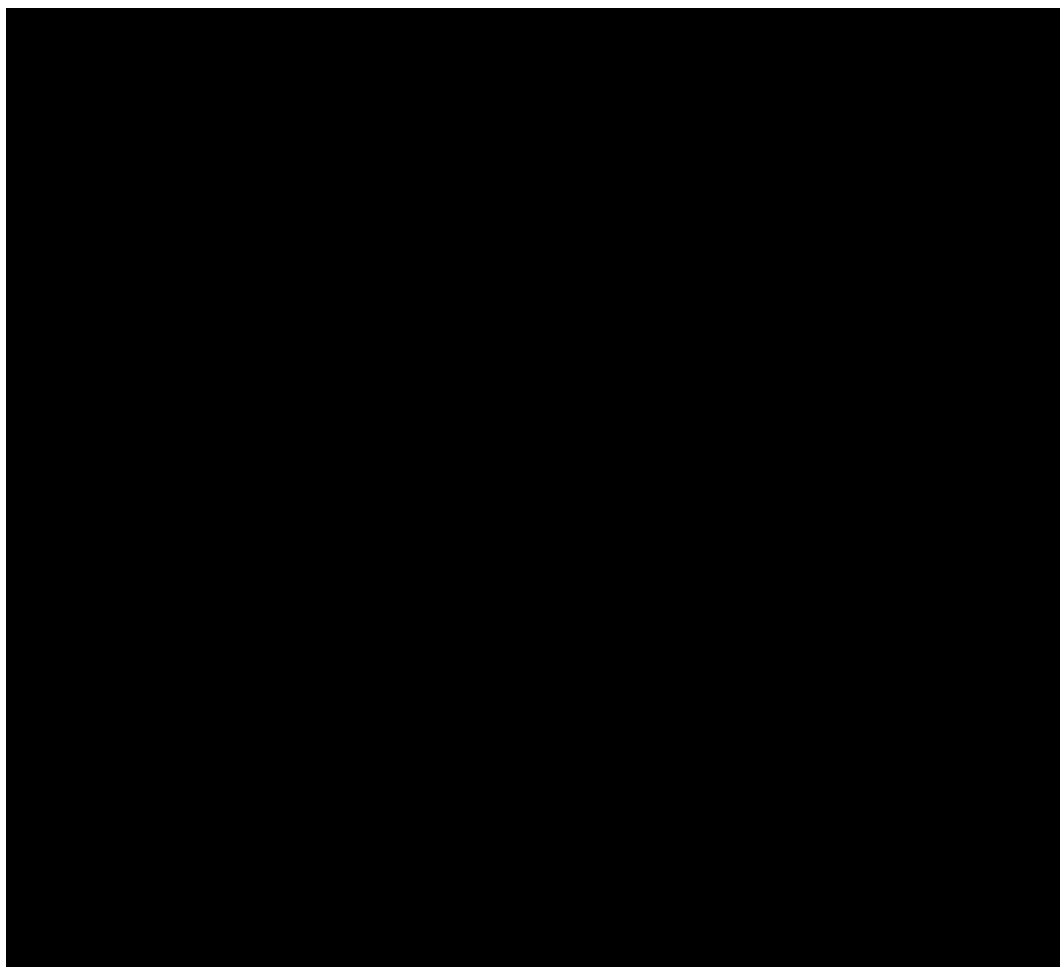
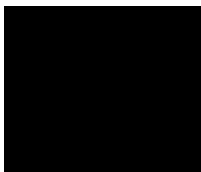




Whitfield Growth

Annex D1 - Planning and Consenting Strategy

September 2025

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Whitfield Growth

Annex D1 - Planning and Consenting Strategy

September 2025

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Executive summary

This Planning and Consenting Strategy sets out the proposed approach for securing the necessary permissions and approvals for the Whitfield Growth Scheme. The strategy has been prepared to support the first submission under Ofwat's Large Scheme Gated Process and reflects current assumptions on scheme design, feasibility, and delivery.

The Whitfield Growth scheme will be a major infrastructure project intended to support the strategic housing growth identified in the Dover District Local Plan to 2040, specifically the Whitfield Urban Expansion (WUE), which will deliver up to 6,350 homes, including 2,200 homes within the plan period. The scheme is required to address the wastewater treatment needs arising from this growth, with a projected Population Equivalent (PE) increase of 15,240.

The PR24 preferred option comprises the construction of a new Wastewater Treatment Works (WTW) located near Whitfield, supported by a below ground transfer pipeline and a long sea outfall (LSO) discharging to the English Channel. The PR24 preferred option has been selected following an options appraisal process and is considered the most viable solution in terms of environmental impact, engineering feasibility, and regulatory compliance.

The strategy outlines the planning and consenting route for the scheme, including the requirement for full planning permission under the Town and Country Planning Act 1990. The change of use of land, scale and complexity of the scheme, including above-ground infrastructure and potential Environmental Impact Assessment (EIA) requirements, necessitate a planning application.

A detailed review of relevant planning policy has been undertaken, including the Dover District Local Plan to 2040, the Kent Minerals and Waste Local Plan (2025), and the National Planning Policy Framework (2024). The scheme will be developed to align with strategic infrastructure policies, biodiversity net gain requirements, landscape and heritage protections, and water quality safeguards.

Additional consents and licences will be required, including, Environmental Permits, and various statutory approvals for works affecting highways, rail infrastructure, Crown Land, and designated open space. Should infrastructure affect a Marine Conservation Zone, then a Marine Licence would be required. A programme for consent has been developed, identifying key milestones, and a risk register has been produced to identify planning and consenting risks.

This strategy will be subject to ongoing review and refinement as the scheme progresses through subsequent stages of the Gated Process. Key next steps include stakeholder engagement, EIA scoping, land referencing, and preparation of the planning application.

1 Introduction

This report sets out the current strategy for planning and consenting of the Whitfield Growth scheme to meet the need generated from housing growth associated with the Whitfield Urban Expansion (WUE). The WUE is a strategic housing-led urban extension allocated in the Dover Local Plan 2040 which will deliver up to 6,350 homes, including 2,200 homes within the plan period. This report has been developed to support the first submission to OFWAT under the Large Scheme Gated Approach. The Large Scheme Gated Approach guidance¹ summarises this as:

“The first submission sets out progress of scheme design and feasibility assessments. This includes information similar to the requirements defined for gates 1 and 2 of the RAPID process and provides a progress update and quality check.”

This strategy has been developed to meet the requirements and guidance within:

- Updated Ofwat PR24 gated process requirements (June 2025 consultation);
- The NPPF (2024) emphasis on sustainable development, infrastructure alignment, and early engagement;
- The Dover Local Plan to 2040 (2024) and associated supporting documents; and
- The Kent Minerals and Waste Local Plan (2025).

