



BIRCHINGTON PARISH COUNCIL

Response to Thanet District Council

New Thanet Local Plan - Scoping Consultation 2026

Integrated Core Response

October 2026

Abbreviations			
BPC	Birchington Parish Council	TDC	Thanet District Council
NPPF	National Planning Policy Framework	SDS	Spatial Development Strategy
IDP	Infrastructure Delivery Plan	AMR	Annual Monitoring Report
BNP	Birchington Neighbourhood Plan	AHTV	Area of High Townscape Value
LHN	Local Housing Need	HDT	Housing Delivery Test
S106	Section 106 planning obligation	BMV	Best and Most Versatile agricultural land

Superscript numerals refer to the source table in Appendix B.

Executive summary

Birchington Parish Council supports the preparation of a positive, plan-led strategy for Thanet. The central requirement is that the new Local Plan should be built from a transparent chain of evidence: what the 2020 Plan has actually delivered; what homes, jobs, services and environmental outcomes are needed; how much growth the district can sustain; where that growth should be located; what infrastructure and investment are required; and how delivery will be monitored and corrected if assumptions fail.^{1,2,9,15-19}

The consultation asks what the new Plan should contain, what its aims and outcomes should be, how people should be involved, which sites may be available, which local heritage assets should be recognised, and what should be made of the emerging background evidence. BPC's response is that these questions should be answered as one connected planning exercise. Site availability, housing numbers, transport schemes, utilities, employment land, heritage and community infrastructure should not be progressed as separate workstreams and reconciled only at the end.^{2,3}

Housing illustrates the point. The nationally derived Standard Method figure is a starting input, while bottom-up evidence identifies the housing needs and pressures arising within Thanet. TDC should test a range of housing quantum options - from the locally evidenced benchmark through intermediate strategic contributions to the full national figure, and any credible investment-enabled higher-growth case - against the same sustainability, opportunity-cost, infrastructure and delivery criteria. The selected housing requirement should meet local need and then make an additional contribution to wider housing objectives that can be transparently sustained and delivered at an acceptable cost to finite land, infrastructure, environment, heritage and without harm to community amenity.^{1,2,10,15}

The same discipline should govern the spatial strategy. Transport capacity, public services and utilities, the economic role of centres and employment locations, productive land, flood and environmental constraints, heritage significance and local character should inform the scale, location and pace of growth before sites are allocated. Where capacity depends on investment, the Plan should identify the scheme, cost, funding route, responsible body, programme, approvals, dependencies and contingency rather than assume capacity will appear later.^{1,10-13,16-19}

That discipline also protects delivery. A Plan that adopts a development quantum or spatial strategy beyond the capacity demonstrated by its evidence, or that relies on unresolved assumptions about infrastructure, funding, land, statutory approvals or delivery responsibility, may look ambitious at adoption but be less effective in practice. The consequences can include stalled strategic sites, infrastructure lag, repeated renegotiation, under-delivery against the trajectory, pressure for development outside the planned sequence and loss of confidence in the plan-led approach. The appropriate response is not to remove ambition, but to distinguish evidenced capacity from aspirational capacity and to attach clear responsibilities, triggers and contingencies to the latter.^{1,6,15-19}

The new Plan must also operate successfully after adoption. From 31 October 2026 the national scheme of delegation will require many planning functions to be determined by officers and will create a presumption of officer determination for a wider class of applications unless the

statutory referral gateway is met. The Local Plan cannot alter that national scheme. It can, however, provide clear local policies, site requirements, designations and measurable criteria so that officer and committee decisions are consistent, transparent and capable of being explained by reference to evidence and policy.^{1,7,8}

Core proposition - TDC should prepare one evidence-led system linking need, sustainable capacity, spatial choice, policy, delivery, development management and monitoring. Every material planning choice should be capable of being traced to evidence, assessed against stated policy and, where delivery depends on future intervention, tied to a funded programme or explicit contingency.

1. Purpose and overall position

This document is BPC's integrated response to the New Thanet Local Plan Scoping Consultation. It distils the principal conclusions of the harmonised topic responses on housing, transport, economic development, public services and utilities, and the historic environment, together with the 60 candidate local heritage assets submitted for Birchington. It is intended to answer TDC's scoping questions at the level at which they now need to be answered: as choices about the future spatial strategy and the evidence, implementation and decision-making framework needed to support it.^{2,15-20}

BPC supports growth where it produces sustainable places, strengthens the local economy, meets housing and community needs and is capable of being delivered. The Council's concern is not with growth in principle but with a process that could allow a formula, a call for sites or an individual infrastructure scheme to determine the spatial strategy before the cumulative evidence has been assembled. National policy requires a positive plan, but it also requires an appropriate strategy based on proportionate evidence, effective policies and a reasonable prospect that allocations will be deliverable when intended.^{1,6}

The plan should therefore perform two linked functions. First, it should set the long-term strategy: vision, measurable outcomes, development quantum, spatial distribution, allocations, designations, infrastructure and delivery. Second, it should provide a clear local basis for determining planning applications, working alongside - not duplicating - national decision-making policies. Both functions depend on the same qualities: clear evidence, explicit policy tests, transparent reasoning, proportionate reporting and active monitoring.¹

Section summary: The new Local Plan should be both a spatial strategy and an operating framework: it should say what Thanet is trying to achieve, where and how growth should occur, what must be delivered with it, and how individual planning decisions will be assessed and explained.

