



BIRCHINGTON PARISH COUNCIL

Response to Thanet District Council

New Thanet Local Plan - Scoping Consultation 2026

SD5 - Public Services, Utilities & Community Infrastructure

October 2026

Abbreviations			
BPC	Birchington Parish Council	TDC	Thanet District Council
NPPF	National Planning Policy Framework	SDS	Spatial Development Strategy
PPG	Planning Practice Guidance	IDP	Infrastructure Delivery Plan
S106	Section 106 planning obligation	CIL	Community Infrastructure Levy
KCC	Kent County Council	ICB	Integrated Care Board
WRMP	Water Resources Management Plan	DWMP	Drainage and Wastewater Management Plan
UKPN	UK Power Networks	KFRS	Kent Fire and Rescue Service
LTDS	Long Term Development Statement	BNP	Birchington Neighbourhood Plan

Superscript numerals refer to the source table in Appendix B.

1. Purpose and overall position

Birchington Parish Council welcomes the preparation of the new Thanet Local Plan and recognises the Government's objectives for increased housing supply and economic growth. The planning question is how those objectives should be translated into a spatial strategy that can be supported by public services, utilities, community facilities and local amenities in practice, while maintaining the quality and resilience of existing communities.^{1,2,22,23}

This response forms part of BPC's integrated scoping submission and should be read with the Core New Thanet Local Plan Scoping Response and the companion Housing, Spatial Distribution and Delivery; Highways, Sustainable Transport and Movement; Economic Development and Diversification; and Historic Environment and Local Heritage Assets responses. Housing, transport, economic development, heritage and public infrastructure are parts of one system, so development should be founded on evidence of sustainable capacity and a credible delivery programme. Public services and networks should be planned with the spatial strategy from the outset.^{22,23,24,25,26}

For this response, 'infrastructure' is used in its practical sense. It includes education, healthcare and social care; community, cultural and recreational facilities; water supply and wastewater; electricity and gas networks; telecommunications; waste services; police and fire services; and the operational resources needed to make those services function. Capacity should be assessed at both local-connection and wider-system level, while facility delivery should be measured through funding, staffing and operational readiness as well as land reservation.^{1,2,3}

The new Local Plan should be supported by a Public Services, Utilities and Community Infrastructure Capacity and Delivery Framework alongside the emerging spatial strategy. It should identify existing capacity and deficiencies, committed demand, demand from proposed growth, network headroom, required investment, delivery responsibility, lead times, occupation triggers, resilience and contingency arrangements. This evidence should influence both the location and the pace of development. Figure 1 turns that principle into a single seven-stage capacity-to-delivery sequence which provides the organising map for this response.^{1,2,3}

Section summary: Public services and utilities should help determine the spatial strategy. The relevant test is whether adequate and resilient services will be available where and when growth creates the demand.

2. A capacity-to-delivery sequence

The proposal has seven linked stages. It moves from the baseline and demand forecast through a whole-system capacity test, then into spatial choice, delivery, phasing and monitoring. The key decision follows Stage 3: will operational capacity be available where and when growth creates demand? If not, capacity or the spatial option should be revised and re-tested.

