



BIRCHINGTON PARISH COUNCIL

Response to Thanet District Council

New Thanet Local Plan - Scoping Consultation 2026

SD 1 - Housing, spatial distribution and delivery

October 2026

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

Superscript numerals refer to the source table in Appendix B.

Executive summary

Housing is the central spatial issue for the new Thanet Local Plan because the scale, location and pace of housing growth determine much of the demand placed on land, transport, public services, utilities and local places. BPC supports a positive plan-led response to housing need. At scoping stage the key task is to establish a housing strategy that can be justified, delivered and maintained over the plan period, rather than beginning with a single headline number and working backwards to find enough land.^{1,2,3,12}

Thanet starts from a difficult but clear position. TDC identifies a current Standard Method Local Housing Need figure of 1,106 dwellings per annum. Its scoping material also records average delivery of about 504 dwellings per annum since 2015/16, with the latest two years at just over 800. The adopted Local Plan trajectory rises to 1,317 dwellings per annum between 2026 and 2031. In May and June 2026 TDC planning reports stated that the authority could demonstrate only 3.78 years of housing land supply. The 2025 Housing Delivery Test, published on 17 August 2026, records Thanet at 70%.^{3,6,8}

Those figures do not justify reducing ambition. They do show that three different questions must be kept separate: the nationally derived Standard Method figure; the housing needs and pressures evidenced from Thanet itself; and the housing requirement that the Local Plan ultimately chooses to provide. National guidance confirms that the Standard Method is an unconstrained need assessment and does not itself produce the Local Plan housing requirement. The Plan should therefore test a range of housing quantum options, beginning with a clear local-needs benchmark and extending through intermediate strategic contributions to the full Standard Method figure, with higher investment-enabled growth considered where credible. Each option should be tested for sustainability, deliverability, opportunity cost and the investment needed to make it work.^{1,3,5}

BPC therefore asks TDC to use a transparent sequence: audit the existing baseline and committed development; establish the locally evidenced housing needs and housing mix; define a local-needs benchmark; test a range of housing quantum and spatial options against sustainable capacity and comparative costs; set the housing requirement and trajectory; select and masterplan sites; then monitor delivery against published triggers. The objective should be to meet Thanet's own evidenced housing needs and, where it is sustainable and the benefits justify the additional land, infrastructure and amenity costs, make a further contribution to wider strategic and national housing objectives. Each stage should leave a clear evidence and decision trail capable of being tested at Examination.^{1,5,12,13,14,15,16}

Section summary: The housing response is pro-growth and plan-led. Its purpose is to secure a housing requirement, spatial strategy and delivery programme that remain credible when tested against Thanet's actual housing delivery, infrastructure, market and environmental circumstances.

1. Purpose and overall position

This submission responds specifically to the housing element of the New Thanet Local Plan scoping consultation. It addresses the amount, type, distribution, phasing and delivery of

housing and the evidence that should support those choices. It is intended to complement, not duplicate, BPC's Core Response and the separate responses on transport, public services and utilities, economic development, and the historic environment.^{2,12,13,14,15,16}

The housing question cannot be resolved by land availability alone. Every significant housing option has consequences for movement, schools and healthcare, water and wastewater, energy, employment access, agricultural land, landscape, heritage, settlement character and the viability of infrastructure. Those consequences are part of the spatial choice, not matters to be left until individual planning applications are submitted.^{1,13,14,15,16}

The scoping stage is therefore the point at which TDC should define the evidence sequence that will lead to the housing requirement and spatial strategy. The approach needs to be sufficiently clear that, when the Plan reaches Examination, the Inspector can see how the Council moved from national policy and local evidence to a realistic and deliverable strategy, how reasonable alternatives were treated, and how unresolved dependencies are controlled.¹

Section summary: The housing strategy should emerge from an auditable chain of evidence and decisions (Figure 1). The Call for Sites is evidence of availability; it is not a substitute for deciding the scale and spatial distribution of growth.

Stage	Evidence / decision	Required output
1	Baseline and delivery	Verified position on completions, permissions, affordable housing, committed development, infrastructure and the causes of under-delivery.
2	Locally evidenced housing needs	Bottom-up benchmark for housing needs arising within Thanet, including size, tenure, affordability, specialist housing and household mix.
3	Sustainable capacity	Capacity by area, separating what exists now from capacity that depends on funded and deliverable transport, services, utilities or other investment.
4	Quantum and spatial alternatives	Consistent comparison of the local-needs benchmark, intermediate strategic contributions, the full 1,106 dpa Standard Method figure and credible investment-enabled higher growth.
5	Requirement and trajectory	A justified housing requirement, spatial distribution and phased trajectory showing how local need and any wider strategic contribution will be delivered.
6	Sites and delivery	Allocations and masterplans that implement the strategy, with infrastructure, obligations, funding, phasing and delivery dependencies identified.
7	Monitoring and intervention	Published indicators, trigger points and corrective actions where housing, infrastructure or service delivery departs materially from the Plan.

