EXAMINATION OF THE MEDWAY COUNCIL LOCAL PLAN 2041

HEARING STATEMENT

THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

MATTER

Matter 11 - Energy

ISSUE

Whether the Plan contains a justified and effective strategy for energy generation, distribution and resilience and for renewable and low-carbon energy. Whether the Plan helps to increase the use and supply of renewable and low carbon energy and heat in accordance with national policy.

Representor	The Independent Group (TIG) on Medway Council
Representor ID	E.37
Relevant MIQs	11.1, 11.2, 11.3, 11.4, 11.5 and 11.15
Hearing session	18 November 2026 - PM session (2.00 pm - 5.00 pm)
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Submitted on behalf of The Independent Group (TIG) on Medway Council
Councillor Michael Pearce, Planning Spokesman

1. PURPOSE AND STATUS OF THIS STATEMENT

1.1 This Hearing Statement is submitted by The Independent Group (TIG) in relation to Matter 11 - Energy. It addresses only the Inspectors' Matters, Issues and Questions (MIQs) identified below and should be read alongside TIG's Regulation 19 representations listed in section 6.

1.2 TIG's NPPF paragraph 11(b) Regulation 19 representation contained a specific section headed 'Electricity and Energy'. It stated that reinforcement might be required to serve large-scale housing and employment sites and that no committed funding or delivery programme had been identified. The same representation raised the wider risks of infrastructure lag and development preceding necessary supporting infrastructure on the Hoo Peninsula.

1.3 The later evidence allows that case to be corrected and refined. B2 distinguishes national electricity transmission from the local distribution network operated in Medway by UK Power Networks (UKPN). National Grid Electricity Transmission (NGET) stated at Regulation 19 that there were no known new transmission-infrastructure interactions in the area. NGET's statement should not be taken to establish that existing transmission assets impose no constraints on individual allocations, or to resolve the separate UKPN distribution-capacity question.

1.4 The remaining issue is narrower and concerns the local distribution network: whether the capacity and any reinforcement needed to support the Plan's growth, particularly strategic growth on the Hoo Peninsula, have been identified with sufficient certainty to show that they can be delivered in step with development. TIG therefore responds to MIQs 11.1-11.5 and 11.15 only. It does not introduce new objections to the detailed wording of Policy S25, Policy T41 or renewable and low-carbon energy policy more generally.

1.5 This is consistent with TIG's wider Regulation 19 infrastructure case. The concern was not simply whether utilities could eventually provide a connection, but whether infrastructure necessary for strategic growth would be available at the point development needed it. Matter 11 therefore goes directly to the effectiveness and phasing of the submitted strategy rather than raising a new objection to energy policy in principle.

2. TIG'S POSITION AT A GLANCE

Overall answer to the Matter / Issue

2.1 TIG considers that the evidence has not yet fully demonstrated how the local electricity distribution network will support the scale and timing of planned growth. B2 records that the Council supplied spatial data and a housing trajectory to UKPN in summer 2025; that no specific projects were identified from the growth proposals provided; and, nevertheless, that UKPN estimated approximately £15-20 million for reinforcement to the network.

2.2 That is not necessarily contradictory, because B2 explains that UKPN responds to customer connection applications rather than undertaking speculative reinforcement. However, the evidence does not presently make clear whether the £15-20 million estimate represents routine development-led connection works spread across sites, or whether any shared or upstream reinforcement is needed on which the timing of strategic development depends.

2.3 B2's Executive Summary states that the IDP is intended to identify what infrastructure is required, where and when it is needed, the delivery partner, expected timescale, cost and funding source. For electricity, the delivery partner and broad funding mechanisms are described, but the location, timing, triggers and relationship between the estimated reinforcement and the development trajectory are not identified.

2.4 The position should also be checked against MLP/ED31. That document proposes a stepped housing requirement of 1,309 dwellings per annum in years 1-5, rising to 1,963 dwellings per annum in years 6-10, and expressly explains that strategic allocations are expected to increase delivery after infrastructure requirements and lead-in periods. As B2's UKPN engagement used the summer 2025 housing trajectory, updated confirmation is appropriate.

2.5 Policy S24 is relevant because it requires applications to demonstrate sufficient infrastructure capacity, requires development to be phased to reflect timely infrastructure delivery and requires positive working with utilities providers so that cumulative impacts are considered from the outset. Those are potentially effective safeguards. Their effectiveness for Matter 11 depends, however, on knowing whether the electricity works needed by the growth strategy are ordinary site connections or strategically material reinforcement with longer lead times.