The Whitfield Growth scheme, classified under the Gated Approach in Ofwat’s PR24 determinations, is a major infrastructure project aimed at supporting growth and environmental compliance in the Dover area and specifically to meet the wastewater treatment needs of the WUE.

Existing wastewater assets in the Dover area, (principally Broomfield Bank catchment), lack the capacity to accommodate WUE growth. Different options have been considered in the development of the Whitfield Growth Scheme, including upgrading of existing facilities.

As noted above this report supports the first submission. Development of the Whitfield Growth Scheme is ongoing and as a result the assumptions on which the strategy is based are subject to change. This strategy will be updated at subsequent points for future submissions.

¹ <https://www.ofwat.gov.uk/wp-content/uploads/2025/06/PR24-Large-Schemes-Approach-consultation.pdf>

2 Need for the Scheme

2.1 Whitfield Urban Expansion

2.1.1 Dover Local Plan 2040

The Dover District Local Plan to 2040, adopted in October 2024, is the statutory planning framework that guides development across the Dover District to 2040. The WUE is the largest site allocation (SAP1) in the district and is allocated for 6350 homes as well as supporting infrastructure including schools, a health centre and open space. As of 2024, there have been 1483 permissions / completions. A further 2200 of the 6350 homes are planned to be delivered by 2040 with the remaining 2667 homes delivered after 2040. This will result in a population equivalent of 15,340 for the full build out.

Table 2.1: SAP1 build out rate

SAP1	Homes	Period
Permissions/completions	1483	Up to 2024
Expected to be delivered up to 2040	2200	2024 – 2040
Expected to be delivered after 2040	2667	After 2040
Total allocation	6350	

The Local Plan acknowledges the need for new wastewater infrastructure to support growth, particularly at Whitfield² and references the options appraisal work that Southern Water is undertaking for infrastructure upgrades in the area.

Policy SAP1 states:

The revised masterplan and development proposals for the site should provide:

The necessary utilities, including wastewater, water supply, electricity and gas network. The developer/landowner should consult the relevant water authority to ensure that there will be sufficient capacity in the Wastewater system to accommodate the development, and any upgrades are carried out where necessary. The phasing and occupation of development should align with the delivery of sewerage infrastructure, in liaison with the service provider. The site layout should be planned to ensure future access to existing water and wastewater infrastructure for maintenance and upsizing purposes.

2.1.2 Dover Infrastructure Development Plan

The Infrastructure Delivery Plan (IDP) June 2023 and accompanying schedule (IDS - Appendix 1) includes the most up to date details of committed and planned schemes by infrastructure type required to ensure that infrastructure can facilitate the planned growth across the District to 2040 as set out in the Local Plan.

The IDP confirms that a new local wastewater system and upgrade are required to serve the WUE at the time of 1800 occupations. These are included in site-specific policies and the Infrastructure Delivery Schedule (IDS)³. The priority / timing is identified as Critical and Short-Medium.

2.1.3 Previous Adopted Dover Core Strategy 2010

The WUE was included in the Adopted Dover Core Strategy and masterplan with 5750 homes expected by 2040. The Dover Local Plan to 2040 includes a larger number of homes but at a slower build out rate which is reflective of the current planning and construction timelines today.

²Para.1.46 - Key issues for the Local Plan - Working with partners to facilitate the delivery of the Whitfield Urban Expansion.

³ <https://www.dover.gov.uk/Planning/Planning-Policy/PDF/Appendices-to-IDP-June-2023.pdf>

2.1.4 Whitfield Masterplan

The Whitfield Masterplan is a Supplementary Planning Document (SPD) to the Dover Local Plan 2040. This SPD is the masterplan for the WUE. It was produced in 2011 with housing growth figures and phasing related to the Adopted Dover Core Strategy 2010. As part of SAP1 a new masterplan is expected to be produced.

2.2 Existing Infrastructure

Currently Wastewater from the Whitfield area is handled at Broomfield Bank WTW approximately 4km to the southwest, across Dover and the intervening River Dour Valley and complex topography. This wastewater treatment works (WTW) is already operating near capacity. Expansion of Broomfield Bank WTW is considered to be complex due to engineering as well as planning and environmental factors. Further work is being undertaken looking at the engineering issues (Annex A1 and Annex A2), this section looks in more detail at the planning issues.

2.2.1 Context of the site

Broomfield Bank WTW is constructed underground in a hillside. A key reason for this was to reduce impact on the local landscape which is designated as National Landscape (formerly Area of Outstanding Natural Beauty). A secondary treatment facility was added to the site in 2002 and this was located below ground in keeping with the original structure. The B2011 Folkestone Road runs immediately to the south of the site providing scenic views of the National Landscape on the approach to Dover. In this context any future expansion would be sensitive in visual terms and achieving further WTW development in this location, particularly above ground, may be controversial.

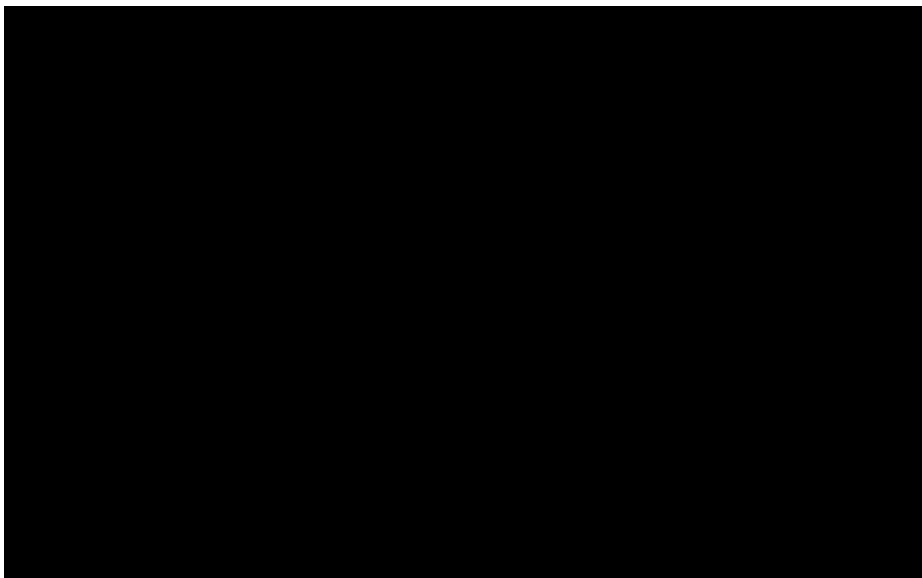
Figure 4: Broomfield Bank entrance to underground treatment works



Photo 2.1: Broomfield Bank underground WTW⁴

The Channel Tunnel Rail Line is shown on the plan below. The Broomfield Bank WTW is shown as the Dover and Folkestone Wastewater Treatment Works. The proximity of the underground Channel Tunnel Rail Link combined with the requirement to construct partly below ground level is a significant constraint.

