared responsibility' whereby our Thames Water infrastructure can often be considered the carrier but is often not the source of pollution.

1.9. The Independent Water Commission[3] identified gaps on a system-wide approach to water planning, with responsibilities fragmented across multiple regulators and overlapping processes. Therefore, it recommended the creation of regional water system planning authorities to deliver integrated, holistic, cross-sector water planning. More recently, the Department for Environment, Food & Rural Affairs (Defra) broadly adopted the Commission's conclusions in their 'A new vision for water' White Paper[4], proposing to consolidate existing planning processes into two integrated frameworks (water supply and water environment) supported by a strengthened regional water planning function to improve coordination across sectors and align national, regional and local priorities. The White Paper outlines how this approach will be trialled and shaped, and in our opinion, such a regional water planning function could be an enabler to deliver on the ambition of this Good Ecological and/or Chemical Status: Urban and Transport (Shared Responsibility) Performance Indicator.

1.10. The objectives of this emerging Performance Indicator are:

a) To make sure that issues attributed to discharges of urban / highway runoff and misconnections do not prevent a waterbody designated under the Water Environment Regulations from reaching the minimum 'Moderate' Ecological and / or Chemical status. This is in line with the Water Industry National Environment Programme (WINEP) guidance for WFD_IMP_MOD schemes.
b) To make sure that issues attributed to discharges of urban / highway runoff and misconnections do not prevent a waterbody designated under the Water Environment Regulations from reaching its target 'Good' Ecological and / or Chemical status. This is in line with the WINEP guidance for WFD_IMP schemes.
c) To make sure that the performance of discharges of urban / highway runoff do not contribute to a waterbody designated under the Water Environment Regulations from deteriorating from its baseline Ecological and Chemical status. This is line with the WINEP guidance for WFD_ND schemes.
d) To test approaches and methods in this 'emerging' Performance Indicator in preparation for a more comprehensive and integrated approach in future planning cycles, post 2030.

Regulation and legislation

1.11. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017[5] defines the assessment, classification and water quality targets for designated surface or ground water in England and Wales.

1.12. We recognise that Defra outlines in their 'A new vision for water' White Paper the HM Government ambition to set new ambitious targets for water environment, also inclusive of potential updates to the Water Framework Directive Regulations. We will continue working

[3] Independent Water Commission - GOV.UK
[4] A new vision for water: white paper - GOV.UK
[5] The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

on our DWMP28 based on the existing framework, intending to incorporate new legislative or regulatory requirements when available.

1.13. There are also specific assessments, classifications and water quality targets for watercourses which are designated for their national and / or European importance for their protected environmental features, ecology or habitats. These are covered by various national policies and European Union (EU) Directives which have been transposed into UK legislation or regulations including for example the Conservation of Habitats and Species Regulations[6].

Key definitions

1.14. The DWMP guidance states the following definition for this Performance Indicator:

"Number of RNAGs[7] (Reasons for Not Achieving Good status / Deterioration) attributed to discharges of urban / highway runoff and misconnections that will not be remedied through investment by Water and Sewerage Companies (WASCs) or other organisations. This only covers runoff or connections entering a company's drainage and wastewater catchments".

[6] The Conservation of Habitats and Species Regulations 2017

[7] The Environment Agency's 'Reasons for Not Achieving Good' status database is updated for every waterbody as part of the River Basin Management Plan cycle. This Performance Indicator will be baselined off the RBMP Cycle 3 RNAG Database.

2. Key assumptions and exclusions

2.1. This section includes a detailed overview of the assumptions that we have made in reporting a Performance Indicator and our reasoning on any exclusions or deviations from the DWMP guidance where the guidance provides flexibility.

Assumptions

2.2. We have made the following key assumptions when preparing this emerging Performance Indicator methodology:

- This emerging Performance Indicator only concerns RNAGs attributed to the 'Urban & Transport' category[8].
- It is solely in relation to RNAGs which may be attributed to various 'sectors' and 'activities' but which may flow into WaSC drainage systems.
- In DWMP28 we will take a pilot approach so region wide forecasting will be in future DWMPs.

Exclusions/deviation from guidance

2.3. This is an emerging Performance Indicator with no currently agreed methodologies or guidance. Regulators are encouraging DWMP practitioners to develop innovative and appropriate methodologies to assess the level of risks for baselining the extent of the issues and forecasting into the future.

[8] Allowances will be made for activities which have quite obviously been mis-categorised or attributed to the wrong sectors during production of the RNAG database as per standard methodologies agreed as part of price review.

3. Data sources, normalisation and assurance

3.1. This section includes a brief description of the key datasets required to generate and report on this Performance Indicator. We also outline the process of assuring the accuracy of these sources used to calculate the Performance Indicator.

3.2. The official waterbody classifications are published by Defra following completion of the latest River Basin Management Plan (RBMP) cycle. The recent Cycle 3 RBMP results will be used to establish the current water quality status of waterbodies.

3.3. The data used to inform the RBMP Cycle 3 waterbody classifications is available on the EA Water Information Management System (WIMS) database9. This is an assured third-party dataset with no normalisation or assurance required.

