

Schedule of responses to public consultation for the Lodge Hill Development Brief

Public consultation on the draft Lodge Hill Development Brief took place over a six week period from 30 August to 14 October 2011.

84 formal written responses were received, in addition one person made use of the available webchat facility. Those responses are summarised in the table below. For ease of reference, they have been broken down according to the section of the draft Brief to which they relate.

All comments on the draft Development Brief have been considered and the table below contains officer's responses to those comments together with recommendations for where changes should be made to the Brief as a result.

General comments

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
A country park/nature reserve/outdoor centre should be provided to benefit existing Peninsula residents	The landscape framework for the site as set out in the Brief demonstrates potential for a large-scale public park facility and requires landscape proposals to reflect the character of the local area; this suggests that a countryside park may be the most appropriate form of provision in this area. The developer will need to provide details on provision of natural greenspace in the context of ecological constraints of the site which will shape facilities provided within this area and may well require some nature conservation areas as well.	Add reference to potential for countryside park in landscape section of brief.	Ms C Bucknall, Ms H Harrison, Mr & Mrs Barclay, M Bannar-Martin, Mrs E Slatcher, Mrs D Welch, Frindsbury and Wainscott Residents Association, Cllr C Irvine, Mr S Bailey, Ms J Coppin, Mr M Skudder
Current central government planning policy means that objective to prevent development merging with surrounding communities and main urban area will be unachievable	This is one of the key objectives of the draft Development Brief and should remain so. Any proposals outside of the Development Brief area would have to be considered on their individual merits; government policy would be relevant but is not the only consideration.	Update references to important gaps to reflect publication of draft/final NPPF	Lt Col (Retd) Beringer, Mr & Mrs Davis, Mrs Beringer, Mr M Skudder
LH is not a true brownfield site	The definition of previously developed land (brownfield) includes the curtilages of existing	None necessary	Lt Col (Retd) Beringer, Mr C Barr, Mr & Mrs Davis, G & M

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	buildings therefore the majority of the site is brownfield. However, this does not mean that all of the site should be built on and the draft Development Brief gives strong support for the retention of the existing landscape features that make the site appear green. Much of this will be publicly accessible, which is an improvement on the existing situation.		Russell, Mrs Beringer, Mr M Skudder
Generally opposed to the development	Noted, but the principle of the site's development has been established in higher-level policy documents.	None necessary	Lt Col (Retd) Beringer, Mr N Latimer, P Lee, Mr & Mrs Barclay, Mr & Mrs Davis, Mrs Beringer, Mr A Baker, Cllr C Irvine, Medway Countryside Forum, Mr M Skudder
Hoo Peninsula has already suffered from a disproportionately large amount of development	Noted, but the principle of the site's development has been established in higher-level policy documents.	None necessary	Lt Col (Retd) Beringer, Ms S Russell, Mr M Bucknall (2), Mr M Bucknall (1), Ms A Bucknall, Mr & Mrs Davis, Ms W White, Mrs Beringer, Mr M Skudder
Compliance with various legislative requirements regarding access and water service for fire engines will be required	Noted, but this is too detailed for inclusion in the Development Brief and would be considered through the planning application and building regulations processes.	None necessary	Kent Fire & Rescue
Welcome the proposal for a country hotel as would provide good amenities	Noted	None necessary	Ms H Woolmington
5,000 houses is too many, would prefer a reduction in numbers (e.g. around 2,000/2,500)	Noted, but the allocated capacity of the site has been established in higher-level policy documents.	None necessary	Ms C Bucknall, Mr C Barr, Ms S Russell, Mrs F Smitherman, Mrs S Whitebread, Mrs L Bannar-Martin, Mr M White, Frindsbury and Wainscott Residents Association, Cllr C Irvine, Mr S Bailey, Medway Countryside Forum, Mr & Mrs Stutely, Cllr Tony Watson
30% affordable housing is too high especially if all social housing and will	30% affordable housing is the target for all of rural Medway (where there is sufficient viability	None necessary	Ms C Bucknall

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make Lodge Hill a drain on the local economy instead of contributing to it	to support it). It relates to a variety of tenures including intermediate housing, and therefore it is not considered that this will cause Lodge Hill to be a drain on the local economy.		
Don't believe there is a need for more housing/What evidence is there of need for the development	Noted, but the principle of the site's development has been established in higher-level policy documents, which considered issues of housing need.	None necessary	Hoo Parish Council, Mrs S Whitebread, Ms D West, Mr M Bucknall (2), Mr M Bucknall (1), Ms A Bucknall, M Bannar-Martin, Ms W White, Mr S Bailey
Development Brief should set a maximum level of development	Any maximum level of development set in the Brief would be arbitrary and subject to challenge. The final capacity of the site will be determined through the planning application process where the form and implications of the final proposals can be considered in more detail.	None necessary	Hoo Parish Council
Medway will be left to bear the cost of infrastructure to support the development sooner or later	The Brief sets out that the developer must be responsible for funding and/or providing the infrastructure required to support the development. In many cases this will include ongoing maintenance, whether through the community organisation or otherwise.	Add note to relevant sections relating to ongoing maintenance.	Hoo Parish Council, Mrs D Welch
Opposed to development on green land	Noted, but the majority of Lodge Hill is a brownfield site and the Brief gives strong support for the retention of the existing landscape features that make the site appear green. Much of this will be publicly accessible, which is an improvement on the existing situation.	None necessary	Mr N Latimer, Mrs L Bannar-Martin, M Bannar-Martin, Ms W White, P & V Richardson, Mrs M Cripps, Mr R Cripps, Medway Countryside Forum, Mr M Skudder
No need for development as others in area are struggling to sell	Noted, but the principle of the site's development has been established in higher-level policy documents, which considered issues of housing need. It is accepted that current market conditions are affecting house building but the overall need has not changed.	None necessary	Mr N Latimer

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Medway Towns are already overcrowded	Noted, but the principle of the site's development has been established in higher-level policy documents.	None necessary	Mr N Latimer
Concern regarding services and infrastructure (will not cope, already struggles)	It is acknowledged that many existing services and infrastructure on the Peninsula do not have the capacity to cope with additional development on this scale, which is why the Brief sets out a requirement for the developer to be responsible for improvements to existing services and provision of new where required. The final level and distribution of investment will be determined through the planning application process and based on the identified needs and impacts of the development.	None necessary	Mr & Mrs Barclay, Ms S Russell, Mrs F Smitherman, Mrs S Whitebread, Ms D West, Mr & Mrs Hillman, Mrs L Bannar-Martin, Mr M Bucknall (2), Mr M Bucknall (1), Ms A Bucknall, Mr M White, Cllr C Irvine, Mr M Skudder, Cllr Tristan Osborne
Regeneration of urban sites should be prioritised over this development	The principle of the site's development has been established in higher-level policy documents, and is not an alternative to regeneration of urban sites but to meet the additional demand which urban sites cannot accommodate, including the need for a higher proportion of family housing	None necessary	Mrs L Bannar-Martin, M Bannar-Martin, Mrs S Ahmad, Ms J Coppin, Frindsbury and Wainscott Residents Association
Alternative uses for the site should be considered (e.g. healthy living centre)	Noted, but the principle of the site's development has been established in higher-level policy documents.	None necessary	Lt Col (Retd) Beringer, Mrs E Slatcher, Mr & Mrs Davis
Many hazardous installations on the Peninsula	The Health and Safety Executive (HSE) sets consultation zones around hazardous installations where they may have implications for development. There is only one consultation zone which affects a very small proportion of the Lodge Hill site (for a pipeline running in close proximity) and the HSE will advise on the appropriateness of any proposals in this area through the planning application process.	Add reference to HSE consultation zone in delivery section.	Mrs D Welch
Loss of agricultural land	A very small proportion of the site is Grade 3 agricultural land (the highest quality is Grades 1, 2 and 3a), and some of this would be within the open space areas rather than being built on.	None necessary	Mrs D Welch

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	The loss of agricultural land was one of the issues considered when the site was allocated for development in higher-level policy documents and was not felt to outweigh the reasons for the allocation.		
Proposals should include a working farm for education purposes	There would be no policy justification for insisting on this, but should a proposal come forward it would be considered on its own merits and might fit well with the sustainable emphasis of the development as local food production.	None necessary	Mrs D Welch
Development Brief should have a Habitat Regulations Assessment (and not rely on that for the Core Strategy)	A full draft of the HRA for the Core Strategy has been shared with the relevant nature conservation groups since these comments were received, and it is understood that they are now satisfied it is sufficient to comply with the Regulations. There will however, be a required for a project-specific HRA/Appropriate Assessment for any outline planning application.	Update relevant section of the Brief to refer to the latest situation	Natural England, KWT, RSPB
The natural environment should be better reflected in the vision	The vision for the site is set in the draft Core Strategy and can be reviewed as part of that document's processing.	Subject to review of Core Strategy.	Natural England, KWT
How much influence will Medway Council have over the development if proposals come in ahead of the Core Strategy?	This concern is one of the main reasons for progressing the Development Brief ahead of the Core Strategy, in order to provide a basis for consideration of any planning applications that come in at an early stage (as indeed is now the case).	None necessary	High Halstow Parish Council
Concerns that development may expand beyond current boundaries	Any proposals outside of the Development Brief area would have to be considered on their individual merits. However, ongoing general protection for open countryside is set out in higher-level policy documents and ensuring the separation between Lodge Hill and surrounding settlements is a key principle of the Brief.	Update references to important gaps to reflect subsequent policy changes such as publication of draft/final NPPF	High Halstow Parish Council, Cllr C Irvine
Development should not be considered ahead of the Core Strategy	The LPA is obliged to consider planning applications whenever they are submitted, but the status of any emerging policy such as the	None necessary	Frindsbury and Wainscott Residents Association, Medway Countryside Forum

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	Core Strategy will be a material consideration at that point.		
Concerned re. lack of consultation	The consultation on the draft Development Brief followed the guidelines set out in the Council's adopted Statement of Community Involvement, and it is intended that ongoing further engagement will be carried out over the lifetime of the project.	None necessary	Cllr C Irvine, Cllr Tristan Osborne, Cllr Tony Watson
Support the vision for the development	Noted	None necessary	RSPB
Focus should be on making Lodge Hill a nice place to live, not on housing numbers	The broad capacity of this site including housing numbers has been established through high-level policy documents. However, it is agreed that quality of life for future occupants should be a key consideration for future proposals and the Development Brief does set out measures to ensure the success of the development in this respect.	None necessary	Mr S Bailey
There needs to be more detail on transport, service and infrastructure provision than currently provided in the Brief	It is not possible for the Brief to go into too much detail as the exact form of development that will come forward is not yet known, and it must remain relevant for the 15-20 year lifespan of the development. The Brief's role is to set a framework against which the more detailed information can be considered at planning application stage.	None necessary	Mr & Mrs Stutely, Frindsbury and Wainscott Residents Association
Vision for Lodge Hill is not precise	The vision for the site is set in the draft Core Strategy. It is deliberately a broad, overarching vision as is appropriate to the strategic level of that document. The Brief is intended to supply the next level of detail on how that vision can be achieved.	None necessary	Cllr Tony Watson
Don't think that Development Brief correctly understands rural life	The specific example given relates to use of terms such as "clusters" and "hubs" in relation to rural services, so this may relate to a lack of understanding of the terminology used in the Brief. Where more specific concerns have been raised in other consultation responses they	See specific concerns raised elsewhere in this document. Also review wording of relevant sections of the Brief to ensure Plain English is used as far as	Cllr Tony Watson

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	have been considered separately in this response and the Brief will be revised where appropriate.	possible while retaining the precise meaning.	
Why does development need to take the form of a new town?	The principle of the site's development has been established in higher-level policy documents.	None necessary	Cllr Tony Watson
Medway Council does not seem to value its rural areas	Opinion noted. A key objective of the Brief is to consider how a larger-scale settlement like Lodge Hill should relate to the surrounding countryside and smaller settlements while maintaining their rural character. It should also be noted that other planning policy documents address wider rural issues, including a number of policies in the draft Core Strategy.	None necessary	Cllr Tony Watson
Feel the Brief is longer and more prescriptive than necessary, which may limit its longer term resilience.	Lodge Hill is a complex site with many issues that must be taken into account by the Brief; this makes it difficult to make the document much shorter. The principles and guidance in the Brief seek to balance the long-term nature of the development with the need to set out principles for development at this stage and are not felt to be overly prescriptive in general.	See responses to specific comments.	Land Securities
Brief should acknowledge that detailed applications will be measured against the outline consent, not the Brief.	This is incorrect; although the outline permission will set key parameters for the site, the Brief will continue to be a material consideration when subsequent detailed applications are submitted and considered.	None necessary	Land Securities
A Development Brief should not contain "policies" but guidance or key principles.	Agreed	Amend wording of Brief to refer to key principles rather than "policies"	Land Securities
Seek clarification of various points of fact in the introduction	Noted	Amend wording relating to site ownership, listing status and evidence base to reflect current situation	Land Securities
Don't consider that it is the role of the Brief to address impact; this is for the planning application process	This point is not accepted; while the planning application process will have to consider the impact of specific proposals in more detail, the guidance contained within the Brief must be	None necessary	Land Securities

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	based on an understanding of the likely impacts of the development.		
Some elements of the text read overly negatively (e.g. housing, community facilities, ecology) and should be reworded to reflect the opportunities that Lodge Hill represents.	The opportunities that the development provides are acknowledged but at the same time the Brief cannot ignore the risk of detrimental impacts, and must strike a balance between the two.	None necessary	Land Securities

Community (Chapter 2)

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Medway Hospital is over-stretched and this will be exacerbated by the increase in population, leading to longer waiting times etc.	The housing growth figures in the Core Strategy include the proposed development at Lodge Hill. The PCT have raised no objection to these and have also been consulted on infrastructure planning to support that document.	None necessary	Lt Col (Retd) Beringer, Ms H Harrison, Mr N Latimer, Mr C Barr, Ms S Russell, Mrs E Slatcher, Mr & Mrs Davis, Mrs D Welch, G & M Russell, Mrs Beringer, Cllr C Irvine, Mrs M Cripps, Mr R Cripps, Mr M Skudder, Cllr Tony Watson
Existing health services on the Peninsula are over-stretched and this will be exacerbated	The developer is required to provide the facilities needed to support the new population - the draft Development Brief identifies a need for a health centre with space for 5-9 GPs and potential for additional health services as part of this.	None necessary	Lt Col (Retd) Beringer, Mr N Latimer, Mr & Mrs Davis, Mrs D Welch, G & M Russell, Mrs Beringer, Cllr C Irvine, Mrs M Cripps, Mr R Cripps, Mr M Skudder
Existing education provision on the Peninsula will not be able to cope with the increased population	The developer is required to provide the facilities needed to support the new population - the draft Development Brief identifies a need for 3 primary schools and a secondary school as part of this. It is acknowledged that the timing of the secondary school will be later in the development which makes its relationship with Hundred of Hoo Academy complicated - consideration will need to be given to interim arrangements.	Add note/comment to Table 2.1 concerning interim arrangements for secondary education.	Lt Col (Retd) Beringer, Mr N Latimer, Mr & Mrs Davis, Mrs Beringer, Mr M Skudder, Cllr Tony Watson