⁴ Image from <https://www.southernwater.co.uk/media/peknlgwq/srn22-network-and-wtw-growth.pdf>



Map 2.1: Route of the Channel Tunnel Rail line

2.2.2 Key planning issues

2.2.2.1 Policy on development in National Landscape areas

Broomfield Bank WTW is located in the Kent Downs National Landscape area. Recent changes to planning legislation through the Levelling Up and Regeneration Act 2023 and the Countryside and Rights of Way Act 2000 (CROW) have increased the emphasis that Local Authorities should place on the importance of conserving and enhancing National Landscape areas. The updated CROW⁵ now requires authorities to 'seek to further the purpose' of conserving and enhancing the natural beauty of the area of outstanding natural beauty, where previously authorities were expected to 'have regard'. This change has been interpreted as giving greater weight to the need to conserve and enhance National Landscape areas and assigning a more active role to local authorities when considering development in these areas. As a result, there is likely to be even greater weight assigned in the planning balance to works at Broomfield Bank than for the previous planning applications.

The National Planning Policy Framework (2024) para. 190 states:

When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

For permanent works such as a new or extended WTW at Broomfield Bank it would be necessary to demonstrate that the solution was in the public interest and that other options outside of the National Landscape area were too costly or not feasible and that any detrimental effects could be moderated. Demonstrating that a new or extended WTW within a National Landscape area meets the exceptional circumstance test is expected to be more challenging than if the solution only involved a below-ground pipeline route through a National Landscape area - due to the temporary nature of the construction impacts and the minimisation of any detrimental effect on the environment, landscape and recreational opportunities.

⁵ <https://www.legislation.gov.uk/ukpga/2000/37/contents>

2.2.3 Existing planning permission at Broomfield Bank

The existing planning permissions at Broomfield Bank are summarised in the table:

Table 2.2: Existing planning permissions at Broomfield Bank

Ref	Date	Description
93/00798	Thu 09 Dec 1993	Construction of wastewater treatment works, access and landscaping Conditional Approval KCC - 28/03/94
00/00069	Fri 24 Mar 2000	Construction of secondary treatment facilities, revised access road layout and associated landscaping, (Dover-Folkestone wastewater treatment scheme).

2.2.3.1 Relevant Planning conditions

93/00798 Construction of wastewater treatment works, access and landscaping Conditional Approval KCC - 28/03/94.

Table 2.3: Planning Conditions 93/00798

Condition No	Requirement	Reason	Relevance
4	Submission of landscaping plans and site access road plans, area for storage of plant and machinery, site drainage plans	To safeguard local and visual amenity	Plans may limit area for expansion or require replace areas 31 and justification.
7	Hedgerow planting along road frontage and western boundary	To assist in absorbing site back into local landscape	Plans may limit area for expansion or require replace areas and justification.
31	Wastewater treatment shall be fully enclosed with the buried structure	In the interests of local amenity	Principle of siting underground may apply to any extension.

The landscaping proposals associated with the original permission have been implemented and include a new woodland belt/buffer planting to the northern and eastern boundaries of the site. The new wood forms an extension to the Broomfield Wood. There is hedgerow planting around the site and open grass fields on the lower sloping areas of the site have been re-established.

3 Developing a Preferred Option

This section describes the scheme developed for Submission 1 of the Large Scheme Gated Approach and the planning constraints that will determine the design of the scheme.

At PR19 and PR24, the preferred option is a new WTW near Whitfield, with a coastal discharge via a long sea outfall.

The scheme will comprise of the following components:

- The construction and operation of a Wastewater Treatment Works on a greenfield site of approximately 4Ha.
- An underground transfer pipeline (final treated effluent) of approximately 10km (terrestrial) and a 3km sea outfall from the Dover Coast. The scheme will also include two pumping stations and a gravity sewer.

The route of the rising main pipeline is expected to cross beneath the A256 and A258 road and some minor local roads as well as the Southeastern Kent Coast Line railway line. Construction of the long sea outfall will require marine working. The scheme will require land outside of Southern Water ownership however, to avoid as many other environmental constraints as possible, this is expected to be through largely be Grade 3 or below agricultural land.

3.1 Planning Considerations

This section describes the key material considerations and planning constraints for developing a preferred option. A review of all applicable planning policies is contained in Appendix B.

3.1.1 Demonstrating Need

The Kent Minerals and Waste Local Plan (2025) Policy CSW15 requires wastewater treatment facilities to demonstrate a clear need for the facility (e.g. population growth, environmental compliance, capacity issues). The Planning application will include the evidence base in relation to WUE growth assumptions is up to date and accurate.

3.1.2 Kent Downs National Landscape area

The Kent Downs National Landscape area is primarily to the south-west of the WUE with a further part extending from the Dover urban area to Kingsdown. The NPPF (2024) Para. 190 directs any development within the National Landscape area to be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

The development of the Whitfield Growth scheme and the submitted planning application would include assessment of impacts on the Kent Downs National Landscape area. The design stage will seek to avoid the National Landscape area. The impacts of this on the area are likely to be temporary and will be considered and detailed in the submitted planning application.

3.1.3 Conservation Areas

There are several conservation areas in the Dover and Walmer areas. The nearest conservation areas to Whitfield are Temple Ewell, River, and Guston. Development proposals must demonstrate that they preserve

or enhance the character and appearance of these areas, in line with Policy HE2 of the Dover Local Plan 2040. There is expected to be a low likelihood that the Whitfield Growth Scheme would affect these areas as the scheme could be routed to avoid conservation areas but where relevant, a Heritage Statement and Conservation Area Appraisal will be submitted.

3.1.4 Special Areas of Conservation (SAC)

The following SACs have been identified:

- Lydden and Temple Ewell Downs SAC is to the west of the WUE.
- Dover to Kingsdown Cliffs SAC is the area along the coast from Dover to Kingsdown Cliffs.
- Thanet Coast and Sandwich Bay (SPA)
- Sandwich Bay (SAC)
- Margate and Long Sans (SAC)

According to Strategic Policy 13 – Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets (SP13) Development affecting SACs must:

- Undergo a project-level Habitats Regulations Assessment (HRA) if there is a likely significant effect on specified features.
- Demonstrate no adverse effect on the integrity of the SAC, either alone or in combination with other plans or projects.
- Provide mitigation measures where necessary, which must be secured and implemented at the required time.
- Avoid development unless there are imperative reasons of overriding public interest and no alternative solutions.

