Medway Local Plan 2041 Examination

Matter 11 – Energy

Hearing Statement

Medway Council

Issues

- **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.**

Introduction

This Hearing Statement has been prepared in response to the Inspectors' Matters, Issues and Questions for Phase 2 of the Examination of the Medway Local Plan 2041.

The Council's answers are set out under each question raised by the Inspectors. References are given to the submitted Plan, examination documents, evidence base documents and statements of common ground where relevant.

For ease of navigation, this Hearing Statement includes bookmarks and a linked table of contents.

Where the Council considers modifications necessary to improve effectiveness, clarity or consistency with national policy, these are identified in this Hearing Statement.

Artificial Intelligence

Artificial Intelligence (AI) was used to assist in the preparation of this Hearing Statement.

Specifically, Microsoft 365 Copilot (GPT-based large language model) was used to assist with drafting, editing and refining text, improving structure and summarising planning policy and guidance.

The source material used by the AI system comprised publicly available planning documents and information provided by the Council's officers, including the Plan (ref: A1), submitted evidence base documents, the National Planning Policy Framework (2024), Planning Practice Guidance and the Inspectors' Matters, Issues and Questions.

AI was used solely as a drafting and editorial aid. All factual content, planning judgements, conclusions, references, quotations and positions presented in this Hearing Statement have been reviewed, checked and approved by the Council. The Council accepts full responsibility for the content of this submission.

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Questions

General

11.1 What evidence informs the energy strategy?

Council's response

11.1.1 Chapter 13 was prepared to recognise the important strategic role that Medway, and in particular Kingsnorth and the Isle of Grain, already performs in relation to energy generation, storage, transmission and related infrastructure.

11.1.2 Chapter 13 was informed by the established presence of significant energy infrastructure within Medway and the continued interest of energy providers in these locations. The policies were also informed by engagement with infrastructure providers during Plan preparation, including representations from National Grid, together with information contained within the Infrastructure Delivery Plan (IDP) (ref: B2, Chapter 3.4, PDF pages 39-45) regarding electricity and gas infrastructure.

11.1.3 The Council did not commission a specific Renewable Energy Study, Energy Strategy or Net Zero Strategy to support Chapter 13.

11.1.4 Whilst paragraphs 13.3.4 and 13.3.5 refer to the commissioning of initial feasibility studies, that work did not progress before the Plan was submitted; it did not inform the preparation of the submitted Plan and has not been relied upon as evidence supporting Policies S25 or T41.

11.1.5 At the time of writing, a Techno-Economic Feasibility and Detailed Project Design have been produced for Chatham, but the Council's internal review is ongoing. For the Hoo Peninsula, a Techno-Economic Feasibility has been produced, but the Detailed Project Design is being commissioned.

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

Council's response

11.2.1 The Plan supports projected energy demand arising from planned growth principally through Policies S24 and S25, the IDP and ongoing engagement with utility providers.

11.2.2 The IDP (ref: B2, Appendix, PDF pages 101-102) considers electricity and gas infrastructure requirements and records engagement with infrastructure providers, regarding the implications of the proposed scale and distribution of development .

11.2.3 The Council has shared housing trajectories, employment forecasts and spatial data with network providers to inform their future investment planning and network reinforcement programmes. The Plan also recognises the strategic role of Kingsnorth and the Isle of Grain in accommodating energy-related infrastructure and supports the provision and upgrading of utility infrastructure where required to meet the needs arising from development.

11.2.4 The Council therefore considers that the Plan provides a framework through which projected energy demand can be addressed through a combination of utility provider investment, network reinforcement and development-related infrastructure, whilst recognising that detailed infrastructure requirements and investment programmes will continue to evolve throughout the Plan period.

11.3 Have energy infrastructure providers confirmed capacity and investment requirements?

Council's response

11.3.1 For electricity distribution, UK Power Networks has not indicated any capacity constraints for the Plan. For gas infrastructure, Southern Gas Networks has not indicated any capacity constraints for the Plan.

Evidence base

- Infrastructure Delivery Plan (ref: B2)
- Viability Assessment (ref: B5)
- Council's Letter Regarding Statements of Common Ground (ref: MLP/ED19)

Explanation

11.3.2 In the Council's Letter Regarding Statements of Common Ground (ref: MLP/ED19), the Council noted two meetings with UK Power Networks to inform the IDP (ref: B2, PDF pages 41-43), which states "Although no new specific infrastructure has been identified UK Power Networks has estimated that there will be a cost of the £15-20m to cover reinforcement to the network. Reinforcement may include connections and some upgrades to the existing network." It is important to note that the Viability Assessment assumed 15% for 'other normal costs' and services (ref: B5, paragraph 7.11, PDF page 104). Subsequently, in July 2025, the Council shared its housing trajectory and employment phasing for the Plan with UK Power Networks as inputs to the 'Regional Planning Dashboard' and 'LAEP+ Planning Tool', which will facilitate ongoing collaboration on network capacity and investment.