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
No provision made for C of E or any other faith	It is not the LPA's role to determine what faith provision should be made for a new community, however we recognise the benefits for creating a sense of community that a place of worship can provide, and the draft Development Brief does state that space should be made available for this (as part of the multi-use community facilities) should demand be identified.	None necessary	Lt Col (Retd) Beringer, Mr & Mrs Davis, Mrs D Welch, Mrs Beringer, Cllr C Irvine, Mr M Skudder, Cllr Tony Watson
If required facilities etc. are provided, the drain on finances will impact on existing villages who will become poor relations	Funding for the facilities and infrastructure to support the development will be the responsibility of the developer and will not impact on the available funding for existing facilities, which is drawn from other sources.	None necessary	Lt Col (Retd) Beringer, Mr & Mrs Davis, Mrs Beringer, Mr M Skudder
Natural green space acts as a lung for surrounding areas and developing it will be detrimental to the health of nearby communities	The draft Development Brief gives strong support for the retention of significant green areas within the site, and it will remain surrounded by large tracts of open countryside. Accordingly it is not considered that this will be an issue.	None necessary	Lt Col (Retd) Beringer, Mrs F Smitherman, Mrs S Whitebread, Mr & Mrs Davis, Mrs Beringer, Cllr C Irvine, Mr M Skudder
Upgrades to existing facilities should include Hoo swimming pool	The Development Brief establishes the principle of meeting some of the development's needs by investment in existing facilities. Hoo pool is a facility where this may be appropriate, but the final distribution of investment will be determined through the planning application process and based on the identified needs and impacts of the development.	Add reference to Hoo pool in section 2.28.	Ms H Woolmington
Will there be funding for extra police?	Funding for police forces is a central government issue and therefore beyond the scope of the Development Brief. However, the Brief does recommend that facilities on site are provided as part of the community provision.	None	Ms H Harrison, Mrs L Bannar-Martin
Integrating the existing community will be difficult as it is already very diverse	Community is a crucial part of making sure Lodge Hill is sustainable, so this aim should remain, but the challenges in achieving it are appreciated.	None necessary	Hoo Parish Council

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Agree that affordable housing should be mixed in with the development. There needs to be some monitoring of delivery to avoid large single-type areas.	Noted	None	Hoo Parish Council
Affordable and specialist housing should give priority to the existing local community	It is standard practice for the Council to have a nominations agreement and/or lettings plan for all affordable housing to be delivered and this can be used to give priority to local people; however, the Council does operate choice based lettings which means that anyone with a connection to Medway is eligible to apply for properties. The amount of affordable housing to be delivered on Lodge Hill is likely to be more than needed to meet the needs of the immediate local community (i.e. Chattenden and neighbouring villages) in any case. The same consideration would apply to specialist housing if it is delivered as affordable, but if it is delivered as a private facility, the Council would have no more control than for ordinary market housing.	Add reference to need for lettings plan to be agreed for affordable housing.	Hoo Parish Council
Agrees that developer must be responsible for meeting needs of the development - without putting further strain on neighbouring villages	Noted	None	Hoo Parish Council
Investment in existing facilities should include contributions towards village halls and play areas in neighbouring villages	The Development Brief establishes the principle of meeting some of the development's needs by investment in existing facilities. The final distribution of investment will be determined through the planning application process and based on the identified needs and impacts of the development	None necessary	Hoo Parish Council
Parish Councils should have full role in community development, prior to any Trust being established	Any proposal to establish a Trust (or similar alternative) should be complementary to the existing and future role of parish council(s).	Clarify references to potential Trust in sections 2.45 – 2.51 to reflect ongoing role for parish council(s)	Hoo Parish Council, Cllr Tony Watson, Mr R Sands

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Measures must be put in place to protect existing facilities and status of Hoo St Werburgh - particularly retail	The risk of undermining facilities in neighbouring villages, including Hoo, is acknowledged and the Brief requires consideration and assessment of any impacts, particularly for retail uses. While facilities at Lodge Hill will clearly be available to other residents of the Peninsula, and the population level should support a greater scale or range of services that currently available, the intention is not to encourage “over-provision” that would divert trade from other local areas. The Brief specifies that efforts should be made to ensure that provision at Lodge Hill is complementary to that in existing villages.	Clarify relevant sections to be clear that “over-provision” of services is not sought.	Hoo Parish Council, Cllr Tony Watson
Will increase pressure to find additional landfill sites	The Council has wider plans and policies to reduce the amount of waste being sent to landfill, but in respect of the proportion for which this is the only option the proposed housing growth in Medway has already been taken into account to inform the relevant policy in the draft Core Strategy.	None necessary	Mr N Latimer
Provision of services at Lodge Hill will undermine existing village provision	The risk of undermining facilities in neighbouring villages is acknowledged and the Brief requires consideration and assessment of any impacts. While facilities at Lodge Hill will clearly be available to other residents of the Peninsula, and the population level should support a greater scale or range of services that currently available, the intention is not to encourage “over-provision” that would divert trade from other local areas. The Brief specifies that efforts should be made to ensure that provision at Lodge Hill is complementary to that in existing villages.	Clarify relevant sections to be clear that “over-provision” of services is not sought.	Dickens Country Protection Society, Ms S Russell, Mrs D Welch, Ms W White, High Halstow Parish Council, Cllr C Irvine, Cllr Tony Watson
The Brief should specify the need for contributions towards Medway's Great Lines Heritage Park	It is not the role of the Development Brief to determine in detail the s.106 requirements of the development as this will be dealt with through the planning application process, based	None necessary	Chatham World Heritage Steering Group

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	on the identified needs and impacts of the development.		
Housing at Lodge Hill will be beyond the financial means of local people	The price of housing is controlled by the market and not something that the LPA can influence, however Lodge Hill will be required to provide affordable housing including intermediate housing which is often suitable for first time buyers struggling to get onto the property ladder.	None necessary	Mrs D Welch
The proposed access arrangements at Dux Court Road will make the existing bowls club and Deangate Ridge Sports Centre unviable through loss of parking	It is recognised that these are valued local facilities and development that undermines their role will not be supported. The final details of access in this area will be determined through the planning application process and impacts on the existing sports facilities will be considered at that time. Any detrimental impact will need to be mitigated, for example through re-provision of parking if it is lost.	Add reference to access section of Transport chapter regarding impact on existing facilities from new access arrangements in this area.	Mr J Allen
The proposals do not create any benefits for existing villages	It is considered that there will be benefits to existing communities; the Brief promotes investment in existing facilities as well as provision of new on-site facilities, and considerable investment in infrastructure is also required. All of this will be available to existing communities as well as residents of Lodge Hill. There is potential to improve the overall sustainability of the Hoo Peninsula in terms of services and the balance between population and employment.	None necessary	Mrs S Ahmad, Cllr C Irvine
Agree that family housing including executive homes should predominate	Noted	None necessary	London & Quadrant Housing Association
The proportion of flats should be kept to an absolute minimum as there is limited demand in this area	Noted. This may be most relevant in early phases, as demand is likely to change as Lodge Hill develops and over the 15-20 development timescale.	None necessary	London & Quadrant Housing Association
Bungalows should be provided	Agreed that bungalows would form part of a comprehensive housing mix as required by the	Add reference to bungalows in discussion of	London & Quadrant Housing Association

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	Development Brief, and help to create an inclusive community.	housing mix, in sections 2.5 – 2.6.	
Support aim to meet Lifetime Homes standards	Noted	None necessary	London & Quadrant Housing Association
Support affordable housing target and split	Noted	None necessary	London & Quadrant Housing Association
Limited demand for intermediate housing in the area at present but may improve once facilities are provided as part of development	Noted, but intermediate housing is a key part of the overall housing mix to create an inclusive community and therefore the target split should remain. In a similar situation on St Marys Island the market did not exist prior to development but has now proved to be very successful.	None	London & Quadrant Housing Association
Council should be non-prescriptive in definition of intermediate affordable housing to ensure flexibility to deliver	Agreed	Amend reference to intermediate housing in section 2.16 to confirm flexibility.	London & Quadrant Housing Association
Welcome the opportunity to work with the Council to integrate existing community	Noted	None necessary	London & Quadrant Housing Association
Support the provision of a Community Trust or similar - has been successful on other large-scale developments	Noted	None necessary	London & Quadrant Housing Association
Existing Chattenden Primary School is in a dangerous place close to a busy junction which may get busier with the development - should be re-sited.	The potential for relocating the school to create a closer relationship between community uses at Chattenden is noted in the Development Brief; there are a number of potential difficulties if it was to be expanded on its current site. However the Development Brief should not specify this as the only acceptable solution as there may be factors outside of the planning process that prevent it coming forward.	Amend reference to possible re-location of community uses at paragraph 2.37 to more strongly encourage consideration of this and note the potential benefits.	Ms D Francis
More (better) facilities are needed for children in the area	Agreed – the Development Brief recognises the need for play facilities as part of the overall community facility requirements.	None necessary	Ms D Francis
Support the provision of community facilities and other services within the site to reduce the need for external car trips	Noted	None necessary	Highways Agency

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The increase in facilities should be concentrated in existing villages, not a new hub	The facilities at Lodge Hill need to be able to meet the needs of the new population and should be easily accessible by non-car modes to ensure that the development is sustainable. However, the Development Brief does establish the principle of meeting some of the development's needs by investment in existing facilities where these can serve both existing and new communities. The final distribution of investment will be determined through the planning application process and based on the identified needs and impacts of the development.	None necessary	High Halstow Parish Council
Community facilities should be funded by a levy	Current planning legislation requires developer contributions through the s.106 procedure to be directly linked to the need and/or impact of a development, but in many cases this is in effect a levy. The level of provision required will be determined through the planning application process but will also have to consider ongoing management and maintenance of new facilities.	None necessary	Diocese of Rochester
Provision should be made for a place of worship offering more than Sunday services	The Development Brief encourages provision of a place of worship as part of a wider multi-use community facility, so would have potential to offer a wide range of services.	None necessary	Diocese of Rochester
Lack of cemetery provision	The existing pressure on rural burial sites is noted and as the increased population from Lodge Hill is likely to exacerbate this, it is reasonable for provision to be made. This may need to be through investment in existing facilities rather than on-site provision.	Add reference to cemetery provision to Table 2.1.	Cllr C Irvine, Cllr Tony Watson
Contributions should be required to further/higher education	Financial contributions can only be required through the planning process where there is a direct impact from a development that must be offset. Given that there is no set proportion of young people who choose to access further & higher education and the degree of choice in	None necessary	University of the Creative Arts

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	this market, it would be difficult to demonstrate this link for Lodge Hill (and especially not in isolation from all other housing schemes, which is a matter for other documents rather than the Development Brief). However, the Brief does require investment in ongoing training and workforce development, and encourages the developers to work with Medway's universities and colleges to deliver this.		
Why are steep plots exempted from meeting housing standards?	The exemption is only proposed to apply to the specific criteria relating to step-free access and gradients, which can be difficult or impossible to meet where natural ground levels are steep. All other aspects of the housing standards would still need to be met.	None necessary	Open Spaces Society
The loss of existing areas protected open space within Chattenden must be replaced/compensated	Agreed	None necessary	Open Spaces Society
Development Brief needs to reflect potential health impacts of the development in widest possible terms, with an emphasis on sustainable development	The development of Lodge Hill has potential to provide significant health benefits to the new and existing community, as a part of its ambition to meet high standards of sustainability. This is included in the Core Strategy Policy CS33 but may need to be made more explicit in the Brief.	Add reference to health impacts in community and transport chapters.	Medway PCT
The local NHS will need to be involved in future discussions around the scale and type of health facilities needed on site	Noted	None necessary	Medway PCT
Core Strategy requirements for "liveable neighbourhoods" needs to be brought out more in the Brief	"Liveable neighbourhoods" are a key principle for development to provide good quality of life and have a beneficial impact on health. This requirement is included in the Core Strategy Policy but may need to be made more explicit in the Brief.	Add reference to health impacts and liveability in community and transport chapters.	Sport England
Welcome the acknowledgement that the developer must be responsible for meeting the need for community facilities from the development	Noted	None necessary	Sport England

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Potential loss of Hoo library if provision is made in Lodge Hill	Library provision at Lodge Hill is intended to serve the local community, not to replace existing provision elsewhere, but decisions regarding all library provision are taken outside of the planning process.	None necessary	Cllr Tony Watson
Provision of facilities at Lodge Hill should not replace/centralise provision in existing villages	While facilities at Lodge Hill will clearly be available to other residents of the Peninsula, and the population level should support a greater scale or range of services that currently available, the intention is not to encourage "over-provision" that would divert trade from other local areas. The Brief specifies that efforts should be made to ensure that provision at Lodge Hill is complementary to that in existing villages.	Clarify relevant sections to be clear that "over-provision" of services or replacement of existing is not sought.	Frindsbury and Wainscott Residents Association, Cllr Tony Watson
Why is there no provision for Fire and Rescue Services?	Kent Fire and Rescue Service have been consulted on the proposals for Lodge Hill and have not indicated any requirement for facilities on site.	None necessary	Cllr Tony Watson, Mr R Sands
Concern about the reliance on/powers of a proposed Trust	A development of this scale generates a need for ongoing community governance arrangements. A Community Trust is one option, which the Council feels has significant potential, but the final form, details and responsibilities of the organisation will be determined through the planning application process.	None necessary	Cllr Tony Watson
Proposed allotment provision is inadequate	The Council's draft standard for allotment provision is 0.18 ha per 1,000 population. Based on average occupancy of 2.45 persons and 5,000 units this would require in the region of 2.2 hectares of allotments. The figure quoted in Table 2.1 of the Brief is lower than this and is an error.	Correct reference to allotment provision in Table 2.1 to refer to the correct figure of 0.18ha per 1,000 population.	Cllr C Irvine
Open space should provide plenty of seating as the easiest way to encourage community	The developer will be required to provide details of landscaping of open space through the planning application process but the point is	None necessary	Open Spaces Society