Public services, utilities and community infrastructure

Capacity and delivery should shape the scale, location and pace of growth

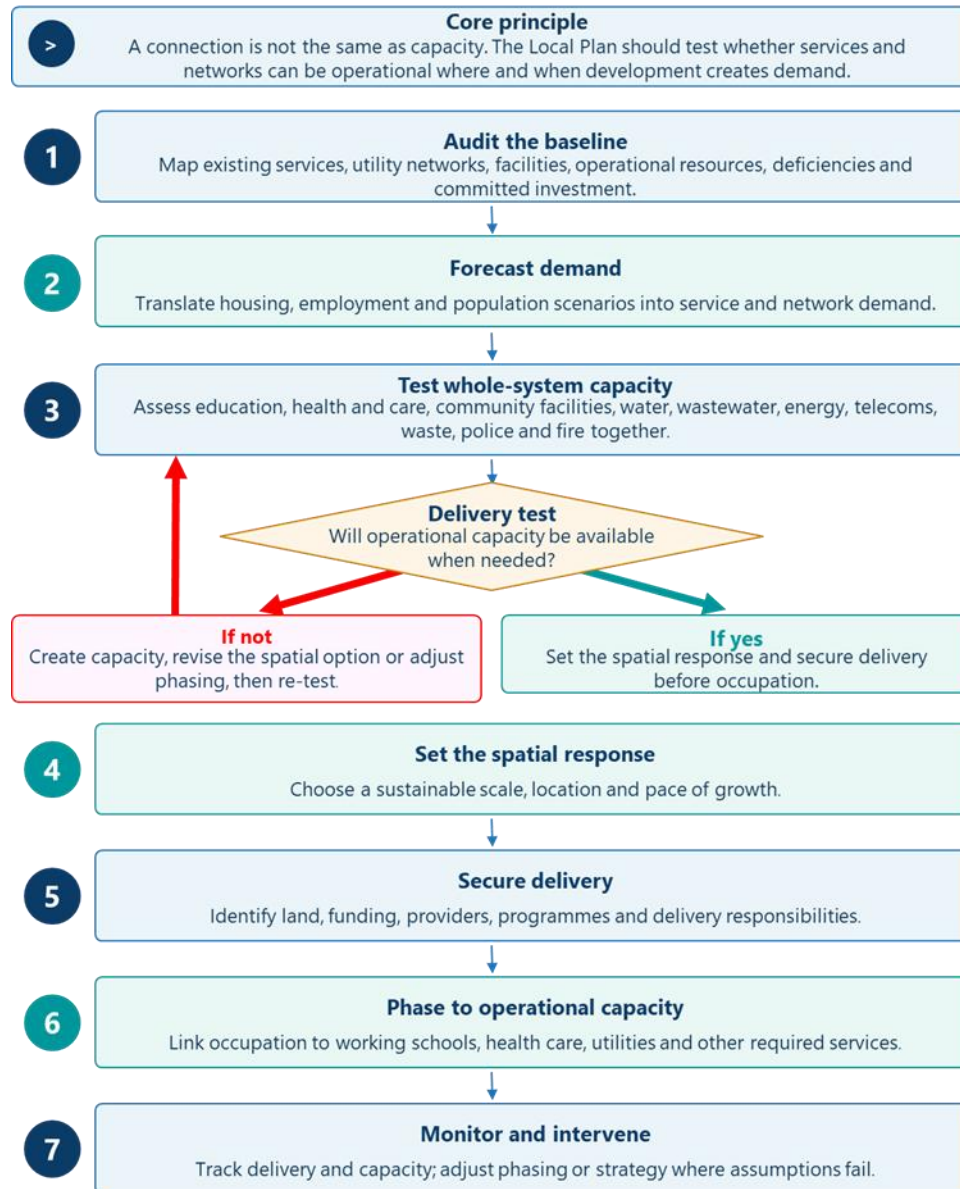


Figure 1. Public-services and infrastructure capacity-to-delivery sequence

The rest of the response follows this sequence. Stages 1-2 establish the baseline and demand. Stage 3 is the whole-system capacity test, addressed through the education, health, community, recreation, utility, waste, emergency-service and resilience sections. Stages 4-7 then convert that evidence into spatial choice, secured delivery, phasing and intervention.

3. National policy and strategic planning context

The August 2026 NPPF gives public-service and utility capacity a direct role in plan-making. Its sustainable-development objectives include the identification and coordination of infrastructure and the provision of accessible community facilities, public-service infrastructure and open spaces that reflect current and future needs. Policy HC1 requires development plans to understand existing deficiencies and additional requirements arising from development and wider change, while HC3 requires necessary facilities to be delivered at the point at which additional population creates the need.¹

Policy W1 is particularly important for utilities. It requires early engagement with utility providers, regulators and network operators so that plans understand energy-supply and network capacity, water supply, drainage and wastewater capacity, and any additional infrastructure needed. Those matters are then to be taken into account in the location and phasing of planned growth. Policy CO1 similarly treats communications coverage, capacity, reliability and resilience as essential infrastructure.¹

The same policy framework protects the effective operation of existing public services and infrastructure, including blue-light services, electricity networks and waste facilities, from unreasonable restrictions created by later development. Policies P5 and P6 place specific emphasis on public safety, emergency-service capability and resilient communications. The result is a broader conception of infrastructure than a conventional list of developer-funded projects.¹

TDC's own scoping document reflects that approach. It identifies health, education and other local facilities as emerging objectives and explains that the future Kent Spatial Development Strategy is expected to identify the type, extent and broad location of strategic infrastructure needed for both development and existing communities, including social infrastructure, waste, utilities and flood-risk management. The Government's 10-Year Infrastructure Strategy likewise seeks better coordination of housing, economic and social infrastructure.^{2,3}

NPPF 2026 policy	Plan-making implication	BPC application
PM1; PM10-PM12	Strategic infrastructure, cross-boundary cooperation and clear expectations for contributions.	Coordinate service and utility requirements with the spatial strategy and emerging Kent SDS.
HC1	Assess existing deficits and future needs for community facilities and public-service infrastructure.	Establish a quantified service baseline before selecting major growth locations.
HC3-HC4	Provide facilities needed by significant population growth and secure timely delivery.	Use occupation-linked triggers and confirm provider commitment, operational readiness and any land reservation required.
HC6-HC7	Protect community and recreational facilities and secure justified equivalent alternatives where change is proposed.	Treat the existing network of facilities as infrastructure to be retained and improved.
W1	Understand energy, water, drainage and wastewater capacity and use it in location and phasing decisions.	Obtain network-level evidence and identify reinforcement, cost, programme and dependencies.
CO1	Plan for high-quality, reliable and resilient communications.	Design full-fibre/mobile connectivity and future upgrading into strategic development.
P4-P6	Protect operation of public services and infrastructure; address public safety and emergency-service capability.	Engage police, fire and other relevant agencies in strategic site and growth testing.
TR1	Integrate land use and sustainable access.	Test whether schools, health, shops and community facilities are practically accessible by walking, wheeling, cycling and viable public transport as well as by car.

Section summary: Public-service and utility evidence should shape the spatial strategy and phasing from the outset and then inform site-specific mitigation, obligations and delivery controls.

4. Stage 1 - Audit the public-services and infrastructure baseline

Before forecasting the needs of further growth, TDC should establish what the adopted 2020 Local Plan and subsequent permissions have actually delivered. The audit should trace each significant commitment from policy or allocation through planning permission, legal obligation and funding to construction, opening and operational service. This is the service-and-infrastructure equivalent of the delivery audit proposed in BPC's principal and housing responses.^{2,22,23}

The baseline should distinguish existing deficiencies from demand already committed through extant permissions and from the additional demand generated by new Local Plan options. That separation is essential. It allows historic shortcomings to be addressed transparently and ensures that available spare capacity is allocated only once across developments and authorities.^{1,2,18}

Evidence layer	What TDC should establish
Existing provision	Facilities, networks, catchments, operating bodies and current service standards.
Existing capacity / deficiency	Quantified and qualitative headroom, constraints and known shortfalls.
Committed demand	Population, floorspace or network demand from development already permitted but not yet fully occupied.
Wider change	Demographic change, visitor demand, service reform, climate effects and technology change independent of new allocations.
New Local Plan demand	Demand generated by each reasonable spatial option and by the preferred growth trajectory.
Required intervention	Expansion, new facility, network reinforcement, operational resources or service redesign required to maintain an acceptable outcome.

The audit should also examine why previously anticipated infrastructure has been delayed, altered or remains outstanding. Causes may include funding, viability, land ownership, provider investment cycles, utility lead times, statutory approvals, staffing, market absorption or development phasing. Those causes should inform the assumptions used in the new Plan and be addressed directly at plan-making stage.^{3,18,19}

Section summary: Establish the real baseline first: what exists, what is deficient, what demand is already committed, what is genuinely funded and programmed, and what remains dependent on future decisions.

