

Independent Sewerage Adoption Panel

Water UK

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7 November 2024

F.A.O. Michael Deakin

Ofwat

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By email only to Michael.Deakin@ofwat.gov.uk and codeforadoption@ofwat.gov.uk

Dear Michael

Independent Sewerage Adoption Panel ('the Panel')

Change Proposal by Torrent Water Management Limited: Addition of the material HDPE for raising sections to DCG v2.1 E6.7

I write further to the above and to the Change Proposal ('the Proposal') submitted to the Panel by Torrent Water Management Limited ('Torrent') and published on the Panel's website on 8th July 2024.

The Panel has now considered the Proposal and I have set out below the details of the Proposal, the Panel's process for consideration of it, and finally the Panel's recommendation to Ofwat on the proposal.

I enclose a copy of the Proposal with this letter as an appendix and for ease of reference.

The Proposal

In the Change Proposal form submitted to the Panel, Torrent stated that it had identified the following issue regarding the materials permitted under the Design and Construction Guidance ('DCG') for use in frame seating rings:

'Current concrete units are easily fractured and are continually replaced. A task which at 60-70kg requires heavy machinery and is very time consuming and costly to both the project and the environment. Health and safety can be compromised when corners are cut.'

As a result of this, Torrent stated that:

'Both Merchants and contractors have been asking for a modern lightweight robust alternative to concrete to replicate the changes happening with pipes and now concrete ring sections. Reducing reliance on machinery and giving health and safety compliance is a must within modern construction.'

Materials permitted for use in frame seating rings are listed in DCG E6 - Construction Of Manholes, Inspection Chambers And Wet Wells. E6.7.1 states that:

'Manhole frames shall be set to level, bedded and haunched externally over the base and sides of the frame in mortar, in accordance with the manufacturer's instructions. The frame shall be seated on at least one course of Class B engineering bricks, on precast concrete masonry units or on precast concrete cover frame seating rings to regulate the distance between the top of the cover and the top rung to no greater than 675 mm.'

Torrent is the manufacturer of the 'TORiser' unit which is constructed from High Density Polyethylene ('HDPE'), an alternative material which is not currently listed under the DCG for use in frame seating rings.

Therefore, Torrent proposed the following change to the DCG:

E6.7.1 – to include HDPE as a material for precast units or cover frame seating rings.

The Panel's consideration of the Proposal and consultation

The Panel considered the Proposal at meetings on 10th July 2024 and 18th October 2024.

In considering the Proposal, the Panel has:

- discussed the Proposal at two meetings;
- asked Torrent to provide further information on the testing carried out on its TORiser product which resulted in its certification by the Water Research Council and its engagement with Highways Authorities on the use of the product.
- consulted with water companies on whether they were permitting use of the TORiser on a trial basis.

The minutes of the Panel's meetings when the Proposal was discussed are enclosed as appendices. The further information provided by Torrent is also enclosed.

The Panel's recommendation to Ofwat

In accordance with its Terms of Reference, the Panel has assessed the Change Proposal in terms of:

- (a) the need for the change, for example, is it a service improvement or is it needed to address a particular issue;
- (b) consistency with the principles and objectives of the Code, and any relevant statutory or regulatory requirements; and
- (c) the impact of the change (be it positive and/or negative) on Customers and on Sewerage Companies.

In reaching its decision on the Proposal, the Panel has taken into account the following issues:

- Some water companies have already accepted the TORiser product on a trial basis and there are clear benefits from the product, as evidenced by the willingness of companies to trial it. The Panel must be mindful of the need to encourage innovation in the sector in accordance with the Adoption Code principles.
- Section 2.5 of the Sewerage Sector Guidance (SSG) provides for innovation on the basis that: *'new processes and products are able to be presented to the Sewerage Company for approval. It is expected that initially, trials will be conducted by way of an agreed deviation from the DCG before an application is made for the new way of working/product to be more generally adopted via the SSG governance process.'* The trials of the TORiser are not yet complete and therefore it is not yet ready to be promoted under the innovation process.
- It is not the role of the DCG or the Panel to promote individual products, but rather to provide specifications at an industry level. As currently drafted, E6.7.1 does not unduly restrict the use of the product or material, as it can be used under the innovation process in the SSG. At this time, the trials of the product have not been completed and therefore there is no requirement to change the DCG or SSG governance processes for its adoption.
- Amending the DCG as proposed would be disproportionate, particularly given that the material in question is not currently restricted by the DCG.

Therefore, the Panel concluded that the Proposal should be rejected on the basis that there are already mechanisms within the Code to allow for the use of HDPE products under the innovation process within the SSG and therefore amending the DCG was not necessary in this instance. However, the Panel noted that the Code may need to be clarified to explain how products which have successfully completed trials under 2.5 of the SSG can be included within the DCG subsequently if appropriate; the Panel will consider this separately.

This decision reflects the consensus of all members of the Panel following consideration of the Proposal at the meeting on 18th October 2024.

I confirm that a copy of this letter has been sent to Torrent and has also been published on the Panel's website. If you require any further information or if the Panel can assist any further regarding the Proposal, please let me know.

Yours sincerely,

Victor Olowe

Chair

Independent Sewerage Adoption Panel