2. Direct response to TDC's scoping questions

TDC's statutory notice identifies five matters on which representations are invited. BPC's position on each is summarised below; the remainder of this response develops the evidence and actions needed to carry those positions forward.³

TDC scoping matter	BPC core response
What should the new Local Plan include?	A positive vision, no more than ten measurable outcomes, an evidence-led spatial strategy, allocations and designations, local policies only where necessary, an integrated infrastructure and delivery programme, and a transparent monitoring and decision framework.
How should people be consulted and involved?	Use online engagement alongside early, accessible face-to-face engagement before choices are narrowed. Hold sessions in local venues across the district, involve town and parish councils at evidence, options and policy stages, and publish a consultation issues-and-response log showing what evidence was considered, what changed and why points were accepted or not accepted.
What sites might be available?	Continue the Call for Sites, but treat submissions as evidence of availability rather than proof of suitability. Establish broad spatial choices and sustainable capacity first, then assess sites against one published set of criteria and cumulative infrastructure requirements.
Which heritage assets should be considered?	Assess BPC/BHT's 60 Birchington candidates using the submitted evidence fact sheets, publish reasoned inclusion/exclusion decisions and integrate accepted assets with conservation-area, AHTV, archaeology, design and site-allocation work.
What about the background studies?	Use them, update them to the August 2026 NPPF where necessary, and close the evidence gaps identified by the topic responses - particularly delivery performance, transport, public-service and utility capacity, economic geography, cumulative land-use effects and heritage/place evidence.

Section summary: The consultation questions should not be answered in isolation. Together they define the evidence, spatial, delivery and governance architecture of the new Plan.

3. Vision, aims and measurable outcomes

National policy now expects local plans to set a positive vision supported by no more than ten measurable outcomes, underpinned by a realistic appreciation of what policies can genuinely shape and deliver. BPC recommends that TDC frame its vision around sustainable growth, stronger places and reliable delivery rather than around development totals alone.¹

Outcome	What success should mean
Homes	Meet locally evidenced housing needs and deliver a sustainable additional contribution to wider housing objectives, including an improved supply of genuinely affordable homes.
Economy	Increase durable employment, investment and productivity while strengthening established centres, visitor destinations, rural enterprise and access to jobs.
Movement	Reduce avoidable travel, increase practical access by walking, wheeling, cycling and public transport, and maintain safe and reliable residual highway capacity.
Infrastructure	Ensure education, health, water, wastewater, energy, digital and community infrastructure are operational when the development that depends on them is occupied.

Place and heritage	Conserve and enhance historic character, local distinctiveness, conservation areas, valued townscape and heritage assets while enabling well-designed change.
Environment and land	Use land efficiently, manage flood/coastal risk, protect important nature and productive land, and secure measurable environmental improvement.
Healthy communities	Maintain access to local facilities, open space, recreation, public safety and the services needed for resilient communities.
Delivery and accountability	Deliver sites, infrastructure and planning obligations to programme; publish performance; and intervene or review where material assumptions are not being achieved.

Each outcome should be supported by a small number of indicators and thresholds. The purpose is not to create a large performance catalogue, but to give the Plan a visible connection between policy, delivery and corrective action.^{1,4,9}

4. One integrated evidence-to-decision framework

The five topic responses point to the same sequence. The Plan should move from evidence to choices and then to delivery; it should not begin with sites and retrofit justification afterwards. Figure 1 is the organising framework for the BPC submission.

Stage	Core question / required output	Principal supporting evidence
1	Baseline and commitments Audit the 2020 Plan, current AMR, committed development and infrastructure. Distinguish what exists, what is committed and what has not been delivered.	SD1-SD5
2	Needs and measurable outcomes Establish housing, economic, community and infrastructure needs and the outcomes the Plan is intended to achieve.	SD1, SD3, SD5
3	Sustainable capacity Test transport, utilities, public services, employment access, land/environment, heritage, viability and market delivery cumulatively.	SD1-SD5
4	Reasonable alternatives Compare development quantum and broad spatial options using one published set of criteria, including opportunity cost and investment requirements.	SD1-SD5
DECISION GATE - Preferred strategy justified? Publish the decision, the rejected options, key trade-offs, dependencies and any strategic balance to be addressed through the SDS. [Core + SD1-SD5]		
5	Local Plan content Translate the evidence into the vision, measurable outcomes, spatial strategy, allocations, designations and necessary local policies.	Core + all SDs

6	Implementation and decisions Set infrastructure, funding, phasing, masterplanning, obligations and decision criteria; link application decisions to the development plan and national decision-making policies.	SD1-SD5
7	Monitoring and intervention Track outcomes, infrastructure, obligations and decision quality; trigger investment, rephasing, contingency or review where assumptions materially fail.	Core + SD1-SD5

Figure 1. Integrated Local Plan evidence, decision and delivery framework

Section summary: The value of the framework is traceability. An Inspector, decision-maker or resident should be able to see how the Plan moved from evidence, through options and trade-offs, to a preferred strategy and deliverable policy response.