An HRA will be undertaken as part of the development of the Whitfield Growth scheme and if significant effects cannot be ruled out an Appropriate Assessment will be undertaken which will identify mitigation measures.

3.1.5 Marine Conservation Zones

The proposed outfall may affect the Dover to Folkestone and Dover to Deal Marine Conservation Zones (MCZs), as well as nearby MCZs such as Goodwin Sands. Policy SP13 of the Dover Local Plan 2040 and Policy DM 2 and DM 3 of the Kent Minerals and Waste Local Plan (2025) state that development must not adversely affect the integrity of these zones. A Marine Impact Assessment, consultation with the Marine Management Organisation along with obtaining a Marine Licence would be required in the event the scheme affects a MCZ.

3.1.6 Special Protection Areas and Ramsar sites

The proposed route and outfall may impact:

- Thanet Coast and Sandwich Bay Special Protection Area
- Thanet Coast and Sandwich Bay Ramsar site
- Outer Thames Estuary Special Protection Area

Dover District Local Plan Policies NE3 and SP13 require development within the Zone of Influence to be supported by a project-level Habitats Regulations Assessment (HRA) and appropriate mitigation measures. An HRA will be undertaken as part of the development of the Whitfield Growth scheme and if significant effects cannot be ruled out an Appropriate Assessment will be undertaken which will identify mitigation measures.

3.1.7 Biodiversity Net Gain

The Environment Act 2021 in addition to the requirements of Kent County Council (and Dover District Council) require that development deliver at least 10% biodiversity net gain. Although it may be possible to agree some of the work as temporary, a new WTW along with land required for above ground infrastructure may result in a baseline that requires a significant area of land to be identified to deliver at least 10% habitat

gain. Habitat surveys will be undertaken to inform the scheme development and site selection process. Once the footprint of the scheme is determined, BNG baseline surveys and calculations can be undertaken to determine the units required to meet the BNG regulations.

3.1.8 Air Quality

Dover District Local Plan to 2040 Policy NE4 requires an Air Quality Assessment if development is near an Air Quality Management Area (AQMA). Dover Urban Area is subject to AQMAs. There is potential for increased HGV movements during the construction phase which may impact AQMAs. A construction environment management plan will be produced to identify and mitigate impacts from HGV and other construction related impacts on air quality.

3.1.9 Source Protection Zones

Dover District Local Plan Policy NE5 requires that development in Source Protection Zones must demonstrate no adverse impact on groundwater quality. Sustainable drainage systems (SuDS) must be appropriately designed. WUE is within a Source Protection Zone (3) and a potential route to the coast is expected to cross several Source Protection Zones. The design of the Whitfield Growth scheme will include appropriate SuDS and will aim to demonstrate no adverse impact on groundwater quality through avoidance and/or mitigation measures.

3.1.10 Construction Traffic

Dover District Local Plan TI2 and SP12 require a Construction Traffic Management Plan (CTMP) which must address routing, timing, and mitigation of impacts on local roads and communities. The construction of the pipeline, potentially through developed areas will require planning to mitigate impacts on the highway network. The planning application for the Whitfield Growth Scheme will include a CTMP to provide detail on the impacts and mitigation required.

3.1.11 Location of Built Waste Management Facilities

The Kent Minerals and Waste Local Plan Policy CSW 6: Location of Built Waste Management Facilities states that the site must be:

- Well located to the Strategic Road Network;
- Outside Flood Zone 3b and SPZ1 unless fully justified; and
- Compatible with surrounding land uses and not within the Green Belt unless very special circumstances apply.

The design of the Whitfield Growth Scheme will take account of policy CSW6 in siting a WTW to ensure it meets the requirements listed.

3.1.12 North Downs Way National Trail

Policy SAP1 – Whitfield Urban Extension includes specific reference to the North Downs Way National Trail which requires development to protect and enhance the route. The Trail runs close to the east of the WUE and goes directly south towards Dover. Any development of a new WTW and pipeline will ensure impacts on the North Downs Way National Trail are avoided where possible or mitigated.

4 Consenting Route

4.1 Planning Consent

The development of a new WTW to serve Whitfield, including a transfer pipeline and long sea outfall (LSO), constitutes “major development” under Section 55 of the Town and Country Planning Act 1990 (TCPA).

Due to the potential scale and nature of the WTW, it would not benefit from permitted development rights under the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO), and a planning application will be required for this element.

The development would be considered ‘waste’ and therefore Kent County Council would be the relevant Local Planning Authority.

4.2 Permitted Development

Elements of the pipeline may fall within permitted development rights under Part 13, Class B(a) of the GPDO, which allows for development by or on behalf of a sewerage undertaker where it relates to the provision, improvement, maintenance, or repair of a sewer, outfall pipe, sludge main, or associated apparatus, provided it is not above ground level.

However, the following considerations apply:

- As the works exceed 1 hectare, they fall under Schedule 2 of the EIA Regulations. An EIA screening opinion will be required to determine whether a full Environmental Statement is necessary.
- If the Local Planning Authority determines that an EIA is required, permitted development rights would be withdrawn, and the full planning application would be necessary to address all the development including the pipeline, the WTW, any pumping stations and outfall.

Given the integrated nature of the scheme and the potential for EIA requirements, the appropriate consenting strategy is to submit a comprehensive full planning application covering all elements of the Whitfield Growth Scheme.

4.3 Other Consents

In addition to planning permission, other consents and licences are likely to be required, these are outlined in Section 7.

