

Code for Adoption Agreements

Sewerage sector documents: Change proposal (Ref 019)

Modification proposal	Sewerage Sector Guidance Appendix C – Design and Construction Guidance: Addition of the material High Density Polyethylene for raising sections to DCG v2.1 E6.7
Independent Water Adoption Panel Recommendation	The Panel recommended rejecting the proposed change
Decision	Ofwat has rejected the proposed change
Publication date	24 February 2025
Implementation date	N/A

Background

Torrent Water Management Limited (**Torrent**) submitted this change proposal to the Independent Sewerage Adoption Panel (**the Panel**) on 8 July 2024, with the Panel publishing the proposal on its website on the same day. The function of the Panel is to consider change proposals to the [sewerage sector guidance and model sewerage adoption agreement](#) (**the Sewerage Sector Documents**) which apply to companies operating wholly or mainly in England. These documents were developed by companies as required by the [Code for Adoption Agreements](#) (**the Code**) and came into effect in April 2020. A change proposal is defined in the Code as a proposed change to the sector guidance or the model adoption agreements.

The change proposed by Torrent concerns the Design and Construction Guidance (**DCG**) which is Appendix C of the Sewerage Sector Documents. Specifically, Torrent is seeking changes to subsection E6.7 of the DCG which is about setting manhole covers and frames. Torrent would like to include High Density Polyethylene (**HDPE**) as a material for precast units or cover frame seating rings.

The change proposal

Currently, materials permitted for use in frame seating rings are listed in section E6 of the DCG. Torrent proposes that subsection E6.7, which is about setting manhole covers and frames, be amended to include HDPE cover frame seating rings as well as concrete cover frame seating rings. Torrent manufactures the 'TORiser' unit which is a seating ring system constructed from HDPE.

Torrent advises that the new HDPE units speed up installations as they are lightweight and do not rely on machinery. Torrent also notes that merchants and contractors are supportive of a modern lightweight alternative to concrete, and this would replicate changes happening with pipes and concrete ring sections.

Consultation and assessment

In submitting its recommendation, the Panel confirmed that it met the Code requirement¹ to assess the change in terms of:

- The need for change, for example, is it a service improvement or is it needed to address a particular issue?
- Consistency with the principles and objectives of the Code, and any relevant statutory requirements; and
- The impact of the change (be it positive and/or negative) on customers and on water companies.

In considering the change 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; and
- consulted with water companies on whether they were permitting use of the TORiser on a trial basis.

Panel recommendation

On 7 November 2024, the Panel recommended to Ofwat, by unanimous agreement, that Ofwat reject the proposed change to the DCG. In reaching its decision, the Panel stated that it considered the following issues:

¹ See paragraph 3.8.11 of the Code.

- 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 the companies to trial it. The Panel was mindful of the need to encourage innovation in the sector in accordance with the principles set out in the Code.
- 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 sets out that 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 Panel noted that trials of the TORiser are not yet complete and, as such, concluded it is not yet ready to be promoted under the innovation process.
- The Panel considered that as currently drafted, subsection 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.
- The Panel concluded that amending the DCG as proposed would be disproportionate, particularly given that the material in question is not currently restricted by the DCG.

The Panel stated 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, in this instance, amending the DCG was not necessary. However, the Panel also noted that the Code may need to be clarified to explain how products which have successfully completed trials under section 2.5 of the SSG can be included within the DCG subsequently (if appropriate). The Panel noted it would consider this separately.

Our decision and reasons

We have considered the above issues and all supporting documentation provided to us by the Panel and Torrent, and have decided to reject the proposed change.

We agree with the Panel that there are already mechanisms within the Code to allow for the use of HDPE products under the innovation process. We also note that although trials of the TORiser indicate that the TORiser is effective, these trials are not yet complete. Accordingly, we consider that given trials remain on-going, there is insufficient evidence, at this stage, to justify the proposed change to section E6.7.1 of the DCG. Such a change would be premature but there may be benefit in the requester resubmitting the change proposal once the outcome of the trials is confirmed. This is consistent with the Code principles of being fair and proportionate and ensuring a level playing field.

Decision notice

In accordance with paragraph 3.9.4 of the Code Ofwat rejects this change proposal.

Emily Bulman

Director, Charges, customers and developer services