

Whitfield Growth

Annex E1 – Stakeholder and Customer Engagement

This is a working document, as timelines and project programmes become clearer this document will be amended and updated.

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1 Introduction

This document summarises the stakeholder engagement and customer insight undertaken to inform Submission 1 and provides an outline stakeholder engagement approach for Submission 2.

We undertook engagement with Ofwat and the Environment Agency to inform our Submission 1 options development.

We also reviewed our existing customer insight from previous price submissions to Ofwat (PR19, PR24) and our Drainage and Wastewater Management Plan to understand customers' priorities. We also carried out dedicated customer insight in Whitfield and nearby areas to understand customers' preferences.

Our outline stakeholder engagement approach for Submission 2 includes high-level stakeholder mapping, as well as potential engagement activities – including for a non-statutory consultation and pre-application engagement.

2 Existing customer and stakeholder insight

As part of our work for Submission 1, we reviewed customer insight carried out for our PR19 and PR24 business plans, and our Drainage and Wastewater Management Plan.

This section summarises relevant key themes from our previous insight and engagement programmes.

2.1 2019 Price Review (PR19)

Our customer insight for PR19 was used to develop our [TA14.3 Cost Adjustment Claim 3 – Growth – Whitfield Technical Annex](#). Our PR19 engagement on Whitfield growth focussed on a new wastewater treatment works with a long sea outfall.

Customers in the area understood the basic premise that not having wastewater systems that can cope with new housing developments may lead to the system being overloaded. They felt it was appropriate for us to build a new wastewater treatment works at Whitfield.

“It sounds like they’re being forward thinking and pragmatic about this – it’s a long-term measure which is good, especially if it means protecting the environment in the future”.

Our wider regional results demonstrated customers supported investment which efficiently and effectively facilitates growth, while making sure the services they currently receive are resilient now and in the future.

Customers expected us to ensure future generations have access to the same level of wastewater services and are willing to invest now to ensure that there is no deterioration in services in the future.

Aligning our quantitative and qualitative assessments indicated a new treatment works with a long sea outfall was the best option for customers. This option was both technically viable and the least whole life cost. In acceptability testing, 76% of customers supported the need to deliver this growth scheme.

2.2 Drainage and Wastewater Management Plan (2023)

To develop our DWMP, we worked with a wide range of partners including the Environment Agency, Local Planning Authorities and organisations with responsibilities for protecting and enhancing the environment such as Natural England, Catchment Partnerships and River and Wildlife Trusts. We engaged with over 180 individuals from 75 organisations.

Our engagement included customer insight panels, stakeholder workshops and public consultations in September 2021 and June 2022.

One of the key themes from our preliminary consultation held in September and October 2021 was whether we have the capacity in our systems to cope with projected levels of growth. Customer insight carried out to support our DWMP found customers felt addressing ageing infrastructure and the combined impact of both climate change and population growth were seen as the most important challenges for our DWMP.

Relevant regional key themes from our June 2022 public consultation include:

- The need to take a holistic approach to issues raised, giving equal weighting to all proposed solutions

- There was substantial support for separating rainwater and foul water systems as the best value way to reduce the risks of flooding, storm overflow discharges and pollution

Stakeholders from across Kent responded to our June 2022 consultation. Some of the key issues include:

- Whether our DWMP adequately reflected the scale and timing of housing growth
- The importance of separating surface water and wastewater to increase capacity and reduce the use of storm overflows
- Canterbury City Council raised concerns about investment to address nutrient pollution

Our [Statement of Response](#) summarises the responses from all stakeholders and how we are addressing them. The final DWMP was published in 2023.

2.3 2024 Price Review (PR24)

2.3.1 Overview

We carried out extensive customer engagement and insight to develop our PR24 business plan¹.

We profiled and engaged our region to speak with representative audiences from our communities. Our panels of current and future customers, businesses and vulnerable communities gave us informed views at every stage of plan development. Bespoke research engaged on the range of issues in developing our plan, we partnered and shared with other water companies and followed regulatory guidance on testing our plan.