5. Stage 2 - Forecast demand from the nature and pace of development

The service impact of growth depends on more than the housing total. Different housing types, age profiles, tenure mixes and household sizes can produce different demands for school places, health and social care, recreation, transport and local facilities. Employment, tourism and major visitor uses can add daytime and seasonal demand alongside changes in resident population.^{1,2} Demand forecasts should be run for the same housing-quantum options used in BPC's housing response so that service capacity, investment and phasing are compared consistently across the alternatives rather than against a single assumed trajectory.^{2,3}

The rate of occupation is equally important. Rapid build-out can create demand before a school, medical facility, sewer upgrade or substation is ready. Conversely, fragmented or slow delivery can postpone contribution or occupation thresholds for years while incremental pressure accumulates. The Local Plan should therefore test a reasonable range of build-out scenarios so that infrastructure planning remains robust under different delivery rates.^{1,3,23}

For each strategic growth location TDC should identify the maximum development that existing capacity can support, the point at which reinforcement must start, the point at which the new service must be operational and the contingency if delivery slips. Triggers should relate principally to actual occupation or demand, with calendar dates used where they provide an additional effective control.^{1,18}

Section summary: Scale, mix and build-out rate all matter. Service and utility triggers should follow actual cumulative demand and should prevent later development phases from materially outpacing the capacity on which they depend.

6. Stage 3A - Education, early years, SEND and post-16 capacity

Education planning should cover early years, primary, secondary, SEND and post-16 provision as an interconnected system. KCC's 2026-2030 Commissioning Plan is a five-year rolling plan intended to secure sufficient high-quality places in the right locations, with district-level planning that responds to housing growth. The Local Plan operates over a much longer horizon and should therefore align with successive iterations of that programme throughout the plan period.¹¹

For each strategic growth area the evidence should identify expected pupil yield, current and forecast capacity, the practical scope to expand existing establishments, any need for new sites, site size and access requirements, funding, delivery lead time and the occupation point by which additional places must be available. SEND and specialist provision should be considered explicitly because catchments and capital requirements may differ from mainstream provision.^{1,11}

Accessibility should be part of the capacity test. School capacity should be assessed by both numerical availability and practical sustainable accessibility, including safe walking, wheeling,

cycling and viable public transport. Education capacity should therefore be tested alongside the transport response and site masterplanning.^{1,24}

Section summary: Education capacity should be forecast, located, funded and phased as part of the growth strategy, with practical accessibility and SEND requirements considered alongside headline school-place numbers.

7. Stage 3B - Health, social care and wellbeing capacity

Health infrastructure should be assessed more broadly than GP floorspace. The Local Plan should work with NHS Kent and Medway and relevant providers on primary care, community services, pharmacy, dental provision where land-use implications arise, social care and the relationship with acute and specialist services. The ICB's primary-care strategy identifies fit-for-purpose premises as critical and links estate planning with the workforce and service model needed to use those premises effectively.¹²

For major growth areas TDC should distinguish physical provision, commissioning and operational capacity. Land or a building may be available while the intended service still depends on capital approval, revenue funding, workforce recruitment, digital systems or a wider reconfiguration of care. The Infrastructure Delivery Plan should record those dependencies and identify the point at which floorspace becomes an operational service.^{1,12}

The spatial strategy can also reduce pressure on services through healthy-place planning. Accessible open space, sport, community meeting places, safe active-travel routes, local centres and opportunities for social interaction are part of preventative health infrastructure and should be planned as a connected network.¹

Section summary: Health planning should test premises, commissioning, workforce, accessibility and timing together. A reserved site is an enabling step; an operating healthcare service also requires commissioning, funding and workforce capacity.

8. Stage 3C - Community facilities, local amenities and settlement centres

Everyday facilities are part of the infrastructure that makes growth function as a place. The NPPF's community-facility policies encompass meeting places, cultural and youth facilities, places of worship, public houses, allotments, recreation and other local services, while its definition of public-service infrastructure also covers libraries, social care and blue-light facilities. The Local Plan should therefore assess provision as a connected settlement-wide network, including the role and accessibility of individual facilities.¹

For Birchington, future growth should reinforce the established role of Station Road, The Square and the wider village centre. New local facilities associated with strategic development should be planned to complement and strengthen the existing centre while remaining

accessible to the new population. This approach is consistent with the made Birchington Neighbourhood Plan and with BPC's economic-development response.^{21,25}

The assessment should consider quality and operating viability as well as the existence of a building. Community halls, libraries, youth provision, cultural venues and voluntary-sector facilities may depend on management arrangements, volunteers, revenue budgets and shared use. Where development relies on such provision, the Plan should identify how it will remain available and fit for purpose over the long term.^{1,3}

Section summary: Plan for a connected network of local amenities. Growth should strengthen established centres and provide accessible places for daily services, community activity and social interaction.

9. Stage 3D - Recreation, open space and social infrastructure

The 2026 NPPF expects locally justified standards for play, sport, informal recreation and allotments and seeks connected and accessible provision. The new Plan should therefore assess both quantity and quality, including accessibility, drainage, equipment, ecological value, inclusion, management and connections to walking and cycling routes.¹

Where evidence supports it, new development may achieve a better outcome by expanding or improving an existing recreation ground, sports facility or community venue and integrating that asset into the new community. The approach should protect reasonable accessibility for the new population. Long-term stewardship and maintenance arrangements should be defined at the same time as capital provision.^{1,21}

Section summary: Open space and recreation are part of social and preventative-health infrastructure. Standards should address quality, accessibility and long-term stewardship as well as hectares or equipment counts.

