Centre City Tower, 7 Hill Street, Birmingham B5 4UA
Westferry House, 11 Westferry Circus, Canary Wharf, London, E14 4HD
www.ofwat.gov.uk

Code for Adoption Agreements

Sewerage sector documents: Change proposal (Ref 020)

Modification proposal	Sewerage Sector Guidance Appendix C – Design and Construction Guidance: Corrugated Steel Pipe Tanks
Independent Water Adoption Panel Recommendation	The Panel recommended rejecting the proposed change
Decision	Ofwat has rejected the proposed change
Publication date	8 May 2026
Implementation date	N/A

Background

ViaCon (United Kingdom) Limited (**ViaCon**) submitted this change proposal to the Independent Sewerage Adoption Panel (**the Panel**) and on 18 September 2025 it was published on the Panel's website. 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 sewerage companies (**water companies**) operating wholly or mainly in England. These documents were developed by water 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 ViaCon concerns the guidance in the Sewerage Sector Documents Appendix C – Design and Construction Guidance (**DCG**) relating to attenuation and storage applications. Specifically, it seeks to include the use of corrugated steel pipe tanks (**CSPTs**) as an option for constructing stormwater attenuation tanks.

The change proposal

ViaCon considers that the current DCG may unintentionally discourage the adoption of CSPTs due to this type of design not being referenced. ViaCon notes that CSPTs are already widely in use across the UK and in Europe for surface water attenuation schemes. Such solutions may be a durable and cost-effective alternative to the stormwater attenuation systems that are currently in use in the water sector. ViaCon considers the exclusion of CSPTs from the DCG to restrict fair competition and innovation.

ViaCon has proposed the addition of two new sub-clauses to the DCG to address this.

A new sub-clause to be 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."

And a new sub-clause to be inserted after E2.48:

"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."

Consultation and assessment

In submitting its recommendation, the Panel confirmed that it met the Code requirement[1] 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?

[1] See paragraph 3.8.11 of the Code.

- 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; and
- asked ViaCon to provide the following additional information about the CSPTs:
    - Self-cleansing capabilities.
    - Crushing and loading strength, including product specifications.
    - Maintenance regime and requirements.
    - Lifespan.
    - Examples of adoption and previous use.

  This information was provided by ViaCon to the Panel.

Panel recommendation

On 18 March 2026, the Panel recommended to Ofwat, by unanimous agreement, that we reject the proposed change to the Sewerage Sector Documents. In reaching its decision, the Panel stated that it has considered the following issues:

- Water companies did not often see CSPTs 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 mainly been used privately and in highways drainage. 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, but this 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 regarding self-cleansing, this would set a negative precedent which could have a wider adverse impact on other parts of the system. Overall, CSPTs did not appear to offer a better storage solution than other products already available.

The Panel stated 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. The Panel noted that if, in the future, ViaCon is able to provide evidence of the assets meeting adoption requirements, it could submit a further change proposal.

Our decision and reasons

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

We agree with the Panel's recommendation, and consider it to be consistent with the Code principles.

We note that the Panel has raised concerns that these tanks would not meet the sector documents' requirements that they are self-cleansing, as set out in section D5.5.2 of the DCG. ViaCon notes that CSPTs can be self-cleansing when installed in systems that are hydraulically designed to be self-cleansing when CSPTs are installed. However, self-cleansing is not a function of the CSPT itself. As a result, there will be networks where the installation of CSPTs is not appropriate.

Additionally, we note that there have not yet been any examples of CSPT solutions being built and adopted by the wastewater sector. It would be inappropriate to include in the DCG a solution that had not yet been successfully implemented by the sector.

We note that the Sewerage Sector Documents do not prevent water companies from trialling CSPTs where a sewerage company consider these to be an appropriate attenuation solution. We agree with the Panel's conclusion that, if a CSPT solution is tried and successfully adopted, there is scope for ViaCon to re-apply for a change to the DCG to include CSPTs.

With the above in mind, we consider that there is insufficient evidence to support the addition of the proposed subclauses after sections C7.8.3 and E2.48 of the DCG at this point. We consider that CPSTs should remain a solution that is agreed with the incumbent sewerage company on a case-by-case basis at this point. However, we remain open to CSPTs being included in the future if successful examples of such systems being built and adopted by water companies can be provided. We have therefore decided to reject the change proposal.

This is consistent with the Code principle of being efficient and effective.

Decision notice

In accordance with paragraph 3.9.4 of the Code Ofwat rejects this Change Proposal.

Emily Bulman
Director, Charges, developer services and new appointee policy