This section summarises relevant key themes from across our PR24 research programmes relevant to Whitfield growth.

We carried out insight in June and July 2025 to develop our regional profile for Whitfield and surrounding areas. Section 3.2 below summarises our key findings.

2.3.2 PR24 customer acceptability²

Our customers feel more connected to our coastline than in other regions and feel this is crucial to their wellbeing and the pride they have in their communities. Many feel their way of life faces challenges from the impact of housing growth and that water and wastewater infrastructure has not kept up.

Customers told us they expect us to:

- Maintain our core services – water supply and wastewater treatment
- Use nature-based solutions, wherever we can, before relying on traditional infrastructure
- Get the basics right and focus on credible and deliverable improvements where it matters

¹ See [SRN03 Customer Acceptability](#) and [SRN14 Customer Insight](#) for full details

² [SRN03 Customer Acceptability](#)

Customers told us they are willing to pay more for the right investments and do not want to pass the problem to future generations. They also put the need to protect, improve and restore the environment at the centre of every conversation, with 86% telling us the environment is more important than ever before.

Customers had a stronger understanding of the impact of extreme events and climate change, and how vital water services are compared to our PR19 insight. They thought the top three priorities for us are ageing infrastructure, growing population and climate change. They wanted us to treat the environment better and put nature first – understanding engineering solutions are needed but they wanted natural solutions to be the right first choice.

We triangulated insight to rank customers priorities, linked to Ofwat's performance metrics for water companies. Preventing pollution was their second highest priority and investing in wastewater infrastructure was their eighth highest (out of 19). We further categorised their priorities into three levels. Both preventing pollution and investing in wastewater infrastructure were level one priorities.

Figure 1: Customers' priorities

Indexed Score	Description	Rank
100.0	Current Water Supply - Continuous supply of clean wholesome water	1
89.8	Pollution - Prevent waste water entering the environment	2
87.7	Internal Flooding	3
85.8	Water Quality & Restrictions	4
81.0	External Flooding	5
79.1	Future Water Supplies	6
75.9	Leakage	7
75.4	Wastewater Infrastructure	8
74.4	Bathing Waters & Rivers	9
72.8	Protect Infrastructure from Growth	10
72.8	Nature Based Solutions	11
66.4	Support Vulnerable Customers	12
65.9	Bill Affordability	13
57.9	Carbon Emissions	14
55.3	Water Efficiency	15
52.4	Customer Service	16
44.7	Regulatory Compliance	17
42.8	Working with Developers	18
21.5	Community Engagement	19

Source: Chapter SRN03 Customer Acceptability

Customers group the impacts of pollution and use of storm overflows into wastewater entering the environment. Informed customers want the environment prioritised in reducing impacts. With our customers connected to the coast, this is the top area they want to see improved.

Customers want to see the same services for future generations and keep bills affordable by focussing on delivering the biggest benefits first. Customers said we should invest in the right long-term solution – putting nature first, working in partnership and embracing new technology – but only 41% trust us to design the right solution.

2.3.3 SRN44 Growth at Wastewater Treatment Works Enhancement Business Case³

Our customers recognise high levels of population and housing growth and want us to ensure infrastructure is developed not just to “keep up” with growth but to protect the environment for future generations. Stakeholders consider development and new housing a top issue and see us as central to the planning process.

Customers want to see solutions that feel logical and are more focused on the right option for the long term. They want solutions that can cope with increases in population and demand, and climate change for the years ahead. Customers, in general, do not support a quick fix (using the term ‘sticking plaster’ coming up during research) for important infrastructure.

When engaging with our local communities, of 15 major population areas of our region – 57% have concerns about ageing infrastructure and 49% have concerns about population growth. For example, customers in central Kent are concerned at the over development and loss of green space. However, customers in Deal (close to the Whitfield site) feel there are too many houses being built without the proper infrastructure in place.