5 Land Review

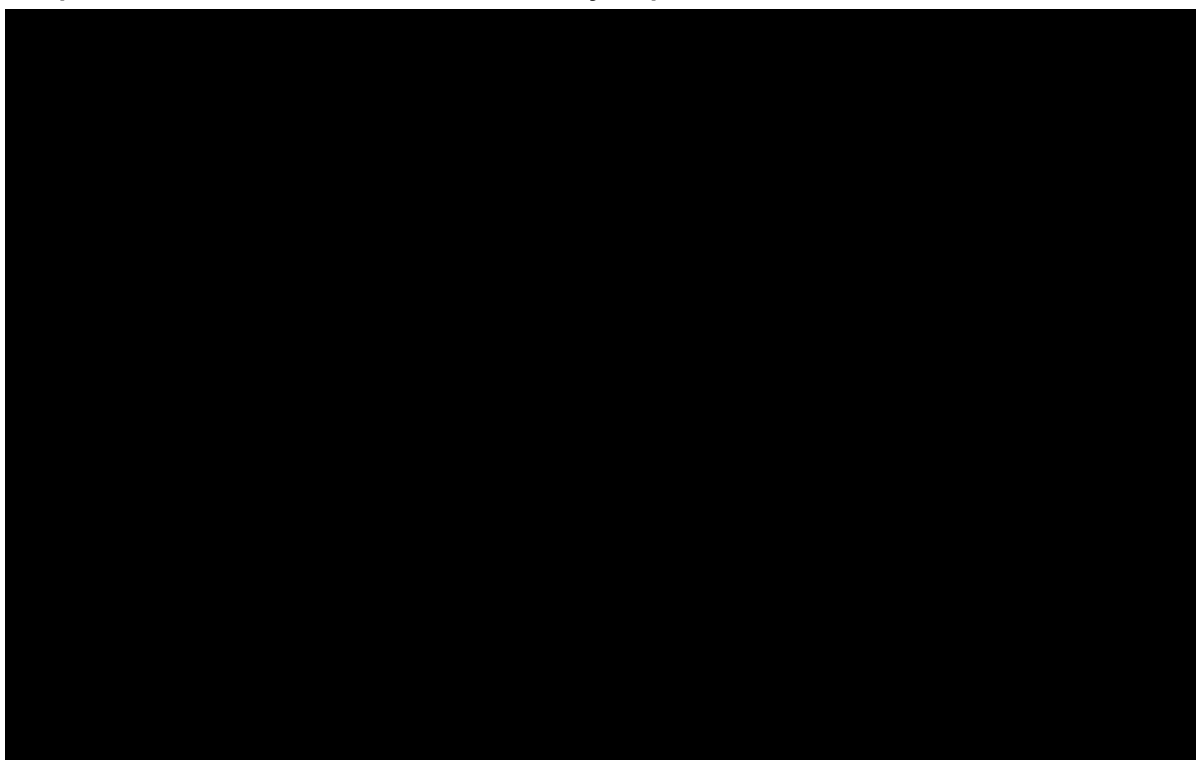
5.1 Land Acquisition

The WTW is expected to require a greenfield site to be purchased. There may also be land purchase required for two pumping stations and other above ground infrastructure. It is expected that the pipeline can be installed underground without the need to purchase the land above it, although landowner consultation will be required.

5.2 Crown Land

The Crown Estate Foreshore and Estuary map⁶ indicates that all of the foreshore from Dover to Deal is owned by the Crown Estate.

Map 5.1: Crown Estate Foreshore and Estuary map



In order to obtain consent from the Crown Estate for any development including infrastructure in relation to the LSO, an application will need to be made to the Crown Estate Marine Team. It is not possible to compulsorily purchase Crown Land.

5.3 Other Land Categories

5.3.1 Common Land

Common Land is registered under the Commons Act 2006. Developing on Common Land is subject to Section 38 consent from the Secretary of State (via the Planning Inspectorate) which is required for any restricted works, including:

- Fencing,
- Building structures,

⁶ <https://www.arcgis.com/apps/Viewer/index.html?appid=0aac22685d2f4d78a2a3b0a5aa1660db>

- Surfacing,
- Ditching or trenching.

There is an area of Common Land ██████████ which may interact with the pipeline route to the LSO.

5.3.2 Open Space

Open Space is defined under the Acquisition of Land Act 1981 as land used for recreation, sports, or visual amenity.

Compulsory acquisition requires:

- Provision of replacement land, or
- Certification by the Secretary of State that the land is no longer needed or the loss is not significant.

Walmer Green and promenade is designated as Open Space in the Dover Local Plan (2040). The pipeline route to the LSO may conflict with this area however the land is unlikely to need to be permanently acquired.

5.3.3 National Trust Land

Development on National Trust land is highly restricted. Land held inalienably under the National Trust Acts 1907–1971 cannot be sold, transferred, or compulsorily acquired without Special Parliamentary Procedure, or Section 23 consent under the National Trust Act 1971 (for works on common land owned by the Trust).

There is a significant amount of National Trust owned land in the St Margaret's Bay and Cliffe areas that should be avoided.

5.3.4 Statutory Undertaker Land

Land referencing will need to be undertaken to identify statutory undertaker land.

Land held by utility providers (e.g. water, electricity, telecoms, rail). Development affecting operational land requires:

- Consent from the statutory undertaker; and
- Demonstration that the development will not impair operational use.

6 Summary of Stakeholder Engagement

The programme for engagement for the scheme will likely include meeting and collaborating with the following organisations and groups:

- Kent County Council,
- Environment Agency,
- Dover District Council,
- Crown Estate,
- Natural England,
- Historic England,
- Network Rail,
- Port of Dover,
- Affected landowners.

7 Other Consents and Licences

Below is a list of some of the potential consents and licences that may be required in addition to the planning permission.

Table 7.1: Potential consents and licences (in addition to planning permission)

Activity	Consent / Licence	Responsible body
Works that could disturb European Protected Species and non-European Protected Species	European Protected Species Licence CRow Assent	Natural England
Works affecting an important hedgerow	Hedgerow Removal	Dover District Council
Works to trees with Tree Preservation Orders	Tree Preservation Order Consent	Dover District Council
Requirement to temporarily close a Public Right of Way (PRoW)	Temporary Closure Order	Dover District Council
Operating wastewater facility	Environmental Permit	Environment Agency
New water discharge activity	Standard or Bespoke Environmental Permit	Environment Agency
Approval for noise generating activities during construction	Section 61 consent (noise and / or vibration)	Dover District Council
Applications for road closures and other restrictions which require a Temporary Traffic Regulation Order (TTRO)	Temporary Traffic Regulation Order	Kent County Council
Works affecting Network Rail Land (Within 15m)	Asset Protection Agreement	Network Rail
Works within Common Land	Section 38 Consent	Planning Inspectorate (on behalf of DEFRA)
Marine activities within 12 miles of the UK coast	Marine Licence	Marine Management Organisation
Works involving physical interaction with the seabed or foreshore on Crown Estate Land	Crown Estate lease/licence/agreement	Crown Estate

8 Programme for Consent

Table 8.1: Indicative durations for consenting activities

Task	Duration (approx.)
EIA Scoping and Baseline Surveys	3 months
EIA Preparation	15 months
Non-Statutory Consultation (including preparation)	2.5 months
Pre-application engagement	6 months
Planning application preparation	6 months
Planning application submission	Milestone
Validation and Statutory consultation by Kent County Council	2 months
Determination	4 months
Discharge of conditions	2 months