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	noted.		
Off-site sports provision should be based on up-to-date assessment of need	The draft Development Brief requires formal sport provision to meet adopted standards. Draft standards for Medway indicate this will require 0.5 hectares per 1000 population.	None necessary	Sport England
Potential for community use of sports provision within schools should be highlighted	It is intended school facilities will be available for community use, including sports provision.	Update relevant section to highlight this intention.	Sport England
Formal indoor sports should be included in the community facility requirements in Table 2.1	Agreed.	Add reference to formal indoor sports to Table 2.1	Sport England
Formal sports facilities should be arranged in a small number of clusters for best functionality	The developer will be required to consider functionality of open space as part of the planning application process. The Brief requires an landscape strategy to be submitted with any outline planning application and this could usefully indicate the distribution of formal (outdoor) sports facilities.	Add requirement for landscape strategy to provide framework guidance on where different types of open space should be located within the overall development.	Sport England
Housing section should acknowledge indicative options for either 4500 or 5000 housing but no defined upper limit on housing numbers was set through the draft Core Strategy	The Brief does not refer to an upper limit for development; however it is noted that the evidence base has been updated since the original draft Brief was written and this should be reflected in the final version.	Amend reference to evidence base masterplan to refer to dual options for housing numbers.	Land Securities
"Family housing" and "executive housing" should be defined	The Council does not have set definitions of these terms but considers that they are generally well understood by all parties and in any case having a definition would limit flexibility to consider proposals on their merits as they come forward over the lifetime of the development.	None necessary	Land Securities
Requirement for all housing to meet Lifetime Homes Standards may impact on viability and should only apply to affordable housing.	Lifetime Homes standards is a key way of ensuring suitable quality housing and influencing quality of life for new residents, and is therefore considered an appropriate aim for the development given the vision for the site. If viability is a concern for a specific element of the scheme, this can be considered through the	None necessary	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	planning application process.		
Don't think it is appropriate for the Brief to refer to a specific target figure for affordable housing, and there should be more flexibility in the requirements	The figure quoted in the Brief is taken directly from the draft Core Strategy, which already sets out the circumstances in which variations and flexibility can apply.	None necessary	Land Securities
Concerned that some of the references to existing communities and circumstances are very subjective	Noted	Consider changes to wording relating to existing communities to ensure robustness.	Land Securities
Concentrations of existing social housing must be taken into account when determining the level of affordable housing in new development adjoining it, including in the event of any joint working between Lodge Hill developers and adjacent landowners.	Reducing the requirement for affordable housing in phases adjoining existing provision would undermine the purposes of the relevant policies (i.e. to meet identified need) but it is possible to consider siting, tenure mix and unit type to avoid an over-concentration of one type of housing in a small area.	Clarify the matters that can be taken into account (tenure, siting etc.)	Land Securities
Mixed tenure elderly housing schemes are difficult to achieve in terms of commercial practicality	Noted, although it may be that Lodge Hill will attract fairly high development values that may make this approach more viable than in other circumstances.	Amend text to refer to the need for a range of tenures without requiring individual schemes to be mixed tenure.	Land Securities
Inappropriate for the Brief to specify phasing of elderly/specialist housing as this is a market decision	The Brief does not prescribe phasing but provides guidance on the considerations that may apply, which is considered entirely appropriate.	None necessary	Land Securities
Is there any evidence to support the claim that personal travel has one of the highest environmental impacts of human activity?	Research carried out on behalf of BioRegional and the WWF suggests that transport accounts for 17% of the average UK citizen's ecological footprint; this is the third highest sector behind home/energy and food.	None necessary	Land Securities
A definition of community services and facilities would be helpful	Noted	Add definition to relevant section	Land Securities
It should be made clear the off-site provision of leisure and sports facilities is only one potential option	The existing wording does not specify this as the only possible solution.	None necessary	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Detailed comments made on the scope of community facility requirements identified by Table 2.1	Noted	Amend content of Table 2.1 to reflect current understanding	Land Securities
Note that co-location of schools in the local hubs will support local retail provision by increasing footfall	Noted	None necessary	Land Securities
References to relocation of existing community facilities should be softened	The relocation of existing uses is encouraged as a possible way of promoting integration between new and existing communities and as this is an important objective for the development it is not considered that this statement should be softened.	None necessary	Land Securities
Location of community uses (on or off-site) should consider synergies between uses and benefits to the existing community.	Accept that these points are important considerations	Amend/clarify relevant sections to include these points	Land Securities
The Governance and Management section is too prescriptive, particularly the key principles for the proposed community organisation, and the majority of this section should be deleted. At the very least it must be made clear that a Community Trust is not the only acceptable option.	Ongoing governance and management arrangements will be crucial to the success of Lodge Hill and its new community and it is therefore considered that the inclusion of this section in the Brief is essential. The Brief already states that while a Community Trust is the Council's preferred options (for the reasons set out in that section), alternative provision will be acceptable if it meet the principles set out. It is therefore important that the principles specified by the Brief are fit for purpose.	None necessary	Land Securities
Clarity needed on status of Hoo's current designation as a "rural service centre", and a more balanced approach to "risks" or "threats" to this centre and other local facilities is needed.	Hoo was defined as a "rural service centre" in the Kent and Medway Structure Plan 1996 and although this document no longer forms part of the development plan, the functioning of Medway's retail hierarchy has not changed significantly in the interim. It is important that the Brief addresses the relationship between Lodge Hill and existing communities on the Peninsula, and the impact on existing facilities is a key strand of that, and one which has been raised	Clarify relevant section to set out there is no intention of deliberate "over-provision", but still need to acknowledge potential impact on Hoo and other local facilities.	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	by many other consultees. However, it is noted that the provision at Lodge Hill, while it may be able to serve the wider Peninsula, is fundamentally intended to support the development itself.		
Direct contributions to support existing facilities (particularly retail) are not appropriate and there are other ways of mitigating impact.	The Brief already acknowledges that contributions can only be required where there is a direct and unacceptable impact, and stresses the need to take a strategic approach to provision in the first place, but it is acknowledged that there may be other ways of mitigating impacts.	Add reference to this section to clarify that financial contributions (if justified) are not the only potential solution to this issue.	Land Securities
Includes a request for Village Green registered under the Commons Act	A village green space (whether registered or not) could provide one of the many types of open space that will be required within the development.	Add requirement for landscape strategy to provide framework guidance on where different types of open space should be located within the overall development.	Open Spaces Society

Economy (Chapter 3)

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Development of the site must comply with the submitted economic strategy	Agreed, but this will be controlled through the planning application process rather than the Brief.	None necessary	Dickens Country Protection Society
Aspiration to prevent LH becoming a commuter town is difficult/unachievable	Disagree. Over half the of students at Medway's universities live in Medway and provision of high skilled jobs in business located at LH will create excellent opportunities for these students to stay local over the long term and purchase property on the development. Lower skilled jobs follow the creation of higher skilled jobs and with more affordable housing planned for the site this creates opportunities for a cross section of skill	None necessary	Lt Col (Retd) Beringer, Ms H Harrison, Mr & Mrs Davis, Mrs D Welch, G & M Russell, Mrs Beringer, High Halstow Parish Council, Frindsbury and Wainscott Residents Association, Cllr C Irvine, Mr & Mrs Stutely, Mr M Skudder

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	people to be working and living at LH		
Do not think as much business space as proposed will be deliverable	The success of this element is largely about marketing i.e. how the commercial offer is conveyed to the public, in addition to the quality of commercial facilities and support infrastructure. Medway has a lack of hi-spec commercial space but that does not mean there is no demand, as shown by the Innovation Centre Medway at Rochester Airport, which has become almost fully occupied in little more than 2 years. LH benefits (or can benefit) from many of the same advantages as the ICM and therefore can also achieve this.	None necessary	Ms H Woolmington, Mr J Allen
Broadband and mobile phone services in the rural area are abysmal and will impact on desirability of location for business	LH is an exemplar development that has to stand the test of time and the highest quality broadband availability will need to be delivered as part of this because modern infrastructure demands it as an 'as standard' feature. The Brief already identifies this as a necessary feature for successful delivery of business space.	None necessary	Ms H Woolmington
Emphasis on sustainable transport will undermine efforts to make Lodge Hill an economic centre	The Brief makes it clear that while sustainable transport must be an important part of the strategy for the site, a realistic balance must be struck taking into account the demand for private car use.	None necessary	Hoo Parish Council
Concern re. size of employment area - how can this be integrated with residential?	The size of employment area specified in the Brief (and as set out in the Core Strategy) is the minimum level that could accommodate the future employment potential of the site and helps to significantly raise the average earnings of Medway residents. The masterplan in the Brief shows where dedicated employment space could be provided, and the type of uses envisaged on the site are those which are most compatible with residential uses.	None necessary	Hoo Parish Council

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Is a rural/semi-rural location the right place for hotels?	A hotel offer goes hand in hand with providing excellent commercial office and other employment space, and would also be well placed in respect of the neighbouring golf course and other existing attractions on the Peninsula. It is entirely appropriate because the demand will be there from local businesses and their visitors.	None necessary	Hoo Parish Council, Cllr Tony Watson
Support inclusion of employment	Noted, but it must try to focus on higher value employment	None necessary	London & Quadrant Housing Association, Highways Agency
Support inclusion of retail	Noted	None necessary	London & Quadrant Housing Association
While support for homeworking generally is welcome, not convinced that there will be demand for live-work units	It is noted that these can be more difficult to deliver but they are not expected to be a significant proportion of overall provision and again marketing and supporting infrastructure and services can help to create a market in this location.	None necessary	London & Quadrant Housing Association
Clarity should be provided on the upper limit of employment space (and the timescales for this) as it will have traffic impacts	Agreed, but this should take place through the planning application process rather than the development brief, when these matters will be able to be considered in more detail.	None necessary	Highways Agency
High-speed broadband should be extended to existing villages	Planning legislation does not allow the Council to insist that developers be responsible for services and infrastructure that are not directly related to the needs and/or impact of their development. However, the very fact that Lodge Hill is being developed will also be a massive incentive to major telecoms providers to improve fibre connectivity on the peninsula. In addition the Council is exploring other avenues for improvement rural broadband infrastructure including a recent bid for Government funding to achieve this in the rural areas of Kent and Medway, which has been successful subject to securing match funding.	None necessary	High Halstow Parish Council, Cllr Tony Watson

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Hotels should not seek links with off-site users as this will increase the need for more, denser buildings and generate more traffic	Hoteliers will not discourage the opportunity of attracting off-site user business as their shareholders would not allow it. However, this has already been taken into account in the Brief and the evidence base that supports it so there is no reason why it should lead to denser buildings or more development than envisaged.	None necessary	Open Spaces Society
Why has less attention been paid to smaller-scale tourism demand - this is already successful on the Peninsula	It is noted that there is some existing successful small-scale tourism on the Peninsula and Lodge Hill may be well placed to provide a similar offer. However, no work has been undertaken specifically in relation to any additional demand that might arise through the Lodge Hill development, therefore the Brief cannot go further than a general principle of support, subject to the details that may come forward in any future planning applications.	Add to leisure section of Chapter 3 to confirm that there is already some successful small-scale tourism on the Hoo Peninsula.	Cllr Tony Watson
The amount of proposed business floorspace should be reduced (including employment in service sectors). It is not appropriate for Lodge Hill to be established as a business location and the suggested employment sectors are inappropriate, as is the provision of hotels or a university.	The amount of business floorspace required is set by higher-level policy documents and reflects the need to balance employment and residential uses as well as meeting the wider needs of the Medway economy. Lodge Hill is one of the highest potential sites in Medway for the type of business provision that will improve the local authority and if this opportunity is not taken it will undermine the economic strategy for the whole Medway area. The suggested business sectors are not an exhaustive list and the precise impacts of detailed proposals as they come forward will still need to be thoroughly assessed through the planning application process.	None necessary	Frindsbury and Wainscott Residents Association
The definition of economic development is too narrow	The Brief does not define economic development but discusses business space, service sector employment, retail and leisure in turn.	None necessary	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Brief does not respond to emerging government policy on economic development, including the Ministerial Statement on Planning For Growth and the draft NPPF, in particular with regard to the need for flexibility.	The Brief encourages flexibility in providing economic development at Lodge Hill, in particular the need to allow for a range of floorspace in order that jobs targets can be met through a variety of types of business use rather than reliance on a few specific sectors with high employment densities. However, if Medway is to meet its wider ambitions for economic growth, the importance of setting ambitious targets cannot be underestimated and the need for flexibility in how they are met does not override this. Furthermore, the NPPF is still in draft form and there is no certainty regarding the content of the final version, so it is cannot be given significant weight in the drafting of the Brief. Once it has been finally adopted, it will become a material consideration alongside the Brief in determining any future planning applications.	None necessary	Land Securities
Agrees that commitment and investment from developers is needed to establish Lodge Hill as a successful business location but feels this paragraph should confirm that Land Securities is committed to this and has been working in partnership with the Council to do so.	It is acknowledged that Land Securities have been working with the Council on strategies to ensure the success of the economic vision for the site.	Add confirmation that partnership working with the Council has been taking place and will continue to do so.	Land Securities
Paragraph 3.6 should not refer to a commuter village as this does not reflect the vision for the new community.	This paragraph specifically says that Lodge Hill's vision requires it to be more than a commuter village, but it is accepted that it could be reworded to explain the economic vision for the settlement more thoroughly.	Amend text to provide more detail on economic vision for Lodge Hill.	Land Securities
The minimum floorspace requirement for employment space is not a part of the relevant Core Strategy policy and should not be used to justify higher requirements in the Brief than in the Core Strategy.	It is acknowledged that the reference to a "minimum of 43,000m ² business floorspace" is from the Core Strategy supporting text rather than the policy itself, but the Brief does not claim otherwise. It is necessary to consider floorspace requirements in order to meet the target of numbers of jobs in line with housing	None necessary	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	numbers, which is a specific requirement of the Core Strategy's parent policy.		
Consideration of likely jobs from relevant floorspace is too detailed for the Brief, speculative and pre-empts work that would need to be carried out as part of the planning application process. It should also note that many of the most densely occupied buildings can be single occupier buildings.	It is very important to have a clear vision for the employment provision at Lodge Hill so that it can fulfil its potential and help to move Medway's economy to a higher-value position. The Core Strategy sets out this aspiration very clearly but as a strategic document cannot go into the same detail as the Brief. It is therefore necessary to consider in more detail in this document how the economic vision for the site can be best achieved in practice. The point regarding single-occupier buildings is noted but there is nothing in the Brief which prevents these from coming forward, and it is considered important to ensure that the development provides for a range of employment types.	None necessary	Land Securities
The Brief should not be used to require floorspace above 43,000m ² as this is not consistent with the Core Strategy and should be acknowledged as an ambitious target, not a minimum.	The Brief does not "require" floorspace above 43,000m ² but encourages developers to aim higher than this in order to meet the potential of the development and to ensure that the job number required by the Core Strategy can be successfully provided. It is also noted that the Core Strategy itself refers to 43,000m ² as a "minimum target" and the Brief is therefore entirely consistent with this.	None necessary	Land Securities
Requirement for high-quality infrastructure is too inflexible and should also allow for future changes.	High-quality infrastructure (specifically broadband) will be essential for Lodge Hill to be successful as an employment location but the point regarding the need to allow for future upgrading and changes to technology is noted.	Amend relevant section to allow sufficient flexibility for future changes in technology.	Land Securities
Assumptions can be made about the employment potential of homeworking, but it is inappropriate and unrealistic to expect workspace provision in all residential dwellings.	While it is accepted that some assumptions can be made about the employment potential of homeworking, this should not be relied on to meet the job figures set out in the Core Strategy as it is a fast-evolving market. The point	Amend requirement for homeworking space to apply to a high proportion of residential dwellings.	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	regarding workspace accommodation in all dwellings is accepted but a reasonable proportion should still provide space for this.		
Business space delivery will need to respond to market demand and developers should not be required to justify variations from the phasing in line with residential development.	It is accepted that market demand will have a role in determining the uptake of employment space at Lodge Hill, but there needs to be some control over this to avoid a situation where all of the employment space is lost to other uses or left vacant while the residential portion is built out. This is essential to ensure the sustainability of the development and that it meets its economic potential. It is considered that the provisions in the Brief already allow sufficient flexibility to respond to changing market circumstances.	Add reference to phasing needing to be agreed through the planning application process, but retain need to justify variations from it once agreed.	Land Securities
Higher education provision should not have to be additional to employment floorspace as it often includes a mix of uses and is essential to meeting Medway's ambitions for the area.	The importance of higher education to the local economy is accepted and where proposals come forward for mixed education/employment uses they will be assessed on their own merits and the portion of the development that provides higher-value employment will be counted as such, but allowing employment floorspace to be substituted for straight educational floorspace would undermine the economic potential of the development.	None necessary	Land Securities
Retail provision at Lodge Hill will improve the Peninsula's sustainability by reducing the need to travel off the Peninsula and this should be acknowledged.	Noted	Add reference to sustainability in travel patterns	Land Securities
It is inappropriate for the Brief to specify a preferred location for hotel development.	Although there are sound reasons for the location referred to in the Brief to be preferred for hotel development, it is accepted they are not the only ones that may be acceptable.	Amend reference to hotel locations to give more flexibility.	Land Securities

Environment (Chapter 4)

