

EXAMINATION OF THE MEDWAY COUNCIL LOCAL PLAN 2041

HEARING STATEMENT

THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

MATTER

Matter 7 - Economic Development

ISSUE

Whether the plan and its policies on employment needs and economic development are clear, positively prepared, justified, effective and consistent with national policy. Whether the employment land strategy and allocations in the Plan align with the evidence base and are deliverable.

Representor	The Independent Group (TIG) on Medway Council
Representor ID	E.37
Relevant MIQs	7.4, 7.7, 7.10, 7.18, 7.19, 7.21, 7.22, 7.49 and 7.51
Hearing session	23 September 2026 - AM session (9.30 am - 1.00 pm) and PM session (2.00 pm - 5.00 pm)
Statement date	27 August 2026
Word count	2,968 substantive words

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 7 - Economic Development. It addresses only the Inspectors' Matters, Issues and Questions identified below and should be read alongside TIG's Regulation 19 representations listed in section 6.
- 1.2 This statement does not introduce a new objection. TIG's Regulation 19 representations challenged Hoo Peninsula employment allocations because of environmental, agricultural-land and infrastructure effects and alternatives. This statement focuses that case against the Council's Employment Land Needs Assessment (ELNA) and submitted policies.
- 1.3 For clarity, TIG's Sites Appraisal distinguished HHH36 MedwayOne (Former Kingsnorth Power Station) as previously developed/brownfield land, while identifying HHH19 and HHH35 as new employment development affecting best and most versatile agricultural land. TIG's principal Matter 7 objection is therefore to HHH19 and HHH35, not to employment redevelopment of HHH36 in principle. This narrows and clarifies TIG's Regulation 19 case.

2. TIG'S POSITION AT A GLANCE

Overall answer to the Matter / Issue

- 2.1 TIG supports a strong local economy, protection and modernisation of viable employment areas, town-centre office regeneration, and the productive reuse of suitable previously developed employment land. However, the submitted Plan has not demonstrated that the additional greenfield employment allocations HHH19 and HHH35 are required or represent the most appropriate strategy.
- 2.2 B12 identifies a minimum industrial requirement of 204,000 sqm against 883,812 sqm of supply. Paragraphs 7.13-7.15 state that supply exceeds the requirement by more than four times, that sites other than the two largest concentrations still provide around 270,000 sqm, and that there is no need to increase industrial supply. Paragraphs 8.13-8.14 identify no pressing qualitative need for further allocations.
- 2.3 Against that evidence, Policy SA14 allocates HHH19 for 14,400 sqm and HHH35 for 157,000 sqm: 171,400 sqm of additional employment floorspace on land not included in B12 Table 7.3's identified supply. The Plan's own SA identifies major negative effects for Policy SA14 on pollution and soil resources, records that HHH19 contains Grade 1 agricultural land, and identifies transport/accessibility and other constraints. The justification for adding these greenfield sites is therefore not demonstrated.

Soundness test engaged

- 2.4 Justified; effective; consistent with national policy.

Main Modification / action sought

- 2.5 Delete HHH19 and HHH35 from Policy SA14 and the Policies Map; retain a genuine brownfield-first employment strategy centred on existing and committed employment land and suitable regeneration opportunities; and reconcile Policy S12/SA14 quantitatively with B12. If the Council maintains that HHH19 and HHH35 are essential to the economic strategy such that their deletion would fundamentally recast the Plan, TIG considers that the strategy has not been justified and the Plan should be withdrawn and re-prepared.

3. RESPONSES TO THE INSPECTORS' MIQs

- 3.0 The changes below are without prejudice to paragraphs 4.2-4.3. TIG considers the principal defects capable of remedy by deleting HHH19 and HHH35. If the Council says those allocations are indispensable, the absence of demonstrated need or comparative justification becomes a strategic defect.

3.1 MIQ 7.4 - Does the scale, type, location and phasing of employment land match market demand, infrastructure constraints and future economic needs?

TIG's answer: Not fully demonstrated.

Reasoning...