5. Delivery and capacity baseline

The new Plan should begin with a concise but comprehensive audit of the 2020 Local Plan. The latest AMR is a necessary starting point, but the audit should go further by tracing important allocations and policies from plan assumption to permission, commencement, completion, infrastructure, affordable housing and operational outcome. Where delivery has fallen short, the cause matters: land availability, market absorption, viability, infrastructure, utilities, statutory approvals, land assembly, programme management or policy design require different responses.^{2,9,12}

The baseline should also include committed development. For Birchington this includes OL/TH/20/1755 and its associated transport, school, community, open-space, medical and link-road dependencies. Existing commitments cannot be treated as spare capacity for further allocations unless the evidence shows that the transport, utilities and services were planned with sufficient headroom.¹⁵⁻¹⁹

TDC's background evidence should be brought into one baseline. The Housing Needs Study, SEA, SFRA and SPA bird survey are relevant, but TDC itself records that a number of background documents were prepared against the December 2025 NPPF and will need revision to align with the August 2026 Framework. The next stage should therefore include an explicit evidence-gap and update schedule rather than assume that publication alone makes each study current for the new policy framework.^{2,10-13,23}

Section summary: Before setting new requirements, TDC should show what the existing strategy delivered, what is already committed, what capacity remains and which evidence needs to be updated or added.

6. Development needs and housing quantum

The Plan should distinguish between different kinds of need rather than compress them into a single headline figure. Housing is the clearest example. TDC identifies 1,106 dwellings per annum as the current Standard Method LHN starting point, while its own scoping material also

recognises that the authority must assess the amount of new homes that can actually be provided having regard to land availability, constraints and other relevant matters.²

BPC's housing response therefore asks TDC to publish a separate bottom-up assessment of locally evidenced housing pressures - including demography, household change, affordability, tenure, migration, specialist needs and economic circumstances - and then to test a range of quantum options. The range should include the local-needs benchmark, intermediate strategic contributions, the full Standard Method figure and any credible investment-enabled higher-growth case. For each step up the range, the Plan should identify both the additional benefit and the marginal cost: infrastructure investment, public-service demand, transport effects, land take, BMV agricultural land, environment, heritage, amenity, viability, market absorption and delivery risk.^{1,10,15}

The purpose is not to construct a preferred lower number. It is to demonstrate how far Thanet can responsibly go. The selected requirement should meet locally evidenced need and then make an additional contribution to wider housing objectives that can be achieved sustainably, delivered and at a transparent proportionate cost to the community and environment. Any unmet strategic balance should be explicit and addressed through the emerging SDS and cross-boundary work rather than concealed within unrealistic local assumptions.^{1,2,15}

Economic and community needs should be treated with the same discipline. Employment land should reflect actual sector needs and the role of centres and strategic employment areas; public-service demand should be forecast from the nature and pace of growth; and visitor, airport and wider strategic scenarios should use consistent assumptions across housing, transport and economic evidence.^{16,17,19}

7. Sustainable capacity and reasonable spatial options

Land that is physically available is not necessarily sustainably available. The spatial strategy should be based on an integrated capacity test applied consistently to each reasonable housing and employment option before individual sites are selected.

Capacity test	Core question	Detailed evidence
Housing and delivery	Can the quantum be absorbed and delivered, including affordable housing, without repeated failure of the trajectory?	SD1
Transport and accessibility	Can trips be reduced, shifted or accommodated; are sustainable links continuous; and are critical schemes funded, approved and timed?	SD2
Economy and centres	Does the option improve access to jobs, strengthen centres and productive economic assets, and avoid unnecessary commercial or settlement sprawl?	SD3
Public services and utilities	Will schools, health, water, wastewater, energy, digital and community services have operational capacity when demand arises?	SD5

Heritage and place	Have conservation areas, local heritage assets, AHTVs, archaeology, local character and design quality shaped the option from the outset?	SD4 / SD6
Land and environment	What are the effects on Green Wedges, BMV land, flood/coastal risk, nature, landscape, open space and environmental resilience?	SD1-SD5 + TDC SEA/SFRA/SPA evidence

The comparison should identify opportunity costs and capacity-creating investment. A location may be less sustainable at present but capable of improvement through a funded intervention; conversely, a nominally available site may remain unsuitable if essential infrastructure is unfunded, operational capacity is uncertain or irreversible land and amenity costs are disproportionate. These distinctions should be made explicit in the options appraisal.^{1,15-19}

The emerging Kent SDS and the future East Kent unitary geography make the wider comparison important. TDC should continue plan preparation, as the consultation proposes, but ensure its evidence can be used at East Kent/Kent scale and that any strategic housing, transport, infrastructure or environmental balance is visible rather than deferred.²

Section summary: The preferred spatial strategy should be the product of a published comparative assessment of needs, capacity, opportunity cost, investment and delivery - not the arithmetic result of aggregating volunteered sites.