Soundness test engaged

2.6 The principal soundness test engaged is effectiveness, together with justification insofar as infrastructure assumptions support the chosen scale and phasing of growth. TIG does not ask the Inspectors to conclude that the network cannot serve the Plan. It asks for a proportionate evidence and delivery trail showing whether reinforcement is required and, if so, that it can be provided at the time it is needed.

Examination action / change sought

2.7 TIG seeks updated confirmation of UKPN capacity and reinforcement assumptions against the latest trajectory; clarification of the nature, timing, triggers and funding arrangements for any strategically material reinforcement; and monitoring proportionate to whatever works are relied upon. If the evidence shows that existing policy mechanisms are insufficient to secure timely delivery, consequential Main Modifications should be made.

3. RESPONSES TO THE INSPECTORS' MIQs

3.0 The changes identified below are without prejudice to TIG's position at paragraphs 4.2-4.5 and to its wider Regulation 19 objections. TIG maintains that defects which cannot lawfully be remedied through limited further work and Main Modifications without materially recasting the submitted Plan require non-adoption, withdrawal and re-preparation. The responses below focus and update TIG's existing Regulation 19 electricity/energy infrastructure and infrastructure-lag concerns. Later examination material is referred to only insofar as it bears upon those existing issues.

3.1 MIQ 11.1 - What evidence informs the energy strategy?

TIG's answer: Partly. B2 provides the principal submitted evidence on electricity distribution, but the delivery implications of its own reinforcement estimate are not yet fully explained.

Reasoning...

3.1.1 B2 identifies UKPN as the distribution network operator, refers to UKPN's Long Term Development Statement and Network Development Plan, and records engagement in summer 2025 using the Council's spatial data and housing trajectory. It also distinguishes production, transmission and distribution, and explains that local supply reaches homes and businesses through the distribution network.

3.1.2 The evidence is therefore more developed than that available to TIG at Regulation 19. The remaining gap is not the absence of any evidence; it is the absence of a clear explanation linking the estimated £15-20 million reinforcement requirement to particular network needs, development phases or lead times.

3.1.3 B2 records that Medway has 13 substations and says that, on Hoo specifically, the presence of generating infrastructure 'suggests' electricity will not threaten growth deliverability. That observation should not be treated as a substitute for distribution-capacity evidence. B2 itself explains that generation, transmission and distribution are distinct. The relevant question is the headroom and reinforcement requirements on the UKPN network actually serving the proposed development loads.

Regulation 19 basis: TIG NPPF paragraph 11(b) Representation, Chapter 8, particularly section 8.4.2; E.37.

Change necessary: Clarify the electricity-distribution evidence trail and the delivery implications of the £15-20 million reinforcement estimate. See EX-TIG-M11-01.

3.2 MIQ 11.2 - How does the Plan support projected energy demand arising from planned growth?

TIG's answer: Not fully demonstrated for the local distribution network.

Reasoning...

3.2.1 Policy S24 provides an important general safeguard: applications must demonstrate sufficient infrastructure capacity, development must be phased to reflect timely infrastructure delivery, and developers must work with utilities providers. B2 similarly says that electricity requirements can be assessed and delivered through the planning application process.

3.2.2 Those mechanisms may be sufficient if UKPN confirms that no strategic or shared reinforcement is needed and that normal connection processes can serve the cumulative growth within the required lead times. If several strategic allocations collectively trigger upstream works, however, leaving the issue entirely to individual connection applications risks reproducing the infrastructure-lag concern raised by TIG at Regulation 19.

3.2.3 The stepped trajectory in MLP/ED31 heightens the importance of timing. The Council should demonstrate that electricity network lead times are compatible with the proposed increase in housing delivery in years 6-10 and with the phasing of the strategic allocations expected to contribute to that increase.

3.2.4 MLP/ED31 is explicit that many strategic allocations are not expected to deliver at full capacity in the early years because of infrastructure requirements, lead-in periods and build-out constraints. It also proposes that growth at Hoo should be planned and phased

so infrastructure is delivered alongside development. Electricity capacity should therefore be tested against the same delivery assumptions rather than treated solely as a matter for applications after strategic phasing has been fixed.

3.2.5 TIG is not asking for detailed engineering design at plan-making stage. A proportionate answer could be confirmation that the latest trajectory can be served through existing headroom and normal connection processes within the required lead times. If that cannot be confirmed, the Council should identify what additional reinforcement is needed and how it affects the timing of the growth relied upon by the Plan.