- 3.1.1 B12 identifies a minimum industrial requirement of 204,000 sqm and 883,812 sqm of industrial supply. Paragraphs 7.13-7.15 state that supply is more than four times the requirement and that, even excluding the two dominant locations, around 270,000 sqm remains, offering geographic and site choice.
- 3.1.2 B12 concludes that there is no need to increase industrial supply and no pressing qualitative need for further allocations. Policy SA14 nevertheless adds HHH19 (14,400 sqm) and HHH35 (157,000 sqm), neither of which appears in Table 7.3's supply calculation.
- 3.1.3 The sequencing is also not fully coherent. Policy S12 says brownfield sites are phased before greenfield sites. Policy SA14 expressly puts HHH35 later, after previously developed employment sites have been occupied, but HHH19 is programmed in years 1-5 despite the SA identifying Grade 1 agricultural land within the site. The Plan does not explain how that early allocation implements a brownfield-first approach.

Regulation 19 basis: TIG Main Representation, sections 4.2.2, 4.4.2 and 8.3; TIG NPPF 11(b) Representation, Chapters 5 and 10; TIG Sites Appraisal, HHH19 and HHH35.

Change necessary: Delete HHH19 and HHH35 and prevent further greenfield release unless monitoring demonstrates need that cannot reasonably be met from existing, committed or previously developed supply. See MM-TIG-M7-01 to 03.

3.2 MIQ 7.7 - What evidence demonstrates deliverability and the necessary infrastructure, investment and market demand?

TIG's answer: The evidence supports substantial existing opportunities, but does not demonstrate a need-led or infrastructure-secure case for HHH19 and HHH35.

Reasoning...

- 3.2.1 TIG accepts that the local area needs modern industrial floorspace. B12 records low built-stock availability, but that is different from demonstrating that additional greenfield allocations are necessary. It identifies MedwayOne as an attractive logistics/distribution location and the prime objective for meeting general employment need.
- 3.2.2 HHH35 is explicitly contingent. A1 paragraph 14.15.6 links it to future housing east of Roper's Lane and to the managed release and relocation of some Medway City Estate businesses. Policy SA14 places it in the latter part of the Plan period and requires regard to a future Frindsbury Peninsula Planning Framework. That may provide a long-term opportunity, but it does not demonstrate present necessity for allocating 157,000 sqm of greenfield land where existing supply already exceeds assessed need.
- 3.2.3 MLP/ED20 also records continuing strategic highway issues at M2 Junction 1, including Local Plan-led mitigation and cumulative impacts still under discussion with National Highways in July 2026. This reinforces the need for a compelling necessity and phasing case before additional peripheral greenfield employment is allocated.

Regulation 19 basis: TIG Main Representation, sections 4.4.2 and 8.2-8.3; TIG NPPF 11(b) Representation, Chapters 8 and 10; TIG Sites Appraisal.

Change necessary: Remove HHH19 and HHH35. If either is retained, the Council should demonstrate specific market need, infrastructure capacity, delivery triggers and why the requirement cannot be met from the existing pipeline.

3.3 MIQ 7.10 - Why is the Economic Strategy the most appropriate strategy for sustainable economic growth?

TIG's answer: The protect-modernise-regenerate elements are broadly supported, but the additional Hoo Peninsula greenfield component has not been shown to be the most appropriate strategy.

Reasoning...

- 3.3.1 Policy S10 directs industrial and warehousing uses towards peripheral locations close to the strategic road network and directs larger net-zero energy and port uses to Kingsnorth and Grain. TIG does not object to recognising those established economic functions. The issue is whether that broad locational principle justifies adding unconstrained quantities of greenfield industrial land.
- 3.3.2 B12 states that existing supply can accommodate the assessed requirement and higher growth. It also identifies substantial urban and distributed opportunities at Innovation Park, Basin 3, Diggerland and through smaller permissions. The strategy therefore has alternatives to HHH19 and HHH35.

- 3.3.3 TIG acknowledges B12 paragraph 8.15, which supports retaining actively promoted sites in the existing pipeline despite over-supply. HHH19 and HHH35 are not included in Table 7.3. The issue is therefore why a further 171,400 sqm of greenfield provision is added beyond a supply already assessed as sufficient.