10. Stage 3E - Public utilities: water, wastewater, energy and telecommunications

Utilities should be treated as capacity-creating infrastructure from the spatial-strategy stage. NPPF policy W1 requires plan-making to understand water, wastewater and energy-network capacity and to use that evidence when deciding where and when growth should occur. TDC's scoping document also identifies utilities as strategic infrastructure for the emerging Kent SDS.^{1,2}

10.1 Water resources and supply

Water resources require early strategic testing. National planning guidance expects Local Plan growth to be aligned with water-company investment and Water Resources Management Plans, while the 2026 water-resources planning guideline requires companies to plan for a

secure supply over at least 25 years. Southern Water's WRMP24 work covers 2025-2075 and identifies Thanet as a distinct water-resource zone within its eastern supply area.^{4,5,6}

The Local Plan should therefore test deployable water resources, treatment and storage, trunk and local distribution, pressure and resilience after allowing for committed development. Water efficiency and demand management should be built into new development as part of the overall evidence that the strategic supply system can support the growth trajectory.^{1,5,6}

Where additional resources or transfers are needed, the Plan should identify their regulatory status, lead time, funding and dependency on other projects. Only options with sufficient regulatory and delivery certainty should be counted as available capacity within the relevant development phase.^{5,6}

10.2 Sewerage, wastewater and drainage

Wastewater capacity is a separate question from water supply. National guidance expects plan-making to be the focus for aligning development needs with sewerage-company investment. Southern Water's DWMP covers its sewer networks, pumping stations and wastewater treatment works and is specifically intended to identify investment needed for robust and resilient wastewater services over the long term.^{4,7}

Wastewater test	Evidence required
Foul sewer network	Hydraulic capacity after existing and committed demand; infiltration and known local constraints.
Pumping stations	Capacity, power resilience, maintenance access and consequences of failure.
Treatment works	Permitted and practical treatment headroom; environmental receiving capacity and investment programme.
Surface water	Separation from foul systems where appropriate, sustainable drainage, adoption and long-term maintenance.
Storm overflows / pollution	Whether additional load is compatible with environmental objectives and planned reduction of spill risk.
Reinforcement	Scheme, cost, promoter, regulatory/funding status, lead time and occupation trigger.

For strategic development, necessary sewer, pumping or treatment reinforcement should be identified before the Plan assumes the associated housing or employment capacity. Conditions or phasing may appropriately control occupation where works are needed, but the Local Plan should first demonstrate that those works have a realistic route to delivery.^{1,4,7}

10.3 Electricity and the changing pattern of demand

Electricity demand will change as well as grow. Housing and employment development will add load, while electric vehicles, heat pumps, battery storage, renewable generation and other low-carbon technologies can alter both peak demand and network flows. UK Power Networks'

March 2026 Distribution Network Options Assessment identifies system constraints and publishes longer-term system needs to support investment and local planning.⁸

TDC should engage UKPN on primary and secondary substations, feeders, reinforcement, connection lead times, land and easement requirements and the cumulative effect of housing, employment and transport electrification. The Local Plan should distinguish an eventual connection offer from network capacity that will actually be available at the time a development phase is occupied.^{1,8}

10.4 Gas and the transition in the energy system

Gas infrastructure remains part of the existing energy system and may create operational, pipeline, access and safety constraints that need to be understood. SGN's Long Term Development Statement is updated through an annual forecasting and stakeholder engagement cycle to inform future network planning and investment.⁹

The Local Plan should engage SGN where growth could affect network capacity or operational assets, while avoiding assumptions that lock strategic development into a particular heating technology over the full plan period. The planning objective should be a safe, resilient and deliverable energy system capable of responding to national decarbonisation and technology change.^{1,9}

10.5 Telecommunications and digital infrastructure

High-quality digital connectivity is now essential infrastructure for homes, businesses and public services. The NPPF places weight on communications coverage, capacity, reliability and resilience, while Government guidance for local planning authorities encourages Local Plans to support both fixed and mobile networks, full-fibre connections and future upgrading.^{1,10}

Major development should therefore be designed for fibre, ducts, mobile coverage and future network enhancement from the outset. Digital provision should also be considered as part of resilience because healthcare, utilities, transport systems, emergency communications, businesses and home working increasingly depend on reliable connectivity.^{1,10}

Utility	Capacity test	Strategic evidence	Delivery test
Water	Resource + treatment + storage + distribution	WRMP / provider investment	Capacity before occupation; reinforcement milestone where needed
Wastewater	Sewer + pumping + treatment + receiving environment	DWMP / regulatory programme	Occupation tied to available hydraulic/treatment capacity
Electricity	Substation + feeder + system headroom	DNOA / network programme	Reinforcement energised before dependent load
Gas	Network capability + pipeline/asset constraints	LTDS / operator programme	Safe operational capacity where gas remains required
Digital	Fixed + mobile coverage, capacity and resilience	Operator deployment plans	Service-ready connections and upgrade path from first occupation

Section summary: Utility evidence should distinguish strategic system capacity, local connection works and operational readiness. Development phases relying on critical reinforcement should proceed where the scheme, funding, programme, responsibility and contingency are sufficiently clear.

11. Stage 3F - Waste collection, recycling and disposal

Waste planning operates at more than one level. National waste policy requires waste management to be considered alongside housing and transport and calls for robust assessment of future arisings, capacity and spatial distribution. Kent's adopted Minerals and Waste Local Plan 2024-2039 provides the strategic planning framework, while KCC's Waste Disposal Strategy was updated in 2026 to address future pressures and service sustainability.^{13,14,15}

The Thanet Local Plan should therefore address both strategic capacity and the operational consequences of growth. New development needs adequate storage and segregation space, practical access for collection vehicles and layouts that support efficient services. At district and East Kent scale the evidence should consider vehicles, depots, staffing, transfer, recycling, treatment and disposal capacity as population and commercial activity increase.^{13,14}

Existing waste facilities and their access should also be protected from incompatible neighbouring development, in line with national planning policy. Because these facilities serve existing communities as well as future growth, their operational requirements should shape spatial choices from the outset.^{1,13,15}

Section summary: Waste capacity includes collection operations as well as disposal infrastructure. Growth should be tested against the whole service chain while protecting the efficient operation of existing strategic waste facilities.