8. How the supporting topic responses shape the strategy

8.1 Housing, spatial distribution and delivery

SD1 provides the detailed case for separating the nationally derived LHN, locally evidenced housing need, sustainable capacity and the final Local Plan requirement. It also establishes the need for a delivery audit, a range of quantum and spatial options, masterplanning of strategic growth and early intervention where delivery assumptions fail. The housing strategy is the point at which the other topic evidence must be brought together.¹⁵

8.2 Highways, sustainable transport and movement

SD2 requires transport to shape the spatial strategy rather than operate as later mitigation. It calls for a refreshed Thanet Transport Strategy, multimodal evidence, realistic treatment of Westwood Cross and major destinations, scenario testing of the North Thanet Link and Manston, reconciliation with committed development and a transport critical path for each strategic allocation. Movement assumptions should be measurable and funded.¹⁶

8.3 Economic development and diversification

SD3 supports growth but distinguishes durable economic development from incremental commercialisation and sprawl. It prioritises centres and appropriate employment locations, recognises Westwood Cross and major visitor anchors, supports genuine rural diversification, and treats farm viability, productive land, natural capital, character and access as economic considerations. Site selection should reflect the infrastructure and market conditions needed for employment to be viable.¹⁷

8.4 Public services, utilities and community infrastructure

SD5 requires operational capacity - not simply land reservation or a future connection offer - to be treated as part of sustainable capacity. It covers education, health, community facilities, open space, water, wastewater, energy, digital networks, waste, police/fire and interdependencies. Growth dependent on reinforcement should be phased to the point at which the relevant service or network is available and resilient.¹⁹

8.5 Historic environment, local character and heritage assets

SD4 seeks a positive historic-environment strategy that informs growth, regeneration, design and public realm. It asks TDC to use the BNP AHTVs, the 2024 CAAMP, archaeology/HER evidence and local-list evidence in spatial choices and site policies. SD6 supplies the standardised evidence for 60 candidate Birchington local heritage assets. Heritage should be used to shape place and capacity, not added as a constraint after allocation.^{18,20-22}

Section summary: The topic responses are not parallel objections. They are the component tests of one sustainable spatial strategy and should be read together when TDC compares growth options and drafts policies.

9. Spatial strategy, Call for Sites and masterplanning

BPC supports TDC's Call for Sites as a means of understanding land availability, including further brownfield opportunities. Availability, however, is only one test. The Call for Sites should not become the mechanism that determines where growth occurs. Broad settlement roles, development quantum, sustainable capacity and strategic infrastructure should be assessed first, after which submitted sites can be tested on a consistent basis.²

For strategic growth areas, the Plan should require comprehensive masterplanning across the whole functional area, not only the land controlled by a single applicant. Masterplans and allocation policies should identify movement networks, schools and community facilities, open space, utilities, heritage and landscape structure, affordable housing, phasing, infrastructure triggers, land ownership dependencies and delivery responsibilities. Where later phases depend on infrastructure or mitigation, the policy should make the dependency and maximum pre-trigger occupation clear.^{1,15,16,19}

Brownfield land and underused premises should be actively brought forward, but neither brownfield nor greenfield should be treated as a substitute for comparative assessment. The issue is whether the location, use and scale are appropriate and deliverable within the wider spatial strategy.¹⁷

10. Implementation and delivery framework

The Plan should be accompanied by a live implementation framework which connects each strategic policy and allocation to the actions needed to make it work. This should be more than a list of infrastructure aspirations. For each critical intervention TDC should record the responsible body, cost, funding status, delivery route, approvals, lead time, dependencies, target date, trigger, contingency and evidence source.^{1,19}

Delivery component	Minimum implementation record
Strategic allocation	Whole-area masterplan, capacity, trajectory, land control, infrastructure critical path and policy requirements.
Transport	Scheme/function, promoter, funding, approvals, interfaces, operational date and contingency if delayed or altered.
Utilities and services	Provider-confirmed existing headroom, reinforcement, cost/programme, operational milestone and maximum occupation beforehand.
Affordable housing	Plan requirement, tenure mix, plan-stage viability, permission/S106 secured amount, completions and review mechanism where justified.
S106 / obligations	Obligation, trigger, sum/land/work, receipt, spending/delivery status, responsible body and public record.
Heritage / environment	Site-specific mitigation or enhancement, delivery mechanism, responsible body, monitoring and long-term management.

The framework should distinguish committed funding from bids or aspirations and distinguish physical completion from operational readiness. Where the Plan relies on an intervention that is uncertain, the policy should state the contingency: alternative access, interim capacity, rephasing, reduced occupation or review. That approach provides the practical evidence needed for the NPPF effectiveness test at Examination.^{1,6}

10.1 Consequences of weak evidence, over-ambition or deferred delivery

Ambition is sustainable only where the evidence and delivery chain support it. The new system does not require perfect certainty, but it does require the Plan to be based on proportionate evidence and to be effective. Material assumptions should therefore be visible, tested and owned. Where a critical matter is unresolved, the Plan should state the risk, the responsible body, the point by which it must be resolved and the contingency if it is not.^{1,5,6}

Plan-making weakness	Likely consequence if not resolved
Incomplete, outdated or internally inconsistent evidence	Reasonable alternatives cannot be compared reliably; the preferred strategy is harder to justify; Gateway work may have to be repeated and soundness issues may carry into Examination.
Development quantum or trajectory materially above realistic market, infrastructure or service capacity	Strategic sites may stall or build out more slowly than assumed; infrastructure can lag; housing or employment delivery can fall behind the Plan; and pressure can increase for proposals outside the intended sequence.
Critical infrastructure dependent on unidentified funding, land, promoter,	Development may be permitted before the supporting intervention is certain, later phases may stall, obligations may be renegotiated and the cost or risk can shift to the public sector or existing communities.

approval or responsible body	
Strategic responsibilities deferred to individual planning applications	Cumulative transport, utility, service and place-making issues are dealt with piecemeal; applicants and decision-makers are asked to solve matters that should have been settled through the Plan; outcomes become less consistent.
Cross-boundary or strategic matters deferred without an agreed route to resolution	The Plan may have to revisit its spatial assumptions as SDS or neighbouring-authority work progresses, weakening delivery certainty and creating avoidable rework.
Vague local policies because difficult choices have been postponed	Delegated and committee decisions become less predictable; local evidence requirements have a weaker policy basis; reasons are harder to explain consistently; and appeal or interpretation risk increases.