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Kingsnorth power station should not be counted as a suitable source of power for Lodge Hill given the uncertainty around its future	It is acknowledged that there is no certainty that the replacement Kingsnorth power station will come forward, but the potential for waste heat if it does is too significant to discount it at this stage. There is also the potential for waste heat from Dam Head Creek power station, which already has a supply of waste heat.	None necessary	Hoo Parish Council
Wind turbines should not be considered	Technology in the renewable energy sector is developing so rapidly that it would not be sensible to rule out specific options. However, the Brief does acknowledge the potential visual and amenity issues from wind turbines, and states that they will only be acceptable where these impacts can be minimised.	None necessary	Hoo Parish Council
Completely agree that no further stress should be put on existing water supplies but would like to know how this can be accomplished	The Brief refers to a mixture of demand reduction measures and new infrastructure investment. There have been discussions with Southern Water at all stages of planning for the development and they have confirmed that sufficient supply can be provided for Lodge Hill and other growth in the area.	Add reference to Southern Water discussions to infrastructure section of Delivery chapter.	Hoo Parish Council
SUDs system should be contained within the site not using adjacent agricultural land and not causing flooding downstream of existing watercourses - BREEAM standard for water run-off gives some confidence in this respect	Noted. The final details of the SUDs system will be determined through the planning application process and in consultation with the Environment Agency.	None necessary	Hoo Parish Council
Concerned re. potential noise and air quality impacts at construction and development stage	Noted	Add a section on construction stage impacts to the Delivery chapter.	Hoo Parish Council, Mrs D Welch, Mr J Allen, Cooling Parish Council, High Halstow Parish Council, Cllr C Irvine, Cllr Tony Watson

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Electric vehicles only shift air quality issues, not remove them	Noted, but the discussion in the Brief was in relation to local air quality issues, so there is still a role for electric vehicles in managing this. In addition, as the electricity grid is decarbonised over time the pollution from grid electricity will be lower than from petrol. Electric cars will also provide the storage needed for an energy grid fuelled by non-polluting renewable energy technologies.	None necessary	Hoo Parish Council
Ancient woodland and SSSI must be protected at all costs	Noted	None necessary	Hoo Parish Council
Assessment of impact on other nearby SSSIs must be carried out at an early stage before any development taking place	Agreed, although Natural England will need to advise on what level of assessment and/or mitigation is appropriate at each stage of the development.	None necessary	Hoo Parish Council, Cllr C Irvine
Existing problems with water supply with be exacerbated	The Brief specifies a number of demand reduction measures and Southern Water have confirmed that sufficient supply can be provided subject to investment.	None necessary	Mr & Mrs Hillman, Cllr C Irvine, Mr S Bailey
Heat load should not dictate phasing at expense of other considerations as this could affect viability	Heat load is not the only consideration but delivering heavy users at the beginning of a phase where possible will help to make any CHP system as efficient as possible.	Rephrase relevant section to clarify that heat load is not the only consideration.	London & Quadrant Housing Association
Concerned that high environmental standards (Code for Sustainable Homes 5/6) will impact viability as properties in Medway do not carry a premium	Sustainability is a key aspect of the vision for Lodge Hill and setting high standards for environmental performance is part of that. Furthermore, if the standards are set at the outset then they can be taken into account at the stage of land purchase by parcel developers and have less of an impact on viability. However, the Brief allows for relaxation of the standards for a phase where there is a sound justification, and viability would be a matter that can be taken into account through the planning	None necessary	London & Quadrant Housing Association

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	application process. It should also be noted that the long timescale for delivery means that Code Level 5 or 6 will be required under national timescales for much of the development's lifetime.		
Negotiations with power providers re. heat connection should not be allowed to delay development	The Brief does specify that links to existing power providers should be taken forward where feasible , and provided that any CHP system is built with the capability for later connection there is no reason why this should delay initial phases of development.	Clarify references to connection to existing power providers with respect to timing.	London & Quadrant Housing Association
Existing residents should be fully involved in proposals for renewable energy generation	The Brief encourages ongoing community involvement in all aspects of the development over its lifespan.	None necessary	London & Quadrant Housing Association
Reference to climate change adaptation should include wildlife corridors for movement of species	Noted	Add reference to wildlife adaptations to box 4.3	Natural England
Support ambition to meet Level 5 and 6 of Code for Sustainable Homes	Noted	None necessary	Southern Water
Rainwater harvesting is useful but cannot be relied on during drought periods	Noted. Rainwater harvesting will not be relied on when the calculations are made to determine supply for the development.	None necessary	Southern Water
Grey water recycling systems will need to be safely maintained in perpetuity	Noted	Add reference to ongoing maintenance to relevant section.	Southern Water
Investment in both water supply and sewerage/wastewater treatment will be required to service the development and Southern Water will require funding from the developer to enable this (assuming they are selected as supplier)	Noted	None necessary	Southern Water
Connection to existing sources of heat should be prioritised above new sources	Noted, but this depends on the feasibility of such connections.	None necessary	Environment Agency
Support measures to reduce waste and suggest various additional measures that can be considered	Noted	Amend detail of text to reflect advice.	Environment Agency

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Note the further discussions on contamination and remediation will be needed at detailed application stage	Noted	None necessary	Environment Agency
Surface water run-off should be restricted to greenfield rates	BREEAM Communities, as specified in the Brief, already requires surface water run-off to be restricted to the rates from the pre-developed site, but reverting to a greenfield rate on a previously developed site such as this is considered to be an unduly onerous requirement. It is also noted that changes in hydrology can be damaging to the nearby SPAs, and the Brief requires consideration of this issue.	None necessary	Environment Agency
Support statements regarding SUDs and offer further detailed advice	Noted	None necessary	Environment Agency
Encourage use of rainwater harvesting and grey water recycling	Noted	None necessary	Environment Agency
Would prefer off-site sewage treatment - arrangements should be made with an appropriate undertaker	Noted, but it is not appropriate for the Development Brief to specify this level of detail. The developer will need to reach agreement with their service provider independently of the planning process. As proposals for provision come forward they will need to be judged on their individual merits.	None necessary	Environment Agency
Development should incorporate highest levels of water efficiency	The Brief requires high levels of water efficiency through the use of Code for Sustainable Homes and BREEAM targets which have minimum water use requirements.	None necessary	Environment Agency
Welcome sustainable approach to biodiversity	Noted	None necessary	Environment Agency
Mitigation land should be designated as SSSI once delivered to ensure long-term protection	Long-term protection of the mitigation land will need to be secured but SSSI designation (which is in any case not within the powers of the LPA) is not necessarily the most appropriate. The planning application process will determine the details, most likely through a s.106 legal agreement.	None necessary	RSPB

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Caveat re. relaxation of environmental policies with sufficient justification undermines purpose of chapter and environment protection	This caveat is necessary because not all phases will be able to meet all standards. However, it is not intended to apply to ecological standards, which are an absolute requirement.	Clarify this section to exclude ecological policies.	RSPB
Do not accept that it is possible for these proposals to meet the aim of enhancing the natural environment	Noted	None necessary	Open Spaces Society, Medway Countryside Forum
Do not agree that proposed list of uses for SSSI buffer zone are appropriate - it will not be a buffer at all if all this is provided	The list of potential uses for the buffer zone has been drawn up in consultation with Natural England but the Brief does also state that as much as possible of the buffer should remain undeveloped.	None necessary	Open Spaces Society, Medway Countryside Forum
Dust during construction will have impact on living conditions of neighbouring villages	Construction stage impacts will have to be considered. The Brief specifies that measures to limit and mitigate air quality impacts will need to be put in place during the development, and that this includes construction stage.	None necessary	Mr S Bailey
Don't think this is an appropriate site for an "exemplar of sustainability"	The principle of development on this site has been set by higher-level policy documents. Sustainability is a key consideration for all development and because Lodge Hill is large-scale and starting from scratch there is a lot of potential to incorporate sustainable measures into the development. It is therefore considered that it is entirely appropriate for Lodge Hill to aim for exemplar status.	None necessary	Cllr Tony Watson
Further work is needed on proposals for a buffer zone to the SSSI to ensure it is effective	The Brief recommends a 200m buffer based on discussion to date with Natural England. The developer will need to plan for buffer zones in more detail through the planning application process.	None necessary	Dickens Country Protection Society
Biodiversity survey work done to date is inadequate, particularly for nightingales	The Brief highlights the significance of the site for nightingale and a number of other species. The developer will be required to provide evidence to support their proposals through the planning application process, which is likely to include further survey work. Natural England will	None necessary	Ms C Knott, Ms S Pain, Mr C Lucas, D Johnson, Mr J Walsham, Mr A Roman, Ms M Tilley, Ms H Stanforth, Mrs J Hobbs, Mr M Howes, Mrs L Howes, Mr G Raffa,

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	advise on the adequacy of survey work for each stage as part of this process.		Frindsbury and Wainscott Residents Association, Mr R Marchese, Mrs C Felix, Mr D Felix, RSPB, Ms J Coppin, Ms L Wintle, Cllr Tony Watson
An equal amount of habitat to that lost needs to be created off-site	The Brief addresses this issue and indicates any lost habitat must be replaced either on or off-site and that it may be necessary to provide more than that lost in order to compensate for potential loss of quality. The final details on habitat loss and delivery mechanism for replacement of this will be determined through the planning application process in consultation with statutory agencies.	Review para 4.71 and 4.72 to make this requirement more specific	Ms C Knott, Ms S Pain, Mr C Lucas, D Johnson, Mr A Roman, Ms M Tilley, Ms H Stanforth, Mrs J Hobbs, Mr M Howes, Mrs L Howes, Mr G Raffa, Mr R Marchese, Mrs C Felix, Mr D Felix, Cllr C Irvine, RSPB, Ms J Coppin, Ms L Wintle
It is unlikely to be possible to retain nightingale habitat on-site as nightingales are susceptible to disturbance so this will also need replacing	The Brief addresses this issue and indicates any lost habitat must be replaced either on or off-site and that it may be necessary to provide more than that lost in order to compensate for potential loss of quality. On-site habitat that is not ecologically functional for a key species will not be able to be counted as retained or replacement habitat. The final details on habitat loss and delivery mechanism for replacement of this will be determined through the planning application process in consultation with statutory agencies.	Add reference to functionality of retained habitat influencing the requirements for replacement.	Ms C Knott, Ms S Pain, Mr C Lucas, D Johnson, Ms J Crawley, Mr J Walsham, Mr A Roman, Ms M Tilley, Ms H Stanforth, Mrs J Hobbs, Mr M Howes, Mrs L Howes, Mr G Raffa, Mr R Marchese, Mrs C Felix, Mr D Felix, RSPB, Ms J Coppin, Ms L Wintle
Nightingale habitat (dense scrub) can take 10-15 years to establish and should be in place before any development	The Brief requires replacement habitat to be functioning before the original habitat is lost. The final details of habitat loss and delivery mechanism for replacement of this will be determined through the planning application process in consultation with statutory agencies.	None necessary	Ms C Knott, Ms S Pain, Mr C Lucas, D Johnson, Ms J Crawley, Mr J Walsham, Mr A Roman, Ms M Tilley, Ms H Stanforth, Mrs J Hobbs, Mr M Howes, Mrs L Howes, Mr G Raffa, Mrs S Jennings, Mr R Marchese, Mrs C Felix, Mr D Felix, RSPB, Ms J Coppin, Medway Countryside Forum,

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
			Ms L Wintle
Development will have unacceptable impact on wildlife	The Brief highlights the ecological importance of the site and the requirement for further surveys to be undertaken to further inform proposals from the developer in order to mitigate ecological impacts. This will be considered in further detail through the planning application process in consultation with statutory agencies.	None necessary	Mr & Mrs Hillman, Mrs L Bannar-Martin, Mrs D Welch, Mr J Allen, Mrs S Ahmad, Ms W White, High Halstow Parish Council, Mr D Macfarlane, Frindsbury and Wainscott Residents Association, Cllr C Irvine, Mrs M Cripps, Mr R Cripps, Ms J Martin, Cllr Tony Watson
Development Brief should reflect the need for further ecological surveys at detailed application stage as well as at outline, and for the surveys to reflect best practice	The Brief states that further surveys will be needed in support to any outline application to ensure that the ecological value of the site is fully understood; it is likely that there will also be more detailed requirements at later stages.	Strengthen para 4.67 to highlight likely requirement to repeat surveys or provide further detail at subsequent detailed application stages	Natural England, KWT, RSPB
Reference to impact on existing habitats should reflect indirect impact as well as direct loss	Para 4.69 indicates potential for direct and indirect impacts.	Strengthen reference to indirect impacts on retained habitat and the potential for this to influence the requirements for replacement.	Natural England, KWT, RSPB
Replacement habitat must consider ecological functionality	The Brief does refer to the need for ecological functionality of the replacement habitat to be considered, but it is accepted that this could be strengthened.	Strengthen references to ecological functionality of replacement habitat to reflect this requirement	Natural England
Welcome aim to enhance biodiversity as well as conserved, but should strengthen reference to habitat linkages as part of this	Reference in the draft Development Brief needs to be strengthened to reflect this	Strengthen the need for linkage to assist with functionality and the references to the potential for this to enhance biodiversity	Natural England
Species and habitats of conservation concern should be included as well as protected species	Acknowledged.	Update definition of high value habitats to reflect this advice.	Natural England
Buffers around ancient woodland may need to be variable depending on the	The Brief allows for flexibility in buffers around ancient woodland and the distances cited are	None necessary	Natural England

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
species supported	only a guideline.		
It is not only the Thames Estuary & Marshes SPA/Ramsar site that may be impacted by the proposals	The Brief also refers to the potential for impact on the Medway Estuary and Marshes SPA/Ramsar site and detailed consideration of its impacts will be needed through the planning application process. A full HRA for the Core Strategy is also being finalised, which will consider the likelihood of impacts on other protected areas.	Update Brief to refer to Core Strategy HRA conclusions once complete and clarify potential for impact on multiple SPA/Ramsar sites and need for this to be thoroughly assessed through the planning application process.	Natural England
Further clarity is needed on the potential impact and mitigation for other nearby SSSIs	Detailed consideration of impacts of nearby SSSIs will take place through the planning application process but on the basis of discussions with Natural England to date, further clarity can be added to the relevant section.	Update relevant section based on advice in Natural England comments.	Natural England
Development Brief does not recognise true ecological value of the site	The ecological value is recognised through inclusion of detailed ecology policy however the land uses which have led to the creation of this are not summarised.	Minor changes to add reference to relationships between habitats on site.	KWT
The importance of inter-relationship of different habitats should be recognised	The Brief refers to the importance of on ecological networks in considering habitat loss, but greater recognition can be made of the value of habitat "mosaics".	Review relevant sections to strengthen ecosystem considerations.	KWT
Do not think Brief should allow for reduction in SSSI buffer	The proposals relating to buffer zones in the Brief are based on discussions to date with Natural England. Detailed proposals for extent and land use will be considered through the planning application process.	None necessary	KWT, RSPB, Open Spaces Society
Uses proposed in buffer may impact on its use as retained/replacement habitat and this may also need to be mitigated off-site	The uses identified as suitable for the buffer zone are based on discussion to date with Natural England. Detailed consideration to proposals for the buffer zone will take place through the planning application process. Impact on ecological functionality of retained habitat will need be taken into account when	Add reference to functionality of retained habitat influencing the requirements for replacement.	KWT