Figure 1. Housing, spatial distribution and delivery: evidence-to-plan framework

2. Thanet's current housing position

The new Plan should start from a concise housing delivery audit, not from a blank sheet. TDC's own scoping material provides several important facts which should frame the next stage of work.^{2,3}

Current indicator	Position	Planning significance
Standard Method Local Housing Need	1,106 dwellings per annum	National-policy starting point identified by TDC as at May 2026; not itself a completed spatial strategy.
Adopted Local Plan stepped requirement	1,317 dwellings per annum, 2026-31	Shows the scale already expected by the adopted Plan and the importance of testing whether the trajectory is being realised.
Average completions since 2015/16	About 504 dwellings per annum	Delivery has been materially below both the current Standard Method figure and the later years of the adopted trajectory.
Recent delivery	Just over 800 dwellings per annum in each of the latest two years cited by TDC	Demonstrates improvement, but not yet delivery at the current LHN or adopted late-plan trajectory.
Five-year housing land supply	3.78 years stated in TDC Planning Committee reports, May/June 2026	Shows current exposure to housing supply pressure and the need for a realistic deliverable pipeline.
Housing Delivery Test 2025	70%	Below the current 75% threshold; under the August 2026 NPPF this constitutes evidenced unmet housing need for the relevant national decision-making policy.

The conclusion is not that Thanet should plan only for past rates of delivery. Past performance is evidence of the scale of the challenge and of the constraints that need to be overcome. The new Plan must show why its future trajectory is credible: which sites will deliver, at what pace, with what infrastructure, against what market assumptions and with what contingency if major sites slip.^{1,3,6,8}

This is especially important because the housing evidence published for scoping is not yet the final evidence base. TDC states that Housing Needs Study Part 2 will assess the amount of new homes that can actually be provided and that the background studies will be updated to reflect the August 2026 NPPF. The scope of that work should therefore be settled now.⁴

Section summary: The new Plan should explain the gap between adopted expectations, national-policy need and actual delivery before carrying forward assumptions from the 2020 Plan.

3. Housing delivery audit of the 2020 Plan

A credible housing strategy needs an evidence-based explanation of what has happened since the 2020 Local Plan was adopted. The audit should trace housing through the full delivery chain: allocation, permission, reserved matters, legal obligations, infrastructure, start on site, build-out completion and occupation. Strategic sites should be reported separately from smaller sites and windfalls so that dependence on a limited number of large schemes is visible.^{9,10}

The audit should distinguish delay caused by planning from delay caused by market absorption, land ownership, infrastructure, utility reinforcement, viability, financing, statutory approvals or developer phasing. It should also compare policy assumptions for affordable housing, community facilities and infrastructure with what has actually been secured and delivered. This is necessary because increasing the number of allocations will not resolve constraints that arise after permission.^{9,10,14}

For housing supply purposes, TDC should publish a clear reconciliation between the sites counted in the trajectory, their planning status, expected annual completions and the evidence supporting those rates. Where a site has repeatedly moved backwards in the trajectory, the reason and realistic recovery assumption should be recorded.^{1,7,10}

Section summary: The baseline should identify the causes of under-delivery. The next Plan should correct those causes rather than simply increase the amount of land allocated.

4. Distinguish the nationally derived starting point from locally evidenced housing need

Two different evidential measures should be made explicit. The Standard Method produces a nationally prescribed Local Housing Need figure - currently 1,106 dwellings per annum for Thanet - and national guidance describes it as an unconstrained assessment which does not itself produce the Local Plan housing requirement. Separately, TDC needs a bottom-up assessment of the housing pressures arising from Thanet's own population, household formation, affordability, tenure, migration and economic circumstances.^{1,3,5}

The Housing Needs Study should therefore quantify those locally arising pressures and, so far as the evidence permits, express them as an annual local-needs benchmark as well as a required housing mix. That benchmark should identify the homes needed for affordability and Social Rent, families, smaller households, older people, disabled people and other groups, and should distinguish the effect of demographic change from wider policy-driven growth assumptions.^{1,4,5}

The local-needs benchmark is not proposed as a rival statutory formula. It is an essential reference point for understanding what part of the housing programme is required to meet needs arising within Thanet and what part represents an additional strategic contribution. The distinction matters because the costs and benefits of growth above the local benchmark should be visible rather than absorbed into one undifferentiated target.^{1,5}