3.4. All asset performance data, asset permits, and growth predictions are available from within Thames Water.

3.5. The data sources we are expecting to make use of are presented in Table 1.

Table 1. Data sources and assurance

Dataset	Source	Assurance
River Basin Management Plan Cycle 3 Reasons for Not Achieving Good status database	England | Catchment Data Explorer	Assured third party data
River Basin Management Plan Cycle 3 Reasons for Deterioration database	England | Catchment Data Explorer	Assured third party data
WIMS database (EA record water quality sampling data)	Open WIMS data	Assured third party data
Asset data, permit conditions & growth data	Internal Thames Water datasets	Assured internal data
Pollutions and misconnections databases	Internal Thames Water datasets	Not assured

3.6. We recognise that information on our, and other, surface water networks is limited both in extent and properties served. We will liaise with key stakeholders such as Highways England, local Highways Authorities, Network Rail and the main airports to understand the full extent and ownership of surface water networks in our catchments. We will work together to facilitate the sharing of data, research and outputs from any relevant investigations and/or modelling studies.

[9] Map Explorer | Water Quality Explorer

4. Reporting thresholds and outputs

4.1. This section presents our initial view of reporting requirements, which we intend to further develop over time as more information becomes available, by the regulator or other stakeholders. We recognise that the upcoming Strategic Policy Statement (SPS) and any directions issued ahead of the next Price Review 2029 (PR29) could have significant impacts on the methodology for this Performance Indicator.

Reporting thresholds & planning horizons

4.2. As this is an emerging Performance Indicator, the reporting thresholds will need to be further defined. At this stage of the process, we expect that we could report on the number and type of waterbodies with RNAGs attributed to the 'Urban & Transport' sector across our region. Following on from the catchment pilot projects, we expect that at some of these locations we will gain a better understanding and definition of our responsibilities for these waterbodies.

4.3. Given the limited data available we are currently unable to baseline the extent of the problem across our region. As such the activities within DWMP28 will focus on baselining the extent of the issue rather than forecasting against specific design horizons and categorising the future performance.

4.4. Our short-term aim is therefore to be able to baseline the extent of the problem to be able to forecast within future DWMPs. To do this we will need to be able to define an effective methodology and prepare tools to be able to quantify the issue during the DWMP28 risk assessment.

Assessing the value of performance

4.5. Alongside publication of this Performance Indicator methodology, there is a requirement to value performance outcomes using our Value Framework. This step will be completed during the Options Development and Appraisal (ODA) stage, once the framework has been fully defined and agreed following consultation with stakeholders.

4.6. It should be noted however, that this Performance Indicator is not expected to be linked to the provision of new assets, but rather to the investment to upgrade existing assets.

5. Performance Indicator methodology

5.1. The following section outlines a proposed high-level methodology for this emerging Performance Indicator. The methodology aligns to practitioner protocol produced by industry groups[10] and seeks to go beyond and identify catchments that may be at risk of RNAGs for Urban and Transport following the roll out of the continuous water quality monitoring programme.

Base year performance – 2030

5.2. We propose to apply this methodology to a small number of 'high risk' pilot waterbody catchments. These would be waterbodies with at least one, preferably multiple, RNAGs attributed to the 'Urban and Transport' category with a 'Probable' or 'Confirmed' level of confidence.

5.3. We have a number of investigations to be delivered as part of our AMP8 WINEP programme due for completion by 2027, which meet the criteria for 'high risk' pilot waterbody catchments. The WINEP investigations team, in coordination with our DWMP team, is sending survey teams out to identify the polluting surface water outfalls, define the ownership of these systems, and then trace back within the network to find the source(s) of the pollution. If the pollution is arising because of the condition or performance of our assets, we can take the necessary measures to address the pollution. If the pollution is coming from a third-party source, we will seek to liaise and work with the third party to identify measures that could be undertaken to address the pollution. Based on the schedule of these investigations, we are not expecting to be able to incorporate any outcome in advance of the final DWMP.

5.4. The results of these pilot studies, including the number of surface water outfalls within the catchment, the level of pollution detected, and the source(s) of the pollution will be fed back to the national steering groups who will compile the results from across the industry to create a baseline for future DWMP forecasting.

5.5. In addition to these pilot studies and in advance of their completion, we also propose to undertake a risk mapping exercise, to be available for the draft DWMP. These studies will identify waterbodies which may have a higher likelihood of being identified in future RNAGs as more information becomes available, for example following the roll out of the continuous water quality monitoring programme.

5.6. We are proposing to undertake a Geographic Information System (GIS) based screening exercise to prioritise a number of catchments with a 'high-risk' of significant environmental impact arising from surface water networks and attributable to 'urban & transport'. The exact definition of 'high-risk' catchment, and the methods of doing this, will be developed in collaboration with stakeholders as part of this exercise.

[10] Cycle 2 Company Network Task and Finish Group on RNAG Performance Indicators

We welcome your views on this technical methodology. Please share them with us by emailing DWMP@thameswater.co.uk.

Our Drainage and Wastewater Management Plan 2030–2055 will include a number of technical methodologies, like this one. They will all provide detailed information on specific topics featured in our draft Plan such as climate change and sustainable approaches to drainage. You will be able to access all of the technical methodologies on our DWMP webpage.

For more DWMP28 information please visit our DWMP webpage and portals on our website.

Thames Water