11.3.3 In Summer 2025, the Council shared its housing trajectory and employment phasing for the Plan with Southern Gas Networks. The IDP (ref: B2: PDF pages 40-41) states: "Currently, capacity is available in the areas to be allocated for development. However, due the large level of development planned, it is possible that network

reinforcement would be required to fully support this. Whether and where any deficits may occur would be determined by the actual level of development at each of these sites. Medway Council has shared spatial data and a housing trajectory with SGN in Summer 2025 to inform SGN's emerging forecasts."

Conclusion

11.3.4 The evidence before the Examination does not indicate that utility providers have identified any critical capacity constraints that would prevent delivery of the scale and distribution of development proposed by the Plan. Instead, the position of the utility providers is that network reinforcement, upgrades and targeted investment will be required in some locations as growth comes forward.

11.3.5 The Council has engaged proactively with utility providers and continues to share housing trajectories, employment forecasts and spatial data to support infrastructure planning and investment programmes.

11.3.6 The Council therefore considers that the Plan is justified and effective, being supported by proportionate evidence and ongoing collaboration with utility providers. Furthermore, paragraph 28 of the NPPF recognises that plans come forward at different times and that there may be a degree of uncertainty regarding the future direction of infrastructure providers' plans. In this context, national policy does not require all infrastructure investment programmes to be fully designed, funded or implemented at the point of Plan adoption. The Council considers that there is a proper and proportionate basis to conclude that the necessary infrastructure can be planned and delivered alongside growth over the Plan period.

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

Council's response

11.4.1 The evidence indicates that some additional energy network reinforcement is likely to be required to support the scale of development proposed by the Plan. The IDP records that UK Power Networks has identified a need for network reinforcement and estimated costs of approximately £15–20 million, although no specific reinforcement projects had been identified at the time the IDP was prepared.

11.4.2 Similarly, the IDP records that Southern Gas Networks considers that existing capacity is available to serve planned growth, but that reinforcement may be required depending on the location, scale and timing of development.

11.4.3 Delivery of any necessary reinforcement will be led by the relevant utility providers through their investment and asset management programmes, informed by the housing trajectory, employment phasing and spatial data shared by the Council.

11.4.5 The Council therefore considers that network reinforcement requirements have been identified at a proportionate level for plan-making purposes and that mechanisms are in place to ensure that infrastructure providers can plan and deliver upgrades alongside development as the Plan is implemented.

11.5 How will delivery be monitored throughout the Plan period?

Council's response

11.5.1 Delivery will be monitored through a combination of the IDP, engagement with utility providers, the Council's Strategic Infrastructure Group, and the Authority Monitoring Report (AMR).

11.5.2 The IDP is a live document that will be updated periodically to reflect changes in energy demand, network capacity, infrastructure investment programmes and development phasing. The Council will continue to engage with infrastructure providers, including UK Power Networks, National Grid and Southern Gas Networks, to review capacity requirements and planned network reinforcement as development comes forward.

11.5.3 In addition, the submitted Monitoring Framework (ref: A14, PDF page 2) includes a specific indicator relating to renewable and low-carbon energy provision, namely the number of planning applications permitted for the generation of renewable or low-carbon energy.

11.5.4 Collectively, these mechanisms provide an appropriate framework for monitoring the effectiveness of the Plan's energy policies and the delivery of supporting energy infrastructure throughout the Plan period.

Policy S25: Energy Supply

11.6 Is Policy S25 solely concerned with renewable and low carbon energy, or would it cover all types of potential energy supply, such as liquid natural gas (LNG)?

Council's response

11.6.1 Policy S25 is intended to recognise Medway's strategic role in relation to energy infrastructure more broadly. However, as drafted, the policy is principally concerned with renewable and low carbon energy generation and production rather than the full spectrum of energy-related infrastructure.

11.7 Does Policy S25 concern all types of renewable and low carbon energy?

Council's response

11.7.1 Policy S25 is not intended to apply to all forms of renewable and low carbon energy development. The policy identifies Kingsnorth and the Isle of Grain as suitable locations for energy-related development because of their established role in accommodating strategic energy infrastructure, rather than as locations suitable for every type of renewable or low carbon energy technology.