4.1 Test a range of housing quantum options

Housing quantum option	Purpose of the option	What TDC should test
Locally evidenced benchmark	A bottom-up benchmark of the housing quantum needed to address needs arising within Thanet, including affordability, tenure and specialist housing requirements.	Whether the quantum and mix are deliverable, where they should be located, and what infrastructure is required to meet local need properly.
Intermediate strategic contribution(s)	One or more increments above the local benchmark, allowing the Plan to test how far Thanet can contribute beyond locally arising need.	For each increment, the marginal housing benefit against extra land take, BMV loss, infrastructure cost, service demand, transport impact, environmental and heritage effects, amenity loss, viability and delivery risk.
Full Standard Method figure	Test the nationally derived 1,106 dpa starting figure in full rather than assuming either that it must be accepted or that it cannot be achieved.	The spatial pattern, infrastructure and public investment required; the opportunity costs; market absorption; and whether the full figure can be delivered sustainably over the plan period.
Investment-enabled higher growth	Where identified transport, utility, public-service or economic investment creates additional capacity, test whether a higher or faster strategic contribution is justified.	The specific investment, funding and delivery body; the additional housing capacity enabled; wider benefits; and whether those benefits justify the additional environmental, land and community costs.

The purpose of this range is comparative, not to pre-judge a preferred figure. TDC should show the incremental benefits and opportunity costs of moving from one quantum to the next. The selected requirement should first provide a credible response to locally evidenced need and should then make the greatest additional contribution to wider housing objectives that can be achieved sustainably, deliverably and at a proportionate cost to infrastructure, finite land, environment, heritage and community amenity.^{1,5,13,14,15,16}

Whatever quantum is selected, housing quality and affordability remain part of the outcome. Affordable housing should be monitored through three distinct measures: the number required by policy, the number secured in permissions and obligations, and the number actually completed by tenure. Plan-stage viability should be robust enough that essential affordable housing and infrastructure are not routinely renegotiated away after land values have been established.^{1,21}

Section summary: The Standard Method and the bottom-up local-needs evidence perform different functions. TDC should publish both clearly, use the local evidence to define the housing problem that must be solved, and test how far a sustainable strategic contribution can extend beyond it.

5. Test sustainable capacity against each housing quantum option

Housing capacity is not the same as the amount of land that can physically contain dwellings. The relevant planning question is how much growth can be accommodated at each tested quantum and in each broad location while maintaining acceptable access to jobs and services and providing the infrastructure, utilities and environmental safeguards that the resulting population requires.^{1,12}

BPC's companion submissions provide the evidence tests that should feed directly into the housing spatial strategy. The transport response requires realistic movement demand, sustainable access and deliverable transport interventions. The public services response tests operational capacity in schools, health, water, wastewater, energy and community infrastructure. The economic response tests access to employment, centres and investment and the effect of land-use choices on agriculture and the visitor economy. The historic environment response identifies heritage, character and setting that should shape allocations and masterplans.^{13,14,15,16}

Companion evidence	Housing question	Required use in site/spatial assessment
Highways, Sustainable Transport and Movement	Can additional trips be reduced, shifted or accommodated, and are critical schemes funded and deliverable?	Use accessibility, network capacity and transport dependencies as comparative spatial criteria; align growth with refreshed transport strategy.
Public Services, Utilities and Community Infrastructure	Will schools, healthcare, water, wastewater, energy and other services have operational capacity when homes are occupied?	Distinguish current headroom from capacity dependent on funded reinforcement; phase housing to operational readiness.
Economic Development and Diversification	Will residents have realistic access to employment, centres and services, and what economic/land-use consequences follow?	Test jobs-homes relationship, centre impacts, productive land and place-based investment.
Historic Environment and Local Heritage Assets	How will development affect significance, setting, local character and settlement identity?	Use heritage and character evidence at spatial and masterplanning stage, not as post-allocation mitigation.

The result should be a capacity assessment that can be applied consistently to the housing quantum range. It should show capacity that exists now, capacity that can credibly be created through identified investment, the cost and timing of that investment, and constraints which materially affect the scale, pace or location of growth. Capacity dependent on an unfunded scheme should not be presented as if it already exists.^{13,14}

Section summary: Sustainable capacity should be tested against the housing quantum range, not assessed only after a number has been chosen. The evidence should show the marginal infrastructure and environmental consequences of each additional increment of growth.