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	determining the amount of off-site mitigation required and it is accepted that the uses in the buffer zone may have an impact on this.		
Provision of SSSI buffer is supported but its purpose should be clear; it is unlikely to be sufficient to prevent predation by cats, for example.	The Brief identifies that there will be direct and indirect impacts on ecology and its recommendations are based on discussions to date with Natural England. Detailed consideration of the ecological impact of the proposal, including proposals for the extent and land use of the buffer zone will be considered through the planning application process.	None necessary	RSPB
A full assessment of disturbance impacts from existing footpaths must be undertaken and mitigation provided	The developer will need to provide detail on green infrastructure for the site to consider impacts and mitigation	None necessary	RSPB
Ancient woodland will need similar protection to SSSI	Buffer zones for ancient woodland are included in Development Brief in recognition of the importance of these areas	None necessary	RSPB
Welcome the recognition of potential impacts on SPA/Ramsar sites, and other nearby SSSIs i.e. bird disturbance, and the need for mitigation of these.	Noted	None necessary	RSPB
Not convinced that timescales for development will allow any replacement habitat to be functioning in time	The developer will be required to provide details on habitat loss and delivery mechanism for replacement of this through the planning application process, in consultation with statutory agencies.	None necessary	Open Spaces Society, Medway Countryside Forum
There is no evidence to show that creating replacement habitat for nightingales can be successful	The developer will be required to provide details on habitat loss and delivery mechanism for replacement of this through the planning application process, in consultation with statutory agencies	None necessary	Frindsbury and Wainscott Residents Association, Open Spaces Society
Believe that the nightingale population amounts to more than 1% of the UK population	The figure for nightingale population is a best estimate on the basis of current information, but it is acknowledged that it could be higher. Detailed consideration of ecological impacts will take place through the planning application process; it is likely that this will require further	None necessary	Medway Countryside Forum

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	survey work and if the nightingale population is found to be more significant this will be taken into account.		
Proposed "policing" of green areas is unacceptable	The developer will be required to provide details on future management of open space through the planning application process; ecological considerations and public amenity will both have to be taken into account.	None necessary	Cllr Tony Watson
Development plan has not taken into account the importance of this site for nightingales/the needs of the nightingale population	Nightingales are specifically recognised as being ecological important on this site. Detailed consideration of ecological impacts will take place through the planning application process.	None necessary	Mrs S Jennings, Mr R Marchese, Medway Countryside Forum, Cllr Tony Watson
The SSSI should not be included within the site boundary	The site (allocation) boundary is set by higher-level policy documents but in any case its inclusion within the boundary does not imply any acceptance of development in this area.	None necessary	Frindsbury and Wainscott Residents Association
There is no mechanism for ensuring that off-site mitigation land will come forward	The planning application process can ensure that an appropriate amount of off-site mitigation land is delivered; the role of the Brief is to highlight the need for this to be thoroughly considered.	None necessary	Frindsbury and Wainscott Residents Association
There is no evidence for the statement that burying and capping of contaminated soils is unlikely to be sufficient. References to risk from contaminated soils should confirm that it is "unacceptable risk" that needs to be avoided, and discussions of phasing of remediation works are too speculative to be included in the Brief.	The evidence base that supports the Core Strategy includes information relating to contamination, and this statement is also based and on discussions with the Environment Agency which have been ongoing for some time. The discussion of phasing is in general terms only.	Amend references to phasing to acknowledge that this is yet to be determined.	Land Securities
It should be confirmed that the construction code of practice can be submitted through conditions.	The Brief already states this; the requirement to have the code of practice prior to commencement of development is necessary in whatever form it may be submitted if it is to be fit for purpose.	None necessary	Land Securities
Charging points etc. for electric vehicles will only be necessary if these are	It is considered that electric vehicles will need to form part of the strategy for the site, whether for	Clarify references to electric vehicles to confirm that	Land Securities

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considered as appropriate measures for the site as the scheme progresses.	sustainability or air quality reasons. However it is accepted that the supporting text is not as clear on this point as it could be.	provision will be needed.	
All statements regarding the significance of the site for ecology or the potential for impacts should be qualified to confirm that these can be mitigated. There should also be reference to ongoing work that the developer is undertaking with Natural England and other bodies.	Mitigation is discussed in the Brief and it is not considered appropriate to water down references to the significance of the site as this is one of the fundamental constraints affecting its capacity and deliverability; it would also contradict consultation responses received from ecology bodies including Natural England. However, a general statement regarding mitigation can be included.	Add statement regarding potential for mitigation of ecology impacts and beginning of ecology sections.	Land Securities
The nightingale population is not believed to be as much as 1% of the UK population; this should refer to Kent, not just the surroundings of Lodge Hill.	This is directly contrary to comments from ecology bodies who believe that the nightingale population around Lodge Hill may even be higher than 1% of the UK population. Information on the RSPB's website suggests that Kent holds around 25% of the UK population. However it is acknowledged that the figure in the Brief is an estimate based on current best knowledge and detailed consideration of proposals through the planning application process will need to be based on up-to-date surveys.	None necessary	Land Securities
Requirements for off-site replacement habitat should clarify that this will be based on consultation with Natural England and will consider quality of habitat as well as quantity.	The Brief already states that it is the value of the habitat (ecologically) rather than its size that is the key consideration in determining the amount of replacement habitat required. The final requirements will be determined through the planning application process and this will include consultation with Natural England and other ecology bodies.	Add reference to clarify that the final amount of off-site mitigation will be determined through the planning application process.	Land Securities
The Brief should explain how the definition of "high value habitats" was reached.	This definition was put forward by Natural England who are the statutory body in respect of ecology and will eventually need to agree any mitigation proposals put forward. It is not considered necessary to set this out in the Brief.	None necessary	Land Securities

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<p>The SSSI buffer zone should be referred to as "up to 200m" and it is inappropriate to define a geographical area at this stage.</p>	<p>Ecology is a very significant issue affecting the proposed development and therefore it is entirely appropriate to show the probable extent of the buffer zone on a map basis. In any case the image must be read together with the accompanying paragraphs. It is not considered appropriate to specify "up to 200m" as the Brief already states that reductions may be acceptable with justification, but this will have to be determined when detailed proposals are considered through the planning application process.</p>	<p>None necessary</p>	<p>Land Securities</p>
<p>The table of uses that may be allowed in the buffer zone should make clear that this is not an exhaustive list, and should include nursing home/assisted living accommodation.</p>	<p>The list of uses in the table are those which Natural England have accepted may be able to be accommodated in the buffer zone without undermining its purpose. Should proposals for alternative uses come forward they would be assessed on their own merits through the planning application process, however the Council does not wish to encourage this in the Brief as this may undermine the need to ensure that the SSSI is not damaged by the development. Elderly or specialist accommodation is already included.</p>	<p>Confirm in supporting text that other proposals would have to be considered on their merits through the planning application process.</p>	<p>Land Securities</p>
<p>Provision of brown or green roofs and green walls may conflict with other objectives such as needing to provide solar panels, and are not the only measure that will bring the required biodiversity benefits.</p>	<p>This point is accepted, but it is part of the vision for Lodge Hill that it relates to its countryside setting and "greening" the development as much as possible is one way to accomplish this.</p>	<p>Clarify that green/brown roofs and green walls are not the only possible biodiversity measures.</p>	<p>Land Securities</p>
<p>Requirement for mitigation of recreational pressure on nearby SSSI should not assume that this will be necessary in advance of detailed assessment work being undertaken, and must also be proportionate to the impact of the development.</p>	<p>Based on current available evidence and ongoing discussions with Natural England, it is considered very likely that there will be an impact and consequent need for mitigation, but it is accepted that the exact form of this must be determined through the detailed work required as part of the planning application process and</p>	<p>Clarify relevant sections to confirm that mitigation is only required in order to meet impacts found to arise from the development.</p>	<p>Land Securities</p>

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	the mitigation requirements must be proportionate.		
It is beyond the role of the Brief to require that all new development <i>must</i> be designed in a certain way to take account of environmental issues. There needs to be an element of flexibility as technologies may change over the course of the development period.	The Brief does not place restrictions on how the development is built, merely on what standard of environmental performance is achieved. This is the same approach that is taken by the Code for Sustainable Homes and the Building Regulations. The Brief allows for changing technologies and practices over time.	None necessary	
It is considered that the third sentence of paragraph 4.2 should be reworded to read: 'The vision for Lodge Hill is to provide an exemplar for the Thames Gateway in the way that it minimises its impact on the environment and provides for an excellent quality of life for all its residents.' This would be in accordance with the vision for the site set out in the emerging Core Strategy.	The third sentence of paragraph 4.2 merely reflects the aspiration of Medway's Core Strategy, in both the vision and the key principles it sets out.	None	
The desire for the Lodge Hill site to establish a standard for the Thames Gateway in terms of sustainability needs to be balanced with the need to deliver all other aspects of the site.	Noted	None	
The scope to relax individual environmental standards if they cannot be met should have regard to the development as a whole rather than the specific phase, and in the context of the BREEAM Communities framework, as sustainability at Lodge Hill should be considered on a site-wide basis.	Failure to consider sustainability on a phase-by-phase basis could lead to a significant reduction in the overall sustainability of the development. However, it is accepted that for some standards there may be scope to consider the sustainability achievements of the site as a whole rather than on an individual phase basis, given the need to take a holistic view.	Add reference to considering sustainability on a site-wide basis as well as phase-by-phase.	
It would helpful to include an explanation as to why an Interim (BREEAM	The interim certificate is not required as it doesn't provide significant additional information	Add explanation as to why the interim certificate is not	

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Communities) Certificate is not needed.	and places a high regulatory burden on the developer.	required.	
It is unnecessarily onerous to require sustainability statements to be submitted stating how the requirements of the Brief have been met.	It is agreed that the Development Brief should not increase the requirements of the Development Plan, rather it provides guidance on how the aspirations of the Development Plan can be achieved. A sustainability statement is required to be submitted in any case and therefore this provides guidance as to what it should contain.	None.	
It would be helpful for the text within paragraph 4.8 to confirm when the relevant targets will apply (i.e. at the end of the development?)	The targets will be required at the time of the detailed planning application for each land parcel.	The text will be amended to state when the targets will apply.	
The sustainability standards should be amended to reflect the national timeline for the achievement of Code for Sustainable Homes, and that BREEAM target for the development should be to achieve BREEAM 'Excellent'. A BREEAM 'Outstanding' rating should not be imposed within the draft DB if it is not a realistic target.	To ensure that Lodge Hill meets its exemplar vision higher sustainability standards are required than are prescribed nationally. It should be noted that the national standards are set to allow the least economically viable schemes to still be affordable. Lodge Hill by virtue of its location and size is more viable than many areas across the country.	None	
Paragraph 4.9 states 'It is therefore essential that the energy demand of the new buildings at Lodge Hill are minimised and that renewable energy resources are installed.' This would benefit from rewording to read '... the energy demand of new buildings at Lodge Hill is minimised through a range of strategies including renewable energy.' It should also be noted that this is where possible and appropriate.	As the use of renewable energy doesn't reduce energy demand, the proposed amendment is not appropriate. It is always possible and appropriate to reduce energy demand and install renewable energy technologies; elements of this are already required by current legislation such as the building regulations.	None	

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<p>Paragraph 4.10 of the draft DB refers to setting specific energy efficiency targets. Land Securities is it appropriate to set specific energy efficiency targets standards in the Brief process, given its remit to provide 'guidance' and recognising that it needs to retain a sufficient element of flexibility in the face of evolving technologies and for future resilience.</p>	<p>No matter what evolving technologies there are it is still essential that energy demand is reduced through energy efficiency measures. These standards are in line with the Government's proposed zero carbon definition that will come into play in 2016 and will apply to majority of the homes built on site in any case.</p>	<p>None</p>	
<p>The passive design measures in Box 4.1 should be confirmed as illustrative, particularly in the context that a number of the measures may not be applicable to the Lodge Hill development. It should also be noted that natural ventilation is not always the most desirable solution and should therefore be caveated with "where possible".</p>	<p>The Brief already states that these are suggested principles that can be applied to achieve the target, not absolute requirements. Natural ventilation is always a desirable solution that should be implemented wherever possible, but if there are any buildings that due to their use cannot be ventilated naturally (such as chemical laboratories) these will be assessed on a case-by-case basis.</p>	<p>Add "where possible" to references to natural ventilation.</p>	
<p>The energy efficiency figures quoted are not standards of energy consumption, but refer to the maximum allowed energy demand associated with heating and cooling dwellings. These figures do not include lighting, energy associated with the running or use of appliances, or cooking, and should be re-worded accordingly.</p>	<p>Noted</p>	<p>Reword to reflect accurate definition</p>	
<p>The use of planning conditions/obligations to ensure that all buildings would be connected (if an energy network is planned) is unduly onerous, as it may not be possible or desirable for all buildings to be connected to such an energy network.</p>	<p>It is not thought that there would be cases where it would be undesirable to connect the buildings to the network. However, if there are these will be assessed on a case-by-case basis.</p>	<p>Add caveat to text confirming that is it is demonstrated that it would not be appropriate to connect a building to the network this will be considered on a case-by-</p>	

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
		case basis.	
<p>Would connecting existing buildings to a decentralised energy system at Lodge Hill (should this option be pursued) mean a larger energy centre requirement? Connection of any off-site buildings to an energy system on the Lodge Hill site should not be the responsibility of future developers, and it would not be appropriate to pursue this option if it required infrastructure over and above that necessary to serve the development.</p>	<p>It is unlikely that a significantly larger energy centre would be required to accommodate this. However, it should also be noted that if users outside the development were connected to the energy network, heat/energy sales would almost certainly be on a commercial basis which would cover the costs of this. Also, if connection of off-site heat users was proposed as part of the “allowable solutions” element of zero carbon, this would be the developers responsibility in any case.</p>	None	
<p>Requirement for use of waste heat from Damhead Creek or Kingsnorth power stations is too onerous as currently worded.</p>	<p>The Brief already states that this is subject to considering the feasibility of such a connection (which would include financial viability). However, the current wording is required to ensure that if such a connection is feasible that it is taken forward.</p>	None.	
<p>The green text setting out actions in connection with any proposals for a decentralised energy system for Lodge Hill should recognise viability as a constraint in connecting to existing heat sources and should define a communal heating system and if this applies to commercial as well as residential properties. The design of space for plant rooms is too prescriptive as it is a matter to be considered at detailed design stage.</p>	<p>Noted. The Brief will be used to determine detailed applications as well as outline applications, it therefore needs to cover the level of detail required for both.</p>	<p>Amend wording to recognise viability as a constraint, explain communal heating in more detail and make it clear that detail relating to plant rooms is only required at the detailed planning application stage.</p>	
<p>The renewable technologies listed in the Brief as suitable for use at Lodge Hill are not the only ones that should be considered for the Lodge Hill site.</p>	<p>The Brief already recognises that different technologies may come forward in the future and will also be considered on a case-by-case basis.</p>	None	