12. Stage 3G - Police, fire and public safety

Population growth, new centres, visitor activity and changes in movement patterns can affect demand on policing and community-safety services. Kent Police's East Division covers Thanet, Canterbury and Dover as well as Ashford and Folkestone and Hythe, illustrating that operational catchments extend across district boundaries. TDC should engage the police early enough to understand operational demand, estate requirements, accessibility and design implications for strategic growth locations.¹⁶

The NPPF requires major development and places where substantial numbers of people congregate to be informed by current police and other agency information on public-safety and security considerations. It also protects the operational effectiveness of blue-light services. These matters should inform masterplanning, movement, lighting, public realm and the location of facilities in a proportionate way that complements statutory emergency planning.¹

Fire and rescue planning likewise extends beyond fire-station location. KFRS's 2025-2029 delivery plan considers risks associated with climate change, buildings and places, transport, major industry and utilities, fuel and power, including energy storage, renewables and loss of public water services. Strategic growth should therefore be tested for emergency access, firefighting water, hydrants, response routes, building and land-use risks and the implications of emerging technologies.¹⁷

Police and fire engagement should be proportionate to the scale and risk of development. The objective is to identify foreseeable operational requirements early, protect critical facilities and ensure that major growth supports effective emergency response.^{1,16,17}

Section summary: Public safety should be designed into strategic growth. Police and fire services should be involved early enough to test operational demand, access, resilience and estate needs at the appropriate geographic scale.

13. Stage 3H - Infrastructure resilience and interdependency

Modern infrastructure systems are interdependent. Electricity failure can affect water pumping, wastewater pumping and telecommunications; telecommunications failure can disrupt businesses and emergency communications; water-supply failure can affect firefighting; and flooding can interrupt roads, substations, sewers and emergency access at the same time. A capacity assessment that considers each network in isolation can therefore miss material risks.^{1,3,5,7,8,17}

For strategic growth areas TDC should apply a proportionate resilience test that identifies critical dependencies, single points of failure, climate-related risks and reasonable contingency arrangements. The test should complement civil-contingency planning and demonstrate that major new communities will be supported by infrastructure with adequate headroom, redundancy and recovery arrangements.^{1,3}

Resilience also requires realistic assumptions about maintenance and renewal. New assets create future operating costs. The IDP should therefore distinguish capital delivery from long-term ownership, maintenance, adoption and revenue responsibility, particularly for community facilities, open space, drainage and digital or energy infrastructure.^{3,18}

Section summary: Resilience should be tested alongside capacity. Strategic planning should identify interdependencies, foreseeable failure modes and long-term operational responsibility as part of the case for major growth.

14. Applying Stages 3-6 - Birchington lessons from strategic growth

OL/TH/20/1755 provides a useful local illustration of why the new Plan should distinguish land allocation from operational service delivery. The strategic scheme considered by TDC provides for up to 1,600 dwellings together with a 2.05 hectare site for a primary school, land for

expansion or improvement of Birchington Medical Centre, a mixed-use local centre, open space and associated infrastructure and utilities.²⁰

Those provisions are material and valuable, but each sits at a different point in the delivery chain. A serviced school site establishes land availability; an open school also requires funding, commissioning and operation. Medical-centre expansion land enables future physical provision, while additional clinical capacity depends on commissioning and workforce. Local-centre land requires occupiers and viable services, and utility corridors require wider network headroom. The new Local Plan should make those delivery stages explicit for every strategic allocation.^{1,20}

The Birchington example also reinforces the need for whole-place phasing. Housing occupations, school provision, healthcare, local facilities, recreation, sustainable transport, strategic highway works and utility reinforcement should be considered as a single sequence of dependencies. This is consistent with the made Birchington Neighbourhood Plan and BPC's transport and housing submissions.^{21,23,24}

Section summary: Strategic allocations should be monitored by service outcomes as well as land reservations and planning permissions. The Plan should show when facilities become operational relative to the population they are intended to serve.

15. Stage 4 - Set the spatial response at settlement, Thanet and East Kent/Kent scales

Stage 4 is the principal spatial decision. Once the Stage 3 tests have established the capacity, constraints and credible investment path, TDC should determine what scale, location and pace of growth each broad area can support. Where adequate capacity exists or is credibly programmed, that evidence supports the spatial option. Where it does not, the response should be to create capacity, alter the location, scale or pace, or test a wider strategic option and then repeat the demand and capacity tests.^{1,2,23}

Different services operate at different geographic scales. Play areas, convenience shopping and many community activities should normally be close to where people live. Secondary and specialist education, acute healthcare, major waste infrastructure, electricity networks and emergency services may operate across much wider catchments. The evidence base should reflect those real functional geographies.^{1,2}

TDC's scoping material confirms that the emerging Kent SDS is intended to address strategic matters including social infrastructure, waste and utilities. The Local Plan should therefore develop evidence that can operate at both Thanet and wider Kent/East Kent scale, particularly where several authorities may otherwise assume access to the same spare capacity.²

The wider approach should follow the principle of subsidiarity: frequently used services should remain conveniently accessible locally, while genuinely strategic systems should be planned across the catchments in which they operate and connected by appropriate transport and

digital infrastructure. This preserves local access while allowing strategic services to be coordinated efficiently across East Kent and Kent.^{1,24}

Section summary: Use the geography that fits the service. Local facilities should remain accessible to local communities, while strategic networks and services should be planned cumulatively across Thanet, East Kent and the emerging Kent SDS where appropriate.

16. Stage 5 - Secure funding, responsibility and delivery

Infrastructure requirements should be identified early enough to influence land value, viability and development expectations. National viability guidance states that plans should set out the contributions expected from development, including infrastructure for education, health, transport, flood and water management and digital provision, and that those requirements should be sufficiently clear to be reflected in the price paid for land.¹⁹

The Plan should distinguish historic deficiencies from the additional requirements generated by development. New development should make appropriate provision for the impacts it generates, while pre-existing shortfalls should be addressed through the relevant wider investment programmes. Where a facility serves both existing and new communities, the IDP should identify the proportionate mix of developer contributions, provider investment, public funding and other sources.^{18,19}

Planning obligations can be pooled where appropriate, and Government guidance emphasises early involvement of infrastructure providers and transparent monitoring of contributions and trigger points. For large or networked infrastructure the Plan should identify whether forward funding is required and what happens if a contribution stream arrives later than the infrastructure it is intended to support.¹⁸

For each critical item, the delivery question should cover both funding and the sequence required before the service is ready. Land acquisition, design, permissions, regulatory approval, procurement, construction, commissioning, staffing and connection can form a long critical path. The Local Plan should publish that path where it is material to the housing or employment trajectory.^{3,18}

Section summary: Infrastructure costs and delivery paths should be visible at plan-making stage so that land values, viability, phasing and subsequent obligations are based on realistic requirements from the outset.