6. Compare housing quantum and spatial alternatives before selecting sites

The new Plan should compare two things together before individual sites are allowed to determine the pattern of growth: how much housing Thanet should plan for, and where each tested quantum could be accommodated most sustainably. The Call for Sites is valuable evidence of ownership and availability, but landowner promotion does not establish either the appropriate housing quantum or the most sustainable spatial solution.^{2,18}

The alternatives should therefore form a matrix rather than a single line of site options. TDC should test the local-needs benchmark, one or more intermediate strategic contributions, the full Standard Method figure and any credible investment-enabled higher-growth scenario against reasonable spatial distributions, including urban and brownfield capacity, committed strategic growth, settlement extensions and relevant cross-boundary options.^{18,19}

Each option should be assessed using the same published criteria. Alongside housing benefits, the comparison should quantify the opportunity cost of each additional increment of growth: transport and utility investment, schools and healthcare, BMV agricultural land, biodiversity and landscape effects, flood and coastal risk, heritage and settlement character, loss of amenity, viability, market absorption and the public or private investment needed to overcome constraints. Where investment creates capacity, TDC should identify the cost, programme, delivery body and number of additional homes enabled.^{1,13,14,15,16,20}

This approach also provides a clearer basis for strategic planning across Kent. If Thanet can meet its locally evidenced needs and sustainably accommodate further growth, that additional contribution should be explicit. Equally, if the marginal cost or loss of amenity rises sharply before the nationally derived figure is reached, the evidence should identify that point and the strategic balance should remain visible for the emerging SDS and cross-boundary process. The purpose is not to shift need arbitrarily, but to compare where additional housing can be delivered with the greatest overall benefit and least avoidable cost.¹⁹

Section summary: The Local Plan should compare both quantum and location. The preferred strategy should emerge from a transparent comparison of the benefits, opportunity costs, investment requirements and deliverability of reasonable housing scenarios.

7. Set the housing requirement from the comparative assessment

Once the baseline, locally evidenced housing needs, sustainable capacity and the quantum/spatial alternatives have been assessed, TDC will be in a position to set the Local Plan housing requirement and trajectory. The decision should show where the locally evidenced benchmark sits relative to the 1,106 dpa Standard Method figure and why the selected requirement represents the most appropriate point within, or where justified beyond, the tested range.^{1,3,5}

The first objective should be a credible plan to meet Thanet's locally evidenced housing needs, including affordable and specialist needs. Beyond that benchmark, TDC should plan for the greatest additional contribution to wider strategic and national housing objectives that can be accommodated sustainably and delivered reliably. A higher quantum should be supported where the additional homes and wider benefits justify the incremental infrastructure, land, environmental and amenity costs; a lower contribution than the nationally derived figure should not be selected by preference, but may require justification where the comparative evidence shows that the marginal costs, constraints or delivery risks become disproportionate.^{1,5,19}

The trajectory should then be built from the selected requirement upwards from real sites and delivery assumptions. It should reconcile the overall figure with realistic annual completions from each site, expected outlets, market absorption, lead-in times, infrastructure dependencies and affordable-housing delivery. A trajectory should not rely on several strategic sites simultaneously achieving build-out rates for which there is no local or market evidence.^{1,6,7,10}

This creates a stronger Examination position because the selected housing quantum is not simply asserted. It can be traced through a published range of reasonable options, a consistent sustainability and opportunity-cost assessment, and a delivery trajectory grounded in actual sites and dependencies. The evidence should make clear both the benefits secured by additional growth and the point at which further growth would require disproportionate cost or unacceptable loss unless new capacity is created.¹

Section summary: The final housing requirement should be the reasoned outcome of the range test. It should meet locally evidenced need and make a further strategic contribution where the incremental benefits outweigh the additional costs, impacts and delivery risks.

8. Site selection, masterplanning and infrastructure must translate the strategy into delivery

Once the broad strategy and housing trajectory are settled, sites should be selected because they are the best means of implementing that strategy. Strategic allocations should then be planned as complete places, with land use, transport, schools, healthcare, utilities, open space, drainage, affordable housing, employment access and design considered together.^{1,13,14,15,16}

For large growth areas involving several landowners or applications, TDC should require a common masterplan and infrastructure critical path. The critical path should identify the intervention, provider, land requirement, funding route, statutory approval, lead time, dependency and the point by which it must be operational. Cumulative triggers are needed where several developments depend on the same road, school, health facility or utility network.^{14,21}

Birchington illustrates why this matters. The consented strategic development OL/TH/20/1755 already creates substantial housing and infrastructure commitments and interacts with the North Thanet Link, local roads, education, healthcare, utilities, open space, the village centre and surrounding heritage and landscape. That committed growth should form part of the baseline

when any further strategic housing options around Birchington are assessed. Further growth should not be tested as though those commitments and demands do not exist.^{13,14,15,16,17}

Affordable housing and S106 delivery should be treated as outcomes, not only negotiated percentages. Site policies should identify the principal obligations and infrastructure assumptions early enough for them to be reflected in land value and viability. Where long-term schemes require review mechanisms, those mechanisms should be capable of restoring provision if viability improves as well as reducing it if conditions deteriorate.²¹

Section summary: Strategic sites should be selected, masterplanned and phased as delivery programmes. Housing occupations should not run ahead of the infrastructure and services on which the spatial strategy depends.