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
<p>It is expected that all CO2 emissions above the carbon compliance threshold can be addressed through allowable solutions, not just those associated with unregulated energy uses. Also, the Brief should not incorporate a list of preferred options for allowable solutions given that these may be superseded by national requirements when they are published.</p>	<p>The Brief does not say that only unregulated emissions can be offset using allowable solutions. The list of preferred allowable solutions provides a hierarchy that can be followed between now and the publication of the Government's guidelines, and the Brief already acknowledges that this will be subject to compliance with the national guidelines when they are provided. Even when these are provided they may not include a hierarchy and it is therefore appropriate to set local priorities.</p>	<p>None</p>	
<p>It should be sufficient for the <i>scope</i> of a water cycle strategy to be submitted at outline stage, with the detail to follow at Reserved Matters stage. This would allow a bespoke site-specific strategy to be developed alongside the detailed design of the scheme.</p>	<p>The water cycle strategy is a site-wide document and needs to be considered at the very earliest master planning stages to ensure that sufficient water will be available for the site and surrounding area. It is acknowledged that further detail or updating may be needed at detailed stages and this can be allowed for through the use of planning conditions.</p>	<p>None</p>	
<p>Key flood flow paths should not be blocked unless suitable mitigation can be provided – at the moment this caveat is not included in the main text.</p>	<p>Noted</p>	<p>Include reference to possible mitigation</p>	
<p>A definition should be provided of 'as locally as possible' for sourcing materials – suggest using the BREEAM Communities definition, which is a 50 mile radius from the site, and that this should be 'where possible'. 50% locally sourced is unrealistic and should be by volume rather than value; recycled materials should be by mass rather than value, and should this be specific to road materials? All of these should be worded as targets not</p>	<p>The need for a definition is accepted. The standards set out are the minimum that would be acceptable on the Lodge Hill site. It is considered that local sourcing of 50% by volume of construction materials is achievable as much of this will be made up of aggregate, but a reduction to 40% is considered an acceptable compromise. The recycling target refers to all construction materials, not just road materials. This can be changed to a mass rather than a value requirement, but as aggregate (which is</p>	<p>Include a definition of locally sourced materials (i.e. within a 50 mile radius) and amend targets for local and recycled materials.</p>	

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
standards to maintain flexibility and be realistic.	the most commonly recycled material) is much heavier than other materials that have a higher embodied energy it would then be necessary to increase the percentage of materials required to be recycled to 30%.		
It is not appropriate to prescribe requirements in respect of materials over and above those set out by the Code for Sustainable Homes and BREEAM. There should be an element of flexibility in achieving BREEAM and Code ratings, which this prescriptive list is considered to limit.	There are only a small number of prescriptive elements and these are areas that are of particular importance at Lodge Hill, such as water saving and stimulating the local economy. These are in line with the vision for Lodge Hill that is set out in Medway's Core Strategy. The rest (vast majority) of the Code for Sustainable Homes and BREEAM areas are flexible. This includes the materials specifications.	None	
It is inappropriate to include specific measures supporting local food production within the Brief; at most, it should refer to measures to <i>seek to</i> increase local food production where possible. The provisions regarding allotments and food-growing space are too detailed and onerous.	As stated in the Brief, food production has a significant environmental impact and it is important for this to be addressed as part of the sustainability considerations for Lodge Hill. However, it is accepted that this must be considered holistically and food production is not the only issue. The Brief will be applicable to detailed as well as outline planning applications and therefore some guidance is more detailed than would be required for an outline planning application.	Amend wording to confirm that these requirements should be met where they do not unduly conflict with other objectives for the site.	
The Institute of Civil Engineer's Demolition Protocol is applied as a project management tool that ensures that the potential to recover resources from demolition (and refurbishment) has been considered and implemented effectively and should only be referred to for this (i.e. not construction).	Noted	The text will be amended to clarify that this only relates to demolition and not construction.	

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It may not be possible to use roof spaces as outdoor space or for biodiversity if the space is needed to accommodate solar technologies.	Noted	Amend text to incorporate this caveat.	
Mitigation against the future impacts of climate change in accordance with the measures in Box 4.3 should ensure that the requirement is not unduly onerous.	The Brief already states that the measures in box 4.3 should be included "where appropriate" and it is therefore considered that this is not unduly onerous.	None	

Transport (Chapter 5)

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Lack of evening buses is of more concern than supposed "infrequent service"	Noted, although experience elsewhere suggests that more frequent services are also required to improve take-up of public transport.	Update references to existing bus service in Transport chapter to include concerns regarding evening services.	Cllr Tony Watson
Any blockage or congestion of the A228 has huge impacts on Peninsula community as it is the only route in and out.	The importance of the A228 to the existing Peninsula community is accepted. It is the applicant's responsibility to demonstrate how their proposals will impact on the local road network and show how they will mitigate the transport impacts of the scheme to achieve a nil-detriment scenario. The Brief already sets this out.	None necessary	Lt Col (Retd) Beringer, Ms H Harrison, Mr & Mrs Davis, Mrs D Welch, Mrs Beringer, High Halstow Parish Council, Mr M Skudder, Cllr Tony Watson
Congestion during construction process	Construction stage impacts can be controlled through the planning application process by requiring the developers to commit to a code of construction practice. Specific transport issues relating to traffic impact during the construction phase will need to be addressed within the accompanying Transport Assessment.	Add section on construction stage impacts into Delivery chapter, and clarify in relevant section that construction traffic should be considered as part of the required Transport Assessment.	Lt Col (Retd) Beringer, Mr C Barr, M Bannar-Martin, Mr & Mrs Davis, Mrs Beringer, Cllr C Irvine, Mr M Skudder, Cllr Tony Watson

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Public transport to the area is inadequate and the development will exacerbate this situation	The limitations of existing public transport services on the Peninsula s noted, but the Brief requires development of the Lodge Hill site to improve this situation by delivering a high quality bus service linking the site with Strood railway station, P&R at Whitewall Creek and other key destinations. Bus priority measures required as part of this will also benefit existing services, and there is potential for new services to include some of the nearby existing settlements.	None necessary	Lt Col (Retd) Beringer, Mr C Barr, Mr & Mrs Davis, Mrs Beringer, Frindsbury and Wainscott Residents Association, Cllr C Irvine, Mr M Skudder
Increased congestion on local road network	It is the applicant's responsibility to demonstrate how their proposals will impact on the local road network and show how they will mitigate the transport impacts of the scheme to achieve a nil-detriment scenario. The Brief already sets this out.	None necessary	Lt Col (Retd) Beringer, Ms C Bucknall, Ms H Harrison, Mr N Latimer, Ms S Russell, Mr & Mrs Hillman, Mrs L Bannar-Martin, Mr M Bucknall (2), Mr M Bucknall (1), Ms A Bucknall, M Bannar-Martin, Mrs E Slatcher, Mr & Mrs Davis, Mrs D Welch, Mrs S Ahmad, G & M Russell, Mr M White, Mrs Beringer, Cooling Parish Council, Cllr C Irvine, Medway Countryside Forum
In practice the majority of access will be by private car so the transport strategy should avoid an over-reliance on walking, cycling and public transport.	The Brief encourages measures that will increase uptake of sustainable measures by making them a viable alternative to private car transport and it is important that these are carried through to the transport strategy that supports any future planning applications. However, it is accepted in the Brief that the private car will remain an important means of transport for many households and workers at Lodge Hill and this must also be catered for. The exact details of how this is accomplished will be determined through the planning application process and will need to consider	None necessary	Dickens Country Protection Society, Hoo Parish Council, Mrs F Smitherman, Mrs S Whitebread, Frindsbury and Wainscott Residents Association, Cllr C Irvine, Mr S Bailey

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	realistically the balance between different modes of transport.		
Improvement of walking/cycling links may have unintended impacts e.g. on the SSSI and through parking at the Cliffe Woods end of the routes. Road access may also come under pressure.	The Brief acknowledges the potential for ecological impact resulting from increased use of walking and cycling links, and the exact details of this together with any necessary mitigation measures will be determined through the planning application process in consultation with statutory undertakers. A full assessment of the impact on local road network must be carried out as part of the planning application process, and the Brief highlights that this will have to include consideration of links to nearby villages.	None necessary	Dickens Country Protection Society
Concerns remain as to whether satisfactory access can be achieved from Four Elms Hill	It is the applicant's responsibility to demonstrate how their proposals will impact on the local road network and show how they will mitigate the transport impacts of the scheme to achieve a nil-detriment scenario. The Brief already sets this out, and acknowledges that improvements to Four Elms Hill, Four Elms Roundabout and A228 to Lodge Hill will be needed to provide additional capacity. The evidence base supporting the Core Strategy and the Development Brief indicates that it will be possible to provide access from Four Elms Hill subject to the necessary improvements.	None necessary	Dickens Country Protection Society, Mr N Latimer, Frindsbury and Wainscott Residents Association, Cllr C Irvine, Cllr Tony Watson
Rat-running will be a problem for High Halstow, Cliffe and Cliffe Woods, Cooling and Upnor, and any measures to minimise it will result in severance between the villages.	The Brief acknowledges that potential for rat-running through smaller villages is an issue that will need to be considered by the applicant through the planning application process. It is likely that measures to deter rat running will be planned and but a specific requirement of these will be to avoidance severance between villages as connecting Lodge Hill to the existing community is one of the key objectives set out in the Core Strategy and the Brief. It is likely that	Amend relevant section to clarify the importance of retaining local connections while limiting increases in through traffic, and to specify that monitoring is likely to be required to determine the level of intervention necessary.	Dickens Country Protection Society, Hoo Parish Council, Cllr C Irvine

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	the need for and design of measures to reduce rat-running will be considered in response to a monitoring programme for the affected routes.		
Welcome the recognition of the transport impacts of other growth in the area but must ensure that funding for infrastructure connected with this is achieved or it will negate any benefits from the Lodge Hill improvements	Funding for infrastructure connected with other developments will be considered separately as those proposals come forward. However, the Brief acknowledges the need for wider network solutions to address other traffic growth.	None necessary	Dickens Country Protection Society
Access should be from the B2000/A289 not from Four Elms Hill as one road off the Peninsula is insufficient/it cannot cope	The evidence base that supports the Core Strategy and the Brief indicates that it is possible to create access from Four Elms Hill but final details will need to be considered through the planning application process. The significant landscape impact of a connection to the A289 or B2000 would also have to be considered if proposals to connect to either of these roads were put forward.	None necessary	Mr P Childs, Hoo Parish Council, Mrs F Smitherman, Mrs S Whitebread, Cllr Tony Watson
Public transport other than buses should be considered (i.e. rail or trams)	The Brief already outlines the reasons for preferring a bus-led public transport solution, mainly because this is the most cost-effective method. The objective is to provide a very high quality public transport service to support the development. If this can be accomplished through use of buses, there is no justification for further consideration of other modes. However, any proposals that came forward would be considered on their merits through the planning application process.	None necessary	Mr P Childs, Hoo Parish Council, Cllr Tony Watson, Mr R Sands
The Medway Tunnel will need upgrading and a separate river crossing for pedestrians, cyclists and public transport should be provided.	It is not possible to undertake minor capacity improvements to the Medway Tunnel and the expected traffic generation from Lodge Hill would not be high enough to trigger a need for major capacity increases and consequent major infrastructure works. The solution for the wider road network will need to take into account the existing capacity of the Medway Tunnel, and	None necessary	Mr P Childs, Cllr Tony Watson

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	this will be considered in more detail through the planning application process. The issue of a separate river crossing for pedestrians, cyclists and public transport is continuing to be considered as part of the Council's wider objectives for transport in the Medway area but is not a Lodge-Hill specific issue.		
Transport issues have not been fully addressed by the Development Brief.	It would not be appropriate for the Brief to go into further detail on transport solutions or to set out a final solution as the transport issues associated with any forthcoming development will need to be considered through the planning application process and will be dependent on the exact proposals that come forward. However it does highlight the need for further studies and technical work to be carried out.	None necessary	Ms H Woolmington, Mr & Mrs Barclay, Mr M White
Town centre parking (cars and cycles) for residents of other villages to use the shuttle buses should be provided	This would effectively turn the Lodge Hill town centre into a park and ride site, which is not considered appropriate as it would undermine the liveable and welcoming town centre character that is sought. Cycle parking however will be provided in the town centre and could be used by bus passengers if desired. In the longer term there may be potential for other rural bus routes to link into Lodge Hill.	None necessary	Ms H Woolmington
Town centre parking should not be charged	The development brief states that a balance is needed between catering for car users and encouraging more sustainable forms of transport, and the use of parking charges is one possible tool that can be used to establish this balance. The Brief requires a parking strategy to be submitted with any outline planning application for the site and this will therefore be considered in more detail through the planning application process.	Clarify that parking strategy is to address commercial and public parking as well as residential.	Ms H Woolmington, Hoo Parish Council
It is supposition that existing villages are within easy walking/cycling distance of	800m is generally taken as a proxy of a ten-minute walking distance when considering	None necessary	Hoo Parish Council, High Halstow Parish Council

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
facilities proposed at Lodge Hill	access to local services. Both Hoo and High Halstow are just outside this distance to the site but within a 15-minute walking distance. Cliffe Woods is slightly further. Cyclists can travel a little further in similar times. Therefore it is reasonable to say that the villages are within walking/cycling distance, although this does not mean that everyone in the villages will choose to do so. The Brief also sets out the need for improvements in connectivity such as a foot & cycle bridge over the A228.		
Cycleways must be provided off-road for safety reasons, and may need to be segregated from pedestrians as well	The safety implications of cyclists sharing road space depends on the nature of the road, such as speed limits, visibility and similar. On busy, higher-speed roads a separate cycleway would be encouraged. However, this is a matter that will be considered through the planning application process as detailed proposals are brought forward for each part of the road network. The need for segregation between cyclists and pedestrians is something that can also be considered on a case-by-case through this process.	None necessary	Hoo Parish Council, Open Spaces Society
Improvements to walking/cycling links should be begun before development commences	Early provision of walking and cycling improvements is encouraged, but to meet the legal requirements for developer contributions through the planning process the exact phasing of this must be directly linked to the impact or needs of the development.	None needed	Hoo Parish Council
Improvements to public transport will need to be significant	Agreed.	None necessary	Hoo Parish Council, Mr & Mrs Stutely
Improved bus services should benefit existing villages as well	Agreed. The Brief already specifies that the bus route should serve Hoo St Werburgh. Planning legislation does not allow development to be required to mitigate existing problems where they are not linked with the development, but the bus service can be designed in such a way	None necessary	Hoo Parish Council, Cllr C Irvine

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	to maximise its usefulness to the existing community without breaching this principle.		
There must be commitment to subsidy for bus service and associated road improvements	Agreed. The Brief specifies that developer subsidy and funding will be required where the necessary standards cannot be met commercially.	None necessary	Hoo Parish Council
Bus priority measures at Four Elms roundabout will exacerbate the existing congestion problems	The final proposals for Four Elms Roundabout will be determined through the planning application process. The provision of bus priority measures is an important part of the overall strategy for the site, but the applicant will have to demonstrate that their proposals can be implemented without having a detrimental impact on other road users.	None necessary	Hoo Parish Council
Dux Court Lane access will cause rat-running and should be for buses/emergency services only	The size and location of the site and the scale of development proposed are such that a secondary access towards this end of the site is likely to be necessary, and Dux Court Road is the most obvious solution of this. However, the final details of the proposed access strategy will need to be considered through the planning application process.	None necessary	Hoo Parish Council
Improvements to Four Elms Roundabout and beyond should be in place before major growth at Lodge Hill	The Brief states that infrastructure improvements will be need to be timed in line with phasing to ensure appropriate infrastructure is in place by the time it is needed. The final details and phasing will be determined through the planning application process.	None necessary	Hoo Parish Council
Parking spaces should be allocated as not to do so will cause inconsiderate and chaotic parking	Research carried out nationally shows that unallocated or shared parking is often a more efficient means of provision provided the overall level is sufficient. The Brief requires that a parking strategy to be submitted with any outline planning application, which will consider the exact form of any shared parking in more detail.	None necessary	Hoo Parish Council
Residents' parking permits would be unfair	Residents' parking permits or an element of charged parking are only one possible element	None necessary	Hoo Parish Council