9 Risks and Mitigation

Table 9.1: Planning and Consenting Risks and Mitigation

Ref	Risk	Mitigation
1	Land required for the scheme is not able to be acquired voluntarily and results in need for compulsory purchase orders (CPO).	Minimise land required that cannot be CPO'd (e.g. Crown and National Trust Land). Begin land referencing process and seek to get agreements with landowners early.
2	The foreshore from the Eastern Docks at Dover to Deal is Crown Land. The route to LSO is likely needed to cross the foreshore within this area. This can only be developed by agreement from the Crown Estate.	Begin discussions with Crown Estate early.
3	The route of the pipeline to the LSO may conflict with the Walmer Seafront conservation area and the Deal South Barracks conservation area, Upper Walmer conservation area – designated heritage assets. Potential conflict with National and Local policy.	Seek to alter route to avoid any loss or impacts on designated conservation areas. Consider construction methodology to minimise disruption and engage with Dover District Council and Historic England. Harm (even “less than substantial”) must be clearly justified and weighed against public benefits.
4	The route of the pipeline to the LSO may conflict with the Walmer Green and promenade Open Space designated area. Potential conflict with National and Local policy.	Seek to alter route to avoid any loss or impacts on designated open space. If this is not possible identify replacement land.
5	Negative public perception of outfall to the sea will influence planning committee	Careful messaging and a robust stakeholder and public engagement strategy required.
6	Whitfield Growth Scheme may be opposed by public and groups who oppose the WUE.	Careful messaging and a robust stakeholder and public engagement strategy required.
7	Multiple consents, licences and permits will be required for the scheme.	Consider introducing a consents management system to track and manage delivery of required consents / licences and permits.
8	Scheme will be subject to BNG regulations and will need to provide a 10% gain.	Ensure habitat surveys completed order to feed into design and siting of the scheme to minimise habitat loss/impact and therefore reduce BNG baseline.
9	Depending on siting and routing, there may be a need for a Marine Licence. There will be a need for an Environmental Permit for discharge.	Early engagement with the MMO and Environment Agency; allow contingency in programme
10	EIA Screening determines full EIA is required, delaying planning submission	Submit EIA screening request early; prepare baseline surveys in parallel; engage with Kent County Council to scope EIA efficiently and ensure that the project schedule includes sufficient and realistic estimates for regulatory processes.

10 Next Steps

The next steps to inform the planning and consenting aspects of the scheme will include the following activities:

- Continued monitoring of the build out rates for WUE to inform development of Whitfield Growth Scheme
- Confirmation of project design, pipe routing, surface works locations, construction methodologies particularly when important for coastal and outfall aspects e.g. directional drilling, buried pipe
- Monitoring of planning applications at the proposed site and route
- Stakeholder engagement including pre-application engagement with Kent County Council and Dover District Council
- Input to EIA screening, scoping and baseline surveys
- Scoping the requirements for planning application and progressing the submission
- Supporting land referencing and engagement
- Update of cost and programme assumptions related to planning and consents
- Setting up a consents register to manage the necessary consents and licences required
- Manage the risk register in relation to planning and consents risks and mitigations

Appendices

A Existing Permissions

A.1 WTW location

The major existing planning permissions within the Whitfield area relate to the WUE. In addition existing permissions were reviewed within the vicinity of a potential WTW, searching for other significant permissions granted within 5km of Whitfield within the last 5 years.

Table A1: WUE permissions

Reference	Location	Description	Status
10/01010	Phase 1 Whitfield Urban Extension ()	Outline planning application for the construction of up to 1,400 units, comprising a mix of 2-5 bed units, 66 bed care home (Class C2) and supported living units, with vehicular access off the A256; provision of new 420 place 2FE Primary School including early years provision, energy centre and local centre comprising up to 250sqm of retail space (Class A1-A3) along with all associated access arrangements, car parking, infrastructure and landscaping, with all matters (except the means of access off the A256) reserved for future consideration. (Revised Proposals)	Granted
10/01011	Whitfield Urban Extension Whitfield Dover	Outline planning application for the construction of a new community hub/district centre, comprising BRT hub; health and social care centre (Class D1); retail space (Class A1-A3) ; and 100 no. 2-5 bed residential units including 6no. supported living units (Class C3) provision of learning and community campus to incorporate new 420 place 2fe primary school including early years provision and provision of access arrangements, all associated car parking, infrastructure and landscaping, with all matters reserved for future consideration	Granted
16/00136	Land)	Erection 133 dwellings including 40 affordable homes, new vehicular and pedestrian access, internal access roads, car parking, landscaping, provision of open space (4.17 ha) and a locally equipped children's play area (LEAP) (amended details and description)	Allowed following appeal
25/00172	Sub Phase 1G And Part 1E And 1F	Reserved matters application for the approval of appearance, layout,	Awaiting decision

	Phase 1 Whitfield Urban Expansion	landscaping and scale for part Phase 1E, and Phase 1F and 1G, 328 plots pursuant to outline permission DOV/10/01010	
25/00488	Phase 1	Reserved matters application for the approval of appearance, landscaping, layout and scale for 308 plots pursuant to outline application DOV/10/01010	Awaiting decision
25/00486	Phase 1,	Reserved matters application for the approval of appearance, landscaping, layout and scale for 244 plots pursuant to outline application DOV/10/01010	Awaiting decision
23/01458	Land	A hybrid planning application for the erection of up to 430 dwellings comprising an outline element (with all matters reserved except access) for a residential development of up to 342no. dwellings together with the provision of two community football pitches, and a detailed element for 88no. dwellings with associated landscaping, internal access roads, and infrastructure (Received 20/12/2023)	Awaiting decision
25/00487	Sub Phase 1G And Part 1E And 1F Phase 1 Whitfield Urban Expansion	Reserved matters application for the approval of appearance, landscaping, layout and scale for 60 dwellings pursuant to outline application DOV/10/01010	Awaiting decision

Table A2: Major Non-WUE permissions within the last 5 years within 5km of Whitfield

Reference	Location	Description	Status
22/00668	Land	The erection of a solar farm with battery storage and associated infrastructure for a period of 40 years	Granted
22/00390		Temporary use of land until 31st December 2025 for an Inland Border Facility operating for 24 hours a day 7 days a week, for use by or on behalf of HM Revenue and Customs/Border Force, Department for Environment, Food and Rural Affairs and Department for Business, Energy and Industrial Strategy for customs checks, including CTC, ATA, CITES checks and market surveillance.	No Objection (Granted)
22/00602		Erection of a commercial building for flexible use within Class E (g), B2 and B8 with associated parking	Granted

23/00370	Land	Outline application for erection of up to 40 dwellings (matters reserved except access)	Awaiting decision
24/00671		Creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, floodlighting and an access footpath; Refurbishment of two netball courts with perimeter fencing and floodlighting	Granted

A.2 Pipeline route and other infrastructure

Permissions within the last 5 years within close proximity to proposed pipeline route and other above ground infrastructure.