9. Delivery failure has direct consequences for plan-led control

Thanet's recent experience shows why deliverability is a central housing issue rather than a monitoring footnote. TDC planning reports in May and June 2026 stated that the authority had 3.78 years of housing land supply. The 2025 Housing Delivery Test published in August records Thanet at 70%, below the 75% threshold in the current national framework.^{6,8}

The August 2026 NPPF changed the national decision-making mechanism. The former paragraph 11(d) "tilted balance" terminology used in earlier 2026 decisions has been replaced by the new policy structure. Under the current framework, an HDT result below 75% is treated as evidenced unmet housing need for the relevant national policy on residential development outside settlements. The development plan continues to apply, but persistent under-delivery increases the policy pressure for housing beyond the locations and sequence originally planned.^{1,6,7}

That creates a straightforward management risk: an over-optimistic housing trajectory can produce repeated under-delivery; under-delivery can create unmet-need consequences and continuing shortfalls in five-year supply; those conditions increase exposure to additional sites; and the authority then has less practical control over the location, timing and cumulative infrastructure consequences of growth. Allocating more land than can realistically be delivered is therefore not a safe substitute for a credible housing strategy.^{1,6,7,8}

The answer is not to suppress the housing requirement. It is to align the requirement, spatial strategy, site trajectory and infrastructure programme closely enough that the Plan has a reasonable prospect of delivering what it promises. A robust plan-led strategy is itself the best defence against development occurring through a series of uncoordinated decisions.¹

Section summary: Delivery is part of sound plan-making. A housing strategy that cannot maintain a credible supply and delivery trajectory risks weakening the practical control that the Local Plan is intended to provide.

10. Monitoring must trigger intervention, not simply record failure

The housing monitoring framework should be established when the Plan is prepared, with annual reporting against the assumptions that support the housing requirement and spatial strategy. TDC should report permissions, starts, completions, occupations, affordable housing by tenure, site build-out, housing land supply, HDT performance, infrastructure milestones and the principal cause of delay on each strategic site.^{1,6,7,10}

The Plan should identify mandatory management responses to material divergence. National HDT consequences already provide formal thresholds: below 95% requires an action plan; below 85% requires the applicable housing land supply buffer; and below 75% constitutes evidenced unmet housing need under the current NPPF. Local Plan monitoring should add its own earlier warnings for strategic-site slippage and infrastructure dependency so that intervention occurs before the district reaches the national failure thresholds.^{1,7}

Trigger	Required management response	Purpose
Strategic site delivery materially below trajectory for two consecutive monitoring points	Publish cause analysis and revised site programme; bring forward realistic contingency supply only where consistent with spatial strategy.	Correct the trajectory before the shortfall becomes structural.
Critical infrastructure milestone slips beyond dependent housing phase	Rephase dependent occupations or secure funded interim capacity; update the IDP and site critical path.	Prevent housing delivery from outrunning the services on which it depends.
Five-year supply falls below required level	Immediate supply and trajectory review, including deliverability evidence for counted sites.	Restore a credible near-term pipeline.
HDT below 95% / 85% / 75%	Apply national consequences and diagnose the local cause; escalate intervention as thresholds are crossed.	Link monitoring to the current national delivery regime.
Affordable housing or other key policy outcomes materially below plan assumptions	Review viability, tenure delivery, S106 implementation and site mix; use review mechanisms where applicable.	Ensure headline housing delivery is not achieved at the expense of the housing outcomes the Plan was intended to secure.

Monitoring should also work positively. If investment materially increases transport, utility or public-service capacity, the Plan review and SDS process should be able to recognise that additional sustainable capacity. Equally, if a critical assumption fails, later phases should not continue unchanged simply because they appear in an adopted trajectory.^{13,14,19}

Section summary: The monitoring system should diagnose causes, identify responsibility and trigger corrective action. The purpose is to keep the housing strategy aligned with reality throughout the plan period.