11.7.2 For example, the policy does not identify suitable areas for technologies such as onshore wind or large-scale solar development across Medway. Instead, Policy S25 provides a framework for considering energy infrastructure proposals within the context of Medway's existing energy cluster and nationally significant energy infrastructure.

11.8 Does Policy S25 also cover the infrastructure associated with energy supply development, or solely the energy supply production itself?

Council's response

11.8.1 The Council considers that, as drafted, Policy S25 is principally concerned with energy generation and production, including renewable and low carbon energy development and low carbon hydrogen production. However, the Council recognises that energy developments often require significant supporting infrastructure, including electricity network infrastructure, substations, storage facilities, pipelines and grid connections. The submitted policy does not expressly state whether such associated infrastructure falls within its scope.

11.8.2 The intention of the policy is to support the strategic energy function of Kingsnorth and the Isle of Grain, and this may reasonably extend to infrastructure necessary to facilitate energy development. The Council would therefore support a Main Modification to clarify that Policy S25 applies both to energy generation and production facilities and to the associated infrastructure required for their operation and delivery.

11.9 Where Policy S25 (first paragraph) sets out where there are suitable locations for renewable and low carbon energy development, what evidence is this based on in terms of justifying this approach?

Council's response

11.9.1 Please see the Council's response to question 11.1.

11.10 Is Policy S25 (first paragraph) consistent with national policy where it goes onto state that proposals for such development will be supported if the potential adverse impacts are or can be made acceptable, rather than adverse impacts being addressed appropriately?

Council's response

11.10.1 The Council acknowledges that the wording of the first paragraph of Policy S25 differs from that used in paragraph 165(a) of the NPPF (2024). The intention of the policy was to ensure that potential adverse impacts, including cumulative landscape and visual impacts, are properly considered and mitigated where necessary. However, the Council accepts that the phrase "are or can be made acceptable" does not directly reflect the terminology used in national policy, which refers to adverse impacts being "addressed appropriately".

11.10.2 The Council would therefore support a Main Modification to align the wording of Policy S25 more closely with the NPPF (2024). Such a modification would improve consistency with national policy and provide greater clarity for applicants and decision-makers without altering the overall objective of supporting renewable and low carbon energy development in suitable locations.

11.11 Is Policy S25 consistent with national policy where it refers to the threshold for consideration under the Planning Act 2008 (paragraph 3), and why is this a consideration for the Plan?

Council's response

11.11.1 The Council acknowledges that the third paragraph of Policy S25 does not establish a planning policy requirement but instead describes the consenting arrangements that apply to certain energy projects under the Planning Act 2008. The Council accepts that these arrangements are established through legislation and national policy irrespective of whether they are referenced in the Local Plan.

11.11.2 Consequently, the paragraph adds limited value to the policy framework and is not necessary for development management purposes. The Council would therefore support a Main Modification to delete this paragraph. Such a modification would improve the clarity and effectiveness of Policy S25 by focusing it on the land use planning considerations relevant to energy development, whilst avoiding unnecessary repetition of statutory consenting processes.

11.12 Why does Policy S25 concern low carbon hydrogen (paragraph 4), noting there is no reference to it in the supporting text?

Council's response

11.12.1 The reference to low carbon hydrogen production was included in Policy S25 in recognition of opportunities being explored during Plan preparation, including potential hydrogen-related projects in Medway's established energy cluster. However, the Council acknowledges that there is no supporting explanation within the reasoned justification and no specific evidence base demonstrating a need for a standalone policy criterion relating to low carbon hydrogen production. Furthermore, compliance

with relevant safety regulations and national emissions standards would be required through other regulatory regimes regardless of the provisions of the Local Plan.

11.12.2 The Council therefore considers that this part of Policy S25 adds limited value as a development plan policy and would support a Main Modification to delete the fourth paragraph. This would improve the clarity and effectiveness of the policy whilst retaining its broader objectives regarding energy development.

11.13 If Policy S25 is intended to deal with LNG, why are there not specific criteria to deal with it?

Council's response

11.13.1 The Council does not consider that Policy S25 is intended to provide a planning framework for LNG specifically. The references to LNG within the supporting text are intended as contextual information regarding the established role of the Isle of Grain as a nationally significant location for energy generation, storage and import infrastructure, rather than as justification for a specific LNG policy. There is no reference to LNG within Policy S25 itself and the policy contains no criteria directed towards LNG development. The Council therefore considers that the policy should not be interpreted as a specific policy for LNG facilities.

11.13.2 Furthermore, major LNG proposals may constitute Nationally Significant Infrastructure Projects and be considered through separate consenting regimes, including the development consent process where applicable. Accordingly, the Council does not consider that additional LNG-specific criteria are required within Policy S25. However, if the references to LNG create ambiguity regarding the purpose of the policy, the Council would be open to modifications to the supporting text to clarify that these references are descriptive rather than policy requirements.

