

DWMP 28



Our Drainage and Wastewater Management Plan 2030-2055

Delivering for customers, communities and the environment

Performance Indicator Methodology – Treatment Works Compliance (Descriptive)

March 2026





Table of contents

1. Introduction.....	3
2. Data Sources, normalisation and assurance.....	6
3. Performance Indicator methodology.....	7
4. Next steps.....	7

List of tables

Table 1. Extract from Table 2 of Defra guidance	4
Table 2. List of STWs with no numeric permit limits.....	6

This methodology document is a working draft 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 **Treatment works compliance (Descriptive) Performance Indicator** and its purpose and contribution to forming our Drainage and Wastewater Management Plan (DWMP).

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 **Treatment works compliance (Descriptive) 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) and reflects the outcome of schemes and maintenance activities planned for this period. We then forecast what is expected to happen to the indicator at baseline 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 that will be used to summarise the level of risk and 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 DWMPs¹ and subsequent clarifications by the Environment Agency (EA)². To understand the general approach to our DWMP please also refer to our Strategic Context document on our website³.

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:

- 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))

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).

³ [DWMP28 | Drainage and wastewater | Thames Water](#)



- 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^{1,2}. 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 DWMPs¹.

Key definitions

1.7. Treatment works compliance (descriptive). The Government DWMP guidelines¹ provide the following definition:

Table 1. Extract from Table 2 of Defra guidance

Category	Metric	Details
Water environment	Treatment works compliance (descriptive)	Annual number of wastewater treatment works predicted to fail to meet descriptive conditions. It is assumed that this emerging Performance Indicator refers to descriptive permit compliance at sites without numeric permit limits.

1.8. The descriptive permit conditions refer to the specific requirements set out in an environmental permit that dictate how the site must operate to ensure compliance with environmental regulations. There are 137 Environmental Permitting Regulations (EPR) descriptive conditions typically outlining the treatment processes, monitoring obligations, and operational standards that must be met to protect water quality and public health and are applied to all sites alongside a numeric discharge permit. However, some very small sites (usually serving less than 100 people) may have only descriptive permits if the receiving environment does not require other permit limits.



1.9. A Common Classification Scheme (CCS)⁴ category 1 or 2, breach of a descriptive condition at a site with numeric discharge limits, has the potential to cause significant pollution or any other significant impact.

1.10. Descriptive conditions fall into several main categories:

- **Management:** e.g. Operating to a written Environmental Management System (EMS). There are 7 conditions in this category.
- **Operations:** e.g. Storm sewage should not be macerated. There are 72 conditions in this category.
- **Emissions and Monitoring:** e.g. permit limits are not to be exceeded. There are 122 conditions in this category.
- **Information:** e.g. Keep legible records. There are 50 conditions in this category.

⁴ [Appendix 4.18 LIT 11227 - Incidents and their classification common incident classification scheme CICS .pdf](#)

2. Data Sources, normalisation and assurance

Descriptive Permits at non-numeric sites

2.1. There are 9 sewage treatment works in the Thames Water area, which at the time of writing do not have numeric permit limits and are therefore assumed to be applicable to this Performance Indicator. These are listed below:

Table 2. List of STWs with no numeric permit limits

STW name	Population Equivalent	Details
Basildon Park	14	Currently discharges to groundwater and has no storm overflow
Hannington (Hants)	15	Currently discharges to groundwater and has no storm overflow
Hannington (Wilts)	160	Currently discharges to groundwater and has no storm overflow
Headley	225	Currently discharges to groundwater and has no storm overflow
Leckhampstead	204	Currently discharges to groundwater and has no storm overflow
Shirburn	70	Currently discharges to groundwater and has no storm overflow
Temple Guiting	25	Currently discharges to groundwater and has no storm overflow
Welford	376	Currently discharges to groundwater and has no storm overflow
Wolverton Common	15	Currently discharges to groundwater and has no storm overflow

2.2. All 9 STWs without numeric permit limits will be included in this assessment. It is important to note that we will address each STW assessed, not each permitted discharge from each individual STW. Therefore, a CCS category 1 or 2 breach in any of the descriptive conditions in a STW will result in a failing STW under this Performance Indicator.

2.3. All 9 STWs have the following two descriptive permit conditions only:

- The discharge shall be made at the National Grid Reference specified.
- The only activities authorised by the permit are the activities specified in the permit.

2.4. The categorisation of descriptive condition breaches into CCS categories is inherently subjective by the Environment Agency officer and we have therefore, for the avoidance of risk, included all descriptive conditions in our assessment.



- 2.5. Performance with respect to descriptive permit compliance is difficult to forecast. Our forecast will be based on known breaches and the impact of asset deterioration.
- 2.6. All 'day to day' investment related to this Performance Indicator e.g. Opex, maintenance and reactive spend on existing assets, will be defined and included separately in the DWMP data tables.

3. Performance Indicator methodology

- 3.1. As explained in paragraph 2.5 there will be no assessment against this Performance Indicator with regard to future enhancement expenditure.

Base and Asset Health

- 3.2. We will also consider the risk of poor and deteriorating asset health affecting descriptive permit compliance. Thames Water is evaluating the asset health of all STW by calculating the annual likelihood of failure of key equipment types at STWs and using the change in this and the equipment / site criticality, to elicit a risk of non-compliance with permits at individual STWs. This will be reported at all three DWMP spatial scales (L3, L2 and L1)¹.

4. Next steps

- 4.1. We will develop and refine our asset health index and forecasting assessment for STWs.



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.