The practical test is therefore simple: if a strategic allocation or policy depends on a future intervention, the Plan should identify who will deliver it, how it will be funded, when it must be operational and what happens if it is delayed. If no credible route exists, the scale, phasing or location of dependent growth should be adjusted rather than leaving the issue to a later application.^{1,6,15-19}

11. A clear basis for planning decisions under the new arrangements

From 31 October 2026 the national scheme of delegation will apply. Schedule 1 functions must be delegated to officers (subject to the specific own-interest provisions), while Schedule 2 applications are presumed to be delegated unless at least one statutory referral criterion is met and the nominated officer and nominated member agree referral. Current local call-in practices cannot override the national scheme. The change concerns who makes the decision; it does not displace the development plan, national decision-making policies or other material considerations.^{1,7,8}

The Plan cannot recreate committee discretion through local policy but it can make the substantive planning framework much clearer: locally necessary policies, mapped designations, precise site requirements, measurable standards and concise supporting text should give officers, committees, applicants, consultees and communities the same policy starting point.

The August 2026 NPPF deliberately separates plan-making policies from national decision-making policies. Local plans should not duplicate or substantively restate national decision-making policy, but may and should address necessary local issues and site-specific requirements. TDC should therefore prepare a policy architecture that shows clearly which matters are governed nationally and where local policy adds justified place-specific content.¹

This is also relevant to information requirements. NPPF policy DM2 states that local validation lists should include national information requirements and may require additional assessments only where a development-plan policy creates the necessary basis and the requirement is proportionate to the scale and potential impact of the proposal. If TDC expects local transport, heritage, infrastructure, design or other evidence from particular classes of development, the Local Plan should provide the clear policy hook rather than rely on informal practice.¹

11.1 Decision reports and policy reasoning

BPC asks TDC to adopt a proportionate decision-record standard for both delegated and committee decisions. Minor applications need not produce lengthy reports, but every decision should make the reasoning traceable. Major, strategic or locally significant proposals should provide a fuller record.

Decision record	Minimum content
Decision route	Identify the statutory/local route to decision and, where relevant, the outcome of any Schedule 2 referral consideration.
Policy framework	Identify the relevant development-plan policies, neighbourhood-plan policies, national decision-making policies and other material considerations.
Evidence	Summarise the material facts, technical evidence, site context and any significant uncertainty; distinguish evidence from judgement.
Consultation	Record material representations and consultee advice. Where a town/parish council raises a material planning issue that is not accepted, explain the planning reason.
Assessment	Apply the relevant policy tests issue by issue and explain the weight given to material considerations, including cumulative effects where relevant.
Conditions / obligations	Explain why conditions or obligations are necessary, how they address impacts and any critical trigger or delivery dependency.
Conclusion	Give a concise reasoned conclusion showing how the decision follows from policy and evidence, including any departure from the development plan.

The statutory guidance separately requires TDC to keep a record of cases considered for referral to committee, the outcome and reasons, report this regularly to the planning committee and make it available on the website. BPC supports this minimum and recommends that the record is presented in a searchable form linked to the relevant application.⁷

Section summary: Greater officer delegation increases the importance of clear policy and visible reasoning. Accountability should be delivered through the quality and accessibility of the decision record, not by duplicating national committee procedures.

12. Monitoring, accountability and corrective action

Monitoring should operate as an intervention system, not an annual description of what has already gone wrong. The AMR should remain the formal district-wide record, but a shorter public dashboard should track the small number of outcomes and critical delivery dependencies that determine whether the strategy is working.⁹

Area	Public indicators	Management response
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Housing	Permissions, starts, completions, occupations, affordable housing by tenure, five-year supply/HDT position, strategic-site progress and permission-to-completion conversion.	Investigate persistent shortfall; unblock deliverable sites; rephase or review assumptions where the trajectory is no longer credible.
Infrastructure / services	Operational capacity, provider milestones, funded reinforcement, school/health/community delivery and S106 triggers.	Accelerate investment or interim capacity; restrict/rephase dependent occupation; review allocation if critical dependency fails.
Transport	Mode share/accessibility, network performance, safety, parking/destination data and critical scheme delivery.	Adjust mitigation/investment, revise transport programme or phasing where assumptions materially diverge.
Economy / centres	Employment delivery, floorspace, vacancy/footfall, centre vitality, visitor economy and key destination performance.	Refocus interventions or allocations where market/delivery evidence no longer supports the planned role.
Heritage / environment	Local-list/at-risk outcomes, conservation actions, design quality, nature/flood/land indicators and mitigation/enhancement delivery.	Secure remedial action, update evidence or policy guidance, and review assumptions where cumulative harm or non-delivery emerges.
Decision quality	Appeal outcomes, reasons for overturns, referral records, recurring policy interpretation issues and implementation of conditions/obligations.	Issue guidance/training, clarify policy at the next plan stage or review local requirements where repeated ambiguity is identified.