11. Birchington-specific implications

Birchington is already accommodating a major part of Thanet's strategic housing growth. The new Local Plan should therefore treat the settlement as a place with committed development and infrastructure dependencies, not as a blank location available for a fresh allocation exercise. The made Birchington Neighbourhood Plan, the consented strategic development and the evidence in BPC's companion responses together provide a substantial baseline for assessing any further growth.^{11,13,14,15,16,17}

Any additional strategic housing around Birchington should demonstrate that it can be integrated with the existing village and committed development; that safe and sustainable movement can be achieved; that schools, healthcare, water, wastewater and energy can operate at the required time; that access to employment and local centres is credible; and that heritage, landscape, agricultural land and settlement identity have informed the location and form of development from the outset.^{11,13,14,15,16}

The relationship between housing growth and the North Thanet Link requires particular care. The transport response addresses the potential conflict between a free-flowing strategic route and a road passing through or beside residential development requiring local access, crossings, buses, schools and acceptable living conditions. Housing assumptions should not rely on a transport function or delivery programme that has not been reconciled through the Local Plan and refreshed transport strategy.¹³

Section summary: For Birchington, further strategic growth should be assessed cumulatively with the housing already committed and with the infrastructure, movement and place-making obligations that accompany it.

12. Relationship with the other BPC scoping responses

The housing response is one part of BPC's integrated submission. The following cross-references are material to the housing conclusions and should be read as supporting evidence rather than separate objections.

BPC document	Housing issue supported	How it should be used by TDC
Core New Thanet Local Plan Scoping Response	Overall evidence-to-decision sequence, sustainable capacity, spatial strategy and delivery.	Use as the principal statement of the integrated BPC case.
Highways, Sustainable Transport and Movement Response	Accessibility, movement demand, North Thanet Link, Westwood, sustainable modes and transport critical paths.	Use transport capacity and delivery as inputs to housing spatial options and phasing.
Public Services, Utilities and Community Infrastructure Response	Schools, health, water, wastewater, energy, digital, community facilities and operational readiness.	Use provider-confirmed capacity and delivery dates to define sustainable housing capacity and occupation triggers.

Economic Development and Diversification Response	Jobs-homes relationship, centres, Westwood, visitor economy, agriculture and place-based investment.	Test housing distribution against access to employment, economic infrastructure and productive land.
Historic Environment and Local Heritage Assets Submission	Heritage significance, character, AHTVs, CAAMP, design evidence and local assets.	Use heritage and character evidence in spatial comparison, site allocation and masterplanning.

Section summary: The housing strategy should be the point at which the other topic evidence is brought together. A site or trajectory that depends on unresolved transport, infrastructure, economic or place constraints is not yet a complete housing strategy.

13. Requested Local Plan actions

BPC asks TDC to take the following eight actions forward into the next stage of Local Plan preparation. They are deliberately expressed as outputs rather than general aspirations.

- 1. Publish the 2020 Plan housing delivery audit.** Reconcile allocations, permissions, strategic sites, infrastructure, affordable housing and actual completions, and identify the principal causes of delay.
- 2. Publish the locally evidenced housing-needs benchmark and mix.** Use current demographic, affordability, tenure, migration and market evidence to quantify the housing pressures arising within Thanet, identify the required dwelling and tenure mix, and show clearly how that benchmark differs from the nationally derived Standard Method figure.^{1,4,5}
- 3. Prepare an integrated sustainable-capacity assessment.** Bring transport, public services, utilities, employment, environment, agricultural land, heritage, viability and market delivery into one comparative housing evidence base.
- 4. Test a range of housing quantum and spatial alternatives before site selection.** Compare the local-needs benchmark, intermediate strategic contributions, the full 1,106 dpa Standard Method figure and any credible investment-enabled higher-growth scenario across reasonable spatial distributions using one published set of criteria.^{1,5,18,19}
- 5. Set the housing requirement from comparative benefits, costs and deliverability.** For each quantum identify the additional homes and wider benefits, infrastructure and public-service investment, land and amenity costs, environmental and heritage effects, viability and delivery risk. Select the highest sustainable and deliverable contribution that meets local need and provides a proportionate contribution to wider housing objectives.^{1,5,13,14,15,16}
- 6. Select and masterplan sites through the agreed spatial strategy.** Use whole-area masterplanning, infrastructure critical paths, cumulative triggers and plan-stage viability for strategic growth locations.
- 7. Protect plan-led delivery through monitoring and intervention.** Publish annual site and district dashboards, apply national HDT consequences and local early-warning triggers, and rephase or review where critical assumptions fail.

8. Maintain an Examination-ready evidence trail. Retain the evidence, alternatives, provider engagement, assumptions, decisions and delivery dependencies needed to demonstrate that the housing strategy is positive, appropriate, effective and consistent with national policy, and conformant with any applicable SDS.

