

Independent Sewerage Adoption Panel

Water UK

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18th March 2026

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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 ViaCon UK: Add new sub-clauses in DCG for Corrugated Steel Pipe Tanks for below ground stormwater attenuation & storage applications

I write further to the above and to the Change Proposal ('the Proposal') submitted to the Panel by ViaCon UK ('ViaCon') and published on the Panel's website on 18th September 2025. The Panel's recommendation on the Proposal was originally due to be submitted by 18th January 2026; however following a delay in submission of further information by ViaCon as requested by the Panel. Ofwat agreed to extend this deadline until 4th March 2026.

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, ViaCon stated that it had identified the following issue:

The current version of the DCG ('Design and Construction Guidance') includes design criteria for modular geocellular systems and, since Version 2.2, arch-shaped thermoplastic chamber systems. However, corrugated steel pipe tanks, which are widely used in surface water attenuation schemes across the UK and Europe, remain unreferenced in DCG.

As a result of this, ViaCon stated that:

This absence may unintentionally discourage adoption by sewerage undertakers, despite corrugated steel systems being structurally robust, durable, and already used under bespoke or site-specific agreements.

Therefore, ViaCon proposed the following change to the DCG:

- *New sub-clause inserted after C7.8.3*

The structural design of stormwater attenuation tanks constructed using helically wound corrugated steel pipes shall be undertaken by a suitably qualified person. Design shall be in accordance with BS EN 1993-4-2, and may reference National Highways CD 375 – Corrugated Steel Buried Structures for guidance on loading, structural detailing, and durability. Reference should also be made to WIS 4-25-01 Issue 1: Specification for the use of steel tanks in the water industry. Corrosion protection, durability (minimum 100-year design life), and watertightness requirements shall be evidenced.

- *New sub-clause after E2.48:*

E2.49 Corrugated Steel Pipe Stormwater Tanks Corrugated steel pipe-based attenuation systems shall comply with WIS 4-25-01 Issue 1 and demonstrate structural adequacy through design calculations to BS EN 1993-4-2 or equivalent. The system may also follow design guidance from CD 375 for installations subject to highway loading. The system shall allow for safe access, inspection, flushing/jetting, and de-silting, with no compromise to structural integrity or protective coatings. Where installed below highways, loading requirements must be approved by both the sewerage undertaker and, where applicable, the highway authority.

The Panel's consideration of the Proposal and consultation

The Panel considered the Proposal at meetings on 30th October 2025 and 16th March 2026.

In considering the Proposal, the Panel has:

- discussed the Proposal at two meetings;
- asked ViaCon to provide the following details about the tanks:
 - Self-cleansing capabilities
 - Crushing and loading strength, including product specifications
 - Maintenance regime and requirements
 - Lifespan
 - Examples of adoption and previous use

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

- Water companies did not often see corrugated steel tanks put forward for adoption and those that have been put forward have not met adoption criteria. From ViaCon's further information, it appears that the tanks have been mainly used privately and in highways drainage, and while the asset could be offered to undertakers on a trial basis, ViaCon had not been able to provide examples of adoption.
- As a condition of adoption, undertakers require storage systems on the public sewer network to be self-cleansing and due to their corrugated form the tanks posed a risk of sediment build-up. The Panel noted that ViaCon suggested that this should be mitigated by upstream and downstream controls which would create increased maintenance risk and cost in respect of cleansing and silt control.
- The Panel was also concerned about the vulnerability of the tanks' zinc coating to damage particularly at the critical point of installation and the likely reduction of durability from jetting or debris; this is a particular risk if the tanks are prone to sediment build-up requiring cleansing. Furthermore, the Panel was concerned that if water companies had to amend their requirements with regard to self-cleansing, this would set a negative precedent which could have a wider adverse impact on other parts of the system. Overall corrugated tanks did not appear to offer a better storage solution than other products already available.

Therefore, the Panel concluded that the Proposal should be rejected on the basis that the change was not necessary and was likely to have a negative impact on water companies and customers as a result of increased asset risk and network cleansing requirements. If in the future ViaCon is able to provide evidence of the assets meeting adoption requirements, it could submit a further change proposal.

This decision reflects the consensus of all members of the Panel following consideration of the Proposal at the meeting on 04 March 2026.

I confirm that a copy of this letter has been sent to ViaCon 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