To support the best option, customers want reassurances that the right solutions have been explored. They want to see nature based and partnership options prioritised but also understand a twin track of natural and traditional solutions are often needed. Customers want to see the infrastructure delivered in a sustainable way, that balances the need for the long term, innovation and technology with keeping bills affordable.

2.3.4 Regional insight – Deal⁴

To inform our customer and stakeholder engagement ahead of our PR24 business plan, we developed a range of regional insight profiles. The most local area to Whitfield we developed a profile for was Deal, as part of our work to better understand our customers across east Kent.

We found customers in Deal lived there because of the mix of coast, beaches and countryside. Their highest priorities are:

- Preventing wastewater polluting or spilling into the environment through rivers and seas
- Protecting and improving the local environment
- Improving bathing water quality
- Making sure infrastructure is in place to support new homes

³ [srn44-wastewater-growth_redacted.pdf](#)

⁴ [SRN14 Customer Insight](#)

3 Engagement to support Submission 1

This section outlines the customer insight and stakeholder engagement carried out to support Submission 1.

3.1 Stakeholder engagement

For Submission 1, we focussed our engagement on key regulatory stakeholders – Ofwat and the Environment Agency. It was important for us to understand regulator concerns while developing our long list of options to enable more focused community and stakeholder engagement for Submission 2.

3.1.1 Environment Agency

We have engaged with the Environment Agency on the scheme throughout its development, initially seeking their input to options development at PR19³.

In July 2025, we agreed to hold a series of regular meetings with the Environment Agency to identify risks and issues early and develop plans to mitigate them through solution development, assessment and consenting. Our first meeting in August 2025 provided an update to the Whitfield Growth scheme, position at PR24 and planned approach to Submission 1 and Submission 2 of the Large Scheme Gated Process.

3.1.2 Ofwat

We met with Ofwat in July 2025 as part of the regular Quarterly Review meetings. We introduced the team, provided an update on the scheme progress, issues, risks and timeline. Quarterly meetings will continue through Submission 1 and Submission 2.

3.2 Customer insight

We carried out dedicated customer insight in the area to help inform our Submission 1 options development and understand customers' views and preferences.

This section summarises our approach to customer insight, headline findings and explains how we factored this into our options development alongside pre-existing insight [see section 2.3.4 above]. We have shared our insight report with Ofwat to support Submission 1.

3.2.1 Customer insight activity

To understand local customers' preferences, we carried out dedicated customer insight activity alongside work to develop regional profiles in July 2025.

Through our online portal, we provided customers in Whitfield and nearby areas with context about the need for the scheme, planned growth in the area and our responsibility to support new developments.

We gave customers high-level information on two types of options:

- Treating wastewater nearby at a new treatment works – including a new outfall
- Transferring wastewater up to 20km away to be treated elsewhere, requiring network reconfiguration and upgrades to infrastructure

We asked customers' initial views on both options, then provided an equal number of pros and cons for both options before asking if their views remained the same

Finally, we asked customers their preferences for options to release treated wastewater to the environment if a new wastewater treatment works was required, providing a brief description of a long sea outfall, a river outfall and a release to ground.

3.2.2 Key themes

Customers initial reactions to the proposals were mixed but had a shared understanding of the need to plan for future growth, highlighting existing issues with blocked drains and tankering.

“Initial reaction is that I am pleased that forward planning is being made. The Dover area is growing rapidly and it is reassuring to know that Southern Water is planning for this” St Margarets at Cliffe resident

Customers identified pros and cons for both types of options presented. A potential new wastewater treatment works was seen as a long-term, environmentally sustainable solution. However, customers shared concerns about further development in the area and the impact of smell and noise.

“Least impactful on the environment long-term” Whitfield resident

“Where in Whitfield is being considered? We have already seen enough land taken with housing developments” Whitfield resident

Some residents expressed support for moving flows elsewhere to be treated, believing it would be less disruptive and make better use of existing infrastructure. However, other customers thought it would be more costly and complicated – requiring major infrastructure upgrades.