Regulation 19 basis: TIG Main Representation, Chapters 4 and 8; TIG NPPF 11(b) Representation, Chapters 5, 7, 9 and 10; TIG Sites Appraisal.

Change necessary: Modify the strategy to prioritise the identified pipeline, existing employment areas, regeneration and previously developed land, and delete HHH19/HHH35. See MM-TIG-M7-01 to 03.

3.4 MIQ 7.18 - What evidence demonstrates that the quantity, type and location of new employment sites are sufficient to meet forecast needs?

TIG's answer: The evidence demonstrates sufficiency without HHH19 and HHH35; it does not demonstrate their necessity.

Reasoning...

- 3.4.1 The central quantitative evidence is B12 Table 7.3. The industrial requirement is 204,000 sqm against identified supply of 883,812 sqm. B12 paragraph 7.14 states that the supply outside the two largest locations is itself around 270,000 sqm and widely distributed, providing choice of area and site characteristics.
- 3.4.2 The Inspectors' requested schedule should identify which SA14 allocations are already counted in B12, which are additional, and why any additional allocation is required. On the present evidence, HHH19 and HHH35 are additions to an already sufficient supply.

Regulation 19 basis: TIG NPPF 11(b) Representation, Chapters 5, 7 and 10; TIG Sites Appraisal HHH19/HHH35.

Change necessary: Delete HHH19 and HHH35 and require a transparent reconciliation of Policy SA14 against B12. See EX-TIG-M7-04.

3.5 MIQ 7.19 - How were new employment sites selected and why are they the most appropriate locations compared with reasonable alternatives?

TIG's answer: The site-selection evidence does not provide an adequate comparative justification for HHH19 or HHH35.

Reasoning...

- 3.5.1 B22.1 describes a sequential site-selection process involving the LAA, SA, Regulation 18 representations, evidence base, policy objectives and professional judgement. It says the reasons for individual selection/rejection are in A3.3 Appendix J.

- 3.5.2 Appendix J gives HHH35 the generic reason that development would help deliver the Plan's vision and strategic objectives. HHH19 is selected because it is "capable of overcoming constraints". Neither reason explains why additional greenfield employment land is necessary when B12 concludes that existing supply already exceeds need, nor why those sites are preferable to relying first on the extensive committed and brownfield pipeline.
- 3.5.3 The SA identifies major negative effects for Policy SA14 on pollution and soil resources and records Grade 1 agricultural land at HHH19. TIG's Sites Appraisal identifies significant BMV loss at HHH19 and HHH35. A generic ability to overcome constraints does not demonstrate that a site is the most appropriate choice where no quantitative or qualitative shortfall requires it.

Regulation 19 basis: TIG Main Representation, sections 4.2.2 and 8.3; TIG NPPF 11(b) Representation, Chapter 5; TIG Sites Appraisal.

Change necessary: Delete HHH19 and HHH35. If the Council seeks their retention, provide a site-specific comparative justification against the reasonable alternative of meeting need from the existing supply and previously developed sites.

3.6 MIQ 7.21 - How will the necessary infrastructure for new employment sites be delivered in a timely manner?

TIG's answer: The Plan does not establish a sufficiently compelling infrastructure case for additional greenfield provision at HHH19 and HHH35.

Reasoning...

- 3.6.1 Policy SA14 seeks to manage HHH35 through late phasing and coordination with Frindsbury Peninsula relocation. This recognises, rather than removes, dependencies. MLP/ED20 also shows that strategic highway capacity and cumulative Local Plan effects at M2 Junction 1 remain matters requiring monitoring and further work.
- 3.6.2 Where B12 already identifies sufficient distributed supply, the Plan should meet need from existing, committed and previously developed sites before adding peripheral greenfield allocations with further infrastructure requirements.

Regulation 19 basis: TIG Main Representation, sections 4.4 and 8; TIG NPPF 11(b) Representation, Chapter 8.

Change necessary: Delete HHH19/HHH35 and align Policy SA14 phasing with demonstrable infrastructure capacity and employment need.