Regulation 19 basis: TIG NPPF paragraph 11(b) Representation, sections 8.4.2 and 8.6-8.7; E.37.

Change necessary: Demonstrate that local distribution capacity and any required works can be delivered in step with the latest proposed trajectory. See EX-TIG-M11-01 and EX-TIG-M11-02.

3.3 MIQ 11.3 - Have energy infrastructure providers confirmed capacity and investment requirements?

TIG's answer: Engagement is demonstrated, but the submitted evidence does not yet amount to a clear confirmation of capacity and investment requirements against the latest trajectory.

Reasoning...

3.3.1 For national transmission, NGET's Regulation 19 representation reported no known new infrastructure interactions in the area. That statement concerns the information then considered; it does not establish that existing transmission assets impose no constraints on particular allocations. Nor does it resolve the separate question of UKPN distribution capacity and reinforcement for planned growth.

3.3.2 For local distribution, B2 records that UKPN reviewed information supplied by the Council and that no specific projects were identified. But B2 also records UKPN's £15-20 million reinforcement estimate. The Council should therefore clarify, preferably with current UKPN confirmation, whether existing network capacity is sufficient subject only to routine development-led works, and whether that estimate remains current after the proposed stepped trajectory.

3.3.3 For Hoo, B2 says that the presence of electricity-generating infrastructure 'suggests' that electricity will not threaten deliverability. B2 itself explains, however, that generation, transmission and distribution are distinct parts of the system and that local distribution is through UKPN. Nearby generating capacity is therefore not, by itself, confirmation of distribution headroom at the substations and network locations serving the proposed growth.

3.3.4 The useful confirmation for examination would be straightforward: whether UKPN has any strategic objection to the latest scale and phasing of growth; whether cumulative load is expected to trigger shared or upstream reinforcement; whether the approximate £15-20 million figure remains current; and whether any identified works have lead times capable of constraining the trajectory. This would convert evidence of engagement into evidence of deliverability without requiring certainty about every future site connection.

Regulation 19 basis: TIG NPPF paragraph 11(b) Representation, section 8.4.2; E.37.

Change necessary: Provide updated confirmation of UKPN capacity and investment requirements against the latest trajectory and clarify the status of the £15-20 million estimate. See EX-TIG-M11-01.

3.4 MIQ 11.4 - Is additional energy network reinforcement required and, if so, how will this be delivered?

TIG's answer: B2 indicates that reinforcement is anticipated in aggregate, but the nature and delivery of any strategically material works are not yet clear.

Reasoning...

3.4.1 B2 states that UKPN is not regulated to undertake speculative upgrades. New connections and development-driven reinforcement are delivered through UKPN or an independent distribution network operator, with developers charged for works caused by development and UKPN funding reinforcement up to its stated high-cost cap.

3.4.2 That explains the normal mechanism in principle. What remains unclear is whether the £15-20 million estimate is simply the aggregate cost of such normal site connections and local upgrades, or whether any shared, upstream or location-specific works are required before strategic sites can connect. The answer matters because the latter may have material lead-time and phasing implications.

3.4.3 Appendix 1 to B2 illustrates the distinction. It identifies Hoo Peninsula gas reinforcement for specified sites as 'Critical' within years 0-5, but TIG has not identified an equivalent electricity-reinforcement line item despite the £15-20 million estimate. The Council should explain whether that omission positively indicates that no strategic electricity project is required, or whether works remain to be defined through later connection applications.

3.4.4 The fact that the IDP is a live document does not remove the need for proportionate assurance at examination. Future updates can refine details, but the Plan should establish now whether any electricity reinforcement is a strategic dependency on the housing trajectory and, if so, how its delivery will be aligned with that trajectory.

3.4.5 If the reinforcement is shared across several allocations, the delivery mechanism also needs to address sequencing and cost apportionment. A reactive connection regime may be effective, but only if the first site is not left to fund or trigger works principally required by later cumulative growth. Conversely, if UKPN confirms that all expected works are routine and site-specific, the Council should record that conclusion so the £15-20 million estimate is not mistaken for an unidentified strategic project.

Regulation 19 basis: TIG NPPF paragraph 11(b) Representation, sections 8.4.2 and 8.6-8.7; E.37.

Change necessary: If strategically material reinforcement is required, identify its delivery mechanism, lead time, triggers, funding arrangements and relationship to development phasing. See EX-TIG-M11-02.

