

Independent Sewerage Adoption Panel

Water UK

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29 January 2021

F.A.O. Michael Deakin

Ofwat

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

Dear Michael

Independent Sewerage Adoption Panel ('the Panel')

Sewerage Sector Guidance: CPS01 - Change Proposal from the British Plastics Federation

I write further to the above and to the Change Proposal submitted to the Panel by the British Plastics Federation ('BPF') on 13 July 2020.

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

The Proposal

In the Change Proposal form submitted to the Panel, the BPF requested the following changes be made to the Code documentation:

The maximum permitted depth of inspection chambers of 3 metres in SFA7 (2012) was retained in the draft Design and Construction Guidance throughout the consultation process (see 14/2/19 DCG consultation draft), until the final consultation draft (25/3/19) where it was changed to 2 metres. Errors were also introduced at this stage into the selection process in Figure 1 affecting the use of shallow concrete manholes.

Change:

- *The maximum depth for (Type D) inspection chambers to 3 metres.*

- *Figures B.18 – B.21 back to 14/2/19 consultation draft*
- *Clause B5.2 to back to 3 metres*
- *Figure 1 back to 14/2/19 consultation draft*

Background to the Proposal

The BPF wrote to the Panel on 28 January 2020 outlining its request to change the maximum permitted depth of inspection chambers under the Design and Construction Guidance from 2m to 3m. At that time, the Panel had not yet formally commenced its activities, which began after 1 April 2020. Unfortunately, due to the difficulties arising from the ongoing COVID-19 situation, the Panel was unable to convene a quorate meeting for several months including due to some members being furloughed. In June 2020, the Panel Secretary wrote to the BPF to explain the situation and provide a copy of the Change Proposal proforma that the Panel required for use in all change proposals to ensure consistency.

The BPF submitted the completed proforma (Appendix 1) to the Panel on 13 July 2020. The request was subsequently published on the Panel's website prior to the Panel's meeting on 22 September 2020 and notice of the proposal was given to relevant stakeholders, namely British Water, The Home Builders Federation and The House Builders Association. None of these bodies made any comments on the proposal.

The Panel's consideration of the Proposal

The Panel considered the Proposal at meetings on 22 September 2020, 25 November 2020 and 20 January 2021. Following the first meeting, the Panel decided that it required further information in order to fully consider the Proposal. On 14 December 2020, Ofwat confirmed that it would extend the deadline as requested for the Panel to provide its recommendation on the Proposal until 31 January 2021.

In considering the Proposal, the Panel has:

- obtained technical advice from the Water Research Centre Ltd ('WRc') (Appendix 2);
- consulted with company operations and safety teams;
- consulted with external stakeholders at the Home Builders Federation;
- reviewed the additional representations made by the BPF in its letter to the Panel dated 20th November 2020 (Appendix 3);
- reviewed previous advice given to the Technical Review Group regarding health and safety issues, as summarised in the paper produced by WRc.

The minutes of the Panel's meetings and the advice paper produced by WRc are attached as Appendices and available on the Panel website at www.water.org.uk/sewerage-sector-guidance-approved-documents/.

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, the Panel has taken into account the following issues:

- WRc concluded that the change was likely to have a very limited effect on the use of Type D inspection chambers and previous trials had involved chambers with a depth of up to 4m.
- British Standards permits chamber depth up to 6m, which is also in line with the practice in European countries. An increase from 2m to 3m is therefore in line with this and would bring the Code documentation into closer alignment with other relevant guidance, such as British Standards and Building Regulations.
- An increase to 3m may encourage developers to put forward more assets for adoption, with the result that Customers would not be required to maintain the assets. This would benefit Customers without placing an undue burden on Sewerage Companies.
- Operational and safety teams at Sewerage Companies did not consider that the increase to 3m would pose any additional engineering, operational or safety risks. Consultation with the Home Builders Federation also confirmed that the change would have low impact on developers.
- An increase to 3m may provide suppliers with more scope to demonstrate the benefits of the use of deep inspection chambers extension, which could provide benefits to Sewerage Companies and Developers.

The Panel's recommendation is that the change proposal should be approved and the Sewerage Design and Construction Guidance should be amended in line with the BPF's request. This decision reflects the consensus of all members of the Panel following consideration of the proposal at the meeting on 20 January 2021. This recommendation was made on the basis of improving the principles of efficiency and encouraging innovation. The recommended date of implementation is 1 March 2021. The Panel is satisfied that the proposed implementation date is appropriate in the circumstances.

I confirm that a copy of this letter has been sent to the BPF, which has also been published on the 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