3.7 MIQ 7.22 - What flexibility exists if strategic employment allocations fail to come forward?

TIG's answer: B12 indicates that the employment strategy has substantial quantitative flexibility without HHH19 and HHH35.

Reasoning...

- 3.7.1 The identified industrial supply of 883,812 sqm is more than four times the 204,000 sqm minimum requirement. B12 states that the other sites apart from the two largest concentrations provide around 270,000 sqm and that the existing supply could accommodate higher growth.
- 3.7.2 This materially weakens any case for HHH19 and HHH35 as contingency allocations. Monitoring and review can respond if the existing pipeline delivers differently from current assumptions; uncertainty does not itself justify additional BMV greenfield land now.

Regulation 19 basis: TIG NPPF 11(b) Representation, Chapters 5 and 10; TIG Sites Appraisal.

Change necessary: Remove HHH19 and HHH35; rely on monitoring of the existing pipeline before identifying any further greenfield provision.

3.8 MIQ 7.49 - How does Policy T14 balance rural economic growth with protection of countryside, landscape, heritage and environmental designations?

TIG's answer: Policy T14 contains an appropriate principle, but the strategic employment allocations do not consistently apply it.

Reasoning...

- 3.8.1 TIG supports Policy T14's recognition that sustainable rural economic activity includes existing businesses, farm diversification and rural services. Importantly, T14 states that new employment development should not lead to significant loss of high-grade agricultural land and should demonstrate that other employment locations or land of lower agricultural value are not suitable.
- 3.8.2 That principle exposes the inconsistency in SA14. The Council's own ELNA identifies substantial alternative employment supply, while the SA records Grade 1 land at HHH19 and TIG's Sites Appraisal identifies significant BMV land at HHH19 and HHH35. The Plan should not apply a strong agricultural-land avoidance test to ordinary rural enterprise while simultaneously allocating large greenfield employment sites without demonstrating that existing supply is unsuitable.

Regulation 19 basis: TIG Main Representation, sections 4.2.2 and 4.4.2; TIG NPPF 11(b) Representation, Chapter 5; TIG Sites Appraisal.

Change necessary: Apply T14's avoidance principle consistently through deletion of HHH19 and HHH35 and through the brownfield-first amendment at MM-TIG-M7-03.

3.9 MIQ 7.51 - What role is the rural economy expected to play within the wider Economic Strategy?

TIG's answer: A positive role, but rural economic support should not be equated with large-scale greenfield industrialisation.

Reasoning...

- 3.9.1 A1 recognises that the Medway Council area's countryside contains farming, industry, service and community-focused activities and that rural and coastal areas provide ecosystem services, recreation and other value. TIG's Regulation 19 case likewise emphasised a prosperous rural economy and the continuing economic value of productive agricultural land.
- 3.9.2 Supporting farming, diversification, local services, tourism and appropriately scaled rural enterprise is compatible with that objective. Strategic loss of high-quality agricultural land is different, particularly where B12 does not demonstrate that HHH19 or HHH35 are necessary to meet assessed need.

Regulation 19 basis: TIG Main Representation, sections 4.2.2 and 4.4.2; TIG NPPF 11(b) Representation, Chapter 5.

Change necessary: Retain and strengthen the distinction between sustainable rural enterprise and strategic greenfield industrial allocations; delete HHH19/HHH35.

4. OVERALL CONCLUSION ON THIS MATTER

- 4.1 TIG supports local economic regeneration and necessary employment growth. B12 identifies a minimum industrial requirement of 204,000 sqm against 883,812 sqm of supply, concludes that there is no need to increase industrial supply and identifies no pressing qualitative need for further allocations. MedwayOne is identified as an attractive location and prime objective for general employment need.
- 4.2 In that context, HHH19 and HHH35, totalling 171,400 sqm, have not been justified. Appendix J gives only generic selection reasons, while the SA records significant soil, pollution and accessibility effects. Policy T14 itself says high-grade agricultural land should not be lost where other employment locations or lower-grade land are suitable.
- 4.3 TIG therefore considers the Matter 7 defect capable of focused Main Modification: delete HHH19 and HHH35, retain and prioritise the existing/committed and brownfield pipeline, and strengthen the brownfield-first sequencing. If, contrary to B12, the Council maintains that those greenfield allocations are essential and that their deletion would fundamentally recast the economic strategy, the Plan has not demonstrated why that strategy is justified. In that circumstance the Plan should not be adopted and should be withdrawn and re-prepared.