11.14 What evidence specifically informs and supports Policy S25 and is it proportionate?

Council's response

11.14.1 Please see the Council's response to question 11.1.

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

Council's response

11.15.1 Please see the Council's response to question 11.2.

11.16 How does Policy S25 contribute towards national net-zero objectives?

Council's response

11.16.1 Policy S25 contributes towards national net-zero objectives by supporting renewable and low carbon energy development in locations that already perform a strategic energy function, namely Kingsnorth and the Isle of Grain. In doing so, the policy supports the delivery of renewable and low carbon energy infrastructure and community-led renewable energy initiatives, which are consistent with paragraph 161 of the NPPF (2024), which states that the planning system should support the transition to net zero by 2050 and support renewable and low carbon energy and associated infrastructure.

11.16.2 Policy S25 was not developed from a standalone net-zero or renewable energy strategy and does not seek to quantify its contribution towards carbon reduction targets. Rather, its contribution is through providing positive support for renewable and low carbon energy development in appropriate locations and recognising the strategic role of Medway's existing energy cluster. The Council would be open to modifications to the supporting text to explain this relationship to national net-zero objectives more clearly.

Policy T41: Heat Networks

11.17 Is there evidence to demonstrate that such an approach is viable and so justified for the types of development which Policy T41 specifies?

Council's response

11.17.1 The Council's Viability Assessment (ref: B5, paragraphs 8.140 to 8.143, PDF pages paragraphs 8.140 to 8.143, PDF pages 146-147) considered the implications of district heating and heat networks and noted that such systems can involve additional costs associated with central heat plant infrastructure, distribution networks and metering. The assessment also recorded that the additional costs of district heating were not included within the base viability appraisals because the submitted Plan does not mandate the provision of heat networks. Instead, Policy T41 requires applicants to follow a heat network hierarchy and allows departure from that hierarchy where it can be demonstrated that connection to, or provision of, a heat network is not feasible or viable.

11.17.2 The Council therefore considers that Policy T41 is consistent with the evidence available at the plan-making stage, as it does not assume that heat networks will be viable in all circumstances. Rather, viability and feasibility are intended to be assessed on a site-by-site basis having regard to the type, scale, location and design of the proposed development. Accordingly, the Council considers that the policy provides a proportionate and flexible framework for promoting heat networks whilst recognising that delivery may not be achievable in every case.

11.18 Where Policy T41 refers to development that is not feasible, what does this mean (apart from viability)?

Council's response

11.18.1 Within the context of Policy T41, feasibility is broader than viability and relates to whether a heat network can be practically delivered and operated, having regard to the characteristics of the development and its location. This may include considerations such as the availability and proximity of suitable heat sources, the scale and density of development, anticipated heat demand, the ability to connect to an existing network, opportunities to link with neighbouring developments, land and infrastructure constraints, ground conditions, engineering requirements and any other technical matters that may affect implementation.

11.18.2 The Council considers that a proposal may be demonstrated to be unfeasible where there are technical, physical, operational or infrastructure constraints that prevent the effective delivery of a heat network, even where viability is not the primary issue.

11.18.3 The Council would support a Main Modification to the supporting text to clarify the distinction between viability and feasibility and thereby improve the effectiveness of the policy.

11.19 Is there an update where there is reference to commissioning initial feasibility studies (paragraph 13.3.5) and does this impact on the approach which Policy T41 takes?

Council's response

11.19.1 As noted in the Council's response to question 11.1, whilst paragraphs 13.3.4 and 13.3.5 refer to the commissioning of initial feasibility studies, that work did not progress before the Plan was submitted; it did not inform the preparation of the submitted Plan and has not been relied upon as evidence supporting Policy T41.

11.19.2 At the time of writing, a Techno-Economic Feasibility and Detailed Project Design have been produced for Chatham, but the Council's internal review is ongoing. For the Hoo Peninsula, a Techno-Economic Feasibility has been produced, but the Detailed Project Design is being commissioned.

11.20 What evidece supports Policy T41 and demonstrates that heat networks are feasible within Medway?

Council's response

11.20.1 No completed heat network feasibility study informed Policy T41. The policy was prepared as a positive framework for considering heat network opportunities rather than in reliance on detailed evidence demonstrating delivery in specific locations.