Section summary: These outputs would give TDC a clear route from scoping evidence to a housing strategy that is capable of being defended at Examination and managed after adoption.

14. Examination robustness

The purpose of raising these matters at scoping stage is to ensure that the evidence trail exists before the Plan reaches formal examination. The housing requirement should be capable of being traced from the nationally derived Standard Method figure and the separate local-needs benchmark, through a published range of quantum and spatial alternatives, to the preferred strategy. The assessment should expose the incremental benefits, opportunity costs, investment requirements and delivery assumptions at each step so that the chosen figure can be tested rather than merely asserted.^{1,5,12}

Test	Housing evidence required	How this response supports it
Positive	A strategy that plans positively for growth and addresses development needs through an evidence-led requirement and spatial strategy.	Keeps the national starting point visible while requiring TDC to identify how much growth can be delivered and what investment could increase capacity.
Appropriate	A chosen strategy that takes account of reasonable alternatives and is supported by proportionate evidence.	Requires broad spatial and trajectory alternatives to be compared consistently before sites are selected.
Effective	A reasonable prospect that allocations and policies will be deliverable when expected, with cross-boundary matters addressed.	Uses site trajectories, market evidence, provider commitments, infrastructure critical paths and monitoring triggers.
Consistent with national policy	Housing requirement, delivery and decision-making framework aligned with the August 2026 NPPF and current HDT regime.	Separates national LHN from the final spatial strategy and incorporates current delivery consequences and monitoring.
Conformity, when applicable	General conformity with an adopted SDS where the statutory requirement applies.	Keeps any strategic balance visible and links Thanet evidence to wider Kent strategic planning rather than deferring the issue.

Section summary: The strongest Examination case will be a transparent record showing how TDC moved from evidence to spatial choice and how the resulting allocations are reasonably capable of delivering the housing requirement with the infrastructure and services assumed.

15. Conclusion

Thanet needs a housing strategy that is ambitious enough to address housing need and realistic enough to remain plan-led. The current evidence shows both the scale of the nationally derived housing expectation and the practical consequences when planned delivery does not keep pace. The new Plan should therefore distinguish clearly between the Standard Method starting figure, the housing needs evidenced from Thanet itself, and the final housing requirement chosen through plan-making.^{1,3,5,6}

The central BPC submission is that TDC should test a transparent range of housing quantum options - from the local-needs benchmark, through intermediate strategic contributions, to the full national-policy figure and any credible investment-enabled higher-growth option - against the same sustainability, spatial, opportunity-cost and delivery evidence.^{12,13,14,15,16}

The objective is to meet local needs first and then contribute further where additional growth is sustainable and its benefits justify the extra infrastructure, land and amenity costs. That is a positive growth strategy in which the scale of growth is evidence-led, costs are transparent and delivery remains credible.^{1,5,12}

Appendix A - Housing response: evidence and policy matrix

This matrix summarises the principal housing issues raised in the response and the evidence TDC should carry forward. It is intended as an examination-ready audit trail rather than a substitute for the supporting evidence.

Housing issue	Principal basis	Evidence required	Plan output
Baseline and delivery	NPPF plan-making; TDC monitoring; 2020 Local Plan	Allocation-to-completion audit; site trajectories; affordable housing; infrastructure delivery	Published housing delivery audit and corrected assumptions
Local-needs benchmark and mix	NPPF housing policies; Standard Method; Housing Needs Study	Bottom-up demography, household change, affordability, tenure, migration, ageing, disability and economy; relationship to Standard Method	Published local-needs benchmark and dwelling/tenure mix, clearly distinguished from national-policy LHN
Sustainable capacity	NPPF sustainable development; BPC companion responses	Transport, services, utilities, jobs, land, environment, heritage, viability	Spatial capacity assessment distinguishing current and investment-enabled capacity
Housing quantum and spatial alternatives	NPPF plan-making and reasonable alternatives; Call for Sites	Local benchmark, intermediate contributions, full Standard Method and investment-enabled higher growth tested across reasonable spatial distributions with common criteria	Comparative appraisal of housing benefits, opportunity costs, investment requirements and spatial performance
Requirement and trajectory	Standard Method LHN; Housing Needs Study Part 2; delivery evidence	Selected quantum from tested range; incremental benefits/costs; site-by-site deliverability; infrastructure and market assumptions	Reasoned housing requirement and annual trajectory with explicit justification for the selected contribution
Strategic sites and infrastructure	NPPF; PPG viability/obligations; IDP	Masterplans, infrastructure critical paths, cumulative triggers, viability, provider evidence	Site policies, phasing and occupation controls
Plan-led control and delivery	HDT 2025; five-year supply; NPPF decision-making policies	Supply, HDT, site progress, causes of delay	Monitoring and intervention framework
Examination trail	NPPF PM15; SDS where applicable	Alternatives, decisions, joint working, deliverability evidence	Evidence capable of demonstrating soundness and conformity

Appendix B - Reference table

Official Government, Thanet District Council and adopted development-plan sources are used wherever available. BPC companion submissions are listed where they provide the detailed topic evidence relied on in this housing response.