“It’s hard to see where they would put something that big in Whitfield without destroying more countryside. It makes more sense to me to move it somewhere it won’t impact so many homes” St Margarets at Cliffe resident

(1) Feedback on new wastewater treatment works

While some customers favoured a new local wastewater treatment works for practical reasons others expressed strong opposition to the idea of siting anything further in Whitfield.

Customers were concerned about where the new wastewater treatment works would be, including the impact on the local environment and ground conditions.

“Once the fields go, they’re gone. You can’t reverse that. It’s not just about water – it’s about the kind of place we want to live in” Whitfield resident

“Tilman stone has large industrial areas, and so does Stone Cross, to Sandwich, which goes past Weatherlees Hill Waste Water treatment works. Why not go there, improve there, it makes perfect sense” Whitfield resident

(2) Feedback on discharge point location

If customers had to choose, the long sea outfall was the most supported option if wastewater was treated properly – though many customers do not believe it is. The idea of a new outfall was not well received, and some questioned whether 3km was a long enough distance.

Customers did not want treated wastewater being released into the River Dour which runs through Dover. There was little support for a release to ground because of perceived impact on chalk streams and aquifers – as well as the some of the surrounding ground being largely clay.

3.2.3 How we have used this insight

This insight, alongside insight carried out for PR19, PR24 and our DWMP (see section 2 above), has informed our review of options.

We will also use it to inform our public and stakeholder engagement on our preferred option – explaining how we will minimise environmental and community disruption while delivering the right long-term investment to facilitate new growth.

4 Submission 2 outline engagement plan

4.1 Introduction

To further develop our preferred option ahead of Submission 2, we will engage with stakeholders and consider their feedback to update our designs and inform our construction programme and environmental mitigations. This section outlines our initial plans for engagement.

This section includes stakeholders relevant to our preferred option we will engage with to develop our preferred option and possible engagement methods. We will develop a full stakeholder engagement plan when we have more certainty of the timing of Submission 2.

4.2 Stakeholder mapping

Our stakeholder mapping is informed by:

- Local stakeholders who would have an interest in our project
- Local stakeholders who could be impacted by delivery of our project
- Regulators
- Statutory consultees for Town and Country Planning Act planning applications⁵

Stakeholder mapping will continue to be reviewed as the Whitfield Growth scheme evolves.

Regulators	
Name	Reason for engaging
Ofwat	Economic regulator overseeing large scheme gated process
Environment Agency	Environmental regulator overseeing large scheme gated process Environmental permitting for discharge points
Natural England	Environmental regulator with responsibility for protected and designated sites
Drinking Water Inspectorate	Drinking water quality regulator with interest in nitrate vulnerable zones

⁵ Assuming this is our preferred consenting route

Marine Management Organisation	Issues relating to Marine Conservation Zones
Historic England	Responsible for protecting listed buildings, parks and gardens. Pipeline plans to go through heritage coast area and through areas with listed buildings
Kent County Council Archaeologist	Responsible for local archaeology
CCW (Consumer Council for Water)	Customer representative
Local authorities and political stakeholders	
Local Planning Authority	Kent County Council (KCC) is the responsible local planning authority for Waste infrastructure. KCC also has responsibility for highways and is the Lead Local Flood Authority
Other local authorities	Engagement with Dover District Council on the Whitfield Growth scheme and progress of the Whitfield Urban Expansion
Local MPs	Relevant to the area of proposed development
Parish Councils	Relevant to the area of proposed development
Statutory Stakeholders	
Network Rail	Rail crossing needed for long sea outfall
UK Power Networks	Power supply to site, understanding assets in the local area
SGN	Understanding assets in the local area
Openreach	Understanding assets in the local area
Port of Dover / Dover Harbour Board	Possible interaction with port, depending on option selection
National Highways	Responsibility for major roads needed to deliver materials
Affinity Water	Understand impact on nitrate protection zones and any assets in the local area
Crown Estate	Landowner for seabed