For strategic sites, the public should be able to follow the chain from policy and permission to obligation, receipt or land transfer, works and operational outcome. This is particularly important where infrastructure or affordable housing is phased or subject to review. Publication protects confidence in the Plan and gives TDC earlier evidence of emerging delivery risk.^{15,19}

13. Engagement, strategic planning and local government reorganisation

TDC proposes a combination of portal notifications, website/newsletter material, social media, press releases, paper copies and, at some stages, drop-in sessions. BPC supports that mixed approach, but meaningful engagement should occur before evidence is closed, preferred options are selected or recommendations are effectively settled.

Government guidance for the new plan-making system says engagement should start as early as possible, use mixed methods and recognise that in-person engagement can enable more detailed discussion and reach people who cannot use other methods. Future stages should therefore include accessible face-to-face sessions in local venues across Thanet - including town/parish, library or community venues where appropriate - so that affected communities can question evidence, understand trade-offs and contribute while choices can still change. Digital consultation should widen access, not replace explanation and dialogue.^{2,3,24}

TDC should maintain a live scoping and consultation response matrix recording the issue raised, evidence supplied, TDC assessment, action/change and reason. At each principal stage, a concise 'you said / evidence / response / change' summary should be available before the relevant decision is taken, so members, officers and communities can see which issues remain unresolved and how local evidence has influenced the emerging strategy. This would support the regulatory requirement to publish the main issues raised and explain how they have been considered, and would reduce the risk of important evidence being lost between consultation stages.^{4,5,24}

Local government reorganisation reinforces the need for transferable evidence and clear decision records. TDC's work should be structured so that the emerging East Kent authority can inherit the evidence base, infrastructure programme, obligations and monitoring without having to reconstruct assumptions. At the same time, the Plan should influence the emerging Kent SDS and record where issues are more appropriately resolved at strategic rather than district scale.²

14. Gateway and Examination robustness

TDC's timetable places Gateway 1 on 30 October 2026, followed by consultation on proposed Local Plan content and evidence from 28 January to 12 March 2027. That timetable makes the scoping stage important: Gateway 1 should establish the evidence programme, governance, engagement and project controls needed to support the later choices, while Gateway 2 will examine progress towards soundness and general conformity.^{4,5,6}

The August 2026 NPPF sets five proportionate tests of soundness for local plans. BPC's recommended approach is designed to create the evidence trail for each test from the outset.^{1,6}

PM15 test	National requirement	How the BPC approach supports it
Positive	Meet development needs in accordance with sustainable development and deal with strategic matters through effective joint working.	Separate local and strategic needs, test a sustainable contribution and make unresolved strategic balance explicit for SDS/cross-boundary work.
Appropriate	Use an appropriate strategy, reasonable alternatives and proportionate evidence.	Publish baseline, capacity criteria, quantum/spatial options, opportunity costs and reasons for the preferred strategy.
Effective	Use effective policies with a reasonable prospect that allocations will be deliverable when envisaged.	Tie sites to masterplans, infrastructure critical paths, provider evidence, funding, phasing, triggers and contingencies.
Consistent with national policy	Accord with plan-making policy and do not duplicate or conflict with national decision-making policies.	Use local policy only for justified local/site matters; map clearly how local and national decision policies operate together.
Conformity	Maintain general conformity with any adopted SDS and take the emerging strategy into account as appropriate.	Keep the Thanet evidence usable at Kent/East Kent scale and record how spatial choices align with the emerging SDS.

Examination should not be the first time that assumptions, alternatives and delivery dependencies are assembled into one narrative. TDC should maintain a transparent Examination-

ready evidence trail throughout preparation: evidence source and date, alternatives tested, key representations, decision and reason, delivery assumptions, provider engagement and monitoring commitment.^{5,6}

The consequence of leaving significant evidence, delivery responsibilities or strategic choices unresolved is not simply a more difficult hearing. Gateway 2 is expressly intended to identify emerging soundness issues; a failed Gateway 3 prevents progression to Examination until the prescribed issues are addressed; and at Examination an unsound Plan may require main modifications, a pause for substantial additional work or, where soundness cannot be achieved through modifications, withdrawal. Early realism is therefore a programme-control issue as well as a planning-policy issue: resolving material uncertainties before the preferred strategy hardens is quicker and more transparent than trying to repair them at the end of the process.^{5,6}

Section summary: The strongest protection against late Examination difficulty is an auditable evidence trail built during plan preparation, not a retrospective justification assembled after the preferred strategy has already been chosen.

15. Requested Local Plan actions

BPC asks TDC to carry the following ten outputs into the next stage of plan preparation. They consolidate, rather than repeat, the detailed actions in the supporting topic responses.