11.21 Which growth areas and locations are expected to support heat networks?

Council's response

11.21.1 Chatham and Strood town centres and Hoo St Werburgh may support heat networks. In particular, 'Land either side of Roper's Lane, Hoo St Werburgh' (HHH22 & HHH31), comprising 1,880 homes within the Plan period and an additional 1,320 homes after 2041, may benefit from excess heat generation from the nearby 'MedwayOne, Former Kingsnorth Power Station' (HHH36). This reflects the findings of post-submission work currently under review by the Council and is not evidence that informed the submitted Plan.

11.22 What anchor loads have been identified?

Council's response

11.22.1 Please see the Council's response to questions 11.19 and 11.21.

11.23 What delivery mechanisms have been identified and have alternatives been considered?

Council's response

11.23.1 At the time of writing, a Techno-Economic Feasibility and Detailed Project Design have been completed for Chatham, although the Council's internal review of this work remains ongoing. For the Hoo Peninsula, a Techno-Economic Feasibility Assessment has been completed, but the Detailed Project Design is currently being commissioned. Consequently, the Council is not yet able to identify preferred delivery mechanisms or to draw firm conclusions regarding alternative delivery options. The Council acknowledges that Policy T41 was prepared before this work had been completed and therefore does not rely upon the outcomes of these studies.

11.23.2 The detailed delivery mechanisms for heat networks, including potential ownership, operation, funding and procurement arrangements, are matters that are more appropriately determined through project-level feasibility and design work than through the Local Plan process.

11.24 How does Policy T41 respond to changing technologies and is it sufficiently flexible to accommodate them?

Council's response

11.24.1 The Council acknowledges that Policy T41 is focused specifically on heat networks and does not adopt a technology-neutral approach to low-carbon heat. The policy requires qualifying developments to follow a heat network hierarchy and only permits alternative forms of heating where it has been demonstrated that the relevant heat network options are not feasible or viable.

11.24.2 The policy does not expressly address the wider range of decentralised, renewable and low-carbon energy supply systems referred to in paragraph 165c of the NPPF (2024). Whilst the policy is not technology-neutral, it contains a limited degree of flexibility because it allows applicants to demonstrate that heat network solutions are not feasible or viable and, in such circumstances, permits alternative forms of heating that comply with the relevant Building Regulations, although these alternatives are not otherwise specified by the policy.

11.24.3 The Council acknowledges that technological change may occur over the Plan period and would support a main modification to broaden the supporting text, and if necessary the policy wording, to make clear that emerging decentralised, renewable and low-carbon energy technologies may also be considered where they achieve the objectives of reducing carbon emissions and supporting the transition to net zero.

11.25 Have viability implications been adequately assessed and tested?

Council's response

11.25.1 Please see the Council's response to question 11.17.

11.26 How will implementation be secured through the development management process?

Council's response

11.26.1 The role of Policy T41 is to establish a strategic framework for considering heat network opportunities through the development management process. Implementation would therefore be secured by requiring qualifying development proposals to demonstrate how they have applied the heat network hierarchy and to justify any departure from that hierarchy on the grounds of feasibility or viability. The detailed design, procurement, funding, ownership and operation of any heat network are matters that would be addressed through project-level feasibility work and subsequent implementation arrangements, rather than through the Local Plan itself.

Renewable and Low Carbon Energy

11.27 How has the potential for renewable and low carbon energy been assessed?

Council's response

11.27.1 Please see the Council's response to question 11.1

11.28 What opportunities exist for solar, wind, hydrogen and other renewable technologies within Medway and how does the Plan deliver on these?

Council's response

11.28.1 Please see the Council's response to questions 11.1 and 11.7.

11.29 How does the Plan balance renewable and low carbon energy delivery against environmental constraints?

Council's response

11.29.1 The Plan seeks to support energy infrastructure whilst ensuring that environmental constraints are appropriately considered through the development management process. As noted in the Council's response to question 11.10, the Council would support modifications to align the wording of Policy S25 more closely with paragraph 165a of the NPPF (2024), which refers to ensuring that adverse impacts are addressed appropriately.

11.29.2 The Sustainability Appraisal (ref: A3.3, H.12.1.4, PDF page 428) also recognised that future energy developments may be subject to Habitats Regulations Assessment which would depend on their nature, location and potential effects on designated sites.

11.29.3 More generally, energy proposals would be assessed against the wider policies of the Plan relating to biodiversity, landscape, heritage, flood risk, water resources and environmental protection.

11.30 Does the policy framework for renewable and low carbon energy within the Plan provide sufficient flexibility to respond to future technological change?

Council's response

11.30.1 Please see the Council's response to question 11.24.

11.31 How will cumulative impacts relating to energy be assessed?

Council's response

11.31.1 Please see the Council's response to question 11.10 and 11.29.