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	of a parking strategy for the site. The Brief requires a parking strategy to be submitted with any outline planning application for the site and any proposals for a permit system within this will be considered in more detail as part of the planning application process.		
Car club is welcome but its impact on car ownership remains to be seen	While the exact impact on car ownership is difficult to predict, it forms an important strand of the overall transport strategy for the development.	None necessary	Hoo Parish Council
Needs of High Halstow are being ignored - Dux Court Road should be improved all the way to the village, not just to the Lodge Hill entrance	There is a conflict between this view and other concerns raised regarding rat-running as improvements to Dux Court Road would be likely to increase the potential for greater levels of through traffic. In any case, it is not possible under existing planning legislation to require a developer to implement or fund works that are not directly related to their proposals and there is therefore no justification for upgrading the remainder of Dux Court Road.	None necessary	Mrs F Smitherman, Mrs S Whitebread
Additional traffic and proposed changes to the road network will increase road safety problems	Road safety issues have to be considered as part of the proposals. There is potential for significant improvements in some areas, such as the provision of pedestrian/cyclist footbridges over the A228 and A289. A Transport Assessment will be required to accompany any outline application for the site and this issue will be considered in more detail through this process.	None necessary	Mr J Allen, Frindsbury and Wainscott Residents Association
The proposed bus route should go to Medway Hospital	This would significantly lengthen the bus route and may make the required high level of service unviable. The Brief cannot therefore make this a required destination of the Lodge Hill bus service. However, it is recognised as an important destination for Peninsula residents and it will be important that the bus route enables easy connections for onward journeys	Clarify the need for the bus service to enable easy and reliable onward connections to destinations such as Medway Hospital.	Mr J Allen

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	to the Hospital and other destinations away from the main bus route.		
Four Elms Roundabout needs an underpass	Although the Brief has highlighted the need for improvements on this junction, it cannot specify the final solution as this level of detail will have to be determined through the planning application process and the solution will depend on the exact proposals that come forward.	None necessary	Mr J Allen
Support proposals to improve transport links	Noted.	None necessary	London & Quadrant Housing Association
Houses should have at least 2 allocated spaces, including garages for larger properties	It is not practical to specify this level of detail in the Development Brief. The Brief states that a balance is needed between catering for car users and encouraging more sustainable forms of transport, and the provision of parking is one tool that can be used to influence this balance. The Brief requires a parking strategy to be submitted with any outline planning application for the site and this will therefore be considered in more detail through the planning application process.	None necessary	London & Quadrant Housing Association
Would be concerned if Lodge Hill Lane becomes major access, and how will it cope with bus traffic	The Development Brief states that Chattenden Lane/Lodge Hill Lane is not suitable as the main site access, and developers will have to demonstrate through the planning application process that suitable access arrangements are being made to prevent this from happening. It is already used as a bus route, although not at the level of frequency envisaged in the Brief, and it is accepted that it is likely there will need to be some changes to the road layout, in particular the traffic calming, to accommodate the greater bus use.	Clarify status of Lodge Hill Lane/ Chattenden Lane in relation to site access and bus route.	Ms D Francis
Support for encouragement for sustainable transport modes ahead of private cars	Noted	None necessary	Highways Agency

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Clarity is needed on the long-term position of the bus service and whether subsidy will continue if needed	Agreed, but it would be more practical to ensure that all possible measures to make the service viable are implemented, as it is unlikely to be possible to require developer subsidy in perpetuity. Ongoing monitoring and review of bus service use to ensure that the quality of service is being achieved should also be provided, to undertake other measures to enhance it if it is not being as well used as expected.	Add to relevant section to clarify long-term status of bus service.	Highways Agency
High frequency buses should run in the pm peak as well as the am peak	Agreed	Amend Box 5.1 to refer to the timing of evening peak services	Highways Agency
Subsidised or free bus passes to encourage sustainable transport should be secured as part of the travel plan for the site	The Brief requires these measures to be considered but whether they are implemented or not will depend on the final package of proposals in the Travel Plan that comes forward through the planning application process.	None necessary	Highways Agency
It is not clear whether Lodge Hill is expected to be the only development impacting on (and therefore contributing to) J1 of the M2 or whether it is expected that contributions will be pooled with other (unspecified) developments. It should be made clear that impact on this junction is the responsibility of the Lodge Hill developer alone	Agreed, but the developer of Lodge Hill can only be made responsible for the impact on this junction insofar as it relates to its traffic generation from the development	Clarify the relevant section	Highways Agency
Impact on parking in Rochester and Strood for train stations	The Brief emphasises the need for a very high quality bus service to Strood station, and the suggested longer route also includes Rochester station. This is intended to reduce the level of car traffic to these destinations, but the overall impact will need to be considered through the planning application process as part of the Transport Assessment to accompany any outline planning application.	None necessary	Cllr C Irvine

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Increased capacity on commuter train services will be needed	This will need to be considered at the planning stage when a prediction of the level of rail passengers can be made and future capacity planning can take place. It may be more of an issue in terms of platform/waiting capacity.	Add reference to rail capacity needing to be assessed through the planning application process.	Cllr C Irvine
Development traffic will impact on access to Medway City Estate & Medway Tunnel	The Brief recognises that traffic from Lodge Hill will have an impact on the wider road network, and specifically considers the A289 corridor, which includes these locations.	None necessary	Cllr C Irvine
Use of Dux Court Road as access is unreasonable as most traffic will be going back towards Wainscott anyway	The size and location of the site and the scale of development proposed are such that a secondary access towards this end of the site is likely to be necessary, and Dux Court Road is the most obvious solution of this. However, the final details of the proposed access strategy will need to be considered through the planning application process.	None necessary	Mrs M Cripps, Mr R Cripps
More detail is needed on proposals for Four Elms Roundabout	Although the Brief has highlighted the need for improvements on this junction, it cannot specify the final solution as this level of detail will have to be determined through the planning application process and the solution will depend on the exact proposals that come forward. The Brief sets out the requirement for further information and technical work to be provided through this process.	None necessary	M Oseman
Existing bus service 191 is as direct as possible	Accept this point, though the route is still fairly lengthy	Amend references to existing bus route 191	Arriva Southern Counties
Support need for bus priority measures	Noted	None necessary	Arriva Southern Counties
Support need to make as much of the new development as possible accessible to buses	Noted	None necessary	Arriva Southern Counties
Bus priority measures need to be in place from the outset to ensure the service is reliable and attractive; subsidised tickets alone will not be sufficient	Agreed. The Brief specifies a preference for bus priority measures to be in place from the outset, however in the light of this consultation response and other ongoing discussions this	Strengthen reference to bus priority measures in Brief to emphasise need for early implementation.	Arriva Southern Counties

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	could be strengthened.		
Bus service should also serve Rochester train station and Isle of Grain	The suggested bus route in the Brief does pass Rochester Station. The Isle of Grain is in the other direction and would significantly lengthen journey times, making the required high quality service unviable. However the importance of linking routes to other destinations is recognised.	Clarify the need for the bus service to enable easy and reliable onward connections to other destinations.	Cllr Tony Watson
Buses using the central reservation is ridiculous	This refers to a proposal from the prospective developer and is not referenced in the Development Brief. The final proposals for the road network improvements, including bus priority measures, will be considered in more detail through the planning application process.	None necessary	Cllr Tony Watson
Requiring a "high" proportion of shared surface spaces could undermine other objectives such as creating a permeable network of streets.	Shared surfaces do not need to undermine permeability if they are well designed and the Brief already states that they must be considered as part of a holistic movement strategy and should be used "where possible".	None necessary	Land Securities
Requirements for off-site links pedestrian and cycle links should be more general and any requirements for financial contributions must be directly related to the impact or needs of the development.	No specific routes have been identified but it is considered appropriate for the Brief to highlight the most important destinations. It is acknowledged that any financial contributions must be directly linked to the impact or needs of the development, and this will be assessed through the planning application process. However, where road improvements will be needed anyway, it is important that these make provision for pedestrians and cyclists.	None necessary	Land Securities
Bus priority should not be an absolute requirement as it should depend on traffic flows on the upgraded road system. It should also be clear that the phasing of bus priority measures (e.g. on Four Elms roundabout) is proportionate to the impact of the development.	The provision of bus priority measures is an important part of ensuring that the bus service is recognisably high quality and encouraging people to consider it as a viable alternative to private car use. This is as much about perception of the service as about the technical issue of journey times and delays, therefore bus priority measures are required regardless of	Add reference to relevant section to clarify the reasons behind requiring bus priority measures.	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	traffic flow on the road system following upgrades, including at Four Elms roundabout at an early stage. However, it is accepted that the final details of these measures may vary depending on the road solution that is in place.		
Request minor wording changes to paragraphs 5.23 and 5.27 and Figure 5.3 to ensure that operational feasibility is taken into account and that the bus route is recognised as indicative.	Agreed	Minor wording changes to relevant sections.	Land Securities
The proposed bus service standards are too detailed for inclusion in the Development Brief, and the requirement for the bus service and priority measures.	The provision of a high quality bus service is a crucial part of the transport strategy for Lodge Hill and it is essential that it meets key standards to achieve the expected level of use; without this the traffic impact of the development would be greater as well as undermining the scheme's sustainability. The Brief already allows for some variation of the standards where there is sound justification for this and therefore it is not felt to be too prescriptive. It is also important that it is in place early enough that the first residents can develop sustainable travel habits, and the Brief allows for phasing of the final service to ensure it is proportionate to the demand arising as the development is built out.	None necessary	Land Securities
It is unreasonable to require the Lodge Hill bus service to be capable of using smart ticket technology when it is not known when this might be rolled out across Medway.	This is not unreasonable as existing operators are already installing technology on buses so that they can use a smart ticket system when it is rolled out. Furthermore it may be possible for the Lodge Hill bus service to use some form of smart ticketing in advance of it being on the rest of Medway's services.	None necessary	Land Securities
If free or subsidised season tickets are to be provided this should be for a time-limited period only.	It is accepted that it would not be reasonable to require this indefinitely; this was not the intention of the relevant section.	Clarify wording	Land Securities
Site access zones in Figure 5.5 should accord with those shown on the Concept	It is noted that there was a slight error on Figure 5.5 in relation to the Four Elms Hill access zone.	Correct Figure 5.5	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Plan in the Core Strategy and the Brief should not provide any greater detail/prescription as this will be done through the planning application process.	The Brief's role is to provide a greater level of detail than can be done in the Core Strategy but it is accepted that the final determination will take place through the planning application process.		
The Brief does not provide an accurate picture of current congestion issues at Four Elms roundabout	Congestion at Four Elms roundabout is a known issue which was identified in the transport work carried out for the Core Strategy, and will need to be addressed for the development of Lodge Hill to proceed. However, it is accepted that the wording could be clarified.	Clarify wording to accurately reflect current situation at Four Elms roundabout	Land Securities
Upchat Road bridge only requires replacing if a bus lane is provided running underneath and should not be presented as an absolute requirement. Also note that recent survey work demonstrates it does not need to be completely replaced to meet structural standards	Noted, but as set out in the Brief, bus priority is a key part of the transport strategy therefore requiring bridge replacement. The Council has not had access to the survey work referred to and therefore the statement in the Brief that the structural condition of the bridge is unknown remains correct; in any case this does not address the issues of design life, only its current condition.	None necessary	Land Securities
Financial contributions towards wider road schemes must be directly proportionate to impact from Lodge Hill.	Agreed; this is the intention of the current text.	Clarify wording to confirm proportionality of any contribution requirements.	Land Securities
Reference to no. dwellings served by different types of road is too prescriptive	These are only intended to be indicative	Change wording to clarify that these figures are indicative	Land Securities
Consider that secondary road layouts may be dealt with through detailed applications rather than at outline stage	Noted, although it is considered that some broad principles should be established at outline stage	Amend wording to give flexibility in timing of secondary road network details.	Land Securities
The car will still be an important mode of transport for residents and workers at Lodge Hill parking strategy for the site will need to balance sustainability with this.	Noted; the Brief already states this.	None necessary	Land Securities
The parking strategy should be submitted at detailed stage with only the scope need	The parking strategy must be a site-wide document therefore needs to be agreed prior to	Amend text to allow for agreement of parking	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
to be agreed at outline stage. It should also not be subject to regular updates as this would cause uncertainty to future developers.	the first detailed planning application. However it may be acceptable for this to be achieved through conditions. The need for review is very important given the timescale for development of the site; the wider context of car use is likely to change over this time (e.g. through increasing fuel costs or new technology) and it is important that any lessons from early phases are learnt from. The exact frequency and/or triggers for such reviews will be determined through the planning application process.	strategy through conditions where appropriate	
The Brief should not stipulate provision of a car club as it is only one option among a number that can be considered, and are unsure where there is evidence that it is as effective as claimed.	Research carried out into car clubs is primarily in the context of major metropolitan areas (e.g. by TfL in 2007) but has confirmed their effectiveness. A car club is a crucial component of the transport strategy for Lodge Hill, although it is acknowledged that there are other measures that should also be considered.	None necessary	Land Securities

Character (Chapter 6)

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Unacceptable loss of/impact on woodlands	The Development Brief emphasises the need to protect existing woodlands; no loss of ancient or high quality woodlands is proposed. The potential for indirect impacts is also acknowledged in the Brief and Natural England will continue to be involved in discussions on detailed proposals.	None necessary	Mrs F Smitherman, Mrs S Whitebread, Frindsbury and Wainscott Residents Association, Mr & Mrs Hillman, Cllr Tristan Osborne, Cllr Tony Watson
A market town is not an appropriate form of development for this area and its landscapes and history	“Market town” is a very general description and the intention is that the concept will be tailored to respond to the specific local character of this area, for example its’ topography, landscape and local buildings styles. Market towns are a feature of rural areas throughout Kent and	Strengthen wording of relevant section to ensure the requirement to respond to local character and context is clear.	Cllr Tony Watson

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	South East England.		
Development will destroy the historic importance of the site	The Development Brief stipulates that the history of military use should be reflected through the layout and landscape treatment of the site. It also requires the developer to make provision for interpretation of heritage features. See Heritage section 6.37-6.50 and following policy	None necessary	Lt Col (Retd) Beringer, Mr & Mrs Davis, Mrs Beringer
LH will damage/destroy the rural character of the area	The importance of the rural context of the development site, and the need to protect and conserve this rural context is highlighted in Policy covering items 6.3 and 6.4. This approach is supported by the Medway Landscape Character Assessment (LCA).	Strengthen this policy to include protection and enhancement of the surrounding rural character of the area.	Lt Col (Retd) Beringer, Mr C Barr, Mrs S Jennings, Ms S Russell, Mrs F Smitherman, Mrs S Whitebread, Mr M Bucknall (2), Mr M Bucknall (1), Ms A Bucknall, Mrs E Slatcher, Mr & Mrs Davis, Mrs S Ahmad, Mrs Beringer, Cllr C Irvine, Medway Countryside Forum, Mr & Mrs Stutely, Mr M Skudder, Cllr Tony Watson
One large supermarket with franchises would be less susceptible to vandalism/becoming run down than a "High Street"	The town centre will provide a strong central core and focus of activity for the surrounding community. It is felt that a well-designed high street with a mix of uses, linked to a new supermarket, will provide the best opportunity to create a strong sense of place for the new Lodge Hill development. This approach is supported by guidance under items 6.53 – 6.55, Box 6.2 and following policy.	None necessary	Ms H Woolmington
Welcome the emphasis on retaining landscape features and providing screening to High Halstow	Noted	None necessary	Ms H Woolmington
Military heritage including existing buildings is important and should be retained	It will not be possible to retain all existing buildings. However, the Development Brief requires the history of military use to be reflected through the layout and landscape treatment of the site, and for provision of interpretation of heritage features to be made.	None necessary	Hoo Parish Council, Cllr Tony Watson, Mr R Sands