3.5 MIQ 11.5 - How will delivery be monitored throughout the Plan period?

TIG's answer: The existing framework provides general infrastructure monitoring, but it does not specifically track electricity-network capacity or any reinforcement relied upon for delivery.

Reasoning...

3.5.1 A14 monitors Policy S24 through the number and value of section 106 or other legally binding obligations and refers to the IDP and annual Infrastructure Funding Statement. A14 also contains climate indicators such as renewable/low-carbon energy permissions and greenhouse-gas emissions. B2 and Policy S24 envisage the IDP being refreshed over the Plan period.

3.5.2 Those arrangements may be proportionate if there is no strategic electricity project to monitor. If the Council relies on material reinforcement to support the trajectory, however, monitoring should identify the relevant works, expected delivery point and any slippage capable of affecting site phasing or housing delivery. Carbon or renewable-energy indicators do not perform that function.

3.5.3 Monitoring arrangements should be proportionate to the infrastructure on which the Plan's delivery depends. Where strategic electricity works are identified, A14 and IDP monitoring should identify the works, responsible provider, triggers, milestones, expected delivery dates and any slippage affecting linked allocations. A dedicated indicator should be considered if the existing framework cannot provide that assurance. Even where no strategic works are currently identified, periodic IDP reviews should test actual connection demand against the assumptions underpinning the housing trajectory.

Regulation 19 basis: TIG NPPF paragraph 11(b) Representation, sections 8.6-8.7; E.37.

Change necessary: If material reinforcement is relied upon, ensure that A14/IDP monitoring tracks its delivery and any slippage affecting development phasing. See EX-TIG-M11-03.

3.6 MIQ 11.15 - How does Policy S25 support and address future energy demand arising from growth in Medway?

TIG's answer: Not fully demonstrated insofar as MIQ 11.15 concerns the local infrastructure needed to serve future demand.

Reasoning...

3.6.1 Policy S25 identifies Kingsnorth and the Isle of Grain as suitable locations for renewable and low-carbon energy development. That identification concerns energy generation; it does not establish that the local distribution network can meet the spatial pattern and timing of additional demand. The evidence must distinguish the availability of generating capacity from distribution-network headroom and the works needed to connect strategic sites.

3.6.2 The Council should therefore explain the relationship between Policy S25, B2 and Policy S24. In particular, it should confirm whether the latest growth trajectory can be served within existing distribution capacity plus normal connection works, or whether reinforcement with strategic lead-time implications is required.

3.6.3 B2 reinforces that distinction by describing Medway's power stations and interconnectors as strategically significant infrastructure driven mainly by the UK-wide energy market, while local supply reaches homes and businesses through UKPN's distribution system. Policy S25 can therefore support increased energy generation without answering the separate question of whether new local loads can connect when planned. The answer to future demand must come from the interaction of S25, S24 and the distribution-network evidence.

Regulation 19 basis: TIG NPPF paragraph 11(b) Representation, section 8.4.2 and wider infrastructure/deliverability objection; E.37.

Change necessary: Clarify how Policy S25, B2 and Policy S24 operate together to address future local electricity demand, without treating generation capacity as a proxy for confirmed distribution capacity. See EX-TIG-M11-01 and EX-TIG-M11-02.

4. OVERALL CONCLUSION ON THIS MATTER

4.1 The examination evidence has narrowed rather than displaced TIG's Regulation 19 concern. There is no present basis for TIG to maintain that new national transmission reinforcement has been demonstrated to be necessary. The live issue is the UKPN distribution network and the delivery meaning of the £15-20 million reinforcement estimate recorded in B2.

4.2 B2 identifies no specific UKPN reinforcement project while anticipating an aggregate reinforcement cost, with investment reactive rather than speculative and costs largely development-led. On the submitted evidence, it remains unclear whether the necessary works are routine connections or shared or upstream reinforcement on which strategic development depends. Until that distinction and its delivery implications are demonstrated, the effectiveness of the growth trajectory is not fully established.

4.3 TIG seeks current, proportionate evidence from UKPN and the Council testing cumulative demand, available headroom, reinforcement requirements, connection lead times and strategic-site phasing against MLP/ED31. A general indication of no objection in principle would not, by itself, resolve the identified delivery uncertainty. Where strategically material works are required, their scope, triggers, funding, delivery timescales and monitoring must be demonstrated.