Action	Required output
1. Publish the 2020 Plan delivery audit	Bring housing, employment, transport, infrastructure, services, obligations and major-site delivery into one baseline and identify the causes of material non-delivery.
2. Complete the integrated needs and evidence programme	Update evidence to the August 2026 NPPF, publish evidence gaps and material assumptions, establish measurable outcomes for homes, economy, movement, infrastructure, place and environment, and identify the stage by which unresolved matters must be closed.
3. Test housing quantum as a range	Publish the local-needs benchmark and compare intermediate, full Standard Method and credible investment-enabled options, showing incremental benefits, costs, amenity effects and delivery risk.
4. Test sustainable capacity and reasonable spatial alternatives	Apply one transparent set of housing, transport, economic, infrastructure, land/environment and heritage criteria before the preferred spatial strategy is chosen.
5. Set the strategy before selecting sites	Use the Call for Sites as availability evidence; then select and masterplan sites through the agreed spatial strategy and cumulative capacity assessment.
6. Publish a live delivery and infrastructure framework	For critical interventions identify cost, funding, responsibility, approvals, programme, dependencies, operational trigger, contingency and monitoring. Do not rely on a strategic dependency with no identified delivery body or credible route to implementation.
7. Draft clear local decision policies	Use local policies for necessary local/site matters, avoid duplication of national decision-making policies, and provide the policy basis for proportionate local evidence requirements.

8. Adopt transparent decision-assurance arrangements	Use consistent reasoned officer/committee reports, publish national-scheme referral records, address material town/parish representations and track appeal/policy-learning outcomes.
9. Monitor outcomes and use mandatory management triggers	Publish concise dashboards; intervene through investment, contingency, rephasing or plan review where critical assumptions or delivery thresholds materially fail.
10. Maintain the strategic and Examination trail	Record cross-boundary/SDS work, consultation responses, evidence, alternatives, decisions and delivery assumptions in a form transferable through East Kent reorganisation and defensible at Examination; include evidence of early local face-to-face engagement and how it influenced choices before decisions were taken.

16. Conclusion

The Thanet Local Plan is being prepared at a point of significant change: a new national policy framework, a new plan-making system with gateways, an emerging Kent SDS, local government reorganisation and a national scheme that will delegate a larger share of planning decisions to officers. Those changes make the quality of the Local Plan more not less important.¹⁻⁸

BPC's supporting evidence points to a practical response. TDC should build the Plan from the baseline and locally evidenced needs, test sustainable capacity and reasonable alternatives, choose the spatial strategy transparently, and convert it into allocations, infrastructure, policies and delivery mechanisms that can actually be implemented. Housing, transport, the economy, public services, utilities, heritage and the environment should be planned as one connected system. Ambition should be expressed through outcomes that can be delivered, not through assumptions that transfer unresolved costs, responsibilities or decisions to later planning applications.¹⁵⁻²⁰

The resulting Plan should be concise but firm. National decision-making policies should be applied nationally; local policies should add the justified site-specific and place-specific requirements that Thanet needs. Decisions should then be explainable by reference to the development plan, national policy, evidence and material considerations, with proportionate public reporting and active monitoring of delivery.^{1,7}

Final proposition: A sound Local Plan should not merely identify enough land. It should establish a credible and sustainable strategy for Thanet, provide the rules and evidence needed to make consistent planning decisions, and retain the ability to intervene when delivery, infrastructure or policy outcomes diverge from what the Plan assumed.

Appendix A - BPC supporting evidence suite

The documents below form the detailed evidence supporting this Core Response. They should be read as one coordinated suite. The codes are used throughout the Core Response for navigation only.

Code	Supporting document	Function in the BPC case
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SD1	Housing, Spatial Distribution and Delivery – October 2026	Housing baseline; national LHN versus local-needs benchmark; quantum/spatial options; sustainable capacity; site delivery; monitoring and plan-led control.
SD2	Highways, Sustainable Transport and Movement – October 2026	Vision-led transport; 2020/2018 delivery audit; multimodal evidence; Westwood; North Thanet Link; Manston; phasing, funding and monitoring.
SD3	Economic Development and Diversification – October 2026	Centres, employment hierarchy, Westwood, tourism, rural/farm diversification, productive land, infrastructure and economic monitoring.
SD4	Historic Environment and Local Heritage Assets – October 2026	Historic-environment strategy; conservation areas; AHTVs; archaeology; local list; design/masterplanning; regeneration/reuse and monitoring.
SD5	Public Services, Utilities and Community Infrastructure – October 2026	Education, health, community facilities, recreation, water/wastewater, energy, digital, waste, emergency services, resilience and operational capacity.
SD6	Birchington Local Heritage Assets - Standardised Evidence Fact Sheets – October 2026	Candidate-specific evidence for 60 local heritage assets, criterion mapping, significance, photographs and targeted verification actions.

Appendix B - Scoping consultation cross-reference

TDC consultation matter	Core response location	BPC response
What should be included in the new Local Plan?	Sections 3-12 and 15	Integrated vision/outcomes, spatial strategy, supporting topic evidence, implementation, decision framework and monitoring.
How should people be consulted and involved?	Section 13	Early mixed-method engagement before choices are narrowed; face-to-face sessions in accessible local venues; structured town/parish involvement; live issues-and-response matrix; and transparent evidence at each gateway.
Call for Sites	Sections 7 and 9	Availability evidence only; spatial strategy and capacity before site selection; one published assessment framework and whole-area masterplanning.
Potential local heritage assets	Section 8.5; SD4-SD6	Assess 60 Birchington nominations and integrate local-list evidence with the wider historic-environment strategy.