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	Appendix 3 also itemises those buildings which are considered more important, where consideration should be given to their retention.		
Agree that the surrounding countryside is an exceptional setting and must be preserved	The importance of the rural context of the development site, and the need to protect and conserve this rural context is highlighted in Policy covering items 6.3 and 6.4. This approach is supported by the Medway Landscape Character Assessment (LCA).	Strengthen this policy to include protection and enhancement of the surrounding rural character of the area.	Hoo Parish Council
Flats, apartments and high density housing is not appropriate for a rural area	The higher density, larger scale development will be focussed principally on the town centre (and to a lesser degree on local centres). The edges and more sensitive parts of the development will be at a reduced scale and lower density. This has been judged an appropriate way of respecting and reducing impacts on the rural setting of Lodge Hill.	None necessary	Hoo Parish Council
Suggest the maximum building height should be 2-3 storeys to preserve rural character	The higher density, larger scale development will be focussed principally on the town centre (and to a lesser degree on local centres). The edges and more sensitive parts of the development will be at a reduced scale and lower density. This has been judged an appropriate way of respecting and reducing impacts on the rural setting of Lodge Hill.	None necessary	Hoo Parish Council
Lodge Hill will extend urban fringe into rural Peninsula	The Development Brief recognises the importance of the rural context of the development site, and the need to protect and conserve this. The need to retain separation between Lodge Hill and existing rural settlements and urban areas is one of its key objectives. It is also supported by other policy documents such as the Medway LCA.	Strengthen sections 6.8-6.12 and following policy to emphasise importance of openness of this area and need for visual screening at key points (with final extent to be determined through the planning application process).	High Halstow Parish Council, Cllr C Irvine
Buffers/separations between Lodge Hill and surrounding areas must remain strong	The Development Brief recognises the importance of the rural context of the development site, and the need to protect and	Strengthen sections 6.8-6.12 and 6.18-6.22 (and following policies) to	P & V Richardson

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	conserve this. The need to retain separation between Lodge Hill and existing rural settlements and urban areas is one of its key objectives. It is also supported by other policy documents such as the Medway LCA.	emphasise importance of openness of these areas; separation to surrounding settlements as well as main urban area; and need for visual screening at key points (with final extent to be determined through the planning application process).	
Long build programme and possible future changes in economic circumstances will undermine any efforts to create a coherent masterplan	The challenges of dealing with a long build programme are acknowledged in the Brief. The developer will be required to prepare design codes which will help to provide coherence across the whole development as the masterplan develops. In addition, a design review is encouraged to provide regular reviews of the masterplan and design codes over the lifespan of the project.	Update section on Design Codes to reflect different stages of detail over ongoing design programme. Strengthen requirement for design review of subsequent stages.	Cllr C Irvine
Guidance on density and building height should be more prescriptive	Figure 6.14 provides broad guidance on densities for different parts of the site. Table 6.1 provides indicative building heights for different areas. It is not possible to be more prescriptive at this stage as the full impact of any proposal will have to be assessed through the planning application process.	Update section on Design Codes to include requirement for density areas to be set, and to reflect need for further detail at different stages of the ongoing design programme. Update masterplan section to refer to subsequent stages of design and planning process and to encourage regular masterplan reviews.	Open Spaces Society
Do not agree that small-scale development should be permitted on or close to the ridge	The Development Brief makes it clear that any small-scale development proposals for this area will be carefully scrutinised for their impact on the wider landscape. It is not appropriate to rule them out completely as there are existing	None necessary	Open Spaces Society

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	heritage features in this area, which will require restoration, maintenance and interpretation. Some small-scale development may be the best method for ensuring this.		
Areas of Local Landscape Importance should not be replaced by Landscape Character Assessment	The decision to replace ALLI designations with Landscape Character Assessment has been taken by higher-level policy documents in association with current government guidance under PPS7.	None necessary	Open Spaces Society, Medway Countryside Forum
Woodland planting must be provided to ensure development is not visible from High Halstow	The issue of visual impact of new development from High Halstow is recognised by the Development Brief, which includes recommendations for woodland planting to minimise this.	Update relevant section to refer to the importance of Landscape and Visual Impact Assessment in determining the extent of planting and other mitigation through the planning application process.	Mr S Bailey
Development should not be permitted in the corner of the site by High Halstow	The issue of visual impact of new development from High Halstow is recognised by the Development Brief, which includes recommendations for woodland planting to minimise this. However, it is not appropriate for the Development Brief to rule out all development in this area as any proposals will have to be assessed in detail through the planning application process and their appropriateness will depend on their exact impacts.	Update relevant section to refer to the importance of Landscape and Visual Impact Assessment in determining the limits of developable area and the extent of planting and other mitigation through the planning application process.	Cllr Tony Watson
Open spaces should be left natural, not "designed"	A natural space is not necessarily a space that has not been designed. There is likely to be a place for both "natural" and more formal spaces within the overall development. Emphasis particularly at the edges and throughout the Green Grid network should be on natural spaces with biodiversity value but formal sports facilities, gardens, allotments and play areas will	Add requirement that landscape strategy should provide framework guidance on areas that may be more appropriately designed to remain natural in character and those that may require a more formal	Cllr Tony Watson

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	need to form part of the open space mix throughout the development. There is potential for the landscape strategy and design codes to provide more guidance on this to inform detailed design stage, but this should not be over-prescriptive. The Development Brief requires landscape design for individual development parcels to take account of the existing context and features. Detailed proposals will be examined on their merits through the planning application process.	design treatment.	
Any countryside management plan for Hogmarsh Valley must prioritise protection of agricultural land and use	The Brief indicates the adopted Landscape Character Assessment is to be utilised to inform plans in the Hogmarsh Valley. This supports retention and strengthening of rural character, but while agriculture is acknowledged in the Brief as an important use in this area, we cannot pre-judge at this stage what the conclusions and recommendations of any countryside management plan regarding land use may be.	None necessary	Hoo Parish Council
Interested in proposals for countryside management plan for urban fringe area	Noted	None necessary	Open Spaces Society
Would like more information/examples of small-scale measures proposed for potential countryside management plan area. Also note that MOD may not have any responsibility for this area following development.	The potential for a countryside management plan was raised by local stakeholders and the Council would not wish to pre-empt what their aims and priorities may be if they choose to proceed with it. It was understood that the MOD wished to continue with training activities in much of this area, but landowner references can be made more generic.	Change references to MOD to "landowner"	Land Securities
Some elements of the landscape character may have been overstated in the Brief (e.g. visibility of Chattenden Barracks area, degree of woodland on Chattenden Ridge)	Noted	Ensure wording accurately reflects current situation	Land Securities
The Brief should not specify woodland planting to the High Halstow edge as	The Brief already states that woodland planting "may" be appropriate but it is considered a	None necessary	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
alternatives may be acceptable.	beneficial measure that would address a number of issues and therefore it is not appropriate to remove the reference entirely.		
Suggested protection of landscape features in less sensitive landscape areas is overly stringent.	Successful integration of Lodge Hill into the surrounding landscape context is a vital element of planning for the development and while areas may be less visually sensitive it does not mean that protecting and incorporating landscape features into the development should be discounted in these areas.	None necessary (although please note this section has been re-written in response to other comments)	Land Securities
References to public art should confirm that this can be dealt with by condition rather than as part of the outline application.	The Brief already acknowledges that much of the detail of the public art strategy will come forward after outline application stage.	None necessary	Land Securities
Heritage section over-emphasises significance of on-site heritage and retention of buildings, including some which should not be considered heritage assets.	The retention of some of the buildings on site has strong community support and it is important to ensure that the new settlement of Lodge Hill has some connection with the site's history. It is accepted that it will not be possible to retain all buildings on site (even all of those that may be considered heritage assets) but it is entirely appropriate for the Brief to encourage retention and re-use of buildings to be seriously considered. The Brief takes a fairly broad definition of heritage assets (in line with the guidance in PPS5 which recognises the contribution that undesignated assets can make); the contribution a building can make to the character of Lodge Hill through making a connection with its past is considered suitable justification for encouraging its retention. It is considered that identifying a broad range of potential buildings for retention allows flexibility for future developers to determine which best fit the proposals that come forward through the planning application process.	Minor amendments to wording to ensure that encouragement to retain buildings remains proportionate.	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Acknowledging the secure boundary of the site is one way reflecting the site's heritage but the Brief should not prescribe that this is done through different layouts inside and outside of this line.	The Brief does not prescribe different layouts inside and outside the security fence but seeks to ensure the existence of this division is reflected in the masterplan. It is accepted that the original wording may not have made this clear.	Amend wording to clarify intention to reflect line of security fence without being prescriptive.	Land Securities
The principles for the town centre should not limit it to a single landmark building.	It is accepted that the town centre may be able to accommodate more than one landmark building/location. This is not ruled out by the current text but could be made more explicit.	Amend text to explicitly allow for more than one landmark building.	Land Securities
Reference to "village greens" should use alternative terminology to avoid confusion with legally registered spaces.	A village green is an easily-understood type of space which is referenced to make it clear what is envisioned and it is not considered to imply any legal status in this context.	None necessary	Land Securities
The flexibility in suggested building heights is welcomed but it is suggested that the minimum in all areas should be 1 storey to avoid unduly restricting design solutions.	The Brief does not suggest minimum building heights; instead it refers to "general" height ranges.	None necessary	Land Securities
The urban and rural green edges should not be shown in the Brief as this is a greater level of detail than shown in the Core Strategy concept plan.	It is the role of a Development Brief to provide a greater level of detail than can be provided in the Core Strategy.	None necessary	Land Securities
The inclusion of a masterplan severely limits the future resilience of the Brief, and future development should be guided by the Concept Plan in the Core Strategy.	The masterplan in the Brief is a visual representation of the principles it sets out. It is the role of the Brief to provide more detail than is possible in the Core Strategy, and the masterplan is entirely consistent with the Core Strategy Concept Plan.	None necessary	Land Securities
The inclusion of the Character Areas plan in the Design Code section is too prescriptive, and Design Codes should be produced by the developer.	The character area plan is indicative and not considered too prescriptive but may not add significantly to the understanding of this section. It is accepted that the developer will be responsible for producing design codes but the Council expects this to be carried out in a collaborative and consultative manner and it is appropriate for the Brief to set out these	Remove character area plan.	Land Securities

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	expectations.		

Delivery (Chapter 7)

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
Essential that supporting infrastructure and services are in place in time	Agreed	None necessary	Hoo Parish Council, G & M Russell, High Halstow Parish Council, Mr & Mrs Stutely
Continued engagement is welcomed and should include Hoo Parish Council	Noted	None necessary	Hoo Parish Council
Previous consultation responses must be taken into account	Previous consultation responses (from both Medway Council and developer events) were and will continue to be taken into account in drafting the Development Brief.	None necessary	Hoo Parish Council
Question whether promised services & infrastructure will actually be delivered (in time)	It is absolutely crucial for the success of Lodge Hill that the supporting infrastructure is in place as it is needed. The Development Brief sets out the broad scale of infrastructure likely to be needed but the final details and timing will be determined through the planning application process.	None necessary	G & M Russell, Ms W White, High Halstow Parish Council, M Oseman
Infrastructure and commercial development should be constructed concurrently with residential	It is absolutely crucial for the success of Lodge Hill that the supporting infrastructure is in place as it is needed. A balance between housing and commercial delivery is also needed if the development is to meet its objectives regarding sustainability and quality of life. The final details and timing will be determined through the planning application process.	None necessary	London & Quadrant Housing Association
Construction traffic will have to be carefully considered	Agreed	Add a section on construction stage impacts to the Delivery chapter.	London & Quadrant Housing Association
Chattenden needs investment in early phases, not left until last or it will become a poor relation	Agreed, but final details will need to be determined through the planning application process and can only be required where it is	Amend references to integration with Chattenden to encourage early	Ms D Francis

Summary of comment	MC response	Recommended changes to Development Brief	Comment made by
	proportionate to the development.	consideration of this area.	
There are existing underground sewers within and adjacent to the site that must be protected	Noted	Add note on existing services to infrastructure section of Delivery chapter.	Southern Water
Diocese of Rochester are keen to be involved in finalisation of the masterplan and other future engagement	Noted	None necessary	Diocese of Rochester
A site-wide masterplan at outline application stage is likely to be illustrative and should not be referred to as one of the principles of the development.	It is accepted that the masterplan at outline application stage will be illustrative. However, there will still be an expectation that subsequent application should broadly accord with the approved masterplan. It is also noted that there may be a subsequent need for reviews of the masterplan over the lifetime of the development.	Amend wording within Process section to refer to masterplan as "illustrative". Add to Masterplan section to confirm role of masterplan reviews.	Land Securities
The Brief should not specify that applications must come forward in outline form across the whole site; this is too prescriptive.	It is fundamentally important that the development of Lodge Hill is considered holistically and not on a piecemeal basis. It is acknowledged that should the developer choose to submit an application in a different form the Local Planning Authority will be obliged to determine it, but the Council is unlikely to support applications that do not take this holistic approach. It is appropriate for the Brief to specify this.	None necessary	Land Securities
Note that not all conditions will be pre-commencement and therefore Figure 7.1 should be amended to reflect this.	Noted	Amend wording to include conditions that are not pre-commencement.	Land Securities
Note that some infrastructure will be secured by conditions rather than s.106; the text should reflect this.	Noted	Include reference to conditions.	Land Securities
It is not the role of the Brief to speculate on future economic and environmental conditions.	This is included as background information to inform a discussion on phasing. Given the likelihood that the development to be built out over a long (15-20 year) timescale, it is certain that there will be changes in these areas, even if, as stated in the Brief, the form of those changes is yet unknown.	None necessary	Land Securities

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Discussion of the need for flexibility is phrased overly negatively and should merely refer to a balance between local community expectations and the need to ensure deliverability over the longer term.	Community expectations are not the only reason for requiring a degree of certainty at outline application stage; Environmental Impact Assessment, for example is also crucial. The Brief already refers to the need to balance this requirement with the flexibility to respond to changes in circumstances over the lifetime of the development. However, it is accepted that the wording could be clarified to explain how some key principles will be fixed.	Clarify discussion of balance between certainty and flexibility.	Land Securities
References to phasing timescale should follow those used in the Core Strategy evidence base, and it is not appropriate to include a spatial representation of this as it is not included in the Core Strategy.	The reference to three broad phases that would take "around five years" each to build out is in accordance with the Core Strategy evidence base. It is accepted that the map shown in Figure 7.2 is not included within the Core Strategy but the information that it represents is the same. As the Brief provides more detail than the Core Strategy, it is helpful to have a visual representation of this phasing rather than referring readers to a large amount of background documents that set it out.	None necessary	Land Securities
Self-build parcels should not be an absolute requirement.	The Brief already acknowledges that market factors etc. will have a bearing on how land parcels can be disposed of, but for the reasons set out it is considered appropriate to encourage provision of self-build parcels.	None necessary	Land Securities
Suggests some factual additions to Appendix 1.	Appendix 1 is to be re-written in any case to reflect the fact that further consultation has happened relating to the draft Brief.	Section re-written for other reasons.	Land Securities

NOTE: Comments noted as being from Cllr Tony Watson and Cllr Chris Irvine have been collated and forwarded by them on behalf of their constituents and both Councillors have made it clear that these do not necessarily represent their own personal views.