Table A3: Major permissions close proximity to the pipeline route

Reference	Location	Description	Status
20/01155		Change of use and conversion of an agricultural building to a wedding venue with single storey front/side extensions, canopy to front, cycle storage and associated parking (retrospective)	Granted
22/00668	Land	The erection of a solar farm with battery storage and associated infrastructure for a period of 40 years	Granted

A.3 Summary

The relevant permissions for consideration are:

The WUE outline and reserved matters permissions – monitoring the reserved matters permissions associated with the outline permissions will inform the evidence base as to whether the build out rates are as expected or delayed.

Outside of the WUE – The Guston Solar Farm is the main major development in proximity to the proposed WTW site and route. The Solar Farm is constructed and operational. There appear to be routes for the scheme to avoid this development. None of the other major permissions appear to be close or interact with the proposed site and route.

B Policy Review

B.1 Dover District Local Plan to 2040 (2024)

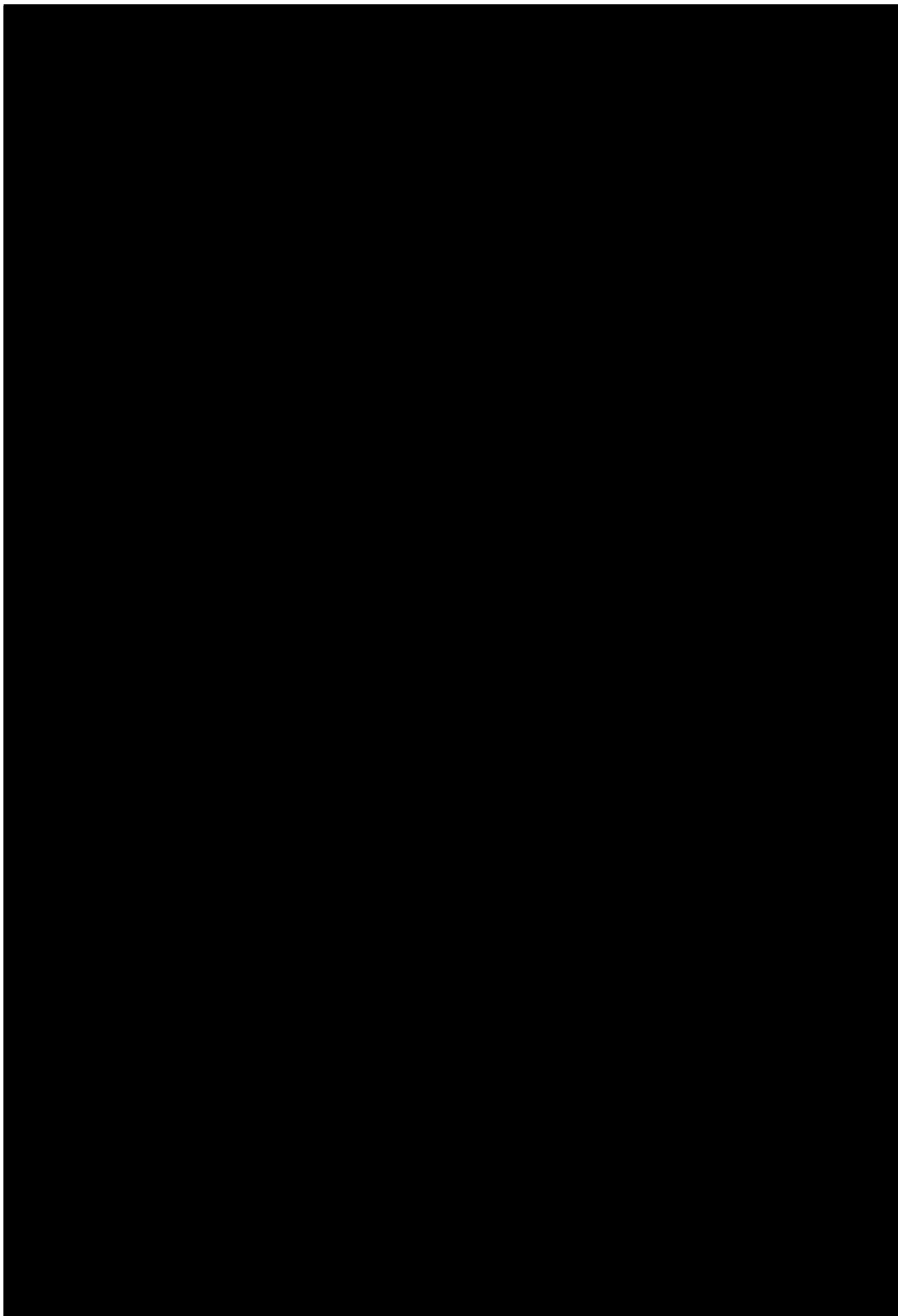
The Dover District Local Plan to 2040, adopted in October 2024, is the statutory planning framework that guides development across the Dover District from 2020 to 2040. It sets out the vision, strategic objectives, and policies for managing growth, protecting the environment, and enhancing communities.

The WUE is a major site allocation (SAP1) for 6350 homes, schools, health centre and open space. Further detail is provided in the Whitfield Masterplan and the Infrastructure Development Plan (IDP).

The plan acknowledges the need for new wastewater infrastructure to support growth, particularly at Whitfield⁷ and references that Southern Water is already undertaking an options appraisal for infrastructure upgrades in the area.

⁷Para.1.46 - Key issues for the Local Plan - Working with partners to facilitate the delivery of the Whitfield Urban Expansion.

Figure B1: Site allocations in Dover



The relevant policies in relation to the scheme are listed below:

Policy SP11 Infrastructure and Developer Contributions

- The WTW must be delivered in a timely manner to support development.
- Demonstrate that the infrastructure is necessary, viable, and phased appropriately.
- Contributions may be required via Section 106 or Section 278 agreements.

Policy SP13 Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets

The pipeline and outfall may affect:

- Thanet Coast and Sandwich Bay SPA/Ramsar
- Marine Conservation Zones
- Kent Downs AONB
- A Habitats Regulations Assessment (HRA) may be required.
- Apply the mitigation hierarchy: avoid, mitigate, compensate

SAP1 - Whitfield Urban Expansion

- The policy is targeted at developers at the WUE
- Emphasis on developer to consult Southern Water to ensure sufficient capacity and any upgrades are carried out where necessary.
- The phasing and occupation of development should align with the delivery of sewerage infrastructure, in liaison with the service provider.
- The site layout should be planned to ensure future access to existing water and wastewater infrastructure for maintenance and upsizing purposes.

NE1 - Biodiversity Net Gain

- A minimum 10% biodiversity net gain is required.
- Submit a Biodiversity Metric calculation and management plan.

NE2 - Landscape Character and the Kent Downs AONB

- A Landscape and Visual Impact Assessment (LVIA) is required.
- Development must conserve and enhance the AONB and its setting.

NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy

- If the pipeline or outfall affects the SPA, scheme must:
- Provide mitigation (e.g. habitat creation)
- Contribute to the Strategic Access Management and Monitoring Strategy (SAMMS)

NE4 - Air Quality

- An Air Quality Assessment is required if construction or operation affects AQMA areas (e.g. A20 corridor).
- Mitigation must be proposed if thresholds are exceeded.

Policy NE5 Water Supply and Quality

- Development must protect water quality and not harm groundwater or surface water.
- The WTW must be designed to avoid pollution and safeguard Source Protection Zones.
- Early consultation with the Environment Agency

CC2 - Sustainable Design and Construction

- The WTW must incorporate low-carbon design, resource efficiency, and resilience to climate change.
- Use of sustainable materials and energy-efficient systems is expected.

CC5 - Flood Risk

- A Flood Risk Assessment (FRA) is required, especially for coastal or low-lying areas.
- Must demonstrate that the WTW and pipeline are safe from flooding and do not increase flood risk elsewhere.

CC6 - Surface Water Management

- A Surface Water Management Strategy is required.
- Use of SuDS (Sustainable Drainage Systems) is encouraged, subject to groundwater protection.

T11 - Sustainable Transport and Travel

- Construction and operation must minimise transport impacts.

T12 - Transport Statements, Assessments and Travel Plans

- A Transport Assessment is required for construction traffic and operational access.
- A Construction Traffic Management Plan may be needed.

B.1.1 Infrastructure Delivery Plan (2023)⁸

The Infrastructure Delivery Plan (IDP) June 2023 and accompanying schedule (IDS - Appendix 1) includes the most up to date details of committed and planned schemes by infrastructure type required to ensure that infrastructure can facilitate the planned growth across the District to 2040 as set out in the Local Plan.

The IDP confirms that a new local wastewater system and upgrade are required to serve the WUE at the time of 1800 occupations. These are included in site-specific policies and the Infrastructure Delivery Schedule (IDS)⁹. The priority / timing is identified as Critical and Short-Medium.

B.1.2 Whitfield Masterplan (2011)

The Whitfield Masterplan is a Supplementary Planning Document (SPD) to the Dover Local Plan 2040. This SPD is the masterplan for the WUE. It was produced in 2011 with housing growth figures and phasing related to the Dover Core Strategy 2010. At that time the WUE was expected to generate 5750 homes by 2040. The updated Dover Local Plan 2040 has changed this to 2200 new homes by 2040 with a total capacity of 6350 on the site.

B.2 Kent Minerals and Waste Local Plan (2025)

Below is a summary of the policy requirements for the scheme from the Kent Minerals and Waste Local Plan.

Policy CSW 15: Wastewater Development

Policy CSW 15 supports wastewater treatment and sludge treatment facilities, including extensions, subject to:

- Proven Need - requirement to demonstrate a clear need for the facility (e.g. population growth, environmental compliance, capacity issues).
- Biogas Recovery - If anaerobic digestion is used, biogas must be recovered for energy use using best practice.
- Nutrient Neutrality - If the site is in a sensitive water catchment (e.g. near the Stour or aquifers), the applicant must demonstrate at least nutrient neutrality—especially for nitrates and phosphates. This is necessary for compliance with the Conservation of Habitats and Species Regulations 2017.

Policy DM 10: Water Environment

This policy is especially relevant due to the proximity to Source Protection Zones (SPZs) and the marine environment at Walmer:

⁸ <https://www.dover.gov.uk/Planning/Planning-Policy/PDF/IFS/Infrastructure-Delivery-Plan-V2-June-2023-FINAL.pdf>

⁹ <https://www.dover.gov.uk/Planning/Planning-Policy/PDF/Appendices-to-IDP-June-2023.pdf>

- The scheme must demonstrate no deterioration in water quality or ecological status of water bodies.
- A hydrogeological and/or hydrological assessment is required to assess risks to groundwater and surface water.
- A Flood Risk Assessment is needed if the site is in or near a flood zone.
- The long sea outfall must be assessed for its impact on marine water quality and habitats.

Policy DM 2 and DM 3: Environmental and Ecological Protection

Given the proximity to the Heritage Coast and marine designations (e.g. Marine Conservation Zones, SSSIs, SACs):

- The scheme must avoid or mitigate impacts on designated sites.
- A Habitats Regulations Assessment (HRA) may be required.
- A Biodiversity Net Gain (BNG) of at least 10% is expected, with 20% encouraged.

Policy CSW 6: Location of Built Waste Management Facilities

The site must be:

- Well located to the Strategic Road Network.
- Outside Flood Zone 3b and SPZ1 unless fully justified.
- Compatible with surrounding land uses and not within the Green Belt unless very special circumstances apply.

Policy DM 13: Transportation

If construction or operation involves significant HGV movements:

- Schemes must assess impacts on local roads and air quality.
- If >200 HGVs/day are expected near sensitive habitats, an air quality assessment and HRA screening are required.

B.3 National Planning Policy Framework (2024)

Key NPPF policies relevant to the scheme are identified below.

Achieving sustainable development (paragraphs 7–11)

The proposal must contribute to economic, social, and environmental objectives. There is a presumption in favour of sustainable development, unless it conflicts with protected areas or assets (e.g. Heritage Coast, SSSIs).

Infrastructure Provision (paragraphs 20–23)

Strategic policies must make provision for wastewater infrastructure. The development should align with the local plan's strategy and infrastructure delivery plans.

Meeting the challenge of Climate Change, Flooding & Coastal Change (paragraphs 161–186)

A Flood Risk Assessment (FRA) is required, especially near coastal zones.

The location of the route to the LSO at Walmer is not within a Coastal Change Management Area.

Conserving and enhancing the natural environment (paragraphs 187–195)

The pipeline and outfall must avoid harm to:

- SSSIs, Marine Conservation Zones, and Heritage Coast.
- Irreplaceable habitats (e.g. chalk grassland, ancient woodland).
- A Habitats Regulations Assessment (HRA) may be required.
- Must deliver measurable biodiversity net gain.

When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. **(Paragraph 190)**

Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character. **(Paragraph 191)**

Ground conditions and pollution (Paragraphs 196–201)

Must demonstrate:

- No unacceptable risk to groundwater or surface water.
- Adequate site investigation and pollution control.
- Integration with existing businesses and community facilities.

Promoting sustainable transport (paragraphs 109–118)

- Construction and maintenance traffic must be assessed.
- A Transport Assessment and Travel Plan may be required.
- Must ensure safe access and mitigate any highway impacts.

Plan-Making (Chapters 3 and 4)

- The proposal must align with the development plan unless material considerations indicate otherwise.
- Early pre-application engagement with statutory consultees (Environment Agency, Natural England, Marine Management Organisation) is encouraged.