Ministry of Defence	Understanding unexploded ordnance in the local area
Environmental stakeholders	
Kent Downs National Landscape	Pipeline route likely crosses through Kent Downs National Landscape
Kent Wildlife Trust	Local wildlife trust with interest in habitat protection
Kent and Essex Inshore Fisheries & Conservation Authority	Interest in potential impact of long sea outfall on aquatic habitats and wildlife
National Trust	Interest in heritage protection
Community, business and other stakeholders	
Local residents' groups	Community organisations
East Kent Chamber of Commerce	Local business organisation
Kent and Medway Resilience Forum	Local resilience forum
Local residents	Construction and operation impacts
Local landowners	Understanding local landownership and initial engagement for key sites
Local environmental and recreational groups	Users of the coast, e.g. surfers

4.3 Example engagement activity

This section outlines example engagement activity to inform Submission 2. We have not indicated a timeline as this is currently uncertain. We will develop a more detailed engagement plan closer to the time.

Example activity will include:

- Reaching out to identified key stakeholders after Submission 1 to inform them of publication and next steps
- Regular meetings with regulators – including monthly meetings with the Environment Agency and quarterly meetings with Ofwat
- Briefings offered to parish councils and local councils
 - Local councils will be engaged on a range of topics related to planning including traffic and transport, planning route, environmental mitigation and construction activity.
- Workshops with key stakeholders to explore feedback
- Public information events for residents to learn more about the scheme and our plans
- Updated information on dedicated project webpage

- Technical meetings with regulators and statutory undertakers
- Customer insight on specific options or parts of options
- Identifying hard to reach groups and developing a strategy to engage with them

Our objectives for this engagement will include understanding local stakeholders' concerns and priorities, building relationships and identifying opportunities to co-deliver parts of our non-statutory consultation.

Ahead of Submission 1 being published, we will engage with relevant local authorities and stakeholders to explain the large scheme gated process and how we have developed our options.

4.3.1 Pre-application engagement

As part of developing our planning application, we will seek pre-application advice from Kent County Council on our preferred option. We expect this to take place between mid-2026 and early 2027, when we have enough detail on the scheme.

This engagement will focus on obtaining feedback on the scheme and understanding the level of certainty regarding consent.

More information about our consenting route is in Annex D1: Planning and Consenting Strategy.

4.3.2 Environmental Impact Assessment engagement

We are expecting the Whitfield Growth scheme will require an Environmental Impact Assessment (EIA). Between Submission 1 and ahead of Submission 2, we will engage with Kent County Council and relevant regulators about our EIA. The timing of this will depend on our options development process, so we can provide stakeholders with enough information.

We will seek feedback from the Environment Agency, Natural England, Historic England and the Marine Management Organisation on the scope of our EIA. This will include meetings and workshops where needed.

We will submit our EIA scoping report to Kent County Council for feedback. We will hold meetings with Kent County Council to understand their feedback n.

4.3.3 Non-statutory consultation

Between Submission 1 and Submission 2, we will hold a non-statutory public consultation. This will enable residents nearby the proposed site and pipeline route to see detailed information about our proposals, intended benefits and plans to mitigate environmental and community impacts from operation and construction. This will not replace any engagement or consultation required for planning consent.

Our public consultation will include:

- A dedicated project webpage – with a map and customer-friendly summaries of key topics
- Public information and drop-in consultation events – giving customers opportunities to talk to our project team
- Formal consultation meetings with key stakeholders to allow deep dives into specific feedback
- Advertising campaigns in the local area to promote our consultation – supported by a targeted campaign for hard-to-reach customers

We will analyse the feedback received during our consultation, combined with any dedicated customer insight we carry out, and feed it into our option development process where appropriate. Alongside Submission 2, we will produce a consultation summary report – summarising the feedback we received and explaining how we have addressed it.