17. Stage 6 - Translate capacity into phasing and the live Capacity and Delivery Framework

The Local Plan should use a living framework linked to the IDP, housing trajectory and strategic-site policies. It should be updated as provider programmes and Local Plan options evolve while preserving a clear audit trail showing the evidence relied upon when strategic choices were made. For each critical item it should distinguish capacity that exists now, capacity

that is secured/committed, capacity that is programmed but still dependent on funding or approvals, and capacity that remains aspirational. Development phasing should rely only on capacity whose delivery status is sufficiently credible for the period in which it is needed.^{1,2,3}

Framework field	Minimum information
Existing provision	Location, provider, catchment, current function and service standard.
Existing capacity	Quantified/qualitative headroom and relevant operational limitations.
Existing deficiency	Shortfalls affecting current communities before additional Local Plan growth.
Committed demand	Demand from permissions and allocations already expected to be delivered.
Wider demand	Demography, visitors, service reform, technology and climate effects.
Local Plan demand	Additional demand under each reasonable spatial and build-out scenario.
Network/service headroom	Capacity remaining after existing and committed demand has been allowed for.
Required intervention	New facility, expansion, network reinforcement, operational resource or service redesign.
Land / safeguarding	Site, corridor, easement, access or operational buffer required.
Strategic reinforcement	Major off-site or network-level works required to create capacity.
Local connection works	Site-specific works required to connect or serve development.
Capital cost	Current estimate, price base and allowance for risk/contingency where available.
Funding status	Secured, programmed, bid-dependent, developer-funded, regulatory allowance or unfunded.
Revenue / operation	Who will run, staff, maintain or adopt the service or asset.
Lead organisation	Named body accountable for delivery or commissioning.
Lead time / critical path	Design, consents, land, procurement, construction, commissioning and staffing.
Maximum occupation before reinforcement	Evidence-based threshold that existing capacity can support.
Operational availability trigger	Point by which the new or expanded service must be ready for use.
Resilience / contingency	Dependencies, failure risks and action if programmed delivery slips.
Cross-boundary dependency	Reliance on facilities or networks elsewhere in Thanet, East Kent or Kent.
Monitoring indicator	Measure, reporting body, frequency, threshold and corrective action.

Section summary: The Framework should convert infrastructure from a list of aspirations into a delivery model: capacity, demand, intervention, cost, responsibility, programme, trigger, resilience and monitoring.

18. Stage 7 - Monitor, compare and intervene

Monitoring should continue beyond permission. TDC should be able to trace the relationship between actual development and actual infrastructure delivery: homes or floorspace completed and occupied -> demand created -> trigger reached -> funding secured -> works commenced -> service operational. This should be reported by strategic site and settlement where practicable.^{18,22}

Monitoring stream	Outcome to track
Development	Permissions, starts, completions and occupied homes / floorspace.
Education	Pupil yield, capacity, contributions, site transfer, construction and opening.
Health / community	Premises, commissioning, provider commitment, opening and service availability.
Water / wastewater	Headroom, connection/reinforcement milestones, commissioning and operational capacity.
Energy / digital	Network reinforcement, energisation/service readiness and resilience.
Waste / emergency services	Operational demand, service changes, estate/access requirements and provider actions.

Where delivery materially diverges from the assumptions supporting the growth trajectory, the Plan should identify an intervention route. Depending on the issue, that may mean advancing investment, securing interim capacity, revising later-phase triggers, changing the sequence of allocations or reviewing the Plan. Monitoring is useful only if it can change decisions when assumptions fail.^{3,18,19,22}

Section summary: Monitor operational outcomes alongside permissions and contributions. The Local Plan should define when a service delay becomes material and what corrective action follows.

19. Relationship with BPC companion submissions

This response forms part of BPC's coordinated Scoping Consultation package. The common position is that the spatial strategy should be formed from integrated evidence, with housing, transport, economy, services, utilities, environment and character assessed together before growth locations are substantially fixed.^{22,23,24,25,26}

Companion submission	How this response complements it
Core New Thanet Local Plan Scoping Response	Sets the overarching sequence: baseline, need, sustainable capacity, spatial choice, infrastructure, sites, delivery and monitoring.
Housing, Spatial Distribution and Delivery	Distinguishes the nationally derived housing figure from locally evidenced housing needs and tests quantum and spatial options against sustainable capacity and delivery.
Highways, Sustainable Transport and Movement	Tests whether services and development are practically accessible and whether transport infrastructure is funded and deliverable.
Economic Development and Diversification	Links growth and investment to utilities, digital capacity, centres, employment and place-based infrastructure.
Historic Environment and Local Heritage Assets	Ensures that heritage significance, local character and place identity shape spatial and site choices from the outset.

Section summary: The submissions are mutually supporting: homes, jobs, transport, services, utilities, environment and character should be planned as one connected system.