Ref	Source	Document	Date / status	Relevance / availability
1	Ministry of Housing, Communities and Local Government	National Planning Policy Framework	17 August 2026	Primary national planning policy for plan-making, housing, delivery, soundness and decision-making. Open source
2	Thanet District Council	New Thanet Local Plan Scoping Consultation	24 August - 9 October 2026	Scope, process, Call for Sites, background studies and consultation context. Open source
3	Thanet District Council	New Thanet Local Plan - housing scoping material	August 2026	Records 1,106 dpa LHN, the adopted stepped requirement, historic average delivery and recent delivery rates. Open source
4	Thanet District Council	Background studies - Housing Needs Study	August 2026	Confirms Part 2 will assess the amount of housing that can be provided and that evidence will be updated for the August 2026 NPPF. Open source
5	MHCLG	Planning Practice Guidance: Housing and economic development needs assessments	Current guidance	Confirms the Standard Method is an unconstrained need assessment and does not itself produce the Local Plan housing requirement; supports separate assessment of what can be provided. Open source
6	MHCLG	Housing Delivery Test: 2025 measurement	17 August 2026	Most up-to-date HDT measurement; Thanet recorded at 70%. Open source
7	MHCLG	Housing Delivery Test measurement rule book	Updated 17 August 2026	Current national thresholds and policy consequences for under-delivery. Open source
8	Thanet District Council	Planning Committee public reports pack - 20 May 2026	20 May 2026	TDC officer report states a 3.78-year housing land supply; evidence of the position immediately before the August 2026 NPPF. Open source
9	Thanet District Council	Thanet Local Plan, Adopted July 2020 (to 2031)	Adopted 9 July 2020	Current development plan strategy, housing allocations, strategic sites and phasing. Open source
10	Thanet District Council	Annual Monitoring Report 2025	Monitoring period 1 April 2024 - 31 March 2025	Latest published monitoring of housing, delivery, allocations, infrastructure and policy performance. Open source

11	Birchington Parish Council / Thanet District Council	Birchington Neighbourhood Plan 2021-2031	Made 7 December 2023	Made development-plan document covering strategic growth integration, infrastructure, movement, character and local priorities. Open source
12	Birchington Parish Council	Core New Thanet Local Plan Scoping Response	September 2026	Principal BPC submission on sustainable capacity, spatial choice, delivery and monitoring. BPC companion/local source
13	Birchington Parish Council	Highways, Sustainable Transport and Movement Response	September 2026	Companion evidence on accessibility, transport capacity, the North Thanet Link and delivery. BPC companion/local source
14	Birchington Parish Council	Public Services, Utilities and Community Infrastructure Response	September 2026	Companion evidence on schools, health, water, wastewater, energy, digital capacity and operational readiness. BPC companion/local source
15	Birchington Parish Council	Economic Development and Diversification Response	September 2026	Companion evidence on jobs, centres, Westwood, agriculture, visitor economy and economic infrastructure. BPC companion/local source
16	Birchington Parish Council	Historic Environment and Local Heritage Assets Submission	September 2026	Companion evidence on heritage significance, character, design and place-led growth. BPC companion/local source
17	Thanet District Council	OL/TH/20/1755 - Land North and East of Canterbury Road, Birchington	Permission issued December 2025	Committed strategic housing development and associated infrastructure dependencies relevant to the Birchington baseline. Open source
18	Thanet District Council	New Local Plan - Call for Sites	August 2026	Current site-availability exercise; notes limited expected yield from identified brownfield opportunities. Open source
19	UK Parliament / legislation.gov.uk	Planning and Infrastructure Act 2025 - Spatial Development Strategies	2025; current statutory framework	Strategic planning context for cross-boundary distribution and Local Plan conformity. Open source
20	Department for Environment, Food and Rural Affairs	Land Use Framework for England	18 March 2026; updated 6 May 2026	National land-use framework linking development, food production, resilience and nature. Open source
21	MHCLG	Planning Practice Guidance: Viability; Planning obligations	Current guidance	Plan-stage viability, planning obligations, infrastructure requirements and monitoring. Open source