4.4 That confirmation is particularly important because the Council's revised stepped housing approach now expressly relies on infrastructure requirements and lead-in periods to explain when strategic sites will deliver. The electricity evidence should therefore be current enough to support the same phasing assumptions. A summer 2025 engagement exercise may remain valid, but the examination should establish that rather than assume it.

4.5 TIG seeks a proportionate but robust demonstration that electricity infrastructure will be available when the Plan's growth requires it. Any shortfalls in capacity, delivery mechanisms or phasing must be addressed by further evidence and, where necessary, consequential Main Modifications. TIG does not prejudge the extent of the changes required, and expressly reserves its wider Regulation 19 objections and its position on the soundness of the Plan.

5. MAIN MODIFICATIONS / CHANGES SOUGHT

5.1 These changes are without prejudice to TIG's wider Regulation 19 objections and its position, preserved at paragraph 3.0, on deficiencies that cannot lawfully be remedied by limited further work and Main Modifications without materially recasting the submitted Plan. For the purposes of this table, 'EX' denotes an examination action sought rather than proposed Main Modification wording. If the evidence shows that existing policy wording is insufficient to secure the necessary outcome, consequential Main Modifications may be required.

Ref	Plan policy / text	Issue identified	Action / change sought	Why necessary
EX-TIG-M11-01	B2 - electricity distribution	B2 records no specific UKPN project but an estimated £15-20m reinforcement cost, based on engagement using the summer 2025 trajectory.	Provide updated Council/UKPN confirmation against the latest proposed trajectory, clarifying whether the £15-20m estimate remains current and whether it represents routine site connections/local upgrades or strategically material reinforcement.	Necessary to demonstrate that planned growth is supported by current and proportionate infrastructure evidence.
EX-TIG-M11-02	B2 / Policy S24 / strategic phasing	If material reinforcement is required, its scope, lead time, trigger, funding/apportionment and relationship to strategic-site phasing are not presently identified.	Where strategically material works are required, identify the delivery mechanism, lead times, triggers, funding arrangements and relationship to site phasing in the IDP or equivalent examination evidence, with consequential Plan changes if necessary.	Necessary to demonstrate effective and timely infrastructure delivery.
EX-TIG-M11-03	A14 / IDP monitoring	The existing monitoring framework is general and does not specifically track electricity reinforcement or network-related delay.	If material electricity reinforcement is relied upon for the trajectory, provide monitoring through A14/IDP updates that records the works, expected delivery and any slippage affecting development phasing.	Necessary to demonstrate effectiveness over the Plan period.

6. TIG REGULATION 19 REPRESENTATIONS AND EXAMINATION DOCUMENTS REFERRED TO

Reference	Document	Where relevant
TIG Reg 19	TIG NPPF paragraph 11(b)	Chapter 8, particularly 8.4.2 and

	Representation	8.6-8.10
E.37	TIG Regulation 19 representation	Electricity/energy infrastructure and Hoo Peninsula deliverability objections
A1	Submission Medway Local Plan 2041	Policy S24; Policy S25; Chapter 13
A14	Monitoring Framework	Policy S24 monitoring and climate indicators
B2	Infrastructure Delivery Plan (December 2025)	Executive Summary; electricity section pp.40-41; Appendix 1
E.57	National Grid Electricity Transmission Regulation 19 representation	Existing NGET assets and new-infrastructure comments
MLP/ED31	Proposed stepped housing requirement and land supply	Stepped requirement and infrastructure lead-in rationale
MLP/ED35	Inspectors Phase 2 MIQs	Matter 11
MLP/ED13	Inspectors Guidance Note	paras 19-20

7. APPENDIX

7.1 No appendix is proposed.

SUBMITTED ON BEHALF OF THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

Councillor Michael Pearce

Councillor Michael Pearce
Planning Spokesman
29 October 2026

**For the avoidance of any doubt, Councillor Michael Pearce is an Independent Councillor representing Hoo & High Halstow Ward on Medway Council, which is also the Local Planning Authority (LPA). He serves as the Leader and Planning Spokesman for The Independent Group (TIG) on Medway Council - an unwhipped group of Independent councillors representing the Hoo Peninsula (Strood Rural Ward, Hoo & High Halstow Ward, All Saints Ward), formed for administrative purposes and committee entitlement. While Councillor Pearce is a Medway Councillor and member of the LPA's Planning Committee, he does not speak or act on behalf of Medway Council or the LPA, either generally or at formal planning inquiries.*