20. The seven tasks for TDC

1. Stage 1 - Audit the baseline. Complete a Public Services and Infrastructure Delivery Audit covering the 2020 Local Plan and major permissions; separate existing deficiencies, committed demand, wider change and new-plan demand; and identify why expected infrastructure has or has not been delivered.^{1,2,3,22}

2. Stage 2 - Forecast demand. Scenario-test housing mix, build-out rates, demographics, employment, visitors and wider service change so that demand is understood over time rather than as a single end-state total.^{1,2,23}

3. Stage 3 - Test whole-system capacity. Quantify practical headroom and constraints across education, health/social care, community facilities, recreation, water/wastewater, energy, digital networks, waste, police/fire, accessibility and resilience, using the geographic scale appropriate to each service and avoiding double-counting of spare capacity.^{1,2,11,12,16,17}

4. Stage 4 - Set the spatial response. Use the capacity evidence to determine broad growth locations and a sustainable scale and pace. Where capacity is insufficient or too uncertain, identify capacity creation, revise the spatial option or test a wider Thanet/East Kent alternative, then re-run the demand and capacity tests.^{1,2,23}

5. Stage 5 - Secure delivery. For every critical intervention identify the land, provider, cost, funding status, responsible body, statutory or regulatory approvals, lead time, dependencies and contingency, and integrate those requirements into the IDP, viability work, site policies and obligations.^{1,3,18,19}

6. Stage 6 - Phase development to operational capacity. Define when reinforcement must start, when the service or network must be operational and the maximum occupation that can

occur beforehand. Distinguish reserved land and local connection works from funded, commissioned and operational capacity, including for the committed Birchington strategic development.^{1,20,21}

7. Stage 7 - Monitor and intervene. Publish an annual site/settlement dashboard comparing occupied development with operational services and infrastructure. Where delivery materially diverges from the assumptions supporting the trajectory, trigger the appropriate response: accelerate investment, secure interim capacity, rephase later development or review the spatial assumption.^{3,18,22}

21. Conclusion

The new Local Plan provides an opportunity to place public services and utilities at the centre of sustainable growth planning. The 2026 NPPF supports that approach by requiring plans to understand existing and future community needs, coordinate infrastructure, engage providers, assess utility capacity and secure timely facilities for additional population.¹

For Thanet, the central planning question extends beyond land availability to whether growth can be located and phased so that schools, healthcare, social care, local amenities, recreation, water, wastewater, energy, telecommunications, waste services and emergency services continue to function effectively for both existing and future communities.^{1,2}

The seven-stage sequence in Figure 1 and the Capacity and Delivery Framework provide a practical way to answer that question. Together they give TDC, infrastructure providers, developers and communities a shared picture of what capacity exists, what demand is expected, what investment is required, when it must be operational and what happens if delivery slips. Used alongside the housing, transport, economic and environmental evidence, the approach would help the new Plan translate growth objectives into functioning, resilient places.^{2,3,22,23,24,25,26}

Appendix A - Staged consultation response statements, NPPF and wider policy matrix

This matrix shows how the principal consultation response statements relate to the August 2026 NPPF and the wider service and infrastructure evidence. It provides a traceable route from policy to the evidence and delivery action required at the next plan-making stage.^{1,2}

Consultation response statement	NPPF 2026 basis	Wider policy / evidence	Required evidence or action
Stage 1 - Delivery audit and baseline	PM1; HC1	TDC scoping; 10-Year Infrastructure Strategy	Audit 2020 Plan and permissions; separate current deficits, committed demand and new-plan demand. ^{1,2,3}
Stage 2 - Development mix and pace	HC1; HC3	BPC housing and main responses	Scenario-test household mix and build-out; define maximum occupation before reinforcement and availability triggers. ^{1,22,23}
Stage 3A - Education	HC1; HC3-HC4; TR1	KCC Commissioning Plan 2026-30	Pupil yield, mainstream/SEND/post-16 capacity, sites, funding, accessibility, lead time and opening trigger. ^{1,11}
Stage 3B - Health and social care	HC1; HC3-HC4	NHS Kent and Medway primary-care strategy	Test premises, commissioning, workforce, digital/access requirements and operational readiness. ^{1,12}
Stage 3C - Community facilities and centres	HC1; HC4; HC6	BNP; BPC economic response	Map facility network; protect viable provision; reinforce existing centres; secure sustainable management. ^{1,21,25}
Stage 3D - Recreation and open space	HC1; HC7	BNP / local evidence	Set quantity/quality/access standards; connect provision and secure long-term stewardship. ^{1,21}
Stage 3E - Water resources	W1	PPG; water-resources guideline; Southern Water WRMP24	Test resource-zone balance, treatment/storage/distribution, investment status, lead time and resilience. ^{1,4,5,6}
Stage 3E - Wastewater and drainage	W1; P4	PPG; Southern Water DWMP	Test sewer, pumping and treatment headroom; environmental capacity; reinforcement and occupation triggers. ^{1,4,7}
Stage 3E - Electricity	W1; P4	UKPN DNOA March 2026	Cumulative load, substations/feeders, reinforcement, land/easements, energisation and timing. ^{1,8}

Stage 3E - Gas / energy transition	W1; P4	SGN LTDS	Identify network/asset constraints and safe capacity while retaining flexibility for decarbonisation. ^{1,9}
Stage 3E - Digital connectivity	CO1; P6	Government digital planning guidance	Design fixed/mobile capacity, reliability, resilience, ducts/fibre and future upgrading into strategic sites. ^{1,10}
Stage 3F - Waste services	P4	National waste policy; KCC waste strategy / KMWLP	Test collection operations and strategic capacity; protect facilities; provide storage/access in new development. ^{1,13,14,15}
Stage 3G - Police and fire	P4-P6	Kent Police; KFRS delivery plan	Engage on demand, estate, public safety, emergency access, firefighting water and emerging risks. ^{1,16,17}
Stage 3H - Resilience and interdependency	PM1; W1; P6	10-Year Infrastructure Strategy; provider plans	Identify critical dependencies, climate risks, single points of failure and contingencies. ^{1,3,5,7,8,17}
Stages 3-6 - Strategic Birchington growth	HC3; W1; TR1	OL/TH/20/1755; BNP; BPC transport/housing responses	Coordinate housing occupations with school, health, centre, transport, recreation and utility milestones. ^{20,21,23,24}
Stage 4 - East Kent / Kent coordination	PM1; PM10-PM12	TDC scoping / emerging Kent SDS	Use service catchments and cross-boundary evidence; avoid double-counting spare capacity. ^{1,2}
Stage 5 - Funding and delivery	PM12; HC3	Planning obligations; viability; 10-Year Infrastructure Strategy	Set requirements early; identify cost, funding status, responsible body, critical path and forward-funding needs. ^{1,3,18,19}
Stage 7 - Monitoring and intervention	PM2/plan monitoring principles; HC3	Planning obligations monitoring; BPC main response	Track occupation-to-service delivery and define thresholds for investment, rephasing or review. ^{18,22}

Appendix B - Reference table

The superscript references used in the main response and Appendix A correspond to the sources below. Official Government, local-authority, infrastructure-provider and adopted development-plan sources are used wherever available.