Background studies	Sections 5-8 and Appendix C	Use published studies, update to August 2026 NPPF, and close evidence gaps identified by the supporting responses.
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Appendix C - Principal reference table

Superscript references in the Core Response correspond to the sources below. Detailed topic evidence and additional references remain in SD1-SD6. Official Government, TDC, Planning Inspectorate and adopted development-plan sources are used wherever available.

Ref	Source / document	Date / status	Relevance	Availability
1	MHCLG National Planning Policy Framework	17 August 2026	Current national plan-making and decision-making policy, including PM2, PM6, PM8, PM15 and DM1-DM7.	Open source
2	Thanet District Council New Thanet Local Plan - Scoping Consultation Document	August 2026	TDC scoping issues, housing starting point, SDS relationship, aims/outcomes and topic context.	Open source
3	Thanet District Council Scoping Consultation statutory notice / consultation page	24 August - 9 October 2026	Defines the matters on which representations are invited under Regulation 20.	Open source
4	Thanet District Council Local Plan timetable	Current timetable	Gateway 1, proposed-content consultation, Gateways 2/3, submission, Examination and adoption programme.	Open source
5	MHCLG Plan-making regulations explainer / new local plan system guidance	2026	Scoping, proposed-content consultation, gateway requirements, consultation summaries and submission documents.	Open source
6	Planning Inspectorate Procedural guide for Examinations and Gateways under the 2026 Regulations	26 August 2026	Current gateway and Examination process and soundness focus.	Open source
7	MHCLG Planning Committees and the National Scheme of Delegation of Planning Functions - statutory guidance	1 June 2026; effective 31 October 2026	Mandatory/presumed officer delegation, referral gateway and transparency/reporting arrangements.	Open source
8	Planning and Infrastructure Act 2025 / TCPA 1990 sections 319ZZC-319ZZF	2025-26	Legislative basis for national scheme of delegation and related planning committee reforms.	Open source
9	Thanet District Council Annual Monitoring Report 2025 and monitoring evidence	2025; covers 1 Apr 2024-	Latest published monitoring baseline for Local Plan policy implementation and delivery.	Open source

		31 Mar 2025		
10	Thanet District Council / DLP Thanet Housing Needs Study Part 1	2026; Part 2 referenced by TDC	Housing evidence; Part 2 intended to assess what new homes can be provided having regard to land and constraints.	Open source
11	Thanet District Council Strategic Environmental Assessment Scoping Report	2026	Environmental baseline/objectives for testing the Local Plan.	Open source
12	Thanet District Council Strategic Flood Risk Assessment	May 2026	Current TDC flood-risk evidence for plan-making, subject to alignment with August 2026 policy.	Open source
13	Thanet District Council SPA Bird Survey 2025/26	2026	Evidence on Golden Plover and Lapwing and functionally-linked land relevant to spatial options.	Open source
14	Thanet District Council Thanet Local Plan 2020	Adopted 9 July 2020	Existing development-plan baseline and policies to be audited/reviewed.	Open source
15	Birchington Parish Council Housing, Spatial Distribution and Delivery	Harmonised Final Draft, 24 Sep 2026	Detailed BPC housing evidence and recommendations.	BPC supporting/ local document
16	Birchington Parish Council Highways, Sustainable Transport and Movement	Harmonised Final Draft, 24 Sep 2026	Detailed BPC transport evidence and recommendations.	BPC supporting/ local document
17	Birchington Parish Council Economic Development and Diversification	Harmonised Final Draft, 24 Sep 2026	Detailed BPC economic evidence and recommendations.	BPC supporting/ local document
18	Birchington Parish Council Historic Environment and Local Heritage Assets	Harmonised Final Draft, 24 Sep 2026	Detailed BPC heritage and local-character evidence and recommendations.	BPC supporting/ local document
19	Birchington Parish Council Public Services, Utilities and Community Infrastructure	Harmonised Final Draft, 24 Sep 2026	Detailed BPC infrastructure, services and utilities evidence and recommendations.	BPC supporting/ local document
20	Birchington Parish Council / Birchington Heritage Trust Local Heritage Assets Standardised Evidence Fact Sheets	Harmonised Final Draft, 24 Sep 2026	Primary asset-specific evidence for 60 candidate Birchington local heritage assets.	BPC supporting/ local document

21	Birchington Parish Council / Thanet District Council Birchington Neighbourhood Plan 2021-2031	Made 7 December 2023	Development-plan policies and local spatial, character and community evidence.	Open source
22	Thanet District Council / Alan Baxter Ltd Birchington Conservation Area Appraisal and Management Plan	Adopted July 2024	Current conservation-area significance, positive contributors and management evidence.	BPC supporting/ local document
23	Thanet District Council Background studies published for scoping consultation	August 2026	TDC notes several studies were prepared under the December 2025 NPPF and will be revised for the August 2026 Framework.	Open source
24	MHCLG Engaging the public when preparing a local plan	15 April 2026	Current new-system guidance: engage early, use mixed methods, support accessible participation, use in-person engagement where useful, and explain how consultation feedback has been considered.	Open source