5. MAIN MODIFICATIONS / CHANGES SOUGHT

- 5.1 These changes are without prejudice to TIG's position at paragraph 4.3. For the purposes of this table, 'EX' denotes an examination action sought rather than proposed Main Modification wording.

Ref	Plan policy / text	Defect identified	Modification / change sought	Why necessary
MM-TIG-M7-01	Policy SA14 / HHH19 Deangate Retail Park (Flanders Farm)	14,400 sqm of employment floorspace is allocated on land containing Grade 1 agricultural land despite B12 finding no need to increase industrial supply and no pressing qualitative need for further allocations. It is also phased in years 1-5 notwithstanding Policy S12's brownfield-first approach.	Delete HHH19 from Policy SA14 and the Policies Map.	To make the strategy justified, internally coherent and consistent with the evidence base and agricultural-land avoidance principles.
MM-TIG-M7-02	Policy SA14 / HHH35 Kingsnorth Expansion Area	157,000 sqm of additional greenfield employment floorspace is not demonstrated necessary against B12's substantial supply and is tied to longer-term relocation and infrastructure considerations.	Delete HHH35 from Policy SA14 and the Policies Map, with future need addressed through monitoring and plan review.	Justified and effective; avoids unnecessary greenfield/BMV land take and infrastructure dependency.
MM-TIG-M7-03	Policies S12 and SA14 - brownfield-first sequencing	The stated brownfield-first principle is not fully translated into the allocation/phasing framework, particularly for HHH19.	Amend Policy S12/SA14 to state that additional greenfield employment land will not be released unless monitoring demonstrates that identified need cannot reasonably be met through existing employment areas, committed supply, previously developed land and regeneration opportunities.	To make the economic strategy effective and consistent with its evidence base.
EX-TIG-M7-04	Policy SA14 / B12 quantitative reconciliation	It is not transparent which SA14 allocations are included within B12 Table 7.3 and which are additional to the 883,812 sqm supply.	Require the Council's MIQ 7.18 schedule to reconcile every Policy SA14 allocation against B12, including use class, floorspace, planning status, whether counted in existing supply, access, phasing and delivery prospects, and provide a specific justification for any additional greenfield provision.	To demonstrate that the quantity and location of employment land are justified and effective.

6. TIG REGULATION 19 REPRESENTATIONS AND EXAMINATION DOCUMENTS REFERRED TO

Reference	Document	Where relevant
TIG Reg 19 E.37	TIG Main Representation	Rural economy, BMV agricultural land, economic growth, infrastructure, alternatives and requested removal/reduction of harmful Hoo Peninsula allocations.
TIG Reg 19 E.37	TIG NPPF 11(b) Representation	Chapters 5, 7-10: BMV agricultural land, alternatives, infrastructure and new employment allocations.
TIG Reg 19 E.37	TIG Sites Appraisal	HHH19, HHH35 and HHH36; distinction between new BMV-affecting employment land and brownfield/PDL employment redevelopment.
A1	Submission Medway Council Local Plan 2041	Sections 7.2-7.4 and 7.8; Policies S10, S12 and T14; section 14.15 and Policy SA14.
A3.3	Sustainability Appraisal Volume 3 of 3 - Appendices	Appendix J site selection/rejection; Appendix K Policy SA14 assessment.
B12	Employment Land Needs Assessment (February 2025)	Paras 7.10-7.16 and 8.5-8.16; Tables 7.2-7.3.
B22.1	Site Selection Topic Paper	Sections 2.1-2.5.
MLP/ED15	Phase 1 Matters, Issues and Questions	Matter 7.
MLP/ED20	Statement of Common Ground with National Highways	Section 2.2, particularly M2 Junction 1 and cumulative Local Plan impacts.

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
27 August 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.*