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 and development management.	Open source
2	Thanet District Council New Thanet Local Plan - Scoping Consultation Document	August 2026	Thanet scoping context; health, education and local-facility objectives; Local Plan/SDS relationship; strategic infrastructure.	Open source
3	HM Treasury / National Infrastructure and Service Transformation Authority UK Infrastructure: A 10 Year Strategy	19 June 2025	Long-term strategy for coordinating economic, housing and social infrastructure and improving delivery certainty.	Open source
4	Ministry of Housing, Communities and Local Government Planning Practice Guidance: Water supply, wastewater and water quality	Current guidance	Plan-making guidance on aligning growth, water resources, wastewater capacity, investment and cross-boundary catchments.	Open source
5	Environment Agency / Ofwat / Natural Resources Wales Water resources planning guideline	Updated 16 June 2026	Current statutory planning guidance for secure long-term water resources and alignment with growth.	Open source
6	Southern Water Water Resources Management Plan 2024 / WRMP24	Current final-draft process; 2025-2075 plan period	Long-term water-supply planning; Kent Thanet is a distinct water-resource zone and the plan identifies supply/demand interventions.	Open source
7	Southern Water Drainage and Wastewater Management Plan	DWMP23 published May 2023; statutory successor in preparation	Long-term planning for sewer networks, pumping stations, treatment works and resilient wastewater services.	Open source
8	UK Power Networks Distribution Network Options Assessment (DNOA)	March 2026	Current identification of electricity-network constraints, flexibility/investment needs and longer-term system requirements.	Open source

9	SGN Long Term Development Statement	2025 publication; annual forecasting cycle	Gas-network demand forecasts and investment planning over the next decade and beyond.	Open source
10	Department for Science, Innovation and Technology Digital and telecoms: resources for local authorities / guidance for the local planning authority	Collection updated 1 April 2026	Local Plan role in supporting fixed/mobile networks, full fibre and future digital infrastructure.	Open source
11	Kent County Council Commissioning Plan for Education Provision in Kent 2026-2030	Approved 4 December 2025	Five-year rolling plan for sufficient education places in the right locations, including district-level response to housing growth and SEND.	Open source
12	NHS Kent and Medway ICB Primary Care Strategy / Estates and Infrastructure Strategy	Primary Care Strategy and estates material current; estates summary 2024	Primary-care service model and importance of fit-for-purpose premises, estate planning and infrastructure.	Open source
13	Ministry of Housing, Communities and Local Government National planning policy for waste	16 October 2014; current national waste-planning policy	Requires waste management to be considered with housing/transport, robust capacity evidence and appropriate storage/access in development.	Open source
14	Kent County Council Kent Waste Disposal Strategy	Updated 2026	Current position, future pressures and delivery priorities for sustainable waste disposal services.	Open source
15	Kent County Council Kent Minerals and Waste Local Plan 2024-2039	Adopted 13 March 2025	Current strategic development-plan framework for waste management and minerals provision in Kent.	Open source
16	Kent Police Local Policing Leadership	Current	Confirms East Division operational geography and local/community policing arrangements including Thanet.	Open source
17	Kent Fire and Rescue Service Creating a safer future - together: Our delivery plan 2025 to 2029	2025-2029	Current community-risk and service plan covering buildings, transport, climate, utilities, energy storage/renewables and loss of public water services.	Open source
18	Ministry of Housing, Communities and Local Government Planning Practice Guidance: Planning obligations	Current guidance	Early infrastructure-provider involvement, clarity of contributions, pooling, trigger monitoring and Infrastructure Funding Statements.	Open source

19	Ministry of Housing, Communities and Local Government Planning Practice Guidance: Viability	Updated 16 December 2025	Requires plan infrastructure obligations to be evidence-based, viable and clear enough to be reflected in land value.	Open source
20	Thanet District Council OL/TH/20/1755 - Land North and East of Canterbury Road, Birchington	Committee resolution November 2024; outline permission issued 23 December 2025	Local illustration of strategic housing, school land, medical-centre expansion land, local-centre provision, open space and infrastructure dependencies.	Open source
21	Birchington Parish Council / Thanet District Council Birchington Neighbourhood Plan 2021-2031	Made 7 December 2023	Made development-plan document covering local infrastructure, facilities, recreation, movement, character and integration of growth.	Open source
22	Birchington Parish Council Core New Thanet Local Plan Scoping Response	September 2026	Companion BPC submission on sustainable capacity, infrastructure, spatial strategy, delivery and monitoring.	<i>BPC companion submission</i>
23	Birchington Parish Council Housing, Spatial Distribution and Delivery Response	September 2026	Companion response on locally evidenced housing needs, housing quantum options, spatial distribution, sustainable capacity, infrastructure and delivery.	<i>BPC companion submission</i>
24	Birchington Parish Council Highways, Sustainable Transport and Movement Response	September 2026	Companion response on movement capacity, accessibility, strategic dependencies, phasing and transport delivery.	<i>BPC companion submission</i>
25	Birchington Parish Council Economic Development and Diversification Response	September 2026	Companion response on centres, employment, utilities, digital capacity, visitor economy and place-based investment.	<i>BPC companion submission</i>
26	Birchington Parish Council Historic Environment and Local Heritage Assets Submission	September 2026	Companion response on heritage evidence, local character and place-led growth.	<